New FATCA Online Registration System:
XML File Preparation Instructions for Adding Multiple Sponsored Entities using a File Upload – Coming Late 2015

The XML schema file (.XSD) for uploading multiple sponsored entities help sponsoring entity financial institutions (FIs) who are familiar with XML codes to create an XML file containing sponsored entity and sponsored subsidiary branch data that can be uploaded to the FATCA Online Registration system. **The targeted users of this document should have basic working knowledge of XML and prior experience with creating XML files.** For users unfamiliar with XML who still wish to use the electronic file submission option for inputting sponsored entities, additional information is available at http://www.irs.gov/Businesses/Corporations/FATCA-Registration-Sponsored-Entity-Bulk-Upload.

The .XSD file defines all required and optional XML elements and attributes. It can be used to validate an XML file. The validation criteria are based on the special rules and restrictions associated with the required fields for sponsored entities and sponsored subsidiary branches in the FATCA Online Registration system. Below are the step-by-step instructions on how to create the XML file for uploading.

NOTE: For the purpose of this document, "sponsored entity" generally refers to any of the three sponsored entity classifications, unless otherwise indicated.

Instructions for Creating the Sponsored Entity XML File

1) Download and unzip the XML Schema zip file in a compatible XML editor. Two files will appear in the unzipped folder – **FATCA-FIRegistration-SponsoredEntityUpload-1.0.xsd** (primary schema) and **FATCA-FIRegistration-SponsoredEntityUpload-CountryList-1.0.xsd** (country/jurisdiction list schema) – these should go in the same file directory after unzipping them. The primary schema file will reference the country/jurisdiction list schema file.

2) Create the XML header and root element as shown below, additional detail is provided in the table:

```
<?xml version="1.0" encoding="UTF-8"?>
<tns:SponsoredEntityList version="1.0"
xmlns:tns="urn:us:gov:treasury:irs:fatcafiregselistupload">
```

Elements	Definition/Description	Notes
SponsoredEntityList	**Sponsored Entity List -** A group that contains data about sponsored entities and a sponsoring entity that agrees to perform the due diligence, reporting, and other requirements on their behalf.	This element is the root element in an XML file. It contains fixed version attribute 1.0.

3) Include the FATCA ID of the sponsoring entity FI. The FATCA ID in the XML should be the same as the FATCA ID of the sponsoring entity uploading the file. The table below provides additional information for this element.

Element	Definition/Description	Notes
SponsorFATCAId	**Sponsoring Entity's FATCA ID -** A unique identifier assigned to Sponsoring Entity in FATCA registration system.	• 6 characters, alphanumeric • Letters (excluding the letter O), numbers, or a combination of both. The FATCA ID must match the FATCA account under which the XML file is uploaded.

4) Create sponsored entity and, if applicable, sponsored subsidiary branch records by including all required elements, according to the XML schema. The XML file needs to contain:

  • Sponsored entity record(s) *(required)* – each record needs the name, classification, and country/jurisdiction of the sponsored entity.
  • Sponsored subsidiary branch records *(optional)* – sponsored entities classified as sponsored subsidiaries need the country/jurisdiction for each sponsored subsidiary branch

The table below summarizes the required elements and their descriptions, types, and special rules and restrictions. Appendix B provides the schema diagram for the sponsored entity list.

Elements	Definition/Description	Notes
SponsoredEntity	**Sponsored Entity -** A group that contains data about sponsored foreign financial institution or sponsored direct reporting non-financial foreign financial entity.	• The XML file must contain at least one (1) and up to 5,000 sponsored entity records. • Duplicate (i.e. same legal name, same classification and same country/ jurisdiction) sponsored entities records are not allowed
SELegalNm	**Sponsored Entity Legal Name** - The legal name of the sponsored entity used in official incorporation or organization documents, or the name otherwise recognized by the resident country/jurisdiction government as the sponsored entity's official name. Typically, the legal name is the name used by the sponsored entity in legal documents.	• Up to 150 characters • Lower and upper case letters (a-z, A-Z), numbers (0-9), blank space, hyphen (-), forward slash (/), pound/hashtag sign (#), ampersand (& represented as &), apostrophe ('), period (.), comma (,), percent sign (%), brackets ([]), parentheses (), and curly brackets ({}). **Notes**: 1) According to XML syntax rules, if the legal name contains "&", you must replace it with its entity reference of "&". The FATCA Online Registration system will automatically convert "&" to "&" when each record is processed. 2) Although hyphen (-) is allowed, two hyphens in a row without characters in-between (--) are not allowed.
SDClassificationCd	**Sponsored Entity Classification Code for a Sponsored Subsidiary** - The classification for sponsored direct reporting NFFE (SD)	Must enter the classification code of **SD, SF, or SS** that corresponds to the Classification Code elements
SFClassificationCd	**Sponsored Entity Classification Code for a Sponsored Subsidiary** - The classification for sponsored fund (SF)	

Elements	Definition/Description	Notes
SSClassificationCd	**Sponsored Entity Classification Code for a Sponsored Subsidiary** - The classification for sponsored subsidiary (SS).	
SECountryCd	**Sponsored Entity Country/Jurisdiction Code** - The ISO 3166-1 alph-2 standard country/jurisdiction code for the sponsored entity's country/jurisdiction of residence for tax purposes.	Enter the 2-character alpha code from the list of available countries in country/jurisdiction code reference schema (see [Country/Jurisdiction Listing](#))
SSBranch	**Sponsored Subsidiary Branch -** A group that contains data about a branch of a sponsored subsidiary that is outside the sponsored subsidiary's country/jurisdiction of tax residence.	• The XML file must contain no more than 300 sponsored subsidiary branches for each sponsored subsidiary (SS) • Duplicate (i.e. same country/jurisdiction) sponsored subsidiary branch records are not allowed
SBCountryCd	**Sponsored Subsidiary Branch Country/Jurisdiction Code** - The ISO 3166-1 alph-2 standard country/jurisdiction code for the sponsored subsidiary branch's country/jurisdiction of residence for tax purposes.	Only for sponsored subsidiaries (SS). Enter the 2-character alpha code from the list of available countries in country/jurisdiction code reference schema (see [Country/Jurisdiction Listing](#))

5) Validate the file against the XML schema (both primary schema and country/jurisdiction list schema files) using any XML editor. After validation is completed, the XML editor will inform the user of any errors in the XML and the elements that the error is associated with, based on the XML schema's built-in validation rules. Depending on which XML editor is used for validation, the error messages could be in different formats with varying levels of detail. Follow the error message's instructions to correct the XML elements and revalidate. The XML file size should be less than 100 MB.

6) Once the XML file passes validation, save the file as .XML. The file name should:
   - Contain only letters, numbers, and underscores without any spaces
   - Contain no more than 246 characters (excluding the ".XML" file extension)

Sample XML Code for Adding Sponsored Entities

Below here an example of a sponsored entity XML file and the interpretation of the codes:

```
<?xml version="1.0" encoding="UTF-8" ?>
<tns:SponsoredEntityList version="1.0"
xmlns:tns="urn:us:gov:treasury:irs:fatcafiregselistupload">
<tns:SponsorFATCAId>ABC123</tns:SponsorFATCAId>
<tns:SponsoredEntity>
<tns:SELegalNm>Bank A</tns:SELegalNm>
<tns:SECountryCd>AF</tns:SECountryCd>
<tns:SDClassificationCd>SD</tns:SDClassificationCd>
</tns:SponsoredEntity>
<tns:SELegalNm>Bank B</tns:SELegalNm>
<tns:SECountryCd>AG</tns:SECountryCd>
<tns:SFClassificationCd>SF</tns:SFClassificationCd>
</tns:SponsoredEntity>
<tns:SponsoredEntity>
<tns:SELegalNm>Bank C</tns:SELegalNm>
```

```
<tns:SECountryCd>AF</tns:SECountryCd>
<tns:SSClassificationCd>SS</tns:SSClassificationCd>
<tns:SSBranch>
<tns:SBCountryCd>WS</tns:SBCountryCd>
</tns:SSBranch>
<tns:SSBranch>
<tns:SBCountryCd>AL</tns:SBCountryCd>
</tns:SSBranch>
</tns:SponsoredEntity>
</tns:SponsoredEntityList>
```

Interpretation of codes:
- Sponsoring entity FATCA ID: ABC123
- New sponsored entity
    - o Legal name: Bank A
    - o Classification: SD (sponsored direct reporting NFFE)
    - o Country/jurisdiction code: AF (Afghanistan)
- New sponsored entity
    - o Legal name: Bank B
    - o Classification: SF (sponsored fund)
    - o Country/jurisdiction code: AG (Antigua and Barbuda)
- New Sponsored Entity
    - o Legal name: Bank C
    - o Classification: SS (sponsored subsidiary)
    - o Country/jurisdiction code: AF (Afghanistan)
    - o Sponsored subsidiary branch country/jurisdiction code: WS (Samoa)
    - o Sponsored subsidiary branch country/jurisdiction code: AL (Albania)

What's next?

Once the XML file is created and validated, it is ready to be uploaded to the sponsoring entity FI's FATCA account if the sponsoring entity is in "approved" status. The FATCA Online Registration user guide in late 2015 will have detailed instructions on how to upload the file.

Appendix A – Glossary of Terms

- **Sponsoring entity** – An entity that will perform the due diligence, withholding, and reporting obligations of one or more sponsored investment entities or controlled foreign corporations (sponsored FFIs).
- **Sponsored entity** – An investment entity or an FFI that is a controlled foreign corporation (CFC) having a sponsoring entity that will perform the due diligence, withholding, and reporting obligations on its behalf.
- **Sponsored direct reporting non-financial foreign entity (NFFE) (SD)** – An investment entity that has a sponsoring entity that will perform the due diligence, withholding, and reporting obligations on its behalf.
- **Sponsored fund (SF)** – A direct reporting NFFE that has a sponsoring entity that agrees to perform the due diligence, reporting, and other requirements on its behalf.
- **Sponsored subsidiary (SS)** – A controlled foreign corporation that has a sponsoring entity that will perform the due diligence, withholding, and reporting obligations on its behalf.
- **Sponsored subsidiary branch** – A branch of a sponsored subsidiary that is outside the sponsored subsidiary's jurisdiction of tax residence.

Appendix B – Sponsored Entity List Schema Diagram