September 18, 2025

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Federal Deposit Insurance Corporation
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Chief Counsel's Office
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Office of the Comptroller of the Currency
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RE: Request for Information on Potential Actions to Address Payments Fraud

OCC	Docket ID OCC-2025-0009
Federal Reserve Board	Docket No. OP-1866
FDIC	RIN 3064-ZA49

Dear Agencies:

We appreciate the opportunity to provide input to the Request for Information on Potential Actions to Address Payments Fraud published by the Department of the Treasury, the Federal Deposit Insurance Corporation (FDIC), the Office of the Comptroller of the Currency (OCC), and the Federal Reserve System.

XBRL US is a nonprofit standards organization with a mission to improve the efficiency and quality of reporting in the U.S. by promoting the adoption of business reporting standards. Our organization is a jurisdiction of XBRL International, the nonprofit consortium responsible for developing and maintaining the technical XBRL specification, which is a free and open data standard widely used around the world for reporting by public and private companies, as well as government entities. As an advocate for open data standards, we know that standards give federal agencies a common framework for sharing, analyzing, and verifying information, which makes it easier to detect and stop fraudulent payments. By ensuring data is consistent,

interoperable, and transparent across systems, agencies can close gaps that fraudsters often exploit.

Please see our input on questions raised in the request pertaining to external collaboration, data collection and information sharing, and tools and services, all areas where standardization can be highly beneficial.

External Collaboration

What actions could increase collaboration among stakeholders to address payments fraud?

Adopting a uniform reporting framework that standardizes fraud data in digital, machine-readable format would enable sharing and interoperability of data across agencies and businesses. This approach has already been adopted by government agencies in the Netherlands through a program that allows them to share information using a common reporting framework. That initiative, called Standard Business Reporting (SBR) has been expanded upon by the three largest Dutch banks, ABN Amro, ING, and Rabobank, who now more effectively collect data from customers by using the same government-created uniform data standards for collection. Read more in Banks gain with govt-shared data dictionaries (SBR).

What types of collaboration, including standard setting, could be most effective in addressing payments fraud? What are some of the biggest obstacles to these types of collaboration?

Collaboration can be efficiently enabled by requiring agencies and businesses to adopt the same semantic data language (standard) in respect to fraud activities. There are hurdles to this approach however.

First, agencies have unique missions and goals and may not immediately see the commonalities that they share with other agencies. For example, when Dutch agencies began collaborating on digital standardized dictionaries for their SBR program, the process was initially challenging but eventually they found that multiple agencies required the same entities to report some of the same information, so they were able to reuse these facts across agencies. This enabled a higher level of harmonization and standardization across those agencies.

Second, agencies often have long-standing legacy information systems and processes that may be difficult and costly to change. Internal teams need to be educated that open data standards are “system agnostic” and can be adapted into existing reporting systems. An open data standard is not a system or a product.

If agencies and the businesses with which they exchange data can agree on a single semantic data model, that model can be incorporated into existing systems without the need for significant and costly reengineering.

These hurdles can be overcome if the commitment to collaboration is made at senior levels within all agencies involved.

Could increased collaboration among Federal and State agencies help detect, prevent, and mitigate payments fraud? If so, how?

In 2021, the Office of Management and Budget (OMB) published an RFI requesting input on the Do Not Pay (DNP) initiative to guard against improper payments. The comment letter we submitted encouraged OMB to adopt data standards for DNP as a means to improve the efficiency and timeliness of reported information which in turn would facilitate the identification and prevention of fraudulent payments. Standardization of the data reported through DNP would make data sources interoperable, and thus more easily catalogued and shared across agencies.

Payments Fraud Data Collection and Information Sharing

Broadly, how could payments fraud data collection and information sharing be improved?

Data that is reported following the same semantic data model is interoperable, even if it is reported to different agencies, by different reporting entities. When data has the same structure, it can be comingled in the same database, extracted, analyzed, shared, and inventoried together. Data prepared in structured, standardized format lends itself to automated validation rules that can quickly and inexpensively check for inconsistencies and reasonableness, thus improving the quality of what's reported.

What barriers limit the collection and sharing of payments fraud data between industry stakeholders, and how could these barriers be alleviated? For example, have specific barriers limited development of solutions or participation in bilaterial or multilateral payments fraud data collection and information sharing? What changes would address these barriers?

Agencies traditionally maintain their own custom collection, extraction, and querying methods, a siloed approach that presents a barrier to the sharing of payments fraud data. Adopting data standards would allow agencies to continue collecting their own unique datasets but would make the data collected interoperable and shareable. Applications to collect, query, extract, and analyze data would be less expensive because the same tools can be used across many datasets.

What role should the FRS, FDIC, or OCC take in supporting further standardization of payments fraud data? For instance, can the FRS better leverage or improve the FraudClassifier℠ and ScamClassifier℠ models?

The FraudClassifier model and the ScamClassifier model could be transformed into digital models by creating XBRL taxonomies that represent payment fraud data. This would improve the efficiency and interoperability of data reported using these models. Rendering data on scams and fraud in digital, machine-readable format would make it easier and less costly to use.

These models today are encouraged but not mandated. Given that the models were developed by the Federal Reserve, a logical step would be to make their use mandatory across agencies. Wider adoption of these models would encourage the development of open-source and third-

party commercial tools to process and manage the data, enabling economies of scale and reducing the cost of using the data across all entities. As more agencies use the same models and tools, it will become much easier to identify and track potential fraud. Tools that make this data available will have many potential customers, which will encourage more market entrants, lowering costs to end users, and improving the usefulness of tools as businesses compete.

Thank you again for the opportunity to comment. Please contact me if you have any questions or would like to discuss our comments further. I can be reached at [redacted] or [redacted].

Sincerely,

[redacted]

Campbell Pryde, President and CEO, XBRL US