

2.2.2 Architectural Implications of the FDTA Timeline

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The phased implementation process established by the [Financial Data Transparency Act \(FDTA\)](#) has direct architectural implications that extend well beyond the selection of data formats, taxonomies, or exchange mechanisms [R1].

Because joint data standards and agency-specific implementation decisions evolve over multiple years, reporting systems must preserve [semantic](#) continuity across time [R1, R10]. Systems need to interpret historical submissions according to the semantic definitions, governing rules, and contextual assumptions that applied when the information was reported, while also supporting meaningful comparison with information produced under newer standards, revised interpretations, or subsequent agency implementations [R10].

In this context, one-time conformance with a schema, taxonomy, identifier standard, or data format is insufficient [R8, R9]. Systems require the following capabilities as enduring architectural properties of the interpretation environment:

- Explicit versioning of semantic definitions, governing rules, and interpretive context [R10]
- Traceability between reported information and the semantic context applied during interpretation [R10]
- Coexistence of multiple semantic baselines within the same operational environment [R10]
- Controlled evolution of meaning without loss of auditability, comparability, or reproducibility over time [R10]

These capabilities are architectural in nature. They cannot be achieved reliably through ad hoc conventions, embedded business logic, implementation-specific configuration, or tool-dependent behaviour. Approaches that couple interpretation directly to implementation make meaning opaque, brittle, difficult to audit, and difficult to govern as standards, reporting obligations, and interpretive practices evolve [R10].

Meeting these requirements demands an explicit architectural framework that clearly distinguishes among:

- Evidence and observation
- Interpretation and validation
- [Semantic](#) definition and implementation

The FDTA implementation timeline therefore reinforces the need for a [Reference Architecture](#) that treats semantic interpretation as a first-class architectural concern that is explicitly governed, versioned, traceable, and reconstructable throughout the reporting lifecycle [R1, R10].

FDIS-RA addresses these architectural needs by coordinating existing standards, governance mechanisms, and architectural practices within a coherent framework that supports incremental agency implementation, controlled semantic evolution, and long-term interpretive stability without constraining technology choices or implementation approaches [R10].

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