DATA QUALITY WORKING

Report of Findings

100th Meeting of The Performance Measurement Forum

W Scottsdale, AZ April 27th, 2023

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Performance Department

Bears Very Important Responsibility

Crucial to the reputation of the firm

- Calculate , Publish & Explain returns of clients' portfolios
- Task:
 - Complex
 - Requires a ton of work
 - Last line of defense before numbers go out to clients
 - No mistake is allowed

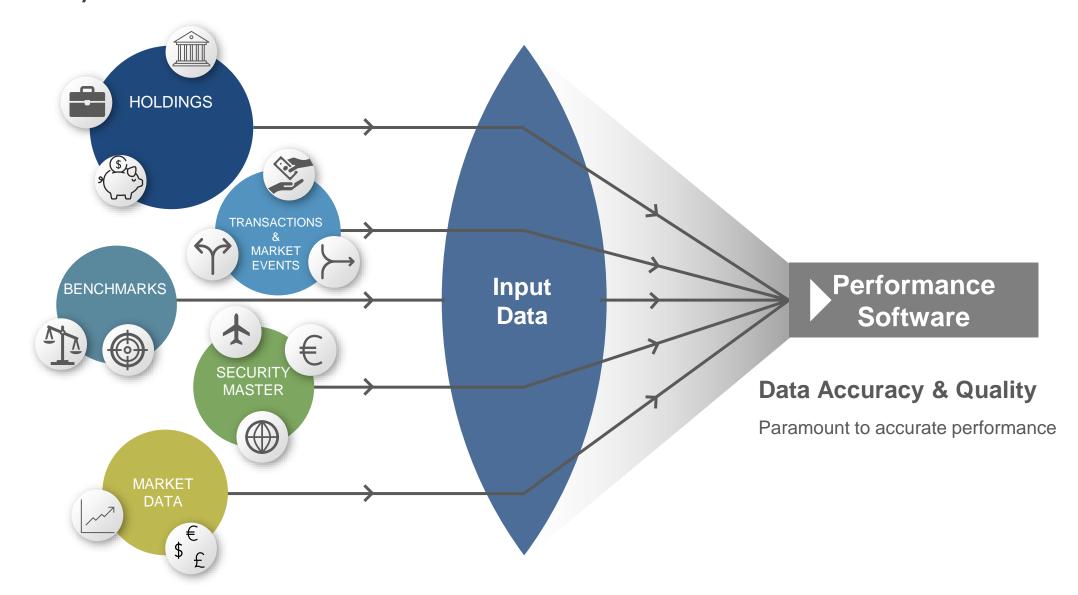


What makes the job so difficult?

- Rely on a sheer volume of data to be
 - accurate, complete and current
- Data that
 - Do not control
 - Produced outside of your department & organization
 - Come from disparate systems
 - Not particularly designed to feed Performance Measurement applications
- Process error prone by nature



Data Everywhere



THE SPAULDING GROUP

Performance Measurement Forum

Data Quality Working Group

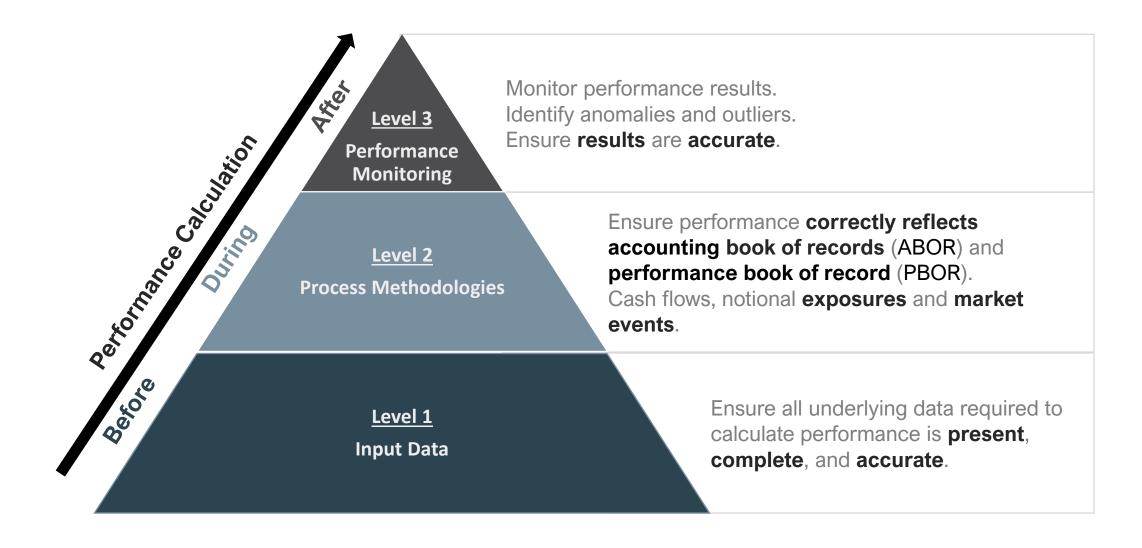
Meetings every 3 weeks 2021-09 to 2022-09

Discuss **Data Quality Challenges**

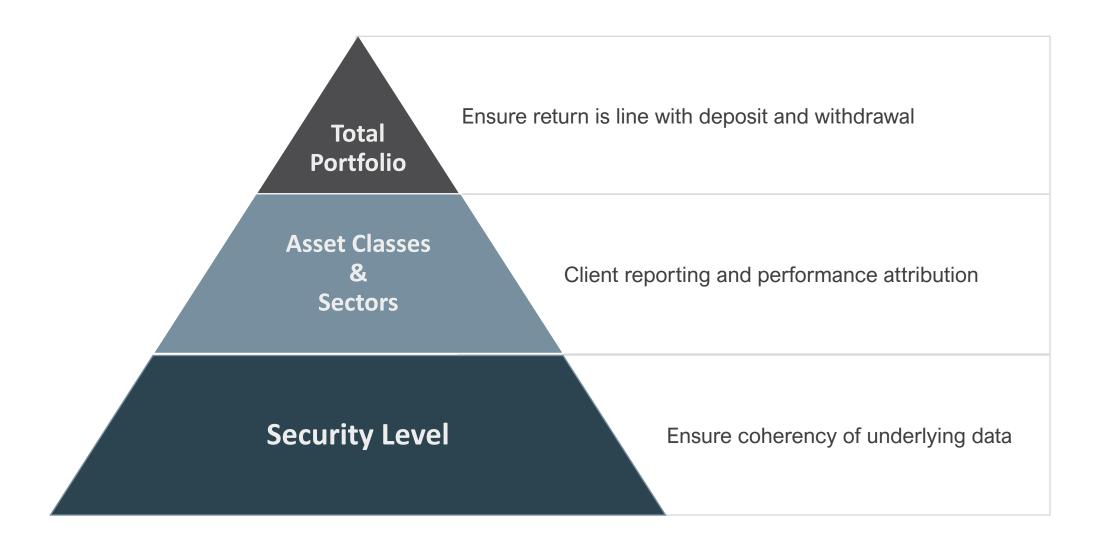
Define **Best Practices**

Goal
Catch & Minimize Errors
Improve Accuracy

VALIDATION PROCESS



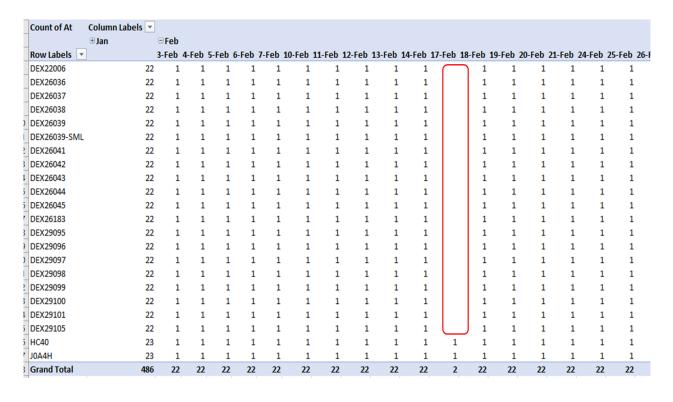
VALIDATION LEVELS



POSITIONS

Evaluation days

Ensure	Outcome	How
 Position files exist for all required days. 	Affects day weighting of cash flows and transactions.	✓ Build array-like report highlighting missing periods.



Considerations

- Frequency
- Weekend
- Weekend on a month-end
- Holidays

POSITIONS

Total Portfolio Value vs Security Level Values

Ensure	Outcome	How
 Market value total portfolio = sum of securities market values 	Incorrect evaluationsIncorrect PerformanceAttribution residual	✓ Provide security level positions.✓ Sum up market values.

Considerations

- o Does performance application expect market values to be provided at the total portfolio level?
- Or does it always sum it from security level positions?

POSITIONS

Accrued Income

When a bond is sold out, the accrued income of the transaction is calculated up to the settlement date. Some portfolio accounting system shows negative accrued income in their holdings file to represent the interest that has accrued until the settlement date.

Ensui	re			C	utcom	ie				Hov	W		
	ccrued income	e on trade	e date	>	> GIPS requirement				✓	Distinguish accrued income from mar values in input file.			
рс	ccrued income sitions contirettlement.				Retu level		calculab	le at se	curity	√ ✓			ibution and \$ Earned. rted when only income.
Sec Id	Issuer	Issue	Invested First	Invested Last	Units Begin	Units End	Begin Market Value	End Market Value	Cash Flows	\$ Earned	TW Contri- bution	Time Weighted Return	
06369ZCC6	BANK OF MONTREAL	3.32 JUN 01 26	1-May-20	1-May-20	35,000,000	20,000,000	35,976,108	20,554,258	-15,420,294	-1,557	-0.00003%	-0.00%	
6369ZCC6	BANK OF MONTREAL	3.32 JUN 01 26	2-May-20	4-May-20	20,000,000	10,000,000	20,554,258	10,277,603	-10,277,305	651	0.00001%	0.00%	
06369ZCC6	BANK OF MONTREAL	3.32 JUN 01 26	5-May-20	5-May-20	10,000,000	10,000,000	10,277,603	10,279,386		1,784	0.00004%	0.02%	
6369ZCC6	BANK OF MONTREAL	3.32 JUN 01 26	6-May-20	6-May-20	10,000,000	-	10,279,386	1,819	-10,284,025	2,819	0.00006%	0.03%	
6369ZCC6	BANK OF MONTREAL	3.32 JUN 01 26	7-May-20	7-May-20		-	-1,819	-910	-	910	0.00002%	-	
6369ZCC6	BANK OF MONTREAL	3.32 JUN 01 26	8-May-20	8-May-20	-	-	-910	-	-	910	0.00002%		
									-100%				
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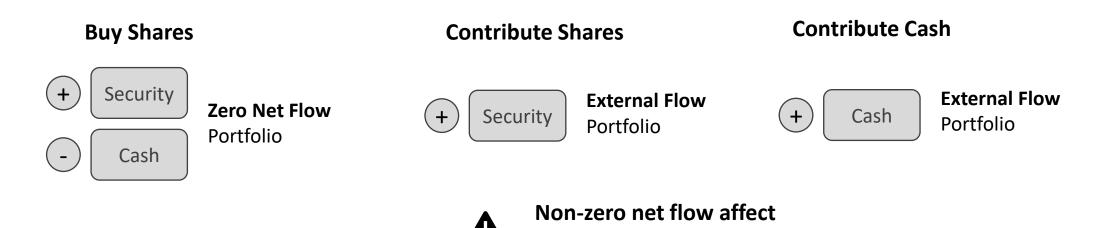
Transaction Code Mapping

Thousands of transaction codes translate to a handful of performance transaction flows. New codes can be introduced anytime.

Ensure	How
 All transaction codes are correctly mapped. 	 ✓ Monitor and identifying new transactions codes. ✓ Soft map transaction codes, so no software modification required.

One-leg vs two-leg transactions

Be carful between one-leg versus two-leg transactions.



Ensure	How
 Two-leg transactions sum to zero net flow. 	 ✓ Identify transactions that are one-leg and two-leg. ✓ Calculate net flow of transactions ✓ Verify net flow against transaction type

Total portfolio return

ABOR vs PBOR

Be aware that certain types of transaction in Accounting Book of Record (ABOR) may require transformation in Performance Book of Record (PBOR).

E.g. Transfer of shares from one portfolio to another at **Book Cost** instead of **Market Price**.

PF 1	→ PF 2
ABOR	ABOR
Withdrawal in Kind @ \$100 (book cost)	Contribution in Kind @ \$100 (book cost)
PBOR	PBOR
Withdrawal in Kind @ \$190 (market price)	Contribution in Kind @ \$190 (market price)
One-leg transaction	One-leg transaction
External flow	External flow

Reconcile with positions

It's possible that the transactions and positions files be out of sync if extracted from the portfolio accounting system at different times

Ensure	How		
 Holdings positions are in sync with transactions. 	✓ Reconcile the positions at end of day against positions of previous day plus transactions during the day.		

 $Share^{Today} = Share^{Yesterday} \pm Transactions$

Reconcile with Cash Positions

Reconciling cash balances is also a good way to ensure positions are in sync with the transactions.

Ensure	How			
 Cash balance positions are in sync with	✓ Reconcile cash balances (per settlement currencies) at end of			
transactions.	day against previous day plusthe transactions of the day.			

$$Cash_{USD}^{Today} = Cash_{USD}^{Yesterday} \pm Transactions$$

Reconcile Variation Margins of Futures Positions

Reconciling variation margin is a good way to ensure futures positions are in sync with the transactions.

Ensure	How
 Futures positions and variation margins are in sync P&L that are marked-to-market daily. 	✓ Reconcile margin balances at the end of each day = variation margin balances of the previous day +/- the futures P&L of the day

$$Margin_{USD}^{Today} = Margin_{USD}^{Yesterday} \pm FuturesP\&L$$

Portfolio	Begin Date	End Date Se	ecurity Id	Issuer	CHECK	Begin Value	FLOW	Ending Value	Difference
PF1	1/1/2022	1/3/2022 CA	ASHCA	CASH - CA	LocalCashFlow	338,991.44	-	83,507.90	(255,483.54)
PF1	1/1/2022	1/3/2022 88	80789AD4	TERANET INC	UnitCount	4,476,607.00	-	4,478,211.00	1,604.00
PF1	1/5/2022	1/5/2022 M	1ARGINCA	CASH MARGIN	Local Cash Flow	2,018,641.54	(697,500.00)	1,320,652.12	(489.42)

Corrections

Transactions are most likely to be corrected between their trade and settlement dates but can occur later before the month is closed.

Ensure	How			
 All transaction corrections are reflected in the performance results. 	 ✓ Reloading systematically holdings and transactions for the past 3 days. ✓ At month end, when the portfolio accounting books are closed, reload holdings and transactions for every day of the month. ✓ Then close performance records 			
 Back dated correction are processed across all portfolios 	✓ Record of backdated pricing adjustments and their impact on reported performance should be retained in accordance with regulatory requirements so that firms can substantiate all reported performance. This may take the form of an audit trail.			

Other considerations

- Closed periods
- Transaction correction with effective date

External Cash flow timing assumption

Timing of external cash flows have impact on return of portfolio.

External cash flows = exogenous; originating from outside the portfolio. Cash Deposit / Withdrawal

Ensure	How
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Reflect when the money is available to invest.

✓ Define rules to establish cash flow assumptions.

	Deposit		Withdrawal	
	Begin	End	Begin	End
MV0	200	200	200	200
CF	100	100	-110	-110
MV1	330	330	110	110
Num	30	30	20	20
Beg/End Day	BOD	EOD	BOD	EOD
F	1	0	1	0
WCF	100	0	-110	0
Denom	300	200	90	200
ROR	10%	15%	22%	10%

Internal Cash flow timing assumption

Timing of internal cash flows have impact on return of the securities, sectors and asset classes. E.g. purchase and sales assumed at the begin vs end of day.

Ensure	How
 Reflect proper timing of transactions. 	✓ Purchase BOD, Sale EOD✓ Ensure net weighted flow = 0

	Purchase		Sale	
	Begin	End	Begin	End
MV0	0	0	100	100
CF	100	100	-110	-110
MV1	110	110	0	0
Num	10	10	10	10
F	1	0	1	0
WCF	100	0	-110	0
Denom	100	0	-10	100
ROR	10%	#DIV/0!	-100%	10%
Contrib	2.0%	2.0%	2.0%	2.0%

Purchase		Sal	е
Begin	End	Begin	End
100	100	200	200
100	100	-220	-220
220	220	0	0
20	20	20	20
1	0	1	0
100	0	-220	0
200	100	-20	200
10%	20%	-100%	10%
<i>1</i> 0%	<i>1</i> 0%	<i>4</i> 0%	<i>4</i> 0%

EXCHANGE RATES

Positions & Transactions

Ensure	How
 Market values of foreign securities converted to home base currency at correct FX rate. 	✓ Load local (foreign) and base (home) values✓ Infer implicit FX rates.
 FX rates consistent across portfolios. 	✓ Compare implicit FX rates across portfolios.
 FX rates consistent across securities (within portfolio). 	✓ Compare implicit FX rates across securities within portfolios.
 FX rates consistent with benchmark 	✓ Compare implicit FX rates against benchmark.

Considerations

- Multiple FX rate sources.
- Priority ranking
- Internal analysis / attribution

SECURITY PRICING

Consistent across portfolios

Ensure security prices	How
Exist for all securities.	✓ Inventory securities actively held in portfolios.✓ Validate prices exist for all securities (on any given day)
Exist on all business days	✓ Validate prices exist for all business days.
 Reflect current market prices. 	✓ Validate security prices changed from day to day.
 Consistent across portfolios 	✓ Compare securities price across portfolios.

SECURITY PRICING

Consistent vs Benchmarks

Ensure	How
 Security prices are consistent with benchmark 	✓ Infer and compare security prices between portfolio and benchmark. Identify acceptable threshold.
 Identify impact of different price sources between portfolio vs benchmark 	✓ Calculate model portfolio using benchmark prices.
 Support for multiple price sources 	✓ Implement price sources hierarchy

PERFORMANCE MONITORING

Identify Outliers

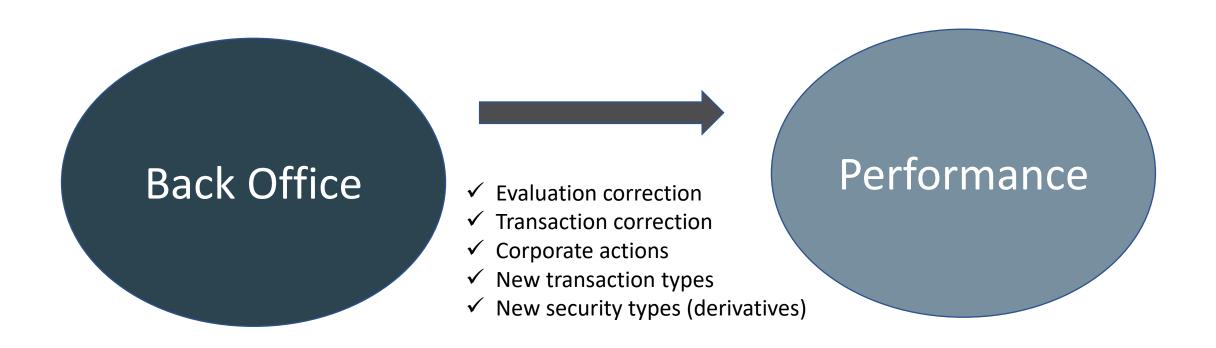
Comparing returns across accounts and benchmark is a good way to identify anomalies. Returns can be monitored at all levels such as total **portfolio**, **asset classes**, **sectors** and **securities**.

Ensure	How
 Accounts performance consistent Peer accounts Benchmark 	 ✓ Identify outliers in peer accounts (Composites) ✓ Performance attribution against Other accounts Model account Benchmark
 Securities performance consistent Peer accounts Benchmark 	 ✓ Identify security level return outliers across peer accounts. ✓ Security Level Attribution against Other accounts Model account Benchmark ✓ Isolate pricing source difference from security selection.

OTHER TOPICS DISCUSSED

Topic	Ensure
 Data file integrity 	 ✓ Record counts actual versus declared (header/trailer record) ✓ Actual date of records versus declared.
Contemporary data.	✓ Verify dates of records are contemporary (recent) unless loading historical data.
 Security classification 	✓ E.g. sector change. Monitor security classifications
 Security master information 	✓ Monitor 3 rd party data metrics
Derivative instrumentsExchange trader, OTC's	 ✓ Notional exposure, marked-to-market, variation margins ✓ Metrics: multiplier, price, delta
Look-through	✓ Disclose exposures pooled funds, ETF, Futures
Illiquid assets	✓ Ensure security prices are reflecting fair market values
 Private equities, Real assets 	✓ 3 months lag evaluation

PROACTIVE COMMUNICATION



Communication Procedures



Questions or Comments

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