Guiding Document for the Transition Period
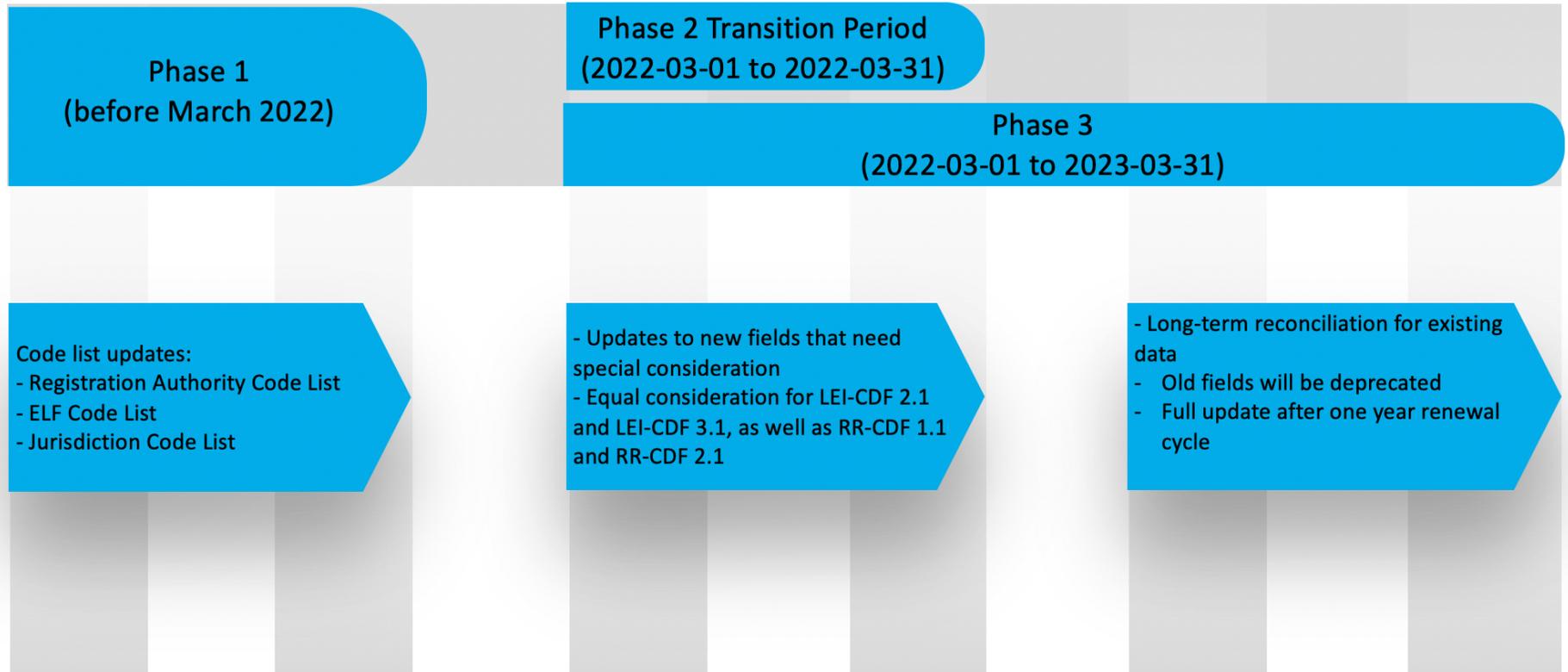
Overview of transition timeline and action items

Transition Overview

**Phase 1
(before March 2022)**

**Phase 2 Transition Period
(2022-03-01 to 2022-03-31)**

**Phase 3
(2022-03-01 to 2023-03-31)**

Code list updates:
- Registration Authority Code List
- ELF Code List
- Jurisdiction Code List

- Updates to new fields that need special consideration
- Equal consideration for LEI-CDF 2.1 and LEI-CDF 3.1, as well as RR-CDF 1.1 and RR-CDF 2.1

- Long-term reconciliation for existing data
- Old fields will be deprecated
- Full update after one year renewal cycle

Phase 1 (before March 2022)
From May to December 2021, GLEIF will publish updates to all code lists to accommodate the ROC policy implementations. This includes the Registration Authorities List, Entity Legal Form Code List, and the GLEIF Accepted Jurisdictions Code list.

Phase 2 Transition period (March 1, 2022 to March 31, 2022)
Newly added/updated fields and values
During Phase 2, users will need to create new scripts for processing LEI and LEI reference data if these data elements are used for monitoring or reporting. Importantly, LEI Issuers will deliver to GLEIF LEI reference data in either LEI-CDF 2.1 and RR-CDF 1.1 or LEI-CDF 3.1 and corresponding RR-CDF 2.1. Users of the Global LEI Repository will only receive information in LEI-CDF 3.1 and RR-CDF 2.1 formats. Therefore, it is important that users convert fully to the new XML format as of March 1, 2022.

The remainder of this section describes how users will need to adjust their consumption of the Global LEI Repository to accommodate this Phase 2.

Updated/New Data Field	Xpath	Potential Impact	Action Needed from Users
Entity Category	/lei:LEIData/lei:LEIRecords/lei:LEIRecord /lei:Entity/lei:EntityCategory	The new values RESIDENT_GOVERNMENT_ENTITY, INTERNATIONAL_ORGANIZATION and GENERAL would affect users who have not adopted the new CDF format.	Allow RESIDENT_GOVERNMENT_ENTITY, INTERNATIONAL_ORGANIZATION and GENERAL in Entity Category field. Two aspects need to be considered: 1. Government entities and international organizations are currently not identified. During Phase 2, some entities may be categorized with the new values, but there is no guarantee for all of them.

Updated/New Data Field	Xpath	Potential Impact	Action Needed from Users
			2. During Phase 2, LEIs with empty entity category field and the ones exhibiting the value GENERAL shall be treated equally.
Entity Status	/lei:LEIData/lei:LEIRecords/lei:LEIRecord /lei:Entity/lei:EntityStatus	The new status NULL could affect some users as the NULL value will be applied to LEIs with a status of ANNULLED or DUPLICATE, or for LEIs issued for a FUND entity in a jurisdiction (e.g., Spain), where the existence of an LEI is a prerequisite to be able to register the fund entity itself.	Allow NULL in Entity Status field During Phase 2, ANNULLED and DUPLICATE LEIs will start exhibiting Entity Status NULL. The process lasts until all ANNULLED and DUPLICATE records have transferred their Entity Status (from ACTIVE/INACTIVE to NULL).
Legal Entity Events Type	/lei :LEIData/lei :LEIRecords/lei :LEIRecord/lei :Entity/ lei :LegalEntityEvents/lei : LegalEntityEvent/ lei :LegalEntityEventType	The newly added field would affect users who are tracking legal entity status and entity expiration date/reason change and successor entities.	Add Legal Entity Events Type field in database structure. Value could be CHANGE_LEGAL_NAME, CHANGE_OTHER_NAMES, CHANGE_LEGAL_ADDRESS, CHANGE_HQ_ADDRESS, CHANGE_LEGAL_FORM, ACQUISITION_BRANCH, TRANSFORMATION_BRANCH_TO_SUBSIDIARY, TRANSFORMATION_SUBSIDIARY_TO_BRANCH, TRANSFORMATION_UMBRELLA_TO_STANDALONE, DISSOLUTION, BREAKUP, MERGERS_AND_ACQUISITIONS, DEMERGER, SPINOFF, BANKRUPTCY, VOLUNTARY_ARRANGEMENT, INSOLVENCY, ABSORPTION or REVERSE_TAKEOVER.

Updated/New Data Field	Xpath	Potential Impact	Action Needed from Users
			Please note that the legal entity events are grouped into three priority groups, and only events that are regarded as high priority by the Regulatory Oversight Committee (ROC) and data collection is expected to begin for the high priority events by March 31, 2022.

The following events are considered as high priority events: CHANGE_LEGAL_NAME, CHANGE_OTHER_NAMES, CHANGE_LEGAL_ADDRESS, CHANGE_HQ_ADDRESS, CHANGE_LEGAL_FORM, ACQUISITION_BRANCH, TRANSFORMATION_BRANCH_TO_SUBSIDIARY, TRANSFORMATION_SUBSIDIARY_TO_BRANCH, TRANSFORMATION_UMBRELLA_TO_STANDALONE, DISSOLUTION.

Medium priority legal entity events include: BREAKUP, MERGERS_AND_ACQUISITIONS, DEMERGER, SPINOFF.

Low priority legal entity events include: BANKRUPTCY, VOLUNTARY_ARRANGEMENT, INSOLVENCY, ABSORPTION, REVERSE_TAKEOVER.

LOUs can begin data collection for medium priority and low priority events before required by the ROC. |

Updated/New Data Field	Xpath	Potential Impact	Action Needed from Users
			During Phase 2, users should consider entities that ceased to operate in Legal Entity Event Container as well as Entity Expiration Date and Entity Expiration Reason fields.
Registration Status	/lei:LEIData/lei:LEIRecords/lei:LEIRecord /lei:Registration/lei:RegistrationStatus	The deprecation of the "MERGED" status could affect some users who track legal entity event with this value which going forward will be represented by the RETIRED status.	Remove MERGED from the Registration Status field. Please note the use of the Merger event in the deprecation of the Registration Status MERGED and the usage of the DISSOLUTION event in the deprecation of Entity Expiration Date and Entity Expiration Reason. During Phase 2, users should consider LEIs with MERGED status to be equivalent to LEIs with Legal Entity Events Type being MERGERS_AND_ACQUISITIONS and Registration Status being RETIRED.
Relationship Type	/rr:RelationshipData/rr:RelationshipRecords/rr:RelationshipRecord /rr:Relationship/rr:RelationshipType	The newly added fund relationship types could affect users who only track direct and ultimate parent information, international branch information or derive relationship statistics from the RR file. The deprecated field Associated Entity could affect users who previously track fund relationships with this field.	Allow IS_FUND-MANAGED_BY, IS_SUBFUND_OF and IS_FEEDER_TO in Relationship Type field. During Phase 2, LEIs with Relationship Type IS_FUND-MANAGED_BY should be treated equally as LEIs with Associated Entity Type being FUND_FAMILY.
Relationship Status	/rr:RelationshipData/rr:RelationshipRecords/rr:Relati	The new status NULL could affect some users as	Allow NULL in Relationship Status field.

Updated/New Data Field	Xpath	Potential Impact	Action Needed from Users
	onshipRecord /rr:Relationship/rr:Relation shipStatus	the NULL value will be applied to LEIs with a status of ANNULLED or DUPLICATE, or for LEIs issued for a FUND entity in a jurisdiction (e.g., Spain), where the existence of an LEI is a prerequisite to be able to register the fund entity itself.	During Phase 2, LEIs with Entity Status NULL should be treated equally as LEIs with Registration Status ANNULLED or DUPLICATE in RR.

Phase 3 (March 1, 2022 to March 31, 2023)

Reconciliation for existing data means that data will only become available at time of new LEI issuance or renewal of existing LEIs. Since the renewal cycle in the Global LEI System is one year, users cannot be sure that queries of the active and verified LEI population yield full information until end of March 2023.

Updated/New Data Field	Xpath	Potential Impact	Action Needed from Users
Entity Category	/lei:LEIData/le i:LEIRecords/l ei:LEIRecord /lei:Entity/lei:E ntityCategory	The new values RESIDENT_GOVERNMEN T_ENTITY, INTERNATIONAL_ORGA NIZATION and GENERAL would affect users who have	Allow RESIDENT_GOVERNMENT_ENTITY, INTERNATIONAL_ORGANIZATION and GENERAL in Entity Category field.

		not adopted the new CDF format.	
Entity Sub Category	/lei:LEIData/lei:LEIRecords/lei:LEIRecord/lei:Entity/lei:EntitySubCategory	The newly added field would affect users who do not migrate to the new CDFs who are taking in LEI data for Government Entities.	Add Entity Sub Category field in database structure. It applies to EntityCategory being RESIDENT_GOVERNMENT_ENTITY, and values could be STATE_GOVERNMENT, LOCAL_GOVERNMENT, or SOCIAL_SECURITY.
Entity Creation Date	/lei:LEIData/lei:LEIRecords/lei:LEIRecord/lei:Entity/lei:EntityCreationDate	This newly added field could affect users as this date will be included for each new LEI assigned as of the implementation of the new CDFs.	Add Entity Creation Date field in database structure.
Legal Entity Events Type	/lei:LEIData/lei:LEIRecords/lei:LEIRecord/lei:Entity/lei:LegalEntityEvents/lei:LegalEntityEvent/lei:LegalEntityEventType	The newly added field would affect users who are tracking legal entity status and entity expiration date/reason change and successor entities.	Add Legal Entity Events Type field in database structure. Value could be CHANGE_LEGAL_NAME, CHANGE_OTHER_NAMES, CHANGE_LEGAL_ADDRESS, CHANGE_HQ_ADDRESS, CHANGE_LEGAL_FORM, ACQUISITION_BRANCH, TRANSFORMATION_BRANCH_TO_SUBSIDIARY, TRANSFORMATION_SUBSIDIARY_TO_BRANCH, TRANSFORMATION_UMBRELLA_TO_STANDALONE, DISSOLUTION, BREAKUP, MERGERS_AND_ACQUISITIONS, DEMERGER, SPINOFF, BANKRUPTCY, VOLUNTARY_ARRANGEMENT, INSOLVENCY, ABSORPTION or REVERSE_TAKEOVER. Please note that the legal entity events are grouped into three priority groups, and only events that are regarded as high priority by the Regulatory Oversight Committee (ROC) and data collection is expected to begin for the high priority events by March 31, 2022.

			The following events are considered as high priority events: CHANGE_LEGAL_NAME, CHANGE_OTHER_NAMES, CHANGE_LEGAL_ADDRESS, CHANGE_HQ_ADDRESS, CHANGE_LEGAL_FORM, ACQUISITION_BRANCH, TRANSFORMATION_BRANCH_TO_SUBSIDIARY, TRANSFORMATION_SUBSIDIARY_TO_BRANCH, TRANSFORMATION_UMBRELLA_TO_STANDALONE, DISSOLUTION. Medium priority legal entity events include: BREAKUP, MERGERS_AND_ACQUISITIONS, DEMERGER, SPINOFF. Low priority legal entity events include: BANKRUPTCY, VOLUNTARY_ARRANGEMENT, INSOLVENCY, ABSORPTION, REVERSE_TAKEOVER. LOUs can begin data collection for medium priority and low priority events before required by the ROC.
Legal Entity Event Effective Date	/lei:LEIData/lei:LEIRecords/lei:LEIRecord/lei:Entity/ lei:LegalEntityEvents/lei:LegalEntityEvent/lei:/ lei:LegalEntityEventEffectiveDate	See above.	Add Legal Entity Event Effective Date field in database structure.
Legal Entity Event Recorded Date	/lei:LEIData/lei:LEIRecords/l	See above.	Add Legal Entity Event Recorded Date field in database structure.

	ei:LEIRecord/lei:Entity/ lei:LegalEntity Events/lei:Leg alEntityEvent/ lei:LegalEntity EventRecorded Date		
Validation Documents	/lei:LEIData/le i:LEIRecords/l ei:LEIRecord/l ei:Entity/ lei:LegalEntity Events/lei:Leg alEntityEvent/ lei:Validation Documents	Newly added values to this field could affect some users.	Add Validation Documents field in database structure. Value could be ACCOUNTS_FILING, REGULATORY_FILING, SUPPORTING_DOCUMENTS, CONTRACTS or OTHERS.
Validation Reference	lei:LEIData/lei :LEIRecords/le i:LEIRecord/le i:Entity/ lei:LegalEntity Events/lei:Leg alEntityEvent/ lei:ValidationR eference	Newly added values to this field could affect some users.	Add Validation Reference values.
Affected Field	lei:LEIData/lei :LEIRecords/le i:LEIRecord/le i:Entity/ lei:LegalEntity Events/lei:Leg	The newly added field could affect some users if they do not have this field in system.	Add Affected Field field in database structure.

	alEntityEvent/ lei:AffectedFie lds/lei:Affecte dField		
Successor Entity	/lei:LEIData/le i:LEIRecor ds/lei:LEIR ecord /lei:Entity/l ei:Successo rEntity /lei:LEIData/lei: LEIRecords/ lei:LEIRecor d /lei:Entity/le i:SuccessorE ntity/lei:Suc cessorLEI /lei:LEIData/le i:LEIRecords/l ei:LEIRecord /lei:Entity/lei:S uccessorEntity/ lei:SuccessorE ntityName	Cardinality changed from having max one successor entity to unbounded number of successor entities.	Handle multiple successor (due to different Legal Entity Events, which could lead to split, demerger, etc.)
Relationship Type	/rr:Relationshi pData/rr:Relati onshipRecords /rr:Relationshi pRecord /rr:Relationshi	The newly added fund relationship types could affect users who only track direct and ultimate parent information, international branch information or derive relationship statistics from the	Allow IS_FUND-MANAGED_BY, IS_SUBFUND_OF and IS_FEEDER_TO in Relationship Type field.

	p/rr:Relationsh ipType	RR file. The deprecated field Associated Entity could affect users who previously track fund relationships with this field.	
Relationship Qualifier Category	/rr:Relationshi pData/rr:Relati onshipRecords /rr:Relationshi pRecord /rr:Relationshi p/rr:Relationsh ipQualifiers	The new value GOVERNMENT_ACCOUN TING_STANDARD could affect some users.	Allow GOVERNMENT_ACCOUNTING_STANDARD in Relationship Qualifier Category field.

Transition Complete (April 1, 2023)

From this date onward, all existing LEIs having a last renewal date greater than 1 April 2022 and all LEIs issued after this date will have complete government entity, fund relationships, and legal entity events data collected (as applicable)[1].

Appendix : Deprecated fields[2]

Deprecated field	Xpath	Comment
Associated Entity	/lei:LEIData/lei:LEIRecords/lei:LEIRecord/lei:Entity /lei:AssociatedEntity	The information will be consistently provided in the fund relationship related fields.

---

[1] GLEIF is expecting to receive more information from the ROC regarding the required data collection for medium and low priority legal entity events.

[2] The deprecated fields will be blank only after the completion of Phase 3. During the transition, they are still available in the data. Data quality checks will be enforced to avoid discrepancies.

	/lei:LEIData/lei:LEIRecords/lei:LEIRecord/lei:Entity /lei:AssociatedEntity@type /lei:LEIData/lei:LEIRecords/lei:LEIRecord/lei:Entity /lei:AssociatedEntity/lei:AssociatedLEI /lei:LEIData/lei:LEIRecords/lei:LEIRecord/lei:Entity /lei:AssociatedEntity/lei:AssociatedEntityName	
Entity Expiration Date	/lei:LEIData/lei:LEIRecords/lei:LEIRecord /lei:Entity/lei:EntityExpirationDate	The information will be consistently provided in the Legal Entity Events related fields.
Entity Expiration Reason	/lei:LEIData/lei:LEIRecords/lei:LEIRecord /lei:Entity/lei:EntityExpirationReason	The information will be consistently provided in the Legal Entity Events related fields.