IT guidance notes for FATCA: US and UK reporting

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General

We have written these guidance notes to assist you in your role as a Reporting Financial Institution ("FI"). They describe the steps you'll need to take to register and submit reports through our Automatic Exchange of Information (AEOI) online portal.

A report will take the form of one or more digital files submitted by you in respect of a reporting period.

The US and UK agreements are based on the same model, so many of the provisions are the same. In general, these guidance notes apply to both the US and UK agreements, but we have indicated where there are differences.

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Registration

If you're reporting under US FATCA, there are two steps in the registration process. Reporting under the UK agreement only requires the second step:

1. IRS registration (US agreement only)

You must first register with the US Inland Revenue Service (IRS) who will give you a Global Intermediary Identification Number (GIIN).

If you are unsure whether you need to register with the IRS, you can refer to our detailed IGA Guidance Notes, which includes a section on registration. You can also look up guidance on the IRS website or seek professional/legal advice. [Download IGA Guidance Notes](#)

If you need to register with the IRS, or are unsure how to register, the IRS website should be able to help. [IRS FATCA registration website](#)

2. Jersey AEOI online portal registration

The group lead or sponsoring FI must apply to register with us on our AEOI online portal. If you're reporting under US FATCA, you'll need to enter your GIIN.

Once you have applied to register, we will review the registration and either accept or reject it.

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If your registration is successful, we will send you an email containing an activation PIN code and the link to the online portal. If your registration is rejected, we will send you an email advising you of the reason.

[AEOI online portal website](#)

FI online user management

If you are the person registering, you are an administration user. You will be able to create and manage other users at the following levels:

User type	Functions
Admin users	Make submissions, remove submissions (provided we haven't already sent the report to the US or UK), manage users (add, edit and remove users), view report submission history
Standard users	Make submissions, edit own user details, view report submission history

Report submission / file upload

The digital file must be in XML format. For reporting, this is currently the FATCA XML version 1.1 and is available to download from the IRS website. The IRS may occasionally update the format. It's your responsibility to ensure you are producing files that conform to the latest version.

[Download the FATCA XML v1.1 schema user guide](#)

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The format for UK reporting is either FATCA XML v1.1 or the CRS schema. Financial institutions can decide which format is best for them.

The OECD has written a CRS handbook, which you can download from their website. It provides practical guidance to help financial institutions implement the CRS.

[Download OECD handbook](#)

Alternative reporting regime (ARR) reporting (UK agreement only)

Reports made under the Alternative Reporting Regime (ARR) in respect of UK non-domiciled clients must also be submitted via this portal, with the deadline for the first submission, covering the period 6 April 2014 to 5 April 2015, being 30 June 2016. This functionality will be available from 23 May 2016.

Reports must be made using the ARR template available on our [website](#).

Our preference and recommendation is that you upload all data in a single file, or as few files as possible. However, we are limiting the maximum size of a single file to 10mb. If you have files bigger than this, you should discuss the matter with our IT helpdesk (jerseytax@gov.je).

To upload the report you will need to log in to our AEOI online portal, and have local or network access to the file you're going to upload. Our portal will validate the file against the schema. We won't accept it if the validation fails. You'll get a response to confirm if the upload was successful or not. If not, our system will highlight the errors that prevented its acceptance.

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The file may have a name of your choice. We recommend you give the file a name that you can easily identify, as you won't be able to access the file contents once you have submitted the file. Your file name will be stored and you can view it on the submission history page.

Submission history

To review a list of reports that your FI has made, you'll need to log in to the online portal. Navigate to the submission history page, and you'll see a list of files that your FI has uploaded.

As an administration user you have the option to delete a submission provided it's before the 30 June deadline. The original file submission and its removal will still be logged in the submission history, but we won't keep the file itself.

After the deadline date of 30 June you can assume we have sent the file to the US or UK. The only way you can amend information after this date will be sending a replacement, correcting, or repairing XML file. The FATCA XML user guide shows you how to do this.

You won't be able to remove any files after 30 June each year.

Late submissions

Any file you upload after the deadline date of 30 June could be subject to a late filing penalty. The penalty is £250 for every late submission.

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Each file, including corrections and repairs, will attract the penalty.

You will not be able to remove files after the deadline so it's important to ensure you've set the correct XML reporting period.

Changing a report submission

Before the deadline of 30 June there are two ways you can change a report you've already submitted.

If you're an administration user, you can navigate to the submission history page, delete the file, then upload a replacement.

The other way is to upload a correcting or repairing XML file or files. The IRS FATCA XML schema user guide shows you how to do this. You must take care that you use the correct document and correcting document references. We will not be able to validate these and we will forward the files to the IRS regardless of incorrect references.

Referential integrity errors within one or more correcting files may result in investigation by the IRS and/or the requirement to resubmit.

Test platform

You can access our test platform where you can check your XML file formation and familiarise yourself with the look and feel of the online portal.

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You'll have to register on the AEOI test portal in the same way you register on the live portal. We'll issue you with a separate ID and PIN to avoid logging in to the wrong portal by accident. If you're testing US FATCA files, you don't need to register with the IRS before accessing the test platform.

FIs use this test facility at their own risk. **You must not submit live data** that can identify any person or their affairs, as the site will not be subject to full data safeguarding procedures.

Although we'll try to make the test platform as similar to the live portal as possible, users should not rely on it, or any response given by it, as irrefutable. We won't be held responsible or be liable whatsoever if any actions or responses from the test platform cause you to breach your regulatory obligations.

Access the test platform website