

Following the first filing of FATCA returns and exchange with the United States, Revenue wish to advise Financial Institutions of the following changes to file validation, which will be applied to the filing of FATCA 2015 financial account information in 2016, and to subsequent filings.

Financial Institutions should note that Revenue will allow a standard naming convention and an alternative naming convention. Financial Institution should apply one or other of these naming conventions and the two naming conventions cannot be mixed. For example, where a Financial Institution chooses the alternative naming convention for the MessageRefID element, the alternative naming convention for the DocRefID element must also be used. This is to ensure compliance with the IRS validation of the DOCREFID which must start with the GIIN and a full stop.

1. Xml schema element reference – MessageRefID

One of the main issues experienced with FATCA xml files was in relation to this field. FI's failed to populate this field or included a reference which was duplicated in other files. Each FATCA xml file submitted by an FI should have a unique value in this field.

For FATCA files submitted to Revenue in 2016, the following naming convention should be applied for the MessageRefID field:

Element	MessageRefID
Datatype:	xsd: string
Pattern:	<Reporting FI GIIN>.<Reporting Year>_<Unique Sequence ID>
Description:	<ul style="list-style-type: none"> • <Reporting FI GIIN> is the GIIN for the reporting FI associated with the reporting group • Period character (.) • <Reporting Year> is the 4 digit reporting year that the data in the file relates to • Underscore • <Unique 4 digit Sequence ID> is a sequence id for each file being uploaded to Revenue. The first file uploaded to Revenue should have a Sequence ID of 0001, and this number should be incremented for each individual file uploaded. The sequence number must be unique within each FATCA year.
Example:	AB012R.00001.ME.372.2015_0001 Where AB012R.00001.ME.372 = Reporting FI GIIN 2015 = Reporting Year 0001 = This is the first file that this FI has uploaded to Revenue

1.1

Alternative MessageRefID Naming Convention

Element	MessageRefID
Datatype:	xsd:string
Pattern:	<TimestampWhenMessageCreated>_<ReportingFIGIIN>
Description:	<ul style="list-style-type: none"> • <TimestampWhenMessageCreated> Timestamp when the message is created in the format: YYYYMMDDTHHMMSSZ • Underscore character (_) • <ReportingFIGIIN> is the GIIN for the reporting FI associated with the reporting group
Example:	20160226T093830Z_AB012R.00001.ME.372 Where 20160226T093830Z = TimestampWhenMessageCreated AB012R.00001.ME.372= ReportingFIGIIN

2. Xml schema element reference – DocRefID

The IRS recently issued guidance in relation to the format for this field and the format should be applied to filings made from 2016 onwards. As is the case with the MessageRefID element, every record, inside every FATCA xml file submitted by an FI should have a unique value in this field. The following format is required by Revenue for standardised DocRefID's:

Element	DocRefID
Datatype:	xsd: string
Pattern:	<MessageRefID>_<Record Sequence Number> Note: This pattern conforms to the IRS schema guidance which can be found on the below link: https://www.irs.gov/Businesses/Corporations/FATCA-XML-Schemas-Best-Practices-for-Form-8966-DocRefID
Description:	<ul style="list-style-type: none"> • <MessageRefID> is the MessageRefID of the file in which the record appears – format for this outlined above • Underscore (_) • <Record Sequence Number> is a unique 10 digit sequence id that uniquely identifies the record within a particular file. For Example – the 5th record in a particular file should have Record Sequence number 0000000005
Example:	AB012R.00001.ME.372.2015_0001_0000000005 Where AB012R.00001.ME.372 = Reporting FI GIIN 2015 = Reporting Year 0001 = This is the first file that this FI has uploaded to Revenue 0000000005 = Unique 10 digit sequence id that uniquely identifies the record within a particular file

2.1 Alternative DocRefID Format

The alternative DocRefID format has a different format for the 4 elements that should contain a DocRefId. The 4 elements are:

1. Reporting FI
2. Sponsor
3. Intermediary
4. Account Report
5. Nil Report

2.1.1 Reporting FI DocRefId Format

Element	DocRefID
Datatype:	xsd:string
Pattern:	<ReportingFIGIIN>.<ReportingYear>.RF<SequenceNumber> [OPTIONAL AMENDMENT NUMBER: .A<AmendmentSequenceNumber>]
Description:	<ul style="list-style-type: none">• <ReportingFIGIIN> is the GIIN for the reporting FI associated with the reporting group.• Period character (.)• <ReportingYear> is the 4 digit reporting year that the data in the file relates to.• .RF• <SequenceNumber> is a unique ID to ensure the uniqueness of the reference.• [OPTIONAL AMENDMENT NUMBER: .A<AmendmentSequenceNumber> is used to identify an amendment. This should only be used for amendments. The AmendmentSequenceNumber should represent the amendment numbers i.e. the first amendment should have .A1.
Example:	Original: AB012R.00001.ME.372.2015.RF1 Amendment: AB012R.00001.ME.372.2015.RF1.A1

2.1.2 Sponsor DocRefId Format

Element	DocRefID
Datatype:	xsd:string
Pattern:	<SponsoringFIGIIN>.<ReportingYear>.SP<SequenceNumber>[OPTIONAL AMENDMENT NUMBER: .A<AmendmentSequenceNumber>]
Description:	<ul style="list-style-type: none">• <SponsoringFIGIIN> is the GIIN in the Sponsor element.• Period character (.)• <ReportingYear> is the 4 digit reporting year that the data in the file relates to.• .SP• <SequenceNumber> is a unique ID to ensure the uniqueness of the reference.• [OPTIONAL AMENDMENT NUMBER: .A<AmendmentSequenceNumber> is used to identify an amendment. This should only be used for amendments. The AmendmentSequenceNumber should represent the amendment numbers i.e. the first amendment should have .A1.
Example:	Original: AB012R.00001.ME.999.2015.SP1 Amendment: AB012R.00001.ME.999.2015.SP1.A1

2.1.3 Intermediary DocRefId Format

Element	DocRefID
Datatype:	xsd:string
Pattern:	<ReportingFIGIIN>.<ReportingYear>.IN<SequenceNumber>[OPTIONAL AMENDMENT NUMBER: .A<AmendmentSequenceNumber>]

Description:	<ul style="list-style-type: none"> • <ReportingFIGIIN> is the GIIN for the reporting FI associated with the reporting group. • Period character (.) • <ReportingYear> is the 4 digit reporting year that the data in the file relates to. • .IN • <SequenceNumber> is a unique ID to ensure the uniqueness of the reference. • [OPTIONAL AMENDMENT NUMBER: .A<AmendmentSequenceNumber> is used to identify an amendment. This should only be used for amendments. The AmendmentSequenceNumber should represent the amendment numbers i.e. the first amendment should have .A1.
Example:	<p>Original:</p> <p>AB012R.00001.ME.372.2015.IN1</p> <p>Amendment:</p> <p>AB012R.00001.ME.372.2015.IN1.A1</p>

2.1.4 Account Report DocRefID Format

Element	DocRefID
Datatype:	xsd:string
Pattern:	<ReportingFIGIIN>.<ReportingYear>.AR<AccountNumber>.ID<SequenceNumber>[OPTIONAL AMENDMENT NUMBER: .A<AmendmentSequenceNumber>]
Description:	<ul style="list-style-type: none"> • <ReportingFIGIIN> is the GIIN for the reporting FI associated with the reporting group. • Period character (.) • <ReportingYear> is the 4 digit reporting year that the data in the file relates to. • .AR • <AccountNumber> is the AccountNumber from the AccountReport element. • .ID • <SequenceNumber> is a unique ID to ensure the uniqueness of the reference.

Example:	<p data-bbox="587 197 689 228">Original:</p> <p data-bbox="587 264 1136 295">AB012R.00001.ME.372.2015.AR12345678.ID1</p> <p data-bbox="587 331 746 362">Amendment:</p> <p data-bbox="587 398 1177 430">AB012R.00001.ME.372.2015.AR12345678.ID1.A1</p>
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2.1.5 NilReport DocRefID Format

Element	DocRefID
Datatype:	xsd:string
Pattern:	<p><ReportingFIGIIN>.<ReportingYear>.NR<SequenceNumber>[OPTIONAL AMENDMENT NUMBER: .A<AmendmentSequenceNumber>]</p> <p>or</p> <p><ReportingFIGIIN>.<ReportingYear>.ID<SequenceNumber>[OPTIONAL AMENDMENT NUMBER: .A<AmendmentSequenceNumber>]</p>
Description:	<ul style="list-style-type: none"> • <ReportingFIGIIN> is the GIIN for the reporting FI associated with the reporting group. • Period character (.) • <ReportingYear> is the 4 digit reporting year that the data in the file relates to. • .NR • <SequenceNumber> is a unique ID to ensure the uniqueness of the reference. <p>or</p> <ul style="list-style-type: none"> • <ReportingFIGIIN> is the GIIN for the reporting FI associated with the reporting group. • Period character (.) • <ReportingYear> is the 4 digit reporting year that the data in the file relates to. • .ID • <SequenceNumber> is a unique ID to ensure the uniqueness of the reference.
Example:	<p>Original:</p> <p>AB012R.00001.ME.372.2016.NR01</p> <p>Amendment:</p> <p>AB012R.00001.ME.372.2016.NR01.A1</p>

3 Xml schema element reference –BirthDate

Reporting FIs should include a date of birth if a U.S. TIN is not available for a U.S. account holder or substantial owner. The date of birth must be properly formatted per IRS Publication 5124 and placed in the Birth Info/Birthdate sub-element of the Accountholder or Substantial Owner element, as appropriate. If a date of birth is provided in lieu of a TIN, filers should include a string of nine

consecutive zeros (“000000000”) in the TIN sub-element for the Accountholder or Substantial Owner element. This TIN should be marked with the “issuedBy” attribute set to “US”. The Account Holder TIN fields must have numeric digits in them and cannot be all blank characters in the TIN data sub-element, otherwise you will receive a “A valid TIN number must be provided in Individual element” error message and your file will be rejected.

4 Xml schema element reference –TIN

A value for a TIN data element must be either in a GIIN format or in one of the following formats for a U.S. TIN to be considered valid:

- Nine consecutive numerical digits without hyphens or other separators (e.g., “123456789”)
- Nine numerical digits with two hyphens, one hyphen entered after the third numeric digit and a second hyphen entered after the fifth numeric digit (e.g., “123-45-6789”)
- Nine numerical digits with a hyphen entered after the second digit (e.g., “12-3456789”)

The Account Holder TIN must be provided and cannot be blank characters in the TIN data sub-element. If an entity Account Holder does not have a TIN, enter all zeros in the TIN data sub-element, otherwise you will receive an error message. The “issuedBy” attribute of the TIN should be populated with a value of “US” for a US TIN.

Sequencing of TIN’s: If supplying multiple TIN numbers – i.e: an Irish TIN and a US TIN for an Account Holder, the US TIN should be the first TIN that appears in the record.

It should be noted that the inclusion of a valid US TIN will be mandatory for all accounts from 2017.

5 Character encoding

All FATCA files should be character encoded UTF-8 without Byte Order Marker (BOM).

6 How to submit corrected/amended files

The process documenting the FATCA file correction procedure is covered in the IRS FATCA schema document - *FATCA xml v1.1*. Section *IVb Account Report* of the publication outlines the procedure on how to produce a file containing updated records. Each FATCA file should only contain one type of data ie there should be no mix of “DocTypeIndic” of the values within a single file. As well as amending the file content i.e. the Account Holder information, an FI must amend the information in the following elements:

“DocTypeIndic”

“CorrMessageRefID”

“CorrDocRefID”

“ReportingFI”

“DocTypeIndic”

The schema lists a number of values which can be used in this element and the correction values applicable to this element are:

- FATCA2 = Corrected Data
- FATCA3 = Void Data
- FATCA4 = Amended Data

You will note that *FATCA xml v1.1*. also allows for the values:

- FATCA11 = New Test Data
- FATCA12 = Corrected Test Data
- FATCA13 = Void Test Data
- FATCA14 = Amended Test Data

These values should **not** be used and your file will not pass validation if they are included.

FATCA2 – the use of the FATCA 2 value in this field is used for records being re-transmitted after the IRS has notified the sender of a problem with the file or underlying data. Corrected Data should **ONLY** be used when responding to an IRS request to correct the data.

FATCA 3 - the use of the FATCA 3 value in this field is restricted to circumstances to erase previously-filed records when data needs to be re-transmitted. Only records with the following errors should be voided:

- No Account Holder or Substantial US Owner TIN
- Incorrect Account Holder or Substantial US Owner TIN
- Incorrect Account Holder or Substantial US Owner Name
- Incorrect Account Holder or Substantial US Owner Name and Address

FATCA4 - is used in circumstances where an FI wishes to submit a file which contains an amendment to a record(s) previously submitted to Revenue or the IRS.

When submitting an amended FATCA file, an FI should include one of the two above mentioned codes in this element.

“CorrMessageRefID”

When submitting a corrected return, the new xml file should refer to the MessageRefID of the original file using the CorrMessageRefId field. The FI should ensure that the new file also contains its own new unique MessageRefID in the MessageRefID element. This will allow the IRS to match the amended file message back to the original file message.

“CorrDocRefID”

All records in an amended return should also refer to the DocRefID of the original record in the original file using the CorrDocRefID field. The FI should ensure that the new file also contains its own new unique DocRefID in the DocRefID element (give further instruction as to where this is located). Again, the population of this element is to allow the IRS to match the amended file message back to the original file message.

“ReportingFI”

The ReportingFI element contains a “DocSpec” element and when submitting an amended/corrected/voiding return, the “DocTypeIndic” value must match the value being used in the records being updated. Similarly, the “CorrDocRefID and the “CorrMessageRefID” values must match the values for the records being updated. A new value should also be used in the “DocRefID” element.

7 Xml schema element reference - IId. Address_Type

Where the “AddressFixed” element is present in the file, population of the City field is mandatory.

8 Xml schema element reference - Account Number

Files which do not populate this field will fail validation.