

## Response of the Global Legal Entity Identifier Foundation (GLEIF) to the Office of Management and Budget (OMB) on the Draft Federal Grants Management Data Standards for Feedback

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**The Global Legal Entity Identifier Foundation (GLEIF) is pleased to provide a response to the Office of Management and Budget (OMB) on the Draft Federal Grants Management Data Standards for Feedback.**

GLEIF will focus its comments on the use of the Legal Entity Identifier (LEI) for Data Element #89 GRMLegalEntityUniqueID.

In 2011, the Group of Twenty (G20) called on the [Financial Stability Board \(FSB\)](#) to provide recommendations for a global [Legal Entity Identifier \(LEI\)](#) and a supporting governance structure. Several US federal agencies are members of the LEI ROC including the Board of Governors of the Federal Reserve System, the Department of the US Treasury Office of Financial Research (OFR), the Securities and Exchange Commission, the Commodity Futures Trading Commission (CFTC), the Federal Deposit Insurance Corporation (FDIC), the Office of the Comptroller of the Currency (OCC) and the Consumer Financial Protection Board (CFPB). This led to the development of the Global LEI System which, through the issuance of LEIs, now provides unique identification of legal entities participating in financial transactions across the globe.

The LEI is based on an international standard. The LEI is a 20-digit, alpha-numeric code based on the ISO 17442 standard developed by the International Organization for Standardization (ISO). The LEI code connects to key reference information that enables clear and unique identification of legal entities.

Currently, more than 1.3 million organizations have obtained LEIs worldwide, which of 180,599 LEIs have been issued for the legal entities domiciled in the United States.

The Global LEI System defines uniqueness ensuring that each LEI code is issued only once and no entity should have more than one LEI. Prior to issuance of the LEI, there are two levels of checks for duplicates in the Global LEI System – one at the LEI issuer within its own database and the second from the LEI issuer

to the Global LEI Foundation across all LEIs issued or in the process of being issued. LEIs also never are reused or re-issued and historical information is archived and not deleted from the Global LEI system.

First, GLEIF proposes that the Global LEI System can be leveraged by the OMB as a data source. The LEI code itself could be used specifically for Data Element #89 GRMLegalEntityUniqueID.

Although the initial introduction of the LEI was for financial regulatory purposes, the usefulness of the LEI can be leveraged for any purpose in identity management for legal entities both by the public and private sectors. The global LEI index is the only global, publicly-available, free online source that provides open, standardized and high-quality legal entity data while avoiding lock-in and cost with vendor proprietary identifiers. No other global and open entity identification system has committed to a comparable strict regime of regular data verification.

LEI records are geocoded for both, legal address and headquarters address of the legal entity represented. Given all geocode data can be provided in machine readable format, either XML, JSON, CSV or Excel format, GLEIF would like to highlight that LEI code already contains key information for below draft data elements listed by OMB:

*Data Element #88 GRMLegalEntityName*

*Data Element #93 GRMLegalEntityAddressLine1Text*

*Data Element #94 GRMLegalEntityAddressLine2Text*

*Data Element #95 GRMLegalEntityCityName*

*Data Element #98 GRMLegalEntityZipPostalCode*

*Data Element #99 GRMLegalEntityCountryCode*

Hence, leveraging the LEI by OMB would help to create standardization of the identification of legal entities across US federal agencies and the LEI reference data would include several data elements containing key information needed by OMB.

Moreover, to date, no identifier system exists in the social sector to uniquely identify nonprofits, thereby hampering the sector's ability to exchange information about a nonprofit's existence, much less effectiveness, results, and activities. GLEIF is engaging in dialogue with important organizations involved

in tracking grants distribution or the products of research studies to leverage the LEI as an identifier for this sector. For example, GuideStar, the world's leading provider of information about nonprofit sector, is discussing with GLEIF the applicability of the LEI for nonprofits.

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