IRAS User Guide

Foreign Account Tax Compliance Act ("FATCA") IRAS Supplementary XML Schema User Guide for Preparing the FATCA Reporting Data File

Contents

Part A   Introduction

1.   With effect from 1 April 2020, Reporting Singaporean Financial Institutions ("Reporting SGFIs") must submit all FATCA returns, including nil returns (if applicable), electronically to IRAS via the "Submit CRS or FATCA Return" e-Service at IRAS' myTax Portal. The FATCA returns should set out all the information in relation to every Reportable Account that the Reporting SGFI maintains in accordance with the United States Inland Revenue Service ("US IRS") FATCA XML Schema Version 2.0 ("FATCA XML Schema"). Correspondingly, IRAS will no longer accept FATCA returns submitted via the International Data Exchange System ("IDES"). The requirement is applicable to all submissions of new, nil, amended, corrected or void FATCA returns, including returns relating to Reporting Years 2018 and earlier.

2.   This Supplementary Guide provides additional guidance on how the information for certain data elements (e.g. MessageRefId and DocRefId) must be presented for the purpose of FATCA reporting to IRAS via myTax Portal.

3.   This Supplementary Guide should be read in conjunction with the FATCA Regulations, FATCA guidance materials and the FATCA XML Schema V2.0 User Guide (US IRS' Publication 5124). These are available on the IRAS FATCA webpage.

Part B   XML File Preparation and Submission

1.   All FATCA returns, including nil returns, must be submitted electronically to IRAS via the "Submit CRS or FATCA Return" e-Service at IRAS' myTax Portal. No paper return will be accepted.

2.   Reporting SGFIs will prepare their FATCA returns[1] in XML format and submit them to IRAS through IRAS' myTax Portal. The XML file does **not** need to be digitally signed, encrypted or compressed. The maximum file size for each XML file is 5MB (uncompressed). If an XML file size exceeds 5MB, it should be split into 2 or more smaller files (or messages) and submitted individually. While there is no naming convention for the XML file, Reporting SGFIs are **strongly encouraged** to use the MessageRefId of the FATCA return to name the file.

3.   A return that is submitted to correct, amend or void information that was previously sent to IRAS should only be submitted one day after the initial return (which contains the error) is submitted.

4.   If a Reporting SGFI does not maintain any financial account that is a US Reportable Account for a Reporting Year, the institution does not need to prepare and submit a nil return in XML format. Instead, it can indicate that it is submitting 'a return with no data' when it uses the AEOI e-Services at myTax Portal to file a nil return with IRAS.

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[1] *Reporting SGFIs that do not wish to acquire a reporting tool to generate the FATCA Return in XML format can submit their FATCA Return using fillable PDF forms. This PDF form will be available for download from the IRAS webpage on 1 April 2020.*

Part C   Schema Information

1.   Part C of this Supplementary Guide provides additional guidance on how the information for certain XML data elements must be presented for the purpose of FATCA reporting to IRAS. The requirement is applicable to all submissions of new, nil, amended, corrected or void FATCA returns, including returns relating to Reporting Years 2018 and early. The requirement is not applicable for amended, corrected or void FATCA return submissions pertaining to Reporting Year 2018 and earlier that were submitted via the International Data Exchange System ("IDES") before 1 April 2020.

2.   This section must be read in conjunction with the FATCA XML Schema V2.0 User Guide (US IRS' Publication 5124).

Section 1 - MessageSpec

1.   XML element - 'TransmittingCountry'

1.1   For reporting to IRAS, Reporting SGFIs must use the code "SG".

2.   XML element - 'ReceivingCountry'

2.1   For reporting to IRAS, Reporting SGFIs must use the code "SG".

3.   XML element - 'Warning'

3.1   For reporting to IRAS, Reporting SGFIs should leave this field blank as the processing of the FATCA returns submitted to IRAS is fully automated.

4.   XML element - 'Contact'

4.1   For reporting to IRAS, Reporting SGFIs should leave this field blank as the processing of the FATCA returns submitted to IRAS is fully automated. Reporting SGFIs are required to appoint a Point of Contact ("POC") when providing FATCA information to IRAS. IRAS will liaise with the appointed POC on reporting matters.

5.   XML element - 'MessageRefId'

5.1   Reporting SGFIs are strongly encouraged to structure the MessageRefId in the following format:

<GIIN><Date and time of file creation><2-digit incremental number>

Where:

- <GIIN> refers to the Global Intermediary Identification Number ("GIIN") assigned to the Reporting SGFI by the US IRS. If a Sponsoring Entity or Trustee is filing a report for a Sponsored Closely Held Investment Vehicle or a Trustee-Documented Trust, the GIIN of the Sponsoring Entity/Trustee can be used.

- <Date and time of file creation> has to be represented in YYYYMMDDHHMMSS format.

- The <2-digit incremental number> would start at '00' and increase to '99' when a file is produced on the same day.

> Example
>
> A Reporting SGFI, with GIIN 123456.00000.SL.702, prepares a FATCA Return for Reporting Year 2019 on 21 May 2020 at 7:20:22pm. The MessageRefID for the FATCA Return that it generates for the day is "123456.00000.SL.70220200521192022 00".

Section 2 – FATCA Report Complex Types

6.   XML element - 'DocRefId'

6.1   The DocRefId data element must be structured in the following format and contain a minimum of 21 characters:

<GIIN><period character(.)><Unique Value across all time for the Reporting SGFI>

Where:

- <GIIN> refers to the Global Intermediary Identification Number ("GIIN") assigned to the Reporting SGFI by the US IRS. If a Sponsoring Entity or Trustee is filing a report for a Sponsored Closely Held Investment

Vehicle or a Trustee-Documented Trust, the GIIN of the Sponsoring Entity/Trustee can be used.

- The second part is a period character (.).

- The <Unique Value> refers to a value for the referenced record assigned by the Reporting SGFI that is unique within the Reporting SGFI for all time. It is recommended for Reporting SGFIs to use the globally unique identifier ("GUID"). The DocRefId must not include any non-alphanumeric characters, excluding periods and dashes. Prohibited non-alphanumeric characters include, but are not limited to, _, @, +, &, ! and *.

> Example
>
> A Reporting SGFI, with GIIN of S519K4.99999.SL.702, prepares a FATCA Return for Reporting Year 2019. The unique reference for the account report is 12291cc2-37cb-42a9-ad74-06bb5746b60b. The DocRefId for the account report will be formatted as "S519K4.99999.SL.392.12291cc2-37cb-42a9-ad74-06bb5746b60b".

6.2   The 'DocRefId' data element should contain at least 21 characters, and the maximum length allowed is 200 characters.

7.   XML element - 'TIN'

7.1   The TIN data element must be in one of the following formats 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")

7.2   For Reporting Years 2017, 2018 and 2019, where a Reporting SGFI maintains pre-existing accounts that are US Reportable Accounts without the required US TIN of the US Account Holder or Controlling Person, and the Reporting SGFI fulfils the 3 conditions stated in Section III(B) of Notice 2017-46, the Reporting SGFI should insert a string of nine consecutive "A"s

(i.e. "AAAAAAAAA") in the 'TIN' data element and provide the date of birth in the 'BirthDate' data element for each US Account Holder or Controlling Person whose required US TIN is not available when the Reporting SGFI reports such accounts to IRAS.

7.3   Please note that the above does not apply to an Entity Account Holder. For Entity Account Holder that is a US Person, Reporting SGFI must report its US TIN. Where the Entity Account Holder is not a US Person (e.g. in the case of Passive NFFE), the ORG_TIN data element should be left blank.

8.   XML element - 'FilerCategory'

8.1   For reporting to IRAS, only the following values are applicable:

If the financial institution reporting the account is a:	FilerCategory for element	FilerCategory Value
RDC FFI (including a Reporting Model 1 FFI)	Reporting FI	FATCA602
Sponsoring Entity of a Sponsored FFI	Sponsor	FATCA607
Trustee of a Trustee-Documented Trust	Sponsor	FATCA609

8.2   Inserting any other values in the data element will result in a record-level error.

Section 3 – ReportingFI

9.   TIN value for ReportingFI

9.1   The list below summarises the applicable categories and TIN values for a Reporting SGFI:

Reporting FI	Description
Registered Deemed-Compliant FFI (RDC FFI)	Enter the Reporting SGFI's GIIN.
Sponsored FFI (other than a sponsored, closely held investment vehicle)	Enter the Reporting SGFI's GIIN.

Sponsored FFI that is a sponsored, closely held investment vehicle	Enter the GIIN of the sponsoring entity.
Sponsored Subsidiary Branch	Enter the Reporting SGFI's GIIN.
Trustee-Documented Trust	Enter the TDT Reference ID issued by IRAS.

9.2 Please ensure that the GIIN of the Reporting SGFI and/or Sponsoring Entity has been updated via the "View/ Update FI AEOI Profile" e-Service before filing the FATCA Return. Please note that if the TIN values provided in the TIN field does not match the GIIN information which was provided to IRAS during registration, the FATCA return will be rejected with a record-level error.

Section 4 – Reporting Group

10.   XML element - 'AcctHolderType'

10.1 For reporting to IRAS, only the following values are applicable:

Value	Description
FATCA102	Passive NFFE with US controlling persons
FATCA104	Specified US person

10.2 Inserting any other values in the data element will result in a record-level error.

11.   XML element - 'PoolReport'

11.1 Pooled Reporting is not applicable to Reporting SGFIs. Reporting SGFIs are required to report an account that would otherwise be treated as held by recalcitrant account holders under the US FATCA statue and regulations, as a US Reportable Account.

Contact Information

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