



Public Sector Discussion

The Trusted Data Requirements for Today's Federal Mandates

Wed, July 15, 2026 | 11:00 AM – 12:00 PM EDT | Virtual

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Discussion Leaders

Public Sector Discussion: The Trusted Data Requirements for Today's Federal Mandates

Moderator



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Department of the Treasury



Today's Agenda

A 60-minute conversation, not a webinar. Questions welcome throughout.

0:00–0:05	Welcome & Framing	Why FDTA, the AI Executive Order, and OMB M-25-06 share one foundation
0:05–0:15	FDTA Implementation Status	Lessons learned from agencies so far
0:15–0:25	DCAM and CDMC in Practice	How agencies are using these best practice frameworks to accelerate readiness
0:25–0:38	LEI, FIBO & EDM Association Resources	The role of identifiers, ontology, and standards across EDMA's four consortia
0:38–0:50	Open Discussion	Tools, technology, and workforce readiness
0:50–0:58	Join the Working Group	A founding cohort applying FIBO to use cases
0:58–1:00	Close & Resources	What's next and where to go

The 2008 Financial Crisis

Historical Lessons in Data Management

The Global Financial Crisis of 2007–2008



The Global Financial Crisis of 2007–2008



01

Historic market turmoil

Unprecedented number of mergers, acquisitions, divestitures and bankruptcies putting immense pressure on the need for timely and accurate data about entities.

02

Inability to Unwind Complex Investment Vehicles

Layers of abstracted data made it impossible to assess the health of the underlying assets of the instruments.

03

Inability to Properly Value the assets

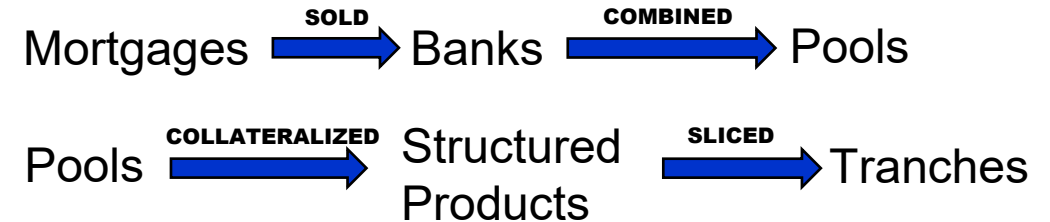
Growing calls for greater public transparency in asset pricing and pricing methodologies.

Data collection and analysis put immense pressure on an already weak information infrastructure

The 2 'data straws' that broke the back...



Collateralization Process



There Were Data Issues Along the Supply Chain

- Bits and pieces of descriptive data were not carried through each step of the process
- Linkages to the underlying loans were broken or obscured
- There was no standard way to identify and define the structure of the collateralized mortgage instruments

**If you can't define the instruments, you can't measure them.
And, if you can't measure them, you can't manage them.**

The 2 'data straws' that broke the back of data...



First Question: What is our exposure to a Lehman collapse?

Problem: Who was Lehman?

- Lehman was 100's of Lehman entities
- Inability to uniquely identify the Lehman's entities
- Unable to understand the complex relationships of parent to sub, entity to sub-entity
- Didn't understand the systemic impact on other players in the economic ecosystem

A Unique Entity Identification and Legal Hierarchy did not exist

- There was no standard way to identify Lehman, and her entities cross the industry
- No standard way to identify Lehman legal entity dependencies
- No way to fully understand and predict the systemic impact of Lehman collapse across the industry

The Financial Crisis thru the lens of Data



Our Data was broken!

Quality of the data was poor

- Lacked accuracy, completeness, timeliness
 - Critical components (lineage; linkages; hierarchies) were missing
 - Process to collect and normalize data (Data Supply Chain) malfunctioned
- No adhere to data management best practices
- No adhere to standards (disparate; inconsistent; siloed)

More was NOT better

- We had data, but it was not comparable
- Difficult to aggregate
- Definitions were inconsistent due to a lack of information standards

Data was not collected and not structured in a way that would enable decision-makers to effectively utilize this data to be alerted to and/or respond to the crisis

The Global Financial Crisis of 2007–2008



Lessons learned from the 2008 financial crisis...

Standards and Data Management **Must Move Together**

- *Data standards reduce ambiguity.*
- *Data management makes standards stick.*

Data Interoperability

Today's Federal Mandates

Why Now: Three Mandates, One Foundation

All converge on the same requirement: **a governed, trusted, machine-readable data environment.**



FDTA

Financial Data Transparency Act

Machine-readable, electronically searchable regulatory data. Standardized identifiers. A path toward Standard Business Reporting.



AI Executive Order

June 2026

Advances AI innovation and security, raising the bar for data quality feeding federal AI systems.



OMB M-25-06

Re-establishes the Chief Data Officer Council and directs “zero trust” data architecture and AI deployment governance.

The question for this group: How do we operationalize this shared foundation across agencies and their partners?

Financial Data Transparency Act (FDTA) Requirements At-A-Glance

Enacted in December 2022. Final joint rule published in June 2026, effective October 1, 2026.

→ Searchable, machine-readable data

A principles-based standard requiring electronically searchable data, with metadata in taxonomy or ontology models that define semantic meaning.

→ Standardized identifiers

Adopts the Legal Entity Identifier and other open identifiers.

→ Nonproprietary, open formats

Schema and taxonomy formats must be open-license, not locked to a single vendor.

→ Increased transparency

Harmonized reporting cuts duplicative effort for industry while improving regulator visibility.

From the bill text:

“A path towards building a comprehensive Standard Business Reporting program [that helps] harmonize and reduce the private sector’s regulatory compliance burden, while enhancing transparency and accountability.”

-- S.4295, Financial Data Transparency Act

Four different problems:

1. Governing the data
2. Giving it meaning
3. Standardizing the report
4. Identifying entities and instruments

The Road to FDTA Implementation

A data, analytics, and AI capabilities improvement journey

Best practices matter

Best practices serve three essential functions



Ensure Foundation for Trust



Align with Business Goals



Enable Scalability & Agility

...and help organizations tackle today's most pressing data & data management challenges:

**Explosive Growth in
Data**

**Inconsistent
Terminology & Usage**

AI & Digital Demands

**Regulatory
Pressures**

**Complex Data
Environments**

4 Industry Leading
Consortia



Pivotal to your AI and Digital
Transformation

D&A

D&A
Data & Analytics

The global **Data & Analytics** market **continues to expand rapidly**, fueled by the explosion of enterprise data, rising AI adoption, cloud migration, and the demand for real-time insights. "Gold In – Gold Out"
Across multiple analyst sources, growth remains strong through 2030–2035.

Expected Growth 2026-2030
\$94.36B → \$333.99B – 177% increase

OMG / SDO

**Standards
Development
Organization**

According to the **World Bank's World Development Report 2025**, international standards function as foundational global infrastructure, influencing trade, manufacturing, safety, digital systems, and global supply chains. The World Bank emphasizes **that standards have reshaped the world economy**

Expected Growth 2026-2033
\$2.59B → \$4.73B – 83% Increase

DTC

**Digital Twin
Consortium**

Digital Twins enable simulation, monitoring, predictive maintenance, and operational optimization. **Across all major reports, the market is experiencing hyper-growth**, driven by adoption in manufacturing, energy, healthcare, automotive, aerospace, smart cities, and more.

Expected Growth 2025-2030
\$21.14B → \$149.81B -- 608% Increase

AREA

**Augmented Reality
for Enterprise
Alliance**

Augmented Reality continues to **be one of the fastest-growing emerging technology sectors**, driven by expanding adoption across retail, healthcare, industrial operations, gaming, education, and enterprise workflows. Across major analyst reports, AR shows strong exponential growth from the mid-2020s through 2034

Expected Growth 2026-2030
\$140.23B → \$560.23B -- 300% Increase

One Membership Organization, Four Consortia

A comprehensive approach to the mandate: EDM Association resources mapped to what FDTA requires.

RESOURCE	WHAT THE MANDATE REQUIRES	THE EDM ASSOCIATION ANSWER
DATA & ANALYTICS DCAM® v3 Data Management Capability Assessment Model	A governed, trusted data foundation.	Governance, quality, ownership, strategy, and metadata in a member-built model used across the US Federal Reserve System (see this OIG report) and operationalized through the Data Excellence Program.
DATA & ANALYTICS CDMC™ Cloud Data Management Capabilities	Sensitive data secured in cloud and AI.	14 key controls for classification, lineage, and cross-border movement of sensitive data, now extended with specialized AI controls for ethics, performance, and risk.
OMG STANDARDS FIBO + Commons Ontology Library Financial ontology on a reusable foundation	Metadata in ontology models that define semantic meaning.	FIBO gives financial entities and instruments shared, machine-readable meaning. The Commons Ontology Library is the reusable, cross-domain foundation FIBO builds on, extending consistent meaning beyond finance to any agency domain.
OMG STANDARDS SBRM Standard Business Report Model	Standardized, machine-readable reports.	A logical model of a report so a filing in any syntax (XBRL, JSON, RDF) can be machine-validated and its fields linked to FIBO.
OPEN IDENTIFIERS LEI Entity and instrument identifiers	Common, open, non-proprietary identifiers.	Maintained by GLEIF, the LEI identifies entities. The EDM Association supports the adoption of open standards such as LEI; the FIBO ontology has also mapped all identifiers.
DIGITAL TWIN FinTwins DTC Financial Technology Working Group	A path to the AI-driven future state.	The Digital Twin Consortium's FinTech group models and simulates financial processes, risk, and settlement, and flags standards gaps, readying public-sector data for a simulation-ready, AI-forward environment.

Frameworks & Benchmarking

Best Practice Capabilities & Standards

DCAM & CDMC: Accelerating Public-Sector Data Readiness

The **Data Management Capability Assessment Model (DCAM)** and **Cloud Data Management Capabilities (CDMC)** frameworks give agencies a shared benchmark for maturity, already in use across the public sector.



Data strategy, architecture, quality, governance, and technology – *assessed together, not in isolation.*

Federal Reserve System

Office of the Inspector General used DCAM in 2022 to assess data management readiness; its January 2023 report endorsed data management best practices for mission success.

<https://oig.federalreserve.gov/reports/board-data-management-roles-responsibilities-jan2023.pdf>

U.S. Securities and Exchange Commission

The SEC's June 2024 report on machine-readable data ties FDTA implementation directly to internal data management improvement efforts.

<https://www.sec.gov/files/fdta-report-6-2024.pdf>

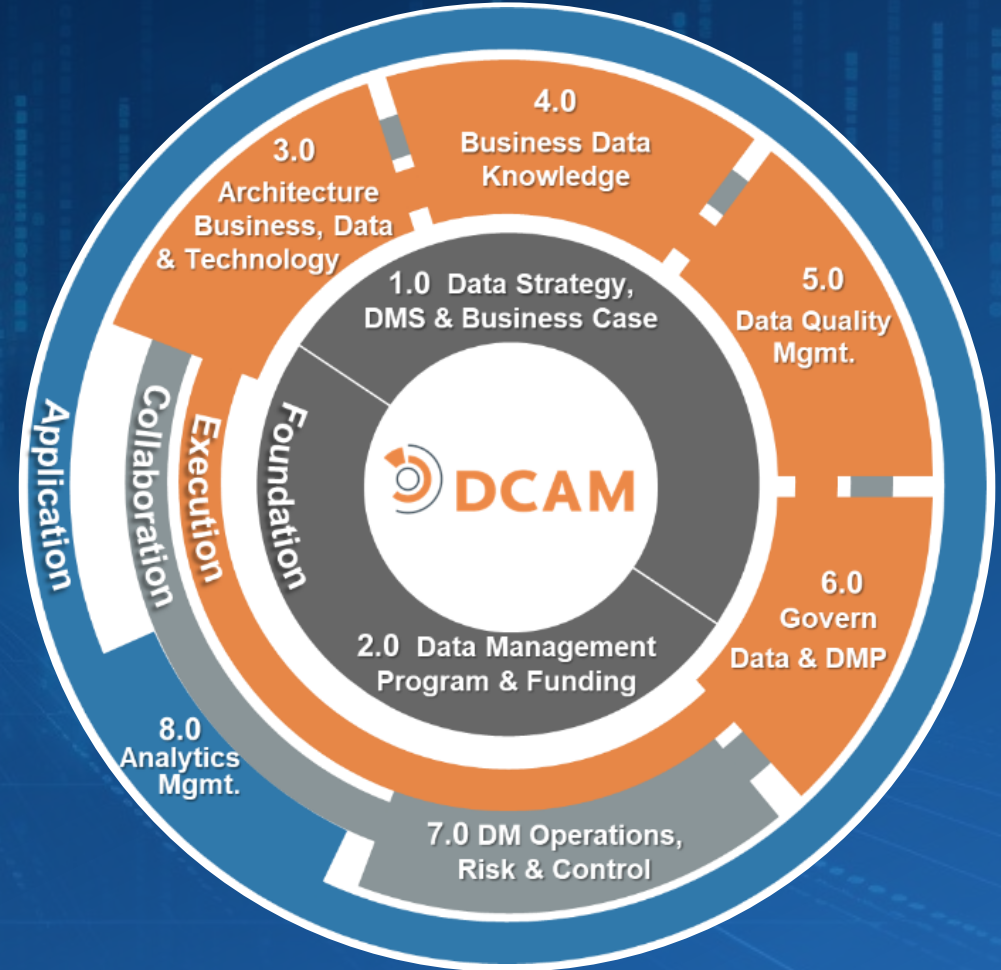
DCAM V3

Data Management Capability Assessment Model

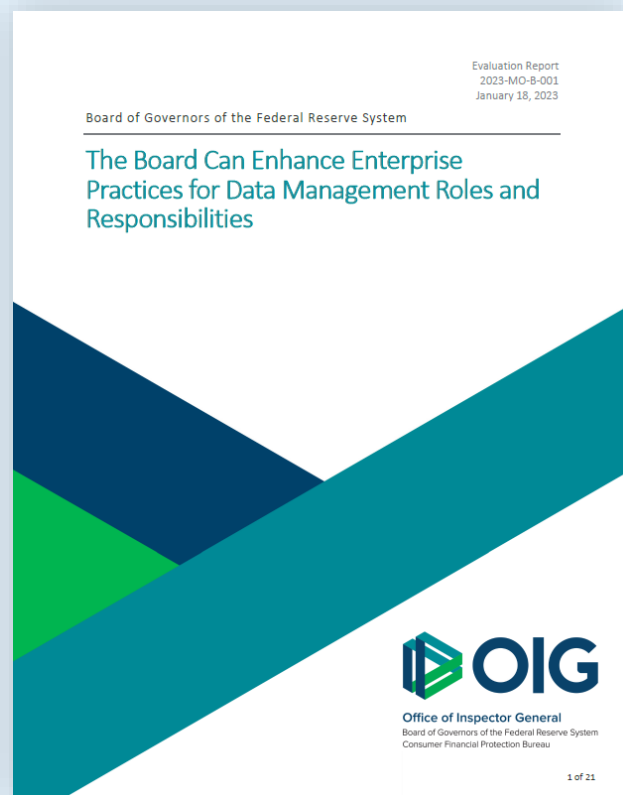
AI Data Foundations

DCAM Release History

- Originally published in 2014
- Major release v2, May 2019
- V2.2.1 adding Analytics, released October 2020
- Major release v3, June 2025
- Added metadata management, communications, and data risk capabilities



DCAM is used by the US Federal Reserve System



- US Federal Reserve System (all district banks and board) utilizes DCAM
- OIG is the audit arm of the US Federal Reserve System
- Public report published January 2023

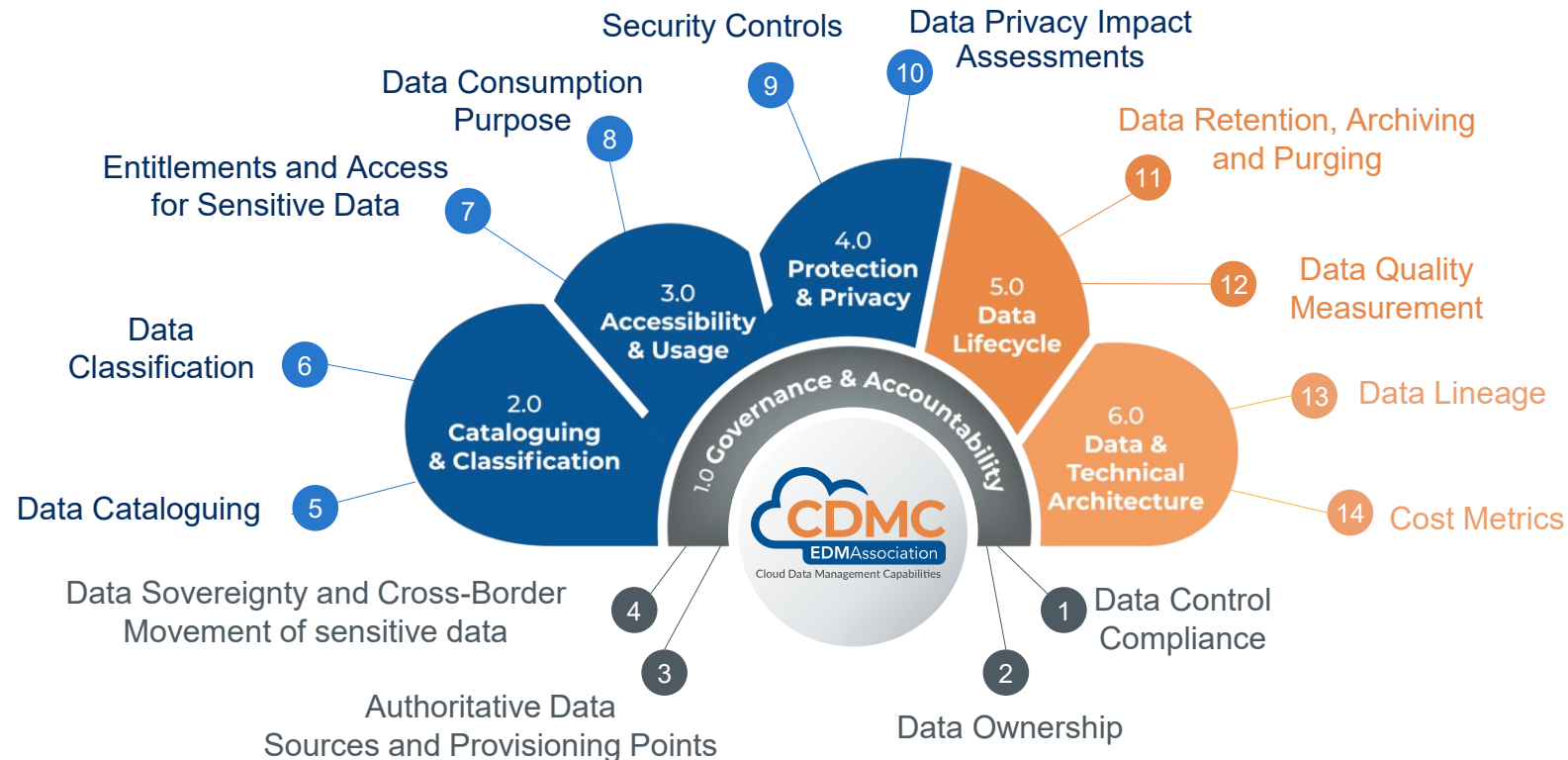
<https://oig.federalreserve.gov/reports/board-data-management-roles-responsibilities-jan2023.pdf>

“The System is also an EDM Association member, and the System’s Data Management Leadership Team has **endorsed the use of DCAM** as the standard tool for assessing data management maturity.”



CDMC: Cloud Data Management Capabilities

14 Key Controls for Managing Data Risk



Sensitive Data

includes classifications such as:

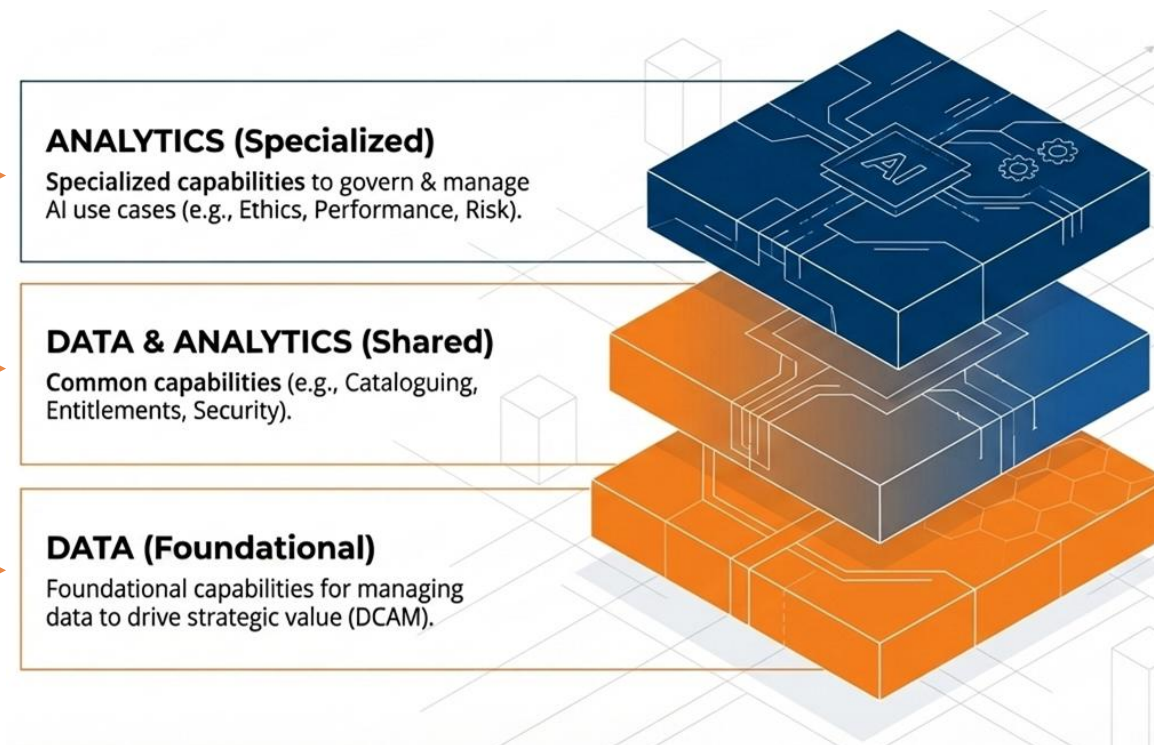
- Personal Information (PI) / Sensitive Personal Data
- Personally Identifiable Information (PII)
- Personal Health Information (PHI)
- Company or Client Identifiable Information
- Material Non-Public Information (MNPI)
- Specific Information Sensitivity Classifications (such as 'Highly Restricted' and 'Confidential')
- Critical Data Elements used for important business processes
- Licensed data

Extending model for AI – 2026: Specialized AI Controls to govern and manage AI use cases (e.g. Ethics, Performance, Risk)

The Control Layers: Data, Analytics & the Intersection

CDMC + AI integrates:

AI Controls →
with
Shared Capabilities →
and
Foundational Data Management →



Enhanced for CDMC + AI:

1. AI Use-case Governance
2. Ethics & Privacy Impact Analysis
3. Performance Evaluations
4. Model Risk Management
5. Enhanced Audit, incl. Functional Lineage, Transparency, Versioning & Reproducibility

Introducing the 2026 Global Data Management Benchmark Report

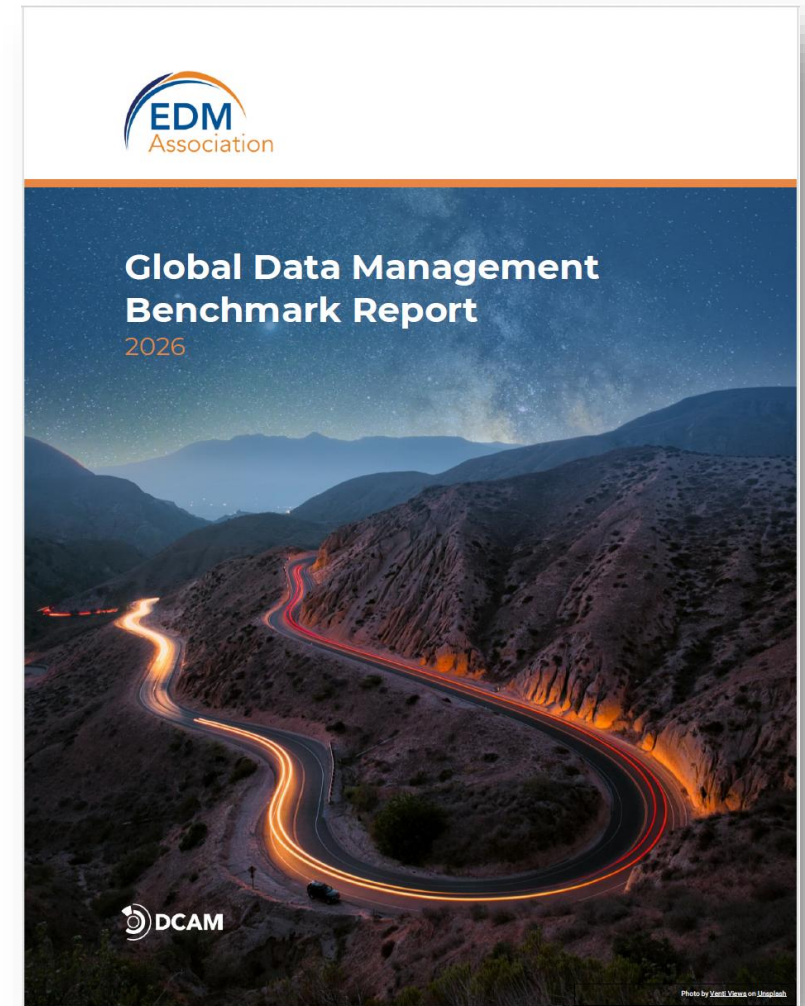
Comprehensive Study and Online Dashboard Viewer

Can data be *trusted* for AI?

Global Data Management Benchmark Report

Powered by  **DCAM**

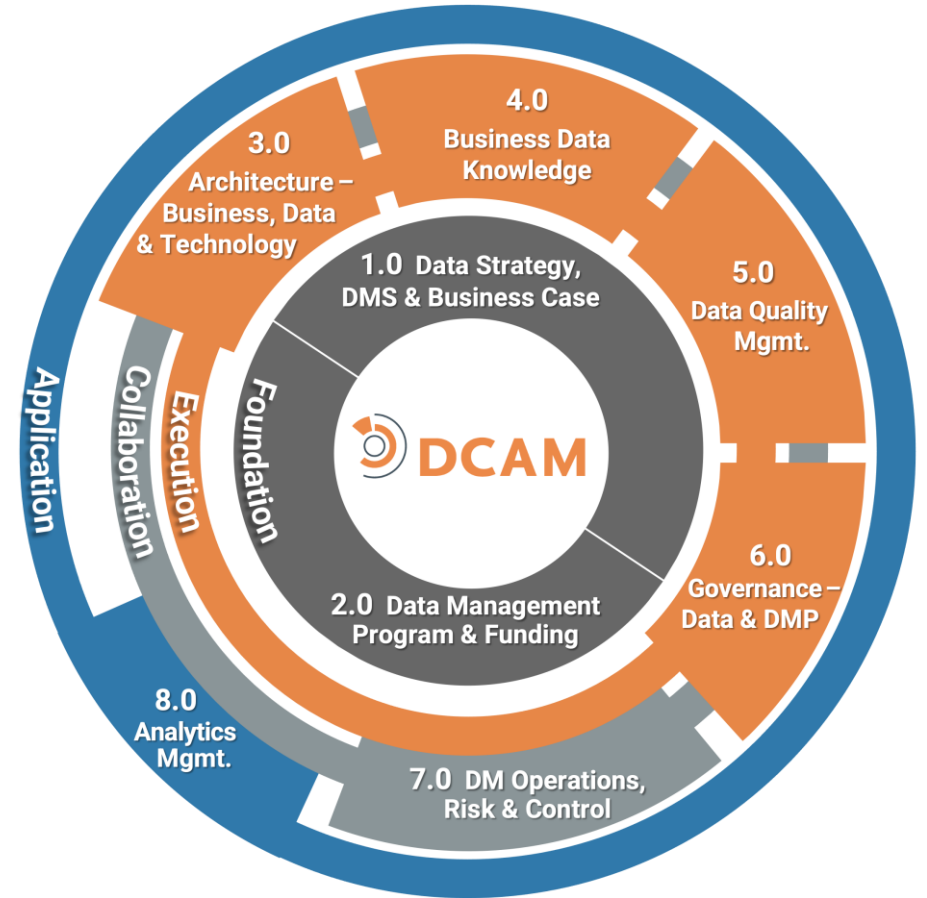
Download your copy:
www.edma.org
Click on Innovation >
Benchmarking



Aligned to DCAM

2026 Global Data Management Benchmark Report

- Survey of 435+ organizations, cross-industry
- 50+ countries represented
- Survey questions and report align to DCAM's 8 key components
- Report presents aggregate DCAM scores of capabilities for all industries vs Financial Services



2026 Benchmark Report: Key Findings

AI investment is outpacing data readiness

- Approximately **31%** of organizations surveyed report advanced data strategy capability, leaving most without the foundation required to support AI at scale

The Chief Data Officer role is now mainstream, but still evolving

- More than 70% of organizations have appointed a CDO, yet high turnover and unclear authority structures continue to limit the role's impact

Governance is improving, but not keeping pace with AI demands

- While over 70% report formal governance structures, many lack the funding models, measurement frameworks, and enterprise alignment required to operationalize them

Analytics programs are widespread, but not operational

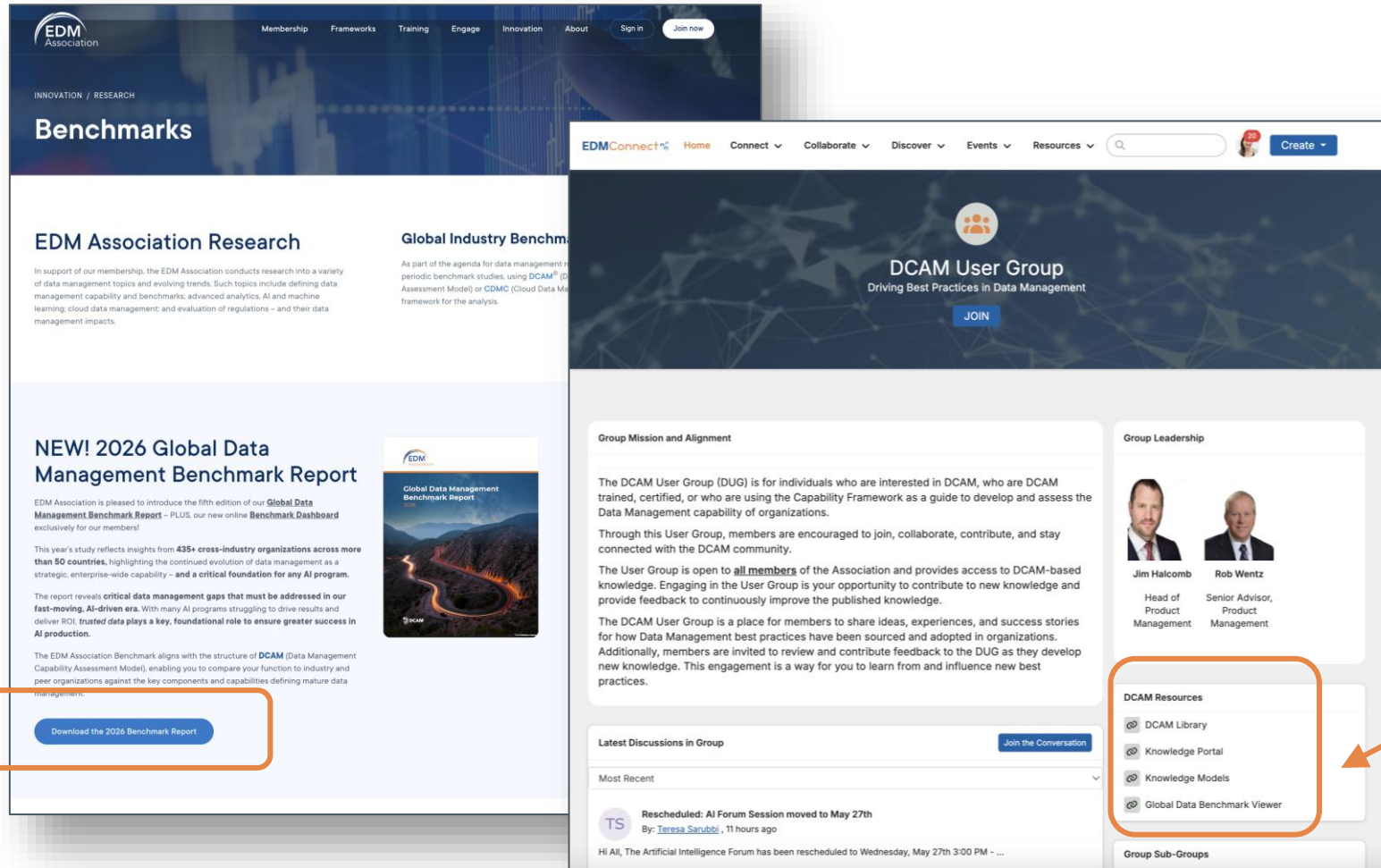
- While 77% of organizations surveyed have established analytics capabilities, only 19% demonstrate mature adoption and education, revealing a significant gap between investment and execution

Workforce readiness is a critical constraint

- Weakness in data literacy, analytics education, and organizational adoption are limiting the ability to scale both data initiatives and AI programs

Accessing the 2026 Benchmark: Exclusive for EDM Association Members

Download the
Report from the
Benchmarks
webpage



Access the
Benchmark
Viewer from
EDMConnect –
go to:

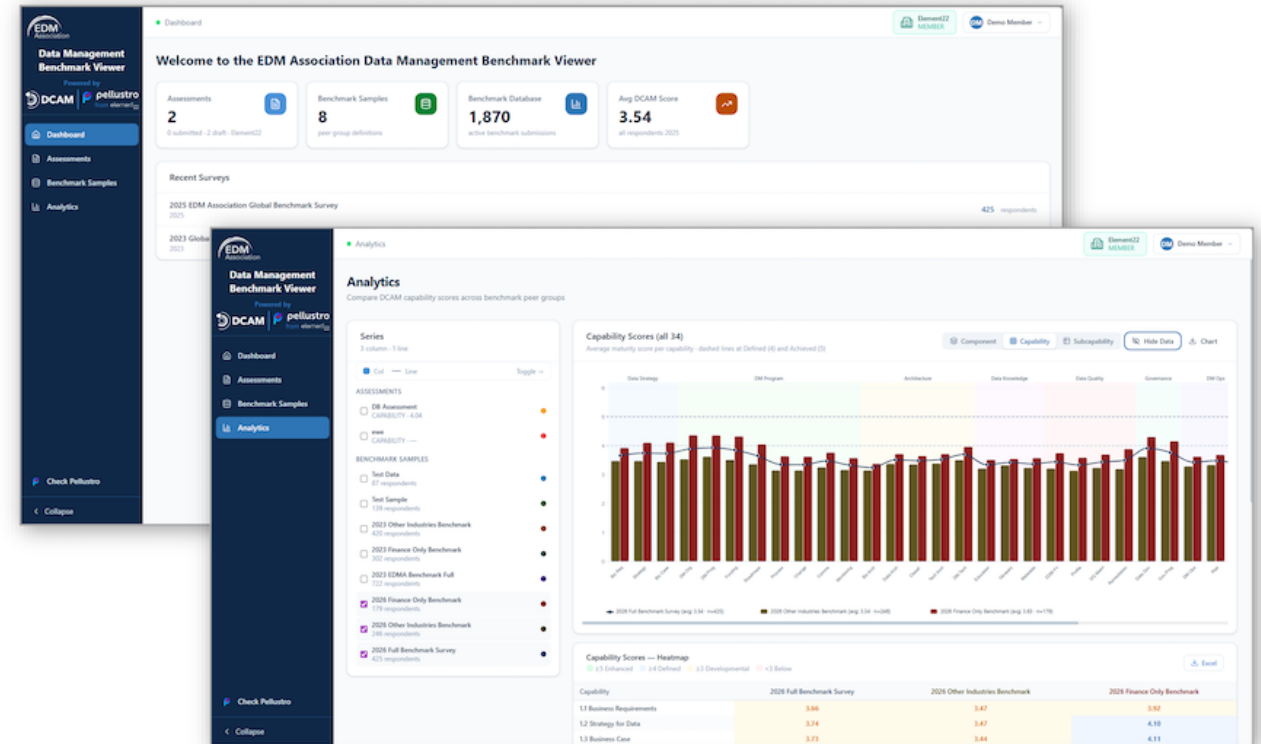
- DCAM User Group
- Knowledge Portal

NEW! Benchmark Viewer

Exclusively for EDM Association Members

- Online dashboard to view, filter and analyze the 2026 and 2023 Benchmarks
- Users can securely upload **their own DCAM assessment scores** to compare to the global Benchmark study results
- As members' anonymous DCAM data builds up over time, a **Benchmark Repository** develops for deeper analysis, filtering and comparison against peer data

Thank you to **Element22** and their **Pellustro** benchmark platform!



FIBO

Financial Industry Business Ontology

FIBO and the LEI: A Closer Look



Financial Industry Business Ontology (FIBO)

- Open-source, MIT-licensed standard, now an EDM Association standard following the OMG combination
- Provides common vocabulary for contracts, issuers, counterparties, and transactions
- Commons Ontology Library extends that shared meaning beyond finance to any agency domain
- Already used or piloted by CFTC, FDIC, NIST, GAO, OFR, and the Bureau of Labor Statistics
- Aligned to LEI and the identifiers named in the FDTA joint rule



Legal Entity Identifier (LEI)

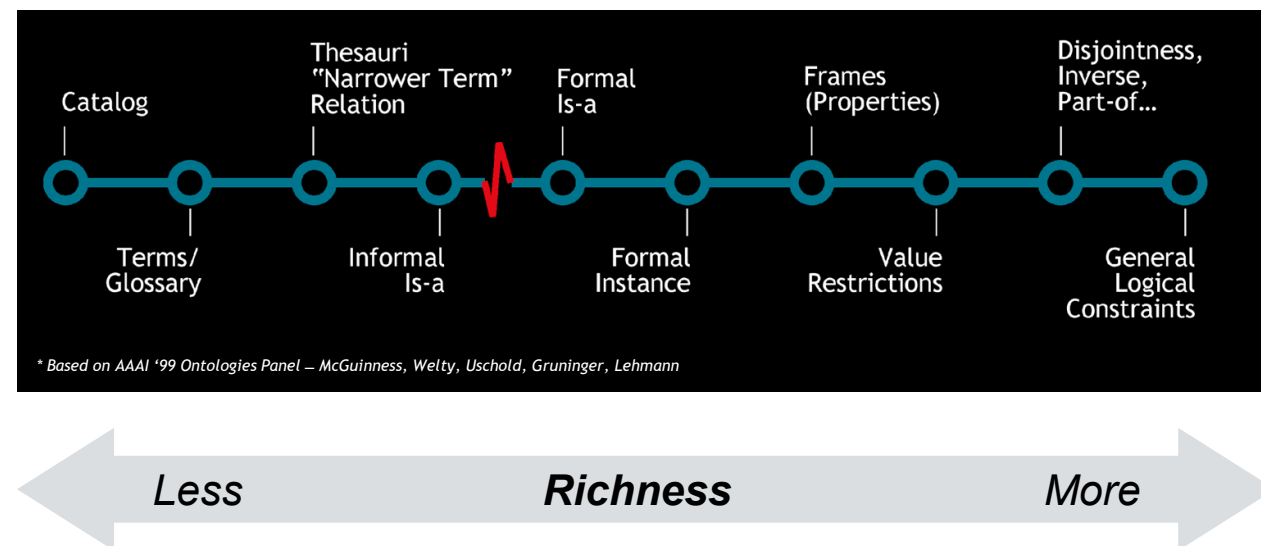
- Traces its origin to the 2010 “Linchpin” paper (Bottega & Powell) written in the aftermath of the Lehman collapse
- This is GLEIF
- The LEI, ISO 17442
- Roughly 3.4 million LEIs issued globally to date
- Regulatory frameworks
- Financial Data Transparency Act (FDTA)

Ontologies Can Fully Express the Semantics of Data

Taxonomies express hierarchies; Ontologies express a large variety of relationships

An ontology is a rich description of a domain:

- Rich, shared, **explicit** definitions of terminology, concepts, nomenclature, and relationships
- Sentences *distinguishing* similar concepts, refining definitions and relationships (constraints, restrictions, regular expressions)
- Alignment between business and data based on “use cases”
- Formal modeling using standards
- Enables knowledge graph-based tools and analytics

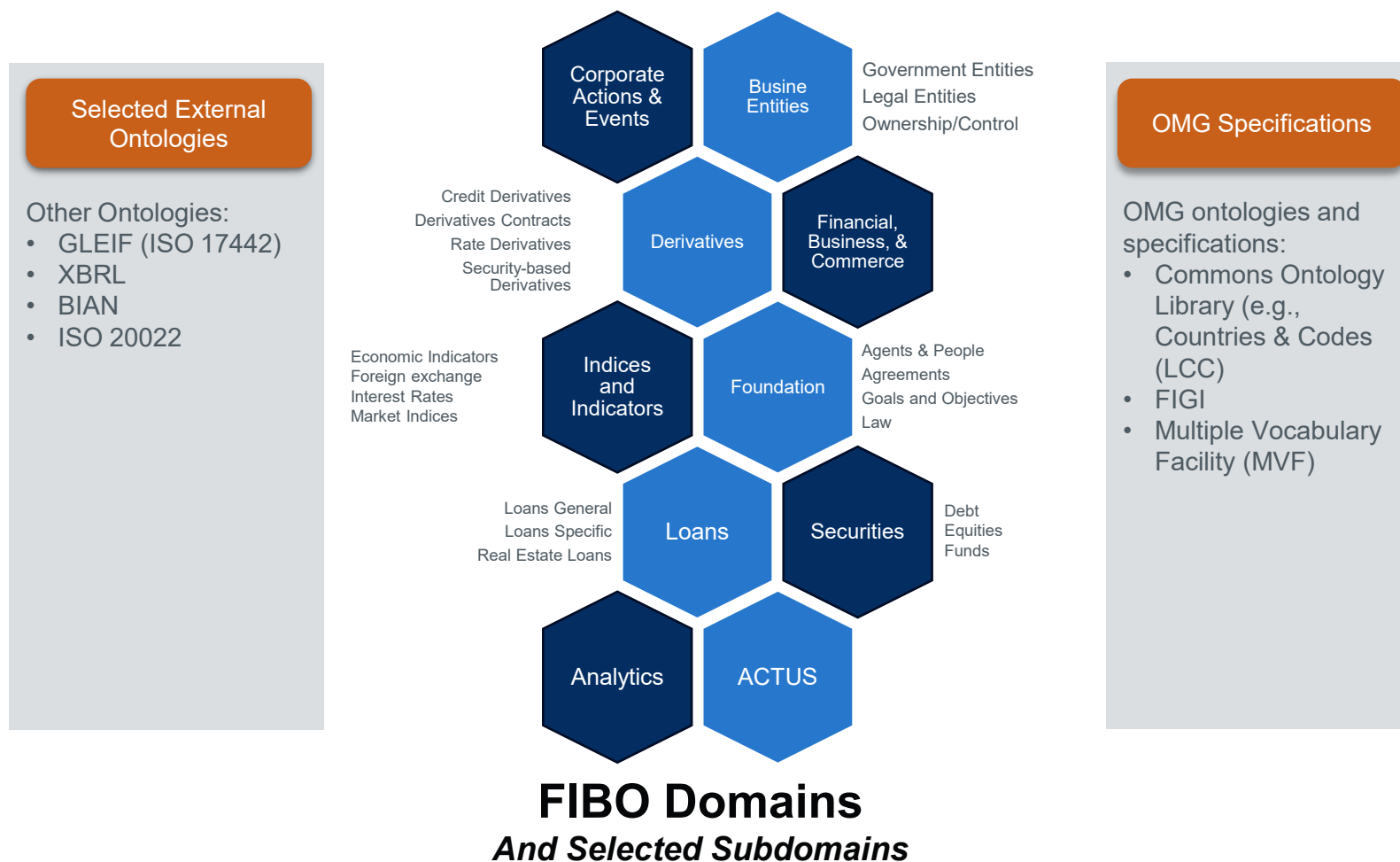


FIBO is the “machine-readable ... ontology model” for the financial sector that clearly defines the semantic meaning of financial data.

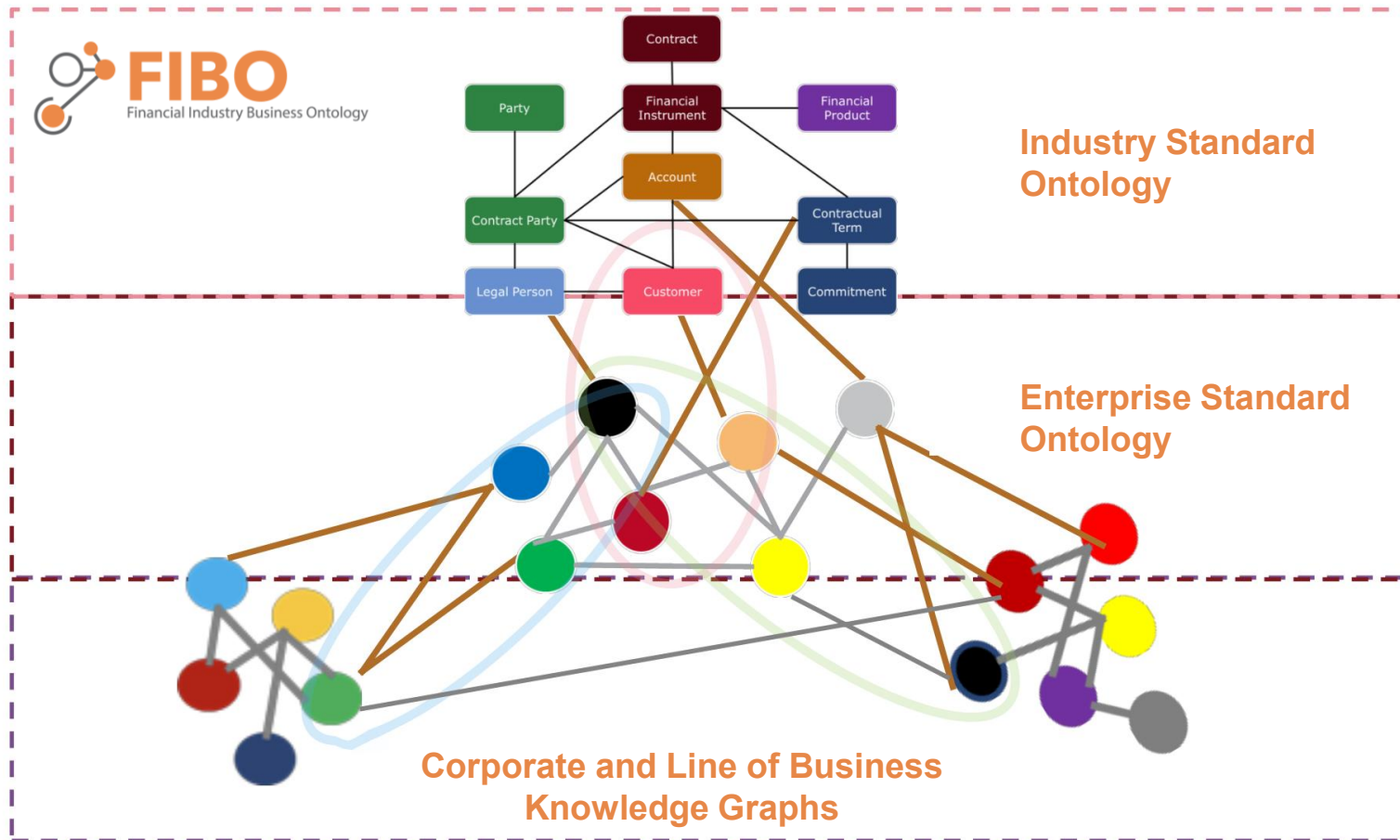
FIBO: Financial Ontology Built on Financial Sector Logic



FIBO is organized into modular domains with thousands of terms covering all major areas of finance.



FIBO as the Scaffolding for Enterprise Data



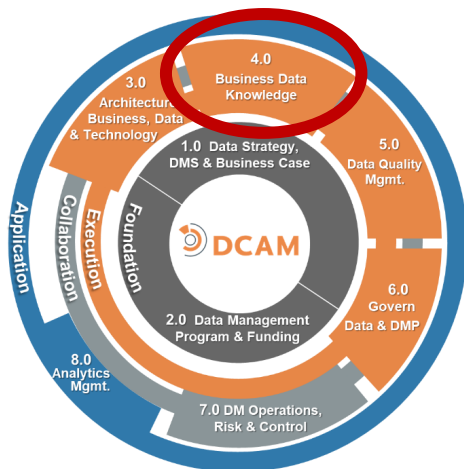
- Works with existing data structures, and especially ontologies
- A foundation and reference model, not a replacement
- Requires mapping, alignment, and translation
- Reconciliation of “sames” and “similar”

FIBO Can Align Public Sector and Industry Practice

FIBO is already powering improvements in data management, analysis, and decision-making.

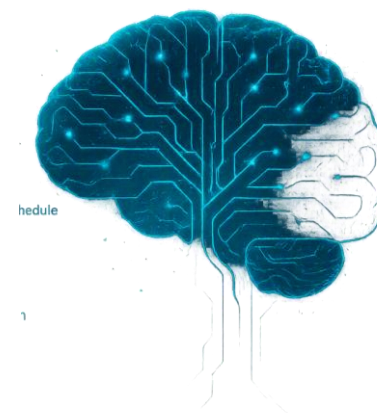
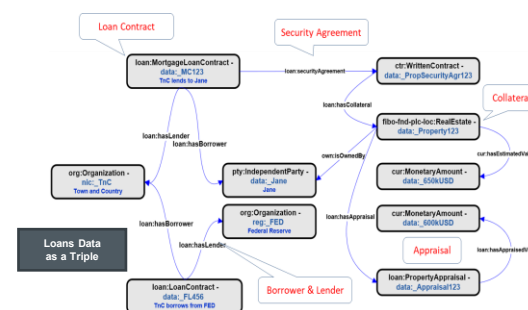
Data Governance & Management

- Data standardization across firms and systems, for example:
- Facilitate enterprise interoperability (systems can understand each other)
- Regulatory reporting consistency, e.g., for BCBS 239
- Provisioning critical risk assessments and analytics (e.g., for KYC and AML)
- Achieving DCAM objectives



Artificial Intelligence

- The most rapidly growing use for FIBO today is to operationalize AI platforms
 - Ontologies radically improve the ability for AIs to use data to carry out more precise and explainable reasoning.
 - Enable discovery, classification and integration of enterprise data based on the definitions



LEI

Legal Entity Identifier

LEI and FIBO: A Closer Look



Legal Entity Identifier (LEI)

- ISO 17442, adopted in the FDTA's final joint rule for legal entity identification
- Roughly 3.4 million LEIs issued globally to date
- Mandatory under MiFID II's "No LEI, No Trade" rule for EU counterparties
- Traces its origin to the 2010 "Linchpin" paper (Bottega & Powell) written in the aftermath of the Lehman collapse
- Maintained globally by GLEIF



Financial Industry Business Ontology (FIBO)

- Open-source, MIT-licensed standard, now an EDM Association standard following the OMG combination
- Provides common vocabulary for contracts, issuers, counterparties, and transactions
- Commons Ontology Library extends that shared meaning beyond finance to any agency domain
- Already used or piloted by CFTC, FDIC, NIST, GAO, OFR, and the Bureau of Labor Statistics
- Aligned to LEI, FIGI, and the identifiers named in the FDTA joint rule



*ing global identity
rting digital trust*



GLEIF Americas

EDM 2026

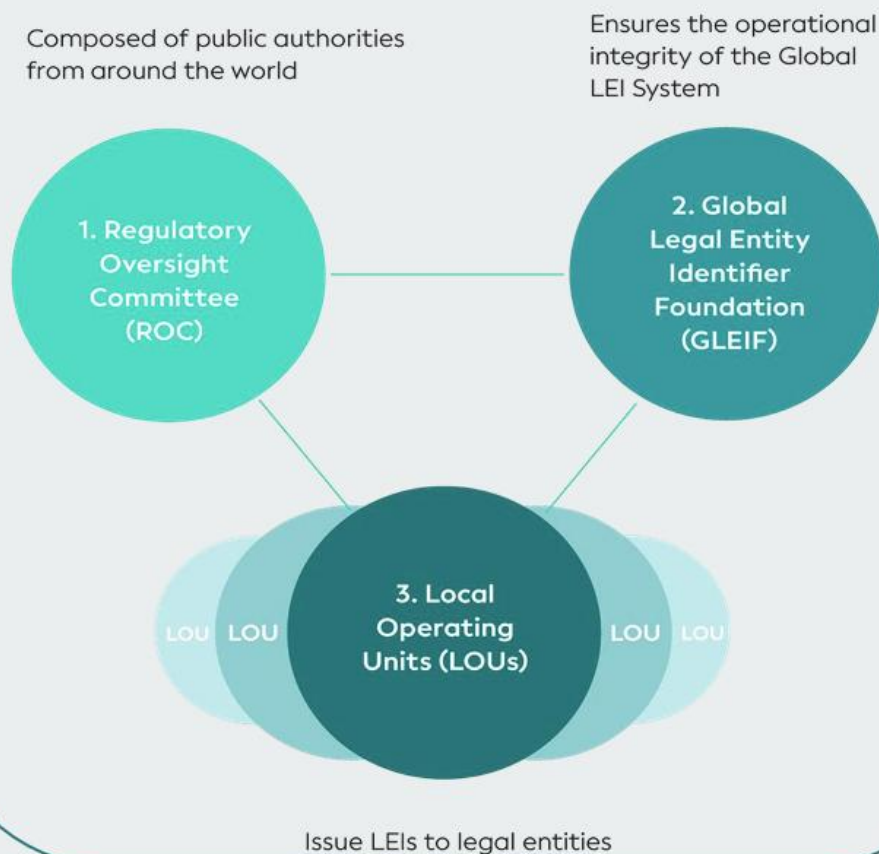
Author: GLEIF Americas

July 2026

What is the Global Legal Entity Identifier Foundation (GLEIF)?

- GLEIF is a not-for-profit Swiss foundation, founded by the Financial Stability Board (FSB).
- GLEIF Americas is the North American office of the GLEIF, a supra-national, not-for-profit organization based in New Jersey
- GLEIF is overseen by the Regulatory Oversight Committee (LEI ROC) with
 - **71 regulators, 7 of which are from the U.S.**
 - **19 observers**
 - from **50 countries**
- GLEIF Board has **18 independent directors**
- **39 accredited Partners** for LEI issuing (**LOUs**) and growing
- **> 3.4 million issued LEIs** as of today, available as open data without IP or copyright protection.

The Financial Stability Board (FSB) and the Group of Twenty (G20) have endorsed the LEI, Global LEI System and GLEIF.



What is the Legal Entity Identifier (LEI)

A LEI is a 20-character, alphanumeric code that uniquely identifies legal entities worldwide.

Key Features:

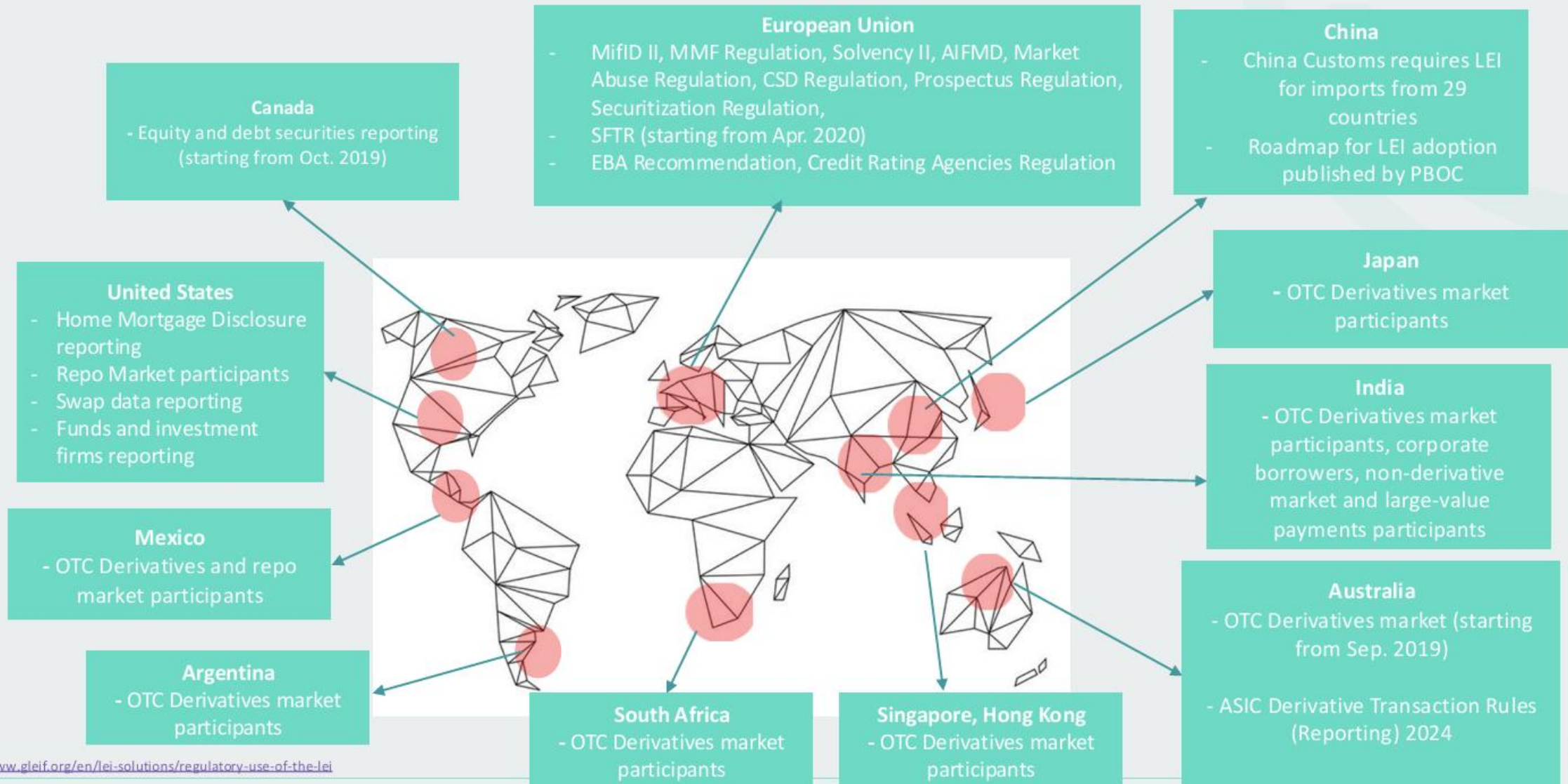
- Established by the ISO 17442 standard, ensuring universal identification.
 - The LEI became a U.S. standard first through the American National Standards Institute (ANSI).
- Anyone can access LEI data through the GLEIF database.
- Each LEI is tied to details like a company's official name, registered address, and ownership structure.
- Example: <https://search.gleif.org/#/record/WRJR7GS4GTRECRRTVX92>

Why is LEI Important?

- Enhances Financial Transparency – *Helps regulators and businesses verify entities in global transactions.*
- Simplifies KYC & AML Compliance – *Reduces fraud risk and speeds up due diligence.*
- Improves Risk Management – *Helps financial institutions track counterparty risk.*
- Saves Time & Cost – *Reduces paperwork and streamlines entity verification.*
- Enables Cross-Border Trade & Investment - *Recognized globally thus enables seamless transactions*
- Has applicability outside of finance – *not limited to finance and is poised to grow in telecom and healthcare.*

Global Regulatory Framework for the LEI

The LEI is included in more than 200+ rules and regulations, including supervisory reporting, payments, AML, etc



The Financial Data Transparency Act (FDTA)

- Congress passed the **FDTA** as a part of the FY 2023 National Defense Authorization Act. The FDTA requires eight of the financial regulatory member-agencies of the U.S. Financial Stability Oversight Council to adopt and apply uniform **data standards** for the information collected from regulated entities.
 - The FDTA represents the most significant step forward in US financial system standardization in over a decade.
 - Standardization requested by the FDTA will reduce cost and risk while improving efficiency and accountability across every financial sector.
- The criteria for FDTA specifies the following:
 - Be fully searchable and machine-readable
 - Be non-proprietary or made available under an open license
 - Incorporate standards developed and maintained by voluntary consensus standards bodies
- The **SEC and CFTC** issued the joint final rule on June 8, 2026, with seven additional agencies finalizing, or expected to finalize, the joint standards shortly thereafter. Consistent with the proposed joint rule, in section 2(a)(1) of the June 2026 joint final rule, the agencies formally establish the International Organization for Standardization (ISO) 17442-1:2020, Financial Services—Legal Entity Identifier (LEI) as the legal entity identifier joint standard required by the statute. The joint final rule becomes effective on October 1, 2026.



Limitations

- This presentation contains confidential and proprietary information and/or trade secrets of the Global Legal Entity Identifier Foundation (GLEIF) and/or its affiliates, and is not to be published, reproduced, copied, or disclosed without the express written consent of Global Legal Entity Identifier Foundation.
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Open Discussion

U.S. Public Sector Forum

U.S. Public Sector Forum: Open Discussion

1

How are today's government agencies activating these initiatives, and what lessons have emerged so far?

U.S. Public Sector Forum: Open Discussion

2

Are frameworks being effectively adopted to accelerate data management best practices in support of these mandates, and how can DCAM and CDMC help?

U.S. Public Sector Forum: Open Discussion

3

What is the role of LEI and ontologies such as FIBO in meeting these requirements?

U.S. Public Sector Forum: Open Discussion

4

What tools and technology are critical to accelerating compliance?



Questions? Comments?

Let's discuss!

Turn on your video. Unmute your microphone. The floor is open.

edma.org



Join the FIBO Forum and FIBO Working Group



A founding cohort applying FIBO to real reporting use cases.

FIBO Forum

- Understand FIBO and learn how to use it to secure and enhance governance/management, analytics and decisions.
- Members collaborate, exchange insights, and address the emerging challenges of using FIBO for achieving their organizations' governance, management, analytical and AI ambitions.

FIBO Working Group

- A small, founding working group – member-led – not another standing committee.
- Early participants shape the scope.
- Apply FIBO to a reporting use case.
- Concrete, scoped, and fast. Target: 90-day cycles.

Interested? Let us know!

- Drop “Yes” in the chat or use the poll on screen now.
- Complete the interest form:
<https://forms.office.com/r/Sppvs4VeVm>



Learn more about the Financial Industry Business Ontology (FIBO)

<https://edmcouncil.org/frameworks/industry-models/fibo/>



We will follow up this week with the working group charter and first meeting date.

Resources & Next Steps



Keep exploring and engaging!



Meeting the Financial Data Transparency Act (FDTA)

Download the EDM one-page resource:



Data Management Capability Assessment Model (DCAM)

- <https://edmcouncil.org/frameworks/dcam>

Cloud Data Management Capabilities (CDMC) Framework

- <https://edmcouncil.org/frameworks/cdmc>

Financial Industry Business Ontology (FIBO)

- <https://edmcouncil.org/frameworks/industry-models/fibo>

2026 Global Data Management Benchmark Report

- <https://edmcouncil.org/innovation/research/benchmarks>

Article: The LEI in U.S. Law: What the FDTA Final Joint Rule Means

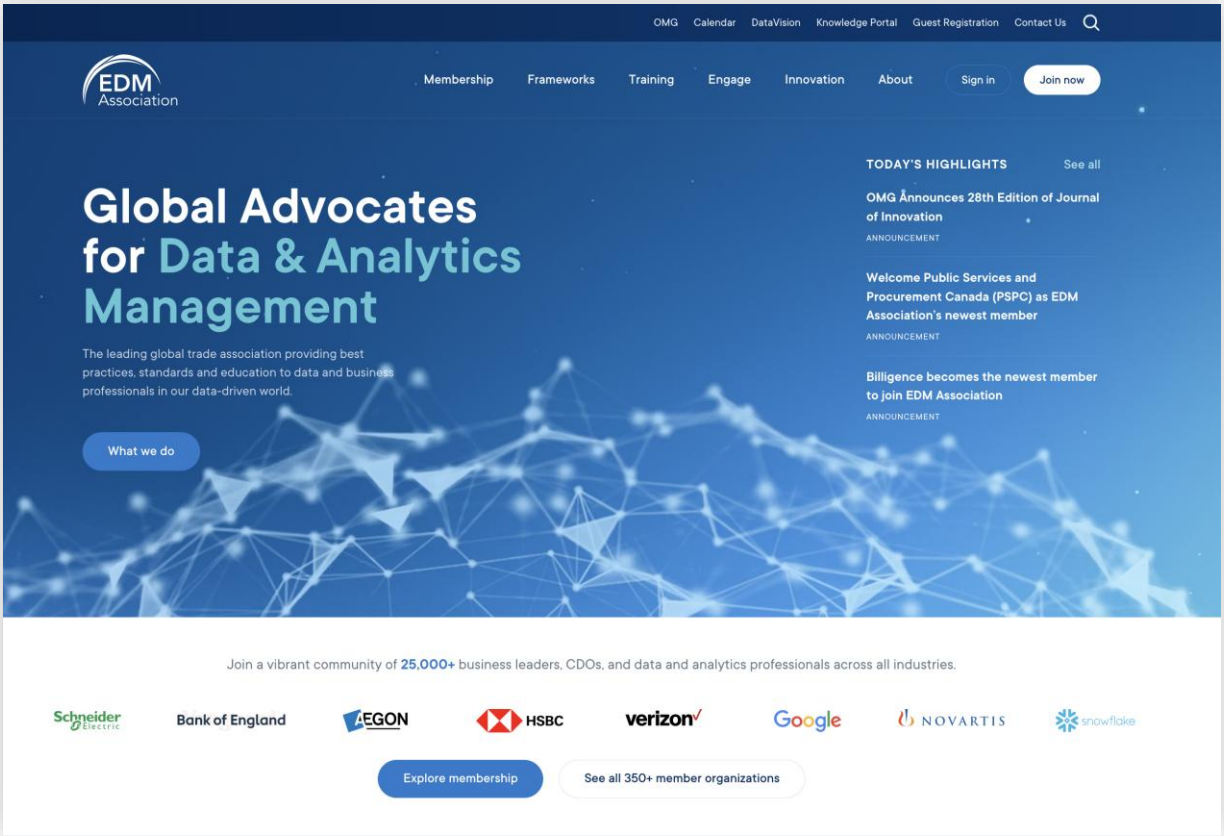
- <https://www.gleif.org/en/newsroom/blog/number-22-in-the-lei-lightbulb-blog-series-the-lei-in-u-s-law-what-the-fdta-final-joint-rule-means>



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<https://edmconnect.edmcouncil.org/publicsectorforum/>

Join our membership community



700+ Member Firms
Cross-industry, including Regulators



30,000+
Professionals



Core Communities
Data & Analytics, OMG Standards,
Digital Twin, Augmented Reality



Worldwide
Americas, EMEA, APAC



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Thank you!

We appreciate your feedback. Please complete our survey.

<https://forms.office.com/r/7EU5AF7Zsg>

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