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Agenda

- Best practice defined
- Previous process
- Rationale for developing new process
- Methodology
 - Phase one
 - Phase two
 - Phase three
 - Phase four
- Topics analyzed
- Preliminary Observations
 - Issues encountered

'Best Practice' Defined

Information not required by US GAAP, but commonly disclosed. Generally, these practices are informal-standardized techniques, methods or processes that have proven themselves over time to accomplish given tasks.



Previous Process

- Focus was on a finite list of extension elements and largely for the primary financial statements and text blocks
- Approximately 11,000 elements were categorically analyzed (68% in detail)
- From that analysis came recommendations across topics to modify the US GAAP Financial Reporting Taxonomy (UGT)



Rational For Developing Process

- Increase of companies filing XBRL instance documents
- Brute force analysis of extension elements would be overwhelming
- Requires a more targeted and systematic approach



Methodology

- Analysis extends beyond just XBRL filings
 - Understanding the US GAAP requirements
 - Understanding how disclosures are currently reported
 - Understanding how that is translated into current UGT
 - Then taking that understanding and applying it to XBRL data
- Development of a multi-step process
 - Steps are broken into four phase process



Methodology Phase One

- Familiarize yourself with the disclosure
 - Foundation-building phase
 - Focus on US GAAP reporting requirements
 - Random sample of thirty companies (XBRL filers and non-XBRL filers)
 - Map sample companies' disclosure to requirements
 - Build expectation for analysis of XBRL data
 - Consider which disclosures in the sample company filings are *required*, *best practice* and *company specific*



Methodology Phase Two

Familiarize yourself with the XBRL

- First, understand the coverage within the UGT for the disclosure topic
- For the XBRL filers of the sample companies, map their elements to the expectation made in Phase One
- Analyze the differences between expectation and actual
- Investigate the underlying elements at cause for the differences



Methodology Phase Three

Pull together the Analyses

- Analyze "bulk downloads" of extension data for disclosure topics or industries
- Use this data to either support earlier findings or uncover issues not identified in the sample companies
- Categorize the extensions as follows: *Best Practice*, *Error*, *Uncommon Disclosure* or *Company Specific*
 - This allows for aggregation and assists in uncovering other issues within the UGT



Methodology Phase Four

Reporting

- Once the above steps are completed, it is to be documented in a way that the analysis can be repreformed
- Conclusion memo written summarizing the findings
- The UGT is updated to reflect the recommendations made



Topics Analyzed

- Disclosure Topics
 - Post-retirement plans
 - Income tax
 - Fair value
 - Derivatives
 - Financial instruments
 - Related parties
 - Commitments and contingencies
 - Share-based compensation
 - Subsequent events

Industries

- Financial services/ banking
- Broker dealers
- Real estate companies
- REIT companies
- Private companies
- Oil and gas
- Development stage entities

Preliminary Observations

- Inappropriate selection of elements is more concerning than extensions
 - Extension rates are falling but with that has come elements used in ways not intended
 - Careful consideration of the way elements are defined
 - Careful consideration of the usability of the UGT
- Dimensions are advantageous when all of the line items cannot be anticipated
 - Assists in usability of the UGT



Issues Encountered

- Differentiating between a "common reporting practice" and the implementation of US GAAP
- Refinement of an industry analysis approach
- Calculating extension rates
- Better development of a systematic approach to analyze extension elements



Questions



