

Response of the Global Legal Entity Identifier Foundation (GLEIF) to the General Services Administration and Chief Data Officers Council on the Request for Information on behalf of the Federal Chief Data Officers Council

November 2021

The Global Legal Entity Identifier Foundation (GLEIF) is pleased to provide comments to the General Services Administration (GSA) and Chief Data Officers Council (CDO) on behalf of the Federal Chief Data Officers Council to Question 4, Data Sharing.

First, some background information on the LEI and GLEIF.

The Legal Entity Identifier (LEI) itself is a 20-digit, alpha-numeric code based on the ISO 17442 standard developed by the International Organization for Standardization (ISO). The code connects to key reference information that enables clear and unique identification of legal entities participating in financial transactions including their ownership structure. The LEI and its associated reference data are accessible to all as open, public data.

Established by the Financial Stability Board in June 2014 under the mission of improving financial stability and transparency due to the aftermath of the financial crisis, GLEIF is tasked to support the implementation and use of the LEI. Even though the primary and initial usage and adoption of the LEI predominantly was in financial markets and financial instruments, the LEI is use agnostic and therefore has been embraced by different industry sectors and regulators since its introduction by the Regulatory Oversight Committee and the Financial Stability Board in 2012. Further details on the use of the LEI in regulatory initiatives is provided [here](#).

GLEIF would like to provide combined comments to Section 4, Data Sharing:

The LEI is the only global standard for legal entity identification. There are innumerable national or regional standards for entity identification across the world. Different identifiers might serve the national needs, however, create conflicts and inefficiencies when it comes to the reconciliation of data across borders. Research conducted by GLEIF and Data Coalition demonstrates that the U.S. federal government alone uses 50 distinct entity identification systems—all of which are separate and incompatible with one another. Therefore, the LEI responds to the critical need for a universal system of identifying entities across markets, products, and regions. Instead of using/accepting multiple identifiers, the CDO could leverage the LEI, as an established open source identifier, to harmonize and share critical data among federal agencies.

By contrast, proprietary identification schemes are not open and therefore limit data sharing as a result of their licensing agreements. Moreover, proprietary identification schemes are expensive and can increase in spend when data sharing among multiple agencies increases.

The value proposition of LEI has been recognized by several U.S. regulators, including the Commodities Future Trading Commission (CFTC), Federal Reserve, Consumer Financial Protection Bureau, National Association of Insurance Commissioners and U.S. Treasury. The LEI currently exists in 29 various U.S.

laws and regulations and globally the LEI exists in 126 laws and regulations. Moreover, there are 3 active consultations that specifically mention the LEI from [U.S. Customs and Board Protection](#), [Federal Reserve](#) and [The Consumer Financial Protection Bureau](#). Consultations and amendments to existing requirements are opportunities to re-consider existing identifier schemes with longer term vision for a broader, standardized and consistent use of global standards and open sharing across US agencies.

The Foundation for Evidence-based Policy Making Act of 2018 (Evidence Act) requires that data be open and be shared across federal agencies. Furthermore, President Biden’s Memorandum on Restoring Trust in Government Through Scientific Integrity and Evidence-Based Policymaking further supports the Evidence Act:

“(d) Consistent with the provisions of the Foundations for Evidence-Based Policymaking Act of 2018, heads of agencies shall, as appropriate and consistent with applicable law, expand open and secure access to Federal data routinely collected in the course of administering Federal, State, local, Tribal, or territorial government programs or fulfilling Federal, State, local, Tribal, or territorial government mandates..”

GLEIF encourages the CDO to adopt a global approach to organizational identity so as to avoid the negative impacts of a siloed approach. The inclusion of multiple identification systems impacts users to engage in name matching and dealing with differences in identifier standards for translation, transliteration, and abbreviation, all of which are costly and prone to error. Therefore, GLEIF believes the key issue is to ensure a holistic and accurate identification system of knowing ‘who is who’ and ‘who owns whom’, which the LEI facilitates as a globally recognized identifier across 200+ jurisdictions.

Federal agencies could also benefit from data that accompanies a LEI record. For example, company name and address (legal and headquarters), can be automatically retrieved or verified from an LEI record. All LEI data is validated and verified by LEI issuers against authoritative sources which results in a trusted source of entity data. LEI issuers are rigorously accredited by GLEIF and renewed annually. GLEIF also facilitates mapping through an [open-API](#), which is available at no costs to end users.

Lastly, in terms of engaging with the private sector and data vendors, GLEIF would be pleased to further engage with the CDO on this topic and provide further information. GLEIF maintains a [Vendor Relationship Group](#), which includes many of the world’s largest financial data providers. GLEIF would be willing to coordinate meeting with this group, as needed.