

To the Authorized Officials of Holding Companies (HCs), Foreign Banking Organizations (FBOs), and Unaffiliated State Member Banks:

The Federal Reserve has integrated the use of the universal Legal Entity Identifier (LEI) into its organizational structure data collections to enable improved analysis, particularly during stressed market conditions. The LEI is a 20-digit, alpha-numeric code that connects to key reference information, thereby enabling clear and unique identification of companies participating in global financial markets.

Holding companies with an existing LEI were required to report it as part of the contact information provided on the cover page of the *Annual Report of Holding Companies* (FR Y-6) effective with fiscal year-ends beginning October 31, 2014, and on the *Report of Changes in Organizational Structure* (FR Y-10) effective October 31, 2014.

The Federal Reserve is expanding the collection of LEIs to include all banking and nonbanking legal entities reportable on the Banking, Nonbanking, Savings and Loan (SLHC), and 4(k) schedules (not the Branch schedules) of the FR Y-10, and on the Organization Chart provided as part of the FR Y-6, only if an LEI has already been issued for the reportable entity at the time of submission. As recently published in the *Federal Register*, the Federal Reserve delayed the implementation date for the expanded collection of LEIs, from June 30, 2015, to December 31, 2015, in response to comments it received.

There will be a one-time information collection to populate existing LEI data for all FR Y-10 reportable entities (excluding branches). The one-time collection will be effective December 31, 2015, with submissions due no later than January 30, 2016. **If neither your holding company nor any of its reportable entities have an LEI, it is not required to obtain one for the sole purpose of reporting the LEI on the FR Y-6 or FR Y-10.** LEIs that have not been renewed (lapsed LEIs) should not be included as part of the one-time collection. If you are unsure about the existence of LEIs for entities in your organization, please search the www.gmeiutility.org website.

If you have not already done so, please complete these items for your top-tier holding company and **respond as soon as possible** via email to mpls.statistics@mpls.frb.org.

Legal Name of Top-Tier Holding Company _____

_____ Yes, we have LEIs to report, OR

_____ No, we do not have any LEIs to report

On or around January 6, 2016, Reserve Banks will use the Yes responses to provide spreadsheets populated with the legal name, RSSD, city, and state for each entity in the structure of those organizations that have confirmed the existence of an LEI. Those holding companies will then need to update their respective spreadsheets with the LEI information for the applicable entities and submit it to the Federal Reserve Bank of Minneapolis no later than January 30, 2016.

Going forward, any new LEIs issued after December 31, 2015, must be reported to the Federal Reserve on the appropriate FR Y-10 schedules within 30 days of their issuance. The FR Y-10 Online electronic submission tool and the FR Y-10 report form will be updated to include the LEI on the Banking, Nonbanking, Savings & Loan, and 4(k) schedules effective December 31, 2015. Also, the collection of LEI information will follow the normal FR Y-6 submission deadline (90 days after a reporting entity's fiscal year-end).

If you have any questions regarding the collection of LEIs, please contact Statistical & Structure Reporting at 612-204-6445, (888) 887-0926 (toll-free), or mpls.statistics@mpls.frb.org.