The 2013 NAIC Annual Statement and 2014 Quarterly Statement Instructions, for all detail investment schedules, include a new electronic only column for the Legal Entity Identifier (LEI). As clarification of this proposal (2012-30BWG) adopted by the Blanks (E) Working Group during the 2012 Summer National Meeting, only the LEI number is to be reported in the LEI field and only if available. If one is not available (or has not been assigned), leave the field blank.

1. What is a LEI?
   - The Legal Entity identifier (LEI) program is designed to create and apply a single, universal standard identifier on an international basis to any organization or firm involved in a financial transaction. Such an identifier for each legal entity would allow regulators to conduct more accurate analysis of global, systemically important financial institutions and their transactions with all counterparties across markets, products and regions, allowing regulators to better identify concentrations and emerging risks. It will also allow local regulators to realize these same benefits. For risk managers in financial institutions, the LEI will increase the effectiveness of tools aggregating their exposures to counterparties.

2. Are LEIs currently available?
   - As of December 2013, the LEI is not yet fully implemented and operational; however, the Charter for the Regulatory Oversight Committee (ROC) has been tasked with taking forward the planning and development work to launch the global LEI system. Updates regarding the status of the global LEI system can be found at www.leiroc.org.

3. Is a CFTC Interim Compliant Identifier (CICI) or the pre-LEIs to be reported in the LEI field?
   - Per the CFTC August 21, 2012, release, “CICIs are interim legal entity identifiers which will be used by registered entities and swap counterparties in complying with the CFTC’s swap data reporting regulations. Once the global LEI system is implemented and operational, the CFTC anticipates that the CICI will transition into the global LEI system.”
   - For NAIC reporting purposes, the CICIs and pre-LEIs are not LEIs unless and until it transitions into the global LEI system. Companies can include the CICIs or pre-LEIs in the LEI field but are not required.

4. Once the global LEI program is fully implemented and operational, will a US insurer be required to obtain a LEI?
   - The NAIC has not adopted any requirement for insurers to obtain LEIs. An insurer would need to comply with any specific state requirement to obtain a LEI, but NAIC staff members are currently not aware of any states planning to require this. However, insurers issuing derivative contracts and other securities will need to comply with any federal requirements in this regard.