

Response of the Global Legal Entity Identifier Foundation (GLEIF) to the General Services Administration Entity Validation Services (EVS) Request for Proposal #ID15170001

September 2018

The Global Legal Entity Identifier Foundation (GLEIF) is pleased to provide comments to the General Services Administration Entity Validation Services (EVS) Request for Proposal #ID15170001. GLEIF will focus its comments on the use of the Legal Entity Identifier (LEI) in the consultation.

The Global Legal Entity Identifier Foundation (GLEIF) is pleased to provide a response to the General Services Administration Entity Validation Services (EVS) Request for Proposal #ID15170001.

GLEIF will focus its comments on the use of the Legal Entity Identifier (LEI) in the RFP.

GLEIF has responded to two previous Requests for Information (RFIs) from the GSA providing background information on the LEI itself as well as on the origin, purpose, governance, operational structure and services performed for the Global LEI System.

The Global LEI System provides a unique environment for collaborative implementation of the specified entity validation services. GLEIF can support any providers that will be chosen by GSA to assign the LEI identifiers. This role will be necessary to piece together all of the providers using the LEI as the linchpin for identification going forward in the GSA programs. GLEIF also offers to be part of the Project Team for the implementation of the Entity Validation Services project.

GLEIF manages a network of global partners to provide identification management services in which each issuer of LEIs is required to adhere to the GLEIF Service Level Agreement for LEI services. The use of the same processes globally ensures consistent services across all LEI Issuers but allows for each jurisdiction's legal registration requirements to be met.

The operational integrity of the Global LEI System is ensured through services provided by GLEIF such as the accreditation of LEI issuing organizations. In its role as accreditation agency, GLEIF evaluates the suitability of organizations issuing LEIs to legal entities. GLEIF is subject to the oversight of the GLEIF LEI Regulatory Oversight Committee (<u>www.leiroc.org</u>) which includes several U.S. regulators as members.

Accreditation is a rigorous evaluation process carried out by GLEIF. Candidate organizations must meet the requirements set out in the Master Agreement. Further, GLEIF will verify annually whether organizations accredited to issue and maintain LEIs continue to meet the requirements with regard to service orientation and quality set out in the Master Agreement.

Requiring adherence to service levels is a necessary component of maintaining the high level of data quality of the Global LEI System. The GLEIF Data Quality Management program monitors and publishes



reports on LEI data quality as well as for each LEI Issuer. The GLEIF data quality management program ensures that the LEI remains the standard for both the public and private sectors best suited to providing open and reliable data for unique legal entity identification management.

GLEIF remains available to discuss any further details that the GSA may require as it conducts the RFP for entity validation services.