

Practical guidance in respect of US FATCA reporting for Jersey institutions

Version 2.0; release date 17 April 2018

These guidance notes provide practical guidance for Financial Institutions (FIs) making FATCA reports to Jersey. They replace all previous practical guidance notes issued and apply in respect of all FATCA reports submitted to Jersey from 17 April 2018 onwards. These notes do not replace the requirement for an FI to ensure it complies with the [Taxation \(Implementation\) \(International Tax Compliance\) \(United States of America\) \(Jersey\) Regulations 2014](#).

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1. US FATCA v2.0 schema

In January 2017, the IRS released version 2.0 of the US FATCA schema. This replaced all previous versions of the schema. You will not be able to upload any XML files to the Jersey AEOI portal in any of the previous schema versions.

A copy of the v2.0 schema guide can be found on the IRS website at the links below:

[Schema Overview](#)

[v2.0 schema and guidance](#)

2. Validation Updates on the AEOI Portal for Reporting year 2018

Some additional validation checks have been installed in the Jersey AEOI portal to identify errors as early as possible and to reduce the number of record level errors identified by the IRS. These validations have been implemented based on errors received back from the IRS.

2.1 Filer category – optional/mandatory (*Revised*)

This element was added in order to specify in what capacity the filer is making the report, for example as a Participating Foreign Financial Institution, a Sponsoring entity of a Sponsored Foreign Financial Institution or trustee of a Trustee-Documented Trust (see page 39 of the IRS's updated user guide for all possible options).

Filer category should only be **reported once**. i.e. it **should not** be reported in both the sponsor and ReportingFI elements.

Acceptable filer category values for sponsor are FATCA607 and FATCA609.

Acceptable filer category values for reporting FI are FATCA601, FATCA602, FATCA603 and FATCA605.

Where an entity is filing as a sponsor or as the trustee of a Trustee-Documented Trust (and therefore using the Sponsor section of the report), the Filer Category should be added to **the sponsor segment of the report only**.

Fig.1 – example of filer category where the entity is a sponsor or trustee of a Trustee Documented Trust.

```
<ftc:Sponsor>
<sfa:ResCountryCode>JE</sfa:ResCountryCode>
<sfa:TIN issuedBy="US">XXXXXX.00000.SP.832</sfa:TIN>
<sfa:Name>Any Company Limited</sfa:Name>
<sfa:Address>
<sfa:CountryCode>JE</sfa:CountryCode>
<sfa:AddressFix>
<sfa:Street />
<sfa:BuildingIdentifier>Any Number, Any Road, Any Parish</sfa:BuildingIdentifier>
<sfa:SuiteIdentifier />
<sfa:FloorIdentifier />
<sfa:DistrictName />
<sfa:PostCode>JE1 1AB</sfa:PostCode>
<sfa:City>Any Parish</sfa:City>
<sfa:CountrySubentity />
</sfa:AddressFix>
</sfa:Address>
<ftc:FilerCategory>FATCA607</ftc:FilerCategory>
<ftc:DocSpec>
<ftc:DocTypeIndic>FATCA1</ftc:DocTypeIndic>
<ftc:DocRefId>XXXXXX.00000.SP.832.b87f374e-51a9-4e7a-a79e-
b9fc1f86932b</ftc:DocRefId>
<ftc:CorrMessageRefId />
<ftc:CorrDocRefId />
</ftc:DocSpec>
</ftc:Sponsor>
```

Where an entity is filing as the reporting FI itself, the filer category **should be added to the 'ReportingFI' segment of the report only**.

Fig.2 - example of filer category where the entity is reporting as an FI.

```
<ftc:ReportingFI>
<sfa:ResCountryCode>JE</sfa:ResCountryCode>
<sfa:TIN issuedBy="US">XXXXXX.00000.LE.832</sfa:TIN>
<sfa:Name>Any Company Limited</sfa:Name>
<sfa:Address>
```

```

<sfa:CountryCode>GB</sfa:CountryCode>
<sfa:AddressFix>
<sfa:Street>Any Parish</sfa:Street>
<sfa:BuildingIdentifier>Any Info</sfa:BuildingIdentifier>
<sfa:PostCode>JE1 1AB</sfa:PostCode>
<sfa:City>Jersey</sfa:City>
</sfa:AddressFix>
</sfa:Address>
<ftc:FilerCategory>FATCA603</ftc:FilerCategory>
<ftc:DocSpec>
<ftc:DocTypeIndic>FATCA11</ftc:DocTypeIndic>
<ftc:DocRefId>XXXXXX.00000.LE.832.1F1C8410-1AEE-4B62-B027-
11F6C5AFDDE3</ftc:DocRefId>
</ftc:DocSpec>
</ftc:ReportingFI>

```

2.3 Account number type - optional

Allows a financial institution to identify the type of account the account number relates to.

The permissible options are

Code	Account Type	Example shown	Validation applied
OECD601	IBAN	Fig.4 (a)	Must start with the two letter country code and be between 15 and 31 letters and digits in length.
OECD602	OBAN	Fig.4 (b)	No specific format required
OECD603	ISIN	Fig.4 (c)	Must start with the two letter country code and be 12 letters and digits in length.
OECD604	OSIN	Fig.4 (b)	No specific format required
OECD605	Other	Fig.4 (b)	No specific format required

Full details can be found in section 6.4.2 of the schema.

Fig. 3 (a) IBAN - Revised - OECD601 – must start with the two letter country code and be between 15 and 31 letters and digits in length.

```

<ftc:AccountNumberAcctNumberType="OECD601">CCXXXXXXXXXXXXXXXXXXXX</
ftc:AccountNumber>

```

Fig. 3 (b) - OECD602, OECD604 and OECD605 – no specific length or format for Account Number.

```

<ftc:AccountReport>
<ftc:DocSpec>
<ftc:DocTypeIndic>FATCA1</ftc:DocTypeIndic>

```

```

<ftc:DocRefId>XXXXXX.00000.LE.832.2A3ABA1A-BA3A-46CE-91F1-
BCC091E96E4</ftc:DocRefId>
</ftc:DocSpec>
<ftc:AccountNumber AcctNumberType="OECD605">5678</ftc:AccountNumber>
<ftc:AccountHolder>

```

Fig. 3 (c) ISIN - OECD603 – must start with the two letter country code and be 12 letters and digits in length.

```

<ftc:AccountNumberAcctNumberType="OECD603">CCXXXXXXXXXX</ftc:Account
Number>

```

2.4 Nil report – optional (*Revised*)

Indicates a reporting financial institution has no accounts to report.

Previous guidance dated 18 April 2017 specified the spelling of “Nil” must be spelt as “Nill” this was due to a mistype in the US FATCA schema. The correct spelling is “Nil”.

Fig.4 – example of a nil report element

```

<ftc:nilReport>
<ftc:DocSpec>
<ftc:DocTypeIndic>FATCA1</ftc:DocTypeIndic>
<ftc:DocRefId>XXXXXX.99999.SL.832.4string</ftc:DocRefId>
</ftc:DocSpec>
<ftc:NoAccountToReport>yes</ftc:NoAccountToReport>
</ftc:nilReport>
</ftc:ReportingGroup>

```

You must ensure that all fields specified in the schema as **required** are populated.

2.5 Namespace

The FATCA XML schema v2.0 uses namespaces based on the OECD common Reporting Standard.

Fig.5 – Mandatory Namespace for FATCA reporting in Jersey

```

<ftc:FATCA_OECD version="2.0" xmlns:sfa="urn:oe.cd:ties:stffatcatypes:v2"
xmlns:iso="urn:oe.cd:ties:isofatcatypes:v1" xmlns:ftc="urn:oe.cd:ties:fatca:v2"
xmlns="urn:oe.cd:ties:fatca:v2" xmlns:xsi="http://www.w3.org/2001/XMLSchema-
instance">

```

2.6 Account holder type

FATCA account holder type is only required when “Organisation” is selected under AccountHolder. If “Individual” is selected, this is not required.

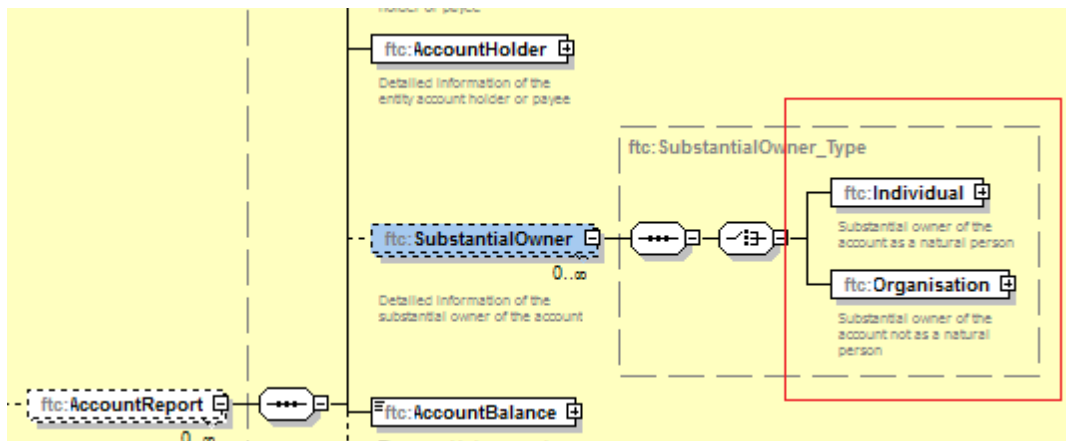
Acceptable values are FATCA101, FATCA102, FATCA103 and FATCA104.

Fig.6 – example of account holder type element

```
<ftc:AccountHolder>
<ftc:Organisation>
<sfa:TIN issuedBy="US">000000000</sfa:TIN>
<sfa:Name>A Company Name</sfa:Name>
<sfa:Address>
<sfa:CountryCode>US</sfa:CountryCode>
<sfa:AddressFix>
<sfa:Street>AAAAA</sfa:Street>
<sfa:BuildingIdentifier>TOWN</sfa:BuildingIdentifier>
<sfa:PostCode>5</sfa:PostCode>
<sfa:City>CITY</sfa:City>
</sfa:AddressFix>
</sfa:Address>
</ftc:Organisation>
<AcctHolderType>FATCA101</AcctHolderType>
```

2.7 Substantial owner

This data element needs to be identified as an individual or an organisation.



If the entity account holder or payee is a nonparticipating FFI (NPFPI) or specified US person, do not complete the SubstantialOwner element.

2.8 US TIN (Revised)

A value for a TIN data element must be either in a GIIN format or in one of the following formats for a US TIN:

- Nine consecutive digits without hyphens or other separators (e.g.123456789)
- Nine digits with 2 hyphens (e.g. 123-45-6789)
- Nine digits with a hyphen entered after the second digit (e.g. 12-3456789)

If the TIN field is omitted or the value is not in a valid format, the AEOI portal will not accept the file.

Nine zeros (000000000) will no longer be accepted.

For US FATCA reports submitted from 2018 onwards, when the TIN of a pre-existing account holder is unknown, the following value may be populated into the TIN element: “AAAAAAAAA” (9 “A”s), provided the following conditions are met:

1. The Financial Institution has obtained and reported the Date of Birth of the account holder and controlling person whose US TIN is not reported;
2. The Financial Institution annually requests the missing TIN from the account holder and;
3. The Financial Institution has searched all electronically searchable data it maintains for the missing TIN prior to submitting the FATCA report.

Use of the 9A format will be taken as a self-certification by the Financial Institution that the above steps have been complied with. Financial Institutions may expect to be required to demonstrate that the above has taken place.

2.9 TIN Issued By (Revised)

Filers can enter multiple foreign TINs. However, they must enter at least one TIN that is issued by the US for the account holder and substantial owners to pass the IRS’s TIN validation. The submission will generate a record-level error by the IRS if it does not have a US issued TIN.

2.10 Date of Birth (Revised)

If a US TIN is unknown then the Date of Birth data tag must be populated with a valid date of birth.

2.11 City or town (Revised)

An FI may choose whether to report addresses using the AddressFix (Fig.7) or AddressFree (Fig.8) format, but regardless of the format used, the “City” element of AddressFix must be completed as this element is required for schema validation.

If the city field is omitted, the AEOI portal will **not** accept the file.

Fig.7 – example of AddressFix element

```
<sfa:Address>
<sfa:CountryCode>US</sfa:CountryCode>
```

```
<sfa:AddressFix>
<sfa:Street>Any Street</sfa:Street>
<sfa:BuildingIdentifier>Any Building</sfa:BuildingIdentifier>
<sfa:PostCode>12345</sfa:PostCode>
<sfa:City>Any City</sfa:City>
</sfa:AddressFix>
</sfa:Address>
```

Fig 8 – example of AddressFree element

```
<sfa:Address>
<sfa:CountryCode>US</sfa:CountryCode>
<sfa:AddressFix>
<sfa:City>Any City</sfa:City>
</sfa:AddressFix>
<sfa:AddressFree>Any Street, Any Town, Any State USA,
12345</sfa:AddressFree>
</sfa:Address>
```

2.12 Pooled reports – not permitted

Pooled reports are not to be used if reporting is being done pursuant to a Model 1 IGA, such as the agreement between Jersey and the US. Pooled reports will not be accepted by the Jersey AEOI portal.

2.13 Receiving country code for US FATCA must be US

Fig.9 – example of receiving country code element

```
<sfa:SendingCompanyIN>XXXXXX.99999.SL.832</sfa:SendingCompanyIN>
<sfa:TransmittingCountry>JE</sfa:TransmittingCountry>
<sfa:ReceivingCountry>US</sfa:ReceivingCountry>
```

2.14 Message Type will be validated to ensure it is a FATCA file

Fig.10 – example of Message type element

```
<sfa:ReceivingCountry>US</sfa:ReceivingCountry>
<sfa:MessageType>FATCA</sfa:MessageType>
<sfa:MessageRefId>JE2017JE123456789ABCDEFG</sfa:MessageRefId>
```

2.15 Reporting of Trustee Documented Trusts

From 2016 reporting FI's will be required to name the Trust.

This would be shown as follows:-

Fig.11 – example of Trustee Documented Trust

```

<ReportingFI>
<ResCountryCode>JE</ResCountryCode>
<TIN>XXXXXX.XXXXX.SP.832</ TIN>
<Name>Trust Name</Name>
<Address>
<CountryCode>JE</CountryCode>
<AddressFree>Address, Jersey</AddressFree>
</Address>
</ReportingFI>
<ReportingGroup>
<Sponsor>
<ResCountryCode>JE</ResCountryCode>
<TIN>XXXXXX.XXXXX.SP.832</TIN>
<Name>Example Trustees Name Limited</Name>
<Address>
<CountryCode>JE</CountryCode>
<AddressFree>Address, Jersey</AddressFree>
</Address>
</Sponsor>

```

Therefore, from 2016, the reporting of Trustee Documented Trusts should be similar to that currently used in reporting sponsored entities, i.e. the Reporting FI shall be the Trust itself, using the sponsor's GIIN (a TDT may not have their own GIIN) and the Sponsor section should be completed with details of the Trustee.

2.16 Empty/Blank Data Tags (*Revised*)

Where the schema indicates that population of a data tag is optional, you must not leave the data tag empty. If you are not populating the data tag with any information it must be removed from the file. However if the data tag is required for validation purposes you are not permitted to remove the element.

Fig.12 – example of incorrect usage of empty/blank data tags

```

<ftc:AccountHolder>
  <ftc:Individual>
    <sfa:TIN issuedBy="US">AAAAAAAAA</sfa:TIN>
    <sfa:Name>
      <sfa:Title></sfa:Title>
      <sfa:FirstName>Jane</sfa:FirstName>
      <sfa:MiddleName></sfa:MiddleName>
      <sfa:LastName>Doe</sfa:LastName>
    </sfa:Name>
  </ftc:Individual>
</ftc:AccountHolder>

```

In the example above, the Title and Middle name tags must either be populated or removed entirely.

2.17 Account Closed (*Revised*)

The data element indicates the account was closed or transferred in its entirety during the calendar year. If an account holder rolls over the amounts in one account (or type of account) into another account (or another type of account) with the same FI during the calendar year, do not report the account as closed.

FI's reporting an account that is closed or transferred in its entirety should complete this element. Withholding agents should not complete this element.

Fig.13 – example of account closed element

```
<ftc:AccountReport>
<ftc:DocSpec>
<ftc:DocTypeIndic>FATCA11</ftc:DocTypeIndic>
<ftc:DocRefId>XXXXXX.00000.LE.832.4B8AFA02-D138-4D97-A273-
FE36E7008235</ftc:DocRefId>
</ftc:DocSpec>
<ftc:AccountNumber>5678</ftc:AccountNumber>
<ftc:AccountClosed>>true</ftc:AccountClosed> <ftc:AccountHolder>
<ftc:Individual>
```

2.18 Additional Data Element (*New*)

Currently, this element is not used for FATCA reporting to the IRS and must not be included.

3. Data Protection

Data submitted in FATCA reports will be extracted by the Jersey Taxes Office and sent to the jurisdiction of residence of the individuals and entities identified in each report. Financial institutions and those reporting must ensure that due care and attention is taken when submitting files to the Jersey AEOI portal as a failure to correctly identify the jurisdiction of residence of the individuals and entities involved will lead to their information being reported to the wrong jurisdiction. The Jersey Taxes Office takes no responsibility for reviewing the correctness of the data submitted to it.

Director – International Tax
17 April 2018

