

Department of the Treasury
Internal Revenue Service

**Foreign Account Tax Compliance Act
International Compliance Management Model
(ICMM)
FATCA 4.1**

Report Notification Technical Support Guide

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1 FATCA Overview and Document Purpose

The Foreign Account Tax Compliance Act (FATCA) was enacted in 2010 by Congress to target non-compliance by U.S. taxpayers using foreign accounts. FATCA requires foreign financial institutions (FFIs) to register with the IRS and report to the IRS information about financial accounts held by U.S. taxpayers, or by foreign entities in which U.S. taxpayers hold a substantial ownership interest. FFIs that do not both register and agree to report will be subject to a 30% withholding tax on certain U.S.-source payments made to them.

As a result of these new reporting requirements, between 100,000 and 200,000 FFIs will be filing new information returns each year, beginning in 2015. The IRS deployed the FFI Registration system in 2013 and new electronic FATCA reporting systems, the International Data Exchange System (IDES) and the International Compliance Management Module (ICMM), in January 2015. IDES is an electronic delivery point where FFIs and Host Country Tax Authorities (HCTA) can transmit and exchange FATCA data with the United States. ICMM is the internal IRS system that will capture, process, and store the data and send notifications via IDES to the sender of the data regarding IRS's retrieval and processing of the data.

EPSS assistors will be providing support to FFIs and HCTAs that contact the IRS regarding error notifications they have received as a result of the processing of their submitted files by ICMM. This document is designed to provide background information on FATCA requirements, supporting systems, and reporting and processing steps to better prepare EPSS assistors to provide this support. It also includes a repository of the response scripts to be used in providing support based on the specific error notification received. A key consideration for the EPSS assistors to keep in mind is that, as the FFIs and HCTAs will never interact directly with ICMM they may be unfamiliar with ICMM and may consider the error notifications as coming from IDES.

2 FATCA Registration and Reporting Requirements

To properly comply with FATCA, an FFI must register and enter into a special agreement with the IRS. Under this agreement a "participating" FFI (PFFI) will be obligated to:

- **Identify U.S. Accountholders:** Undertake certain identification and due diligence procedures with respect to its U.S. accountholders;
- **Report to the IRS:** Report annually to the IRS on its accountholders who are U.S. persons or foreign entities with substantial U.S. ownership. Reporting may be provided directly to the IRS, or through the FFI's competent authority (also known as the Host Country Tax Authority or "HCTA") under an intergovernmental agreement (IGA) with the U.S.;
- **Withhold as necessary:** Withhold and pay over to the IRS up to 30 percent of any payments of U.S. source income, as well as gross proceeds from the sale of securities that generate U.S. source income, made to (a) non-participating FFIs, (b) individual accountholders failing to provide sufficient information to determine whether or not they are a U.S. person, or (c) foreign entity accountholders failing to provide sufficient information about the identity of its substantial U.S. owners.

In March 2015 the IRS began receiving reports on financial accounts and assets held in FFIs and Non-Financial Foreign Entities (NFFEs), in accordance with FFI agreements and IGAs being negotiated between the Treasury Department and foreign governments, which spell out the dates and conditions

for account reporting, among other FATCA-related activities. There are currently two types of IGAs, of which the key aspects of importance to EPSS ICMM error notification support are as follows:

- **IGA Model 1:** The foreign government HCTA will provide all FFI account reports (FATCA Reports) for all FFIs in its jurisdiction, and FFIs will provide to their HCTAs account information on all accounts held by US (or suspected US) persons. Additionally the IRS will resolve issues concerning erroneous or faulty reports through the HCTA for the jurisdiction in which the FFI in question operates.
- **IGA Model 2:** FFIs will transmit FATCA Reports directly to the IRS without intervention by the HCTA for their jurisdictions; however, these FFIs will only provide full, detailed reporting for accounts held by a U.S. person if the account holder provides consent. For those account holders not providing consent, FFIs will send pooled reports which provide the number and cumulative asset balance of all accounts held by US (or suspected US) persons not providing this consent. These pooled reports will form the basis for follow-up action between IRS and Treasury and the HCTA for the FFI's jurisdiction to obtain the desired account details.

As a result of these two types of IGAs, there are two types of records that will be transmitted in a FATCA Report file (from Form 8966):

- **Account Reports** contain information on individual accounts being documented by the FFI, and correspond to Form 8966 Parts I through IV. Information detail includes the account owner name, account value, institution (FFI) holding the account, and amount and type of related income.
- **Pooled Reports** are declarations by an FFI that provide the number of potential US account holders with accounts in the FFI, the combined value of these accounts, and the type of pool (1 of 6 types) in which these accounts are categorized. Pooled reports correspond to Form 8966 Parts I and V, and will only be submitted by FFIs in countries which have executed Model 2 IGAs with the US.

All report data (whether account-level or pooled reports) is submitted via Form 8966 either in paper or electronic form. A separate form (paper form or electronic record) must be submitted for each account and for each pooled report type. Generally, reports from FFIs in Model 2 and non-IGA jurisdictions were due June 29, 2015 while reports from FFIs in Model 1 jurisdictions are expected to be filed by September 30.

3 FATCA Systems Overview

3.1 FFI Registration System

The IRS stood up a FATCA Registration System in August 2013 to support electronic registration of FFIs. The FATCA Registration System is a secure, web-based system, accessible 24/7 via the IRS Registered User Portal, that Financial Institutions (FIs) may use to register completely online as a Participating Foreign Financial Institution (PFFI), a Registered Deemed-Compliant FFI (RDCFFI), a Limited FFI (Limited FFI), or a Sponsoring Entity. All entities filing Forms 8966 electronically or on paper must register using the FFI Registration system.

3.2 FATCA Reporting Systems

In January 2015, the IRS stood up two additional systems that work together to enable those registered FFIs to electronically submit FATCA Reports. Reports that are transmitted electronically will be formatted by their originators in Extensible Markup Language (XML) using the Intergovernmental FATCA

XML Schema, developed by the IRS in conjunction with other HCTAs for this purpose. The electronic files must also be digitally signed, encrypted, and compressed prior to transmission.

3.2.1 International Data Exchange Service (IDES)

The International Data Exchange Service (IDES) is an exchange platform maintained by a third party that will allow any member FFI or HCTA to exchange tax information with any other member FFI or HCTA. IDES functions like an encrypted “drop-box” service, which allows it to serve as a central hub for electronic submission of FATCA data both from Foreign and Domestic Financial Institutions to the IRS as well from the IRS to foreign governments in accordance with FATCA and IGA reporting requirements. The IDES data exchange is globally available to authorized users, with local regulations governing electronic exchanges of tax data.

In addition to the IDES system (referred to as “IDES”), which is accessed via a website, there is also an IRS IDES Homepage that provides valuable information, responses to Frequently Asked Questions (FAQs), and links to the IDES Enrollment site as well as additional resources and documents. One of the documents available on the IRS IDES Homepage is the IDES User Guide that explains how to prepare and transmit files to IRS via IDES as well as how to receive notifications back from IRS regarding the status of file processing.

3.2.2 International Compliance Management Model (ICMM)

The International Compliance Management Model (ICMM) provides IRS with the mechanism to ingest, validate, store, and manage FATCA data received in both XML format (via IDES) and on paper forms. The aim of ICMM is to process, validate, and store such data, making it available for analytics and future compliance activities. As part of this capability, ICMM will also generate notifications to the FFIs and HCTAs of the successful or unsuccessful processing and validation of the file and the data within it as well as issue and track follow up data requests (Competent Authority Requests or CARs).

ICMM has no external interface to outside users. All notifications it generates are delivered to FFIs and HCTAs through IDES, or physically mailed to filers of paper Forms 8966. As such, FFIs and HCTAs may be unfamiliar with the system name, ICMM, although they most likely are aware that there is an internal IRS system communicating with IDES to download and process the reports they are submitting. However, IRS does maintain an ICMM Homepage that provides a brief overview of ICMM and its functions as well as responses to FAQs regarding ICMM Report Notifications and links to relevant resources and documents such as the **FATCA Reports Notification User Guide** and the **FATCA Reports ICMM Notification XML Schema Guide**.

4 FATCA Data Exchange Process

This section provides an overview of the electronic FATCA Data Exchange process used by FFIs, HCTAs and the IRS to exchange information central to FATCA reporting. In addition, specific components critical to this exchange process are discussed as preliminaries to provide background for key elements of the process.

4.1 Data Being Exchanged by IRS and Filers

Data exchanges between the IRS and FFIs and HCTAs under FATCA are unique because of the central role of XML in governing the data being transmitted, which is a significant change relative to legacy information returns received through FIRE. The use of XML ensures a higher level of quality and consistency in the data being exchanged, and provides much more flexibility versus traditional IRS Information Return transmission methods, e.g., FIRE. All parties will be using XML schemas developed

by the IRS in concert with partner HCTAs. While the IRS has been using XML for taxpayer e-filing for years, the XML used in FATCA is based on prior international efforts to apply XML to intergovernmental exchanges of tax and financial data for regulatory purposes. Thus, FATCA XML is somewhat different in composition than MeF XML, though the fundamental advantages of XML still hold.

The FATCA-related data being exchanged by parties is summarized below:

- **Filer (FFI, HCTA) to IRS:** Filers will send FATCA Reports containing account and pooled report data to the IRS in XML format using the [FATCA XML Schema](#). Account reports include account balances on individual accounts held by US persons and related income received for these accounts, and contain information listed on Parts I through IV on [Form 8966](#). Pooled reports are statements from FFIs in Model 2 jurisdictions declaring the number of US persons holding accounts that did not give permission to be reported on, and the aggregate balance and combined income for the pool. Pooled reports include data from Part I and V of [Form 8966](#). Each account or pooled report will be transmitted as a record within a larger file. Each file of FATCA data from an FFI or HCTA to the IRS will consist of at least one account or pooled report record. Account and pooled report data cannot be mixed in the same file, however.
- **IRS to Filer (FFI, HCTA):** The IRS will transmit notifications to FFIs and HCTAs regarding the status of received files and records of account report data. These notifications can be either acknowledgements that files and records have been successfully received and processed, or error messages from the IRS to the filer (sender) indicating the type of error encountered. Notifications from the IRS to filers are generated by the ICM system, and are described in more detail in Sections 6-8. All notification data is prepared in XML format, using [notification schemas](#) developed by the IRS.

4.2 FATCA GIIN as Identifier

The FATCA Global Intermediary Identification Number (GIIN) is a new entity identifier devised by Treasury and IRS in cooperation with foreign finance agencies and HCTAs. The primary motivation for creating the GIIN is the need for the IRS to publically identify FFIs registering under FATCA without assigning these entities a full EIN.

The [GIIN](#) is a 19-character identifier assigned to FFIs as part of the FATCA registration process, such as **98Q96B.00000.LE.250**. The basic structure looks like FFFFFFF.TTTTT.CC.ISO, where,

- “FFFFFF” is a six character FATCA ID code
- “TTTTT” is a 5 character code indicating whether the FI is a Single, Lead or Member of an Expanded Affiliated Group, or Sponsoring Entity
- “CC” is a two character category code
- “ISO” is an ISO 3166-1 compliant 3 digit country identifier (e.g., “840” denotes the United States)
- Periods (“.”) are used as field separators at positions 7, 13, and 16 in the GIIN character string.

Full GIINs are only assigned to FATCA-registered entities, and while central to FATCA reporting the GIIN is also being used by the IRS in other aspects of international tax reporting.

The IRS and other HCTAs use GIIN-like identifiers for communications through IDES. The format for these identifiers is: 000000.00000.TA.ISO, where,

- “TA” indicates tax agency
- “ISO” is the 3 digit country ISO identifier described above.

4.3 Role of IDES in FATCA Data Exchange

One of the concerns facing FATCA implementation on the part of multiple governments has been the need for an intermediary to be involved in data transfers to address certain legal restrictions impacting the ability of FFIs to report directly to the IRS. As a result, the IRS has agreed to contract out the transmission of FATCA data exchanges to a third party contractor, so that all parties involved in FATCA exchange are interacting with the same service. This service is known as the International Data Exchange Service (IDES), introduced in Section 3.2.1 above. Essentially, IDES provides a secure dropbox-like capability for FATCA data exchange. IDES will be used to upload FATCA data only, and will not have the ability to view, process, or edit data exchanged by FATCA parties due to the use of encryption (discussed in Section 4.3 below).

All FFIs and HCTAs needing to use IDES, including the IRS, will create accounts with IDES, and will connect with IDES to upload and download files as needed. Using these accounts, files may be uploaded or downloaded manually through a web interface, or through an automated (system-system) exchange. IDES will send email alerts to recipients when files are available for download, and will send status emails to senders on the outcome of their transmitted files. IDES will hold a file from a sender for up to seven days, after which IDES will no longer allow the recipient to download the file. The IDES contractor will support IDES users with IDES-related functions and activities, including IDES account creation and maintenance, file uploads and downloads, and IDES status messages, but cannot and will not address specifics concerning encrypted FATCA data passing through the service.

Finally, IDES will maintain a set of public encryption keys and corresponding digital certificates to be provided by IDES account holders. IDES users will post the public key from a public/private key pair on IDES, as well as the digital certificate from a Certification Authority (CA) that confirms the integrity of the key and owner. The public key will be used by the sender to encrypt data in IDES transmissions for the recipient owner of the key, and will also be used by transmission recipients to validate digital signatures on messages sent by a public key's owner. Digital certificates will be used by all IDES parties to validate the integrity of public keys and their owners. The IDES contractor will be responsible for maintaining the "key server" housing these public keys and digital certificates, and supporting IDES users in all aspects of public key and digital certificate management. The IDES role in managing keys and certificates is a critical aspect of its role as an intermediary in FATCA data exchanges.

4.4 Encryption Used in FATCA Data Exchange

Because FATCA reporting requires FFIs to provide sensitive data to the IRS, all stakeholders involved are interested in maximizing security of these exchanges. There are several ways in which encryption technology is used to provide multiple layers of protection in each FATCA data exchange:

- **Digital signatures:** All senders (FFI and HCTA filers and IRS) will digitally sign all FATCA-related data files (files containing account/pooled reports from FFIs/HCTA and response notifications from the IRS) using the private key corresponding to the sender's public key posted on IDES. This will enable the recipient to confirm the identity of the sender of a transmitted file with the sender's public key that the recipient downloaded from the IDES key server. Validating these signatures is a mandatory step in the exchange process.
- **Encrypting FATCA-related data files:** All files containing FATCA-related data (account/pooled reports from FFIs/HCTAs, response notifications from IRS) will be encrypted by the sender using the AES-256-CBC (AES) encryption standard. This involves the sender generating an encryption key for one-time use with each file, encrypting the combined data file and the related digital signature file with this key, using CBC ciphering with a 16 byte all-zero initialization vector.

- **Encrypting the AES key:** The 32 byte AES key (with the 16 byte CBC initialization vector) must be provided to the recipient of a FATCA file in order to allow the recipient to decrypt the data/signature file encrypted with the key. To do so securely, the sender encrypts the file containing the AES key and vector (48 bytes total) for the message with the recipient's public key available on IDES. This will allow only the recipient to decrypt the AES key needed to decrypt the actual FATCA data and signature file.
- **Digital certificates confirming sender and recipient identities:** Because IDES users must post valid digital certificates on IDES, all senders and recipients can utilize these certificates to confirm the identity of each correspondent with whom they interact through the service. Senders are required to use these certificates to confirm the identity of recipients and validity of their keys, while recipients are required to use these certificates to confirm the identity of senders and the validity of their signatures.

4.5 FATCA Transmission Structure

A set or group of files moved through IDES is referred to as a "transmission." All transmissions will share a similar structure consisting of multiple files with specific purposes. These files will be zipped into an uncompressed archive using common tools available with common user operating systems (Windows, MacOS, Linux/Unix). The specific files within the transmission archive structure and their filename conventions sent to IDES are described below:

1. Encrypted FATCA Report (from FFI/HCTA) or Notification (from IRS): filename has the form *[SenderGIIN]_Payload*, where *SenderGIIN* is the IRS-issued GIIN of the sender in full GIIN format.
2. Encrypted AES Key: AES key used to encrypt payload in *[SenderGIIN]_Payload*: filename has the form *[ReceiverGIIN]_Key*, where *ReceiverGIIN* is the GIIN of the recipient whose public key was used to encrypt the HCTA key
3. Sender Metadata: contains the unencrypted metadata used by IDES to identify the sender and route to the recipient; the filename has the form *[SenderGIIN]_Metadata.xml*, where *SenderGIIN* is the GIIN of the sender in full GIIN format

In the event the sender is an FFI in a Model 1 Option 2 IGA jurisdiction, the sender's HCTA will be given the opportunity to download and examine the transmission prior to approving access for the IRS. To allow the HCTA to decrypt the payload, these FFIs will include a second version of the encrypted AES key that is encrypted with their home HCTA's GIIN, and included and named following the rules in item (2) above. Similarly, certain Model 2 IGA HCTAs will be copied on any messages the IRS sends to FFIs in their jurisdictions, so the IRS will include an encrypted AES key for these HCTAs in the notification transmissions to the HCTAs.

4.6 FATCA Data Exchange Process

This section outlines the full FATCA Data Exchange Process. There are five components or sub-processes:

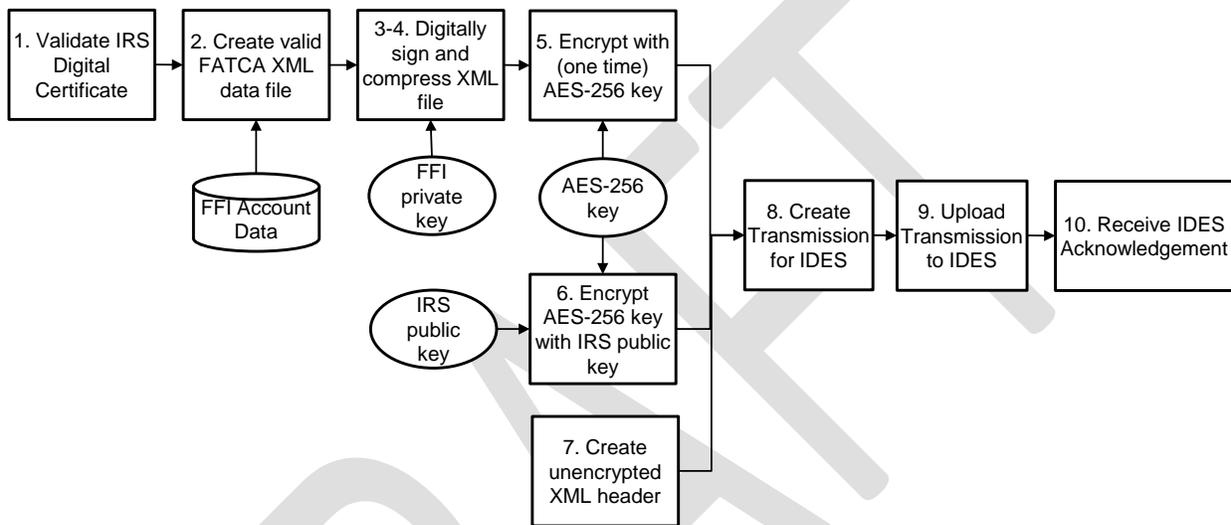
1. FFI/HCTA Filer Uploads Transmission to IDES
2. IRS Downloads Transmission from IDES and Processes File
3. IRS Processes Records in Valid Form 8966 Files
4. IRS Notification Uploads Notification to IDES
5. FFI/HCTA Filer Downloads Notification from IDES

These sub-processes are described in the following sections.

4.6.1 FFI/HCTA Filer Uploads Transmission to IDES

In this sub-process the FATCA Report sender prepares a file of account or pooled report records, creates the files needed for the IDES transmission, and sends the transmission to IDES. None of the steps in this process are actions that EPSS is expected to assist, and the specific actions and sequencing an FFI or HCTA sender takes for these steps will depend on the local operating system and encryption software package, as well as specific IDES procedures. This sub-process is outlined in Figure 4-1 and described in the following steps.

Figure 4-1 FFI/HCTA Upload to IDES Sub-process



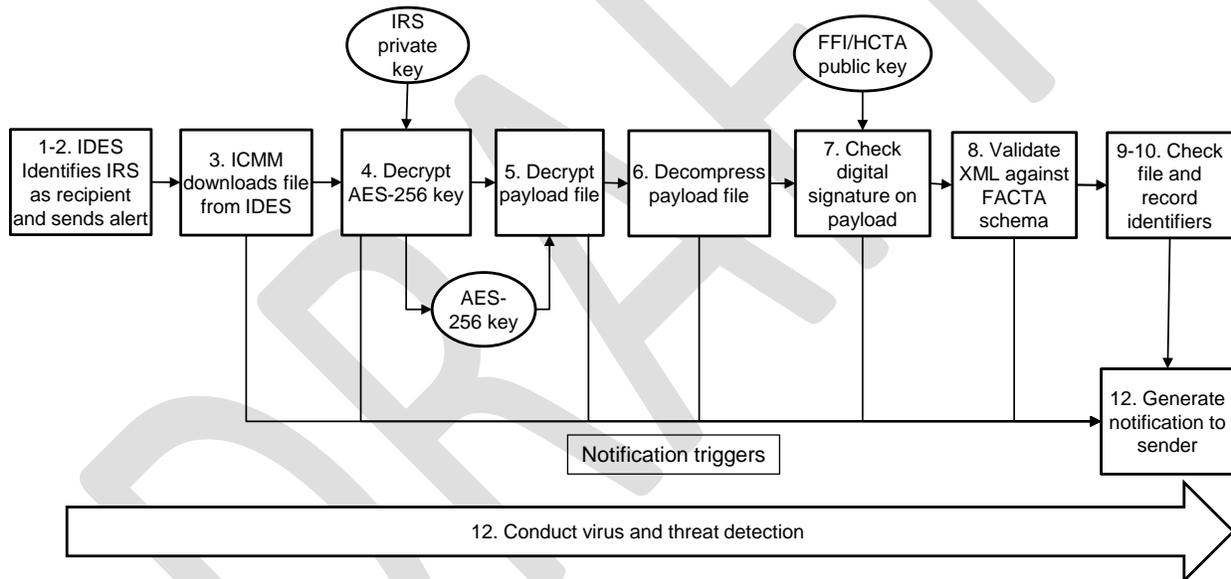
1. The sending FFI or HCTA must first confirm the validity of the digital certificate the recipient (IRS in this case) has posted to IDES. The certificate is accessed on IDES, and validated using the sender's encryption software.
2. The data necessary for the required FATCA account and pooled reports is compiled from the sender's databases, and is used to construct a valid XML data file using the FATCA XML schema. The file should be specifically validated against the schema.
3. The sender signs the XML file with their private key corresponding to their public key and digital certificate previously posted on IDES. This step creates the payload file containing the original XML data and the digital signature.
4. The payload is compressed using ZIP or a similar compression utility available on the local operating system.
5. The sender generates a one-time AES-256 encryption key, and encrypts the compressed file with this key as the first file for the transmission.
6. The AES-256 key used to encrypt the payload is itself encrypted with the public key available on IDES for the IRS (and any Model 1 Option 2 HCTA, if applicable), and is the second file for the transmission.

7. The XML header file for the transmission is created and included in the transmission; this file is the only unencrypted file to be sent through IDES in the transmission.
8. The sender creates the actual IDES transmission by creating an archive with all files (AES-encrypted payload, all copies of the encrypted AES-256 key, and the XML header).
9. The transmission is uploaded to IDES using IDES procedures.
10. The sender receives acknowledgement from IDES that the transmission was received.

4.6.2 IRS Downloads Transmission from IDES and Processes File

When IDES receives a transmission from an FFI or HCTA, it will send an alert to the IRS that a transmission has been received. This alert will trigger ICMM to execute an automated sub-process to pull down and process the transmission and enclosed payload file. This sub-process concludes with a notification to the FFI or HCTA sender of file processing, either an error or interim valid file notification. These steps are described in more detail in Section 5.1, and notifications are discussed in Section 6. This sub-process is outlined in Figure 4-2 and described in the following steps:

Figure 4-2 IRS Download and Process Transmission from IDES



1. IDES identifies the transmission recipient (IRS in this case) by unzipping the transmission archive and examining the unencrypted XML header.
2. IDES sends an alert to the IRS (as recipient).
3. The IDES alert triggers ICMM to initiate a process in IEP to download the waiting transmission in response to the IDES alert; the digital certificate of the sender is reviewed, and if valid the transmission is downloaded. If the download fails or cannot complete, processing stops and an error notification is triggered.
4. ICMM decrypts the IRS copy of the AES-256 key file with the IRS GIIN in the file name with its private key; if decryption fails, processing stops and an error notification is triggered.
5. ICCM uses the decrypted AES-256 key to decrypt the payload file; if decryption fails, processing stops and an error notification is triggered.

6. The payload file is decompressed to extract the digitally signed XML file; if decompression fails, processing stops and an error notification is triggered.
7. The digital signature on the decompressed file is checked to determine validity; if the signature fails validation, processing stops and an error notification is triggered.
8. The XML data file is validated against the FATCA XML schema; if XML validation fails, processing stops and an error notification is triggered.
9. ICMM performs additional checks on specific file and record identifier elements (“MessageRefId”, “CorrMessageRefId”, “CorrDocRefId” and “CorrDocRefId” elements in the FATCA XML schema) to test that these fields are not all blank characters and that they conform to IRS size limitations. If any of these elements are all blanks or exceed the 200 character limit imposed by IRS, processing stops and an error notification is triggered.
10. ICMM evaluates file identifier element (“MessageRefId” element in the FATCA XML schema) to ensure no duplicate elements exist. If the file contains a duplicate MessageRefId value, processing stops and an error notification is triggered.
11. Throughout this process ICMM will scan the IDES transmission and files resulting from each decryption and decompression step for viruses and other cyber security threats. This scanning is performed during steps 3, 4, 5, and 6 in this sub-process. If a virus or threat is detected during these steps, processing stops and an error notification is triggered to notify the sender of the detection of a virus or threat, depending on what is detected.
12. If ICMM detects an error during this sub-process for the file, a notification informing the sender that the file has failed a processing will be triggered. This notification will identify the step that failed, provide a high level description of what the filer can do to resolve the error, and list online resources the filer can use to address the problem. If the file successfully completes processing, a notification indicating successful file processing will be transmitted at the conclusion of record-level processing in the next step.

4.6.3 IRS Processes Records in Valid Form 8966 Files

ICMM will conduct record-level processing on all files that successfully pass file-processing steps. All components of each valid XML file will be evaluated for potential data or metadata errors that are not identified through schema validation. For example, the IRS requires entities filing Forms 8966 and individuals or entities listed as account holders or owners to have TINs provided as part of their identifying information. However, the FATCA schema data types derived from international standards do not require TINs to be provided, and so there is no guarantee that the required TINs will be part of a record in a file that passes schema validation. ICMM record processing ensures the submitted file contains the appropriate data for Form 8966, as mandated by IRS regulations for FATCA reporting.

Filers whose files pass file processing will receive a “valid file” notification. If errors are present, these filers will receive a “valid file with errors” notification, which will contain the following information on detected errors:

- A description of a record level error and error code
- Identifying information for the record in which the error was detected (MessageRefId, DocRefId)
- For field level errors, a full path of the XML schema data elements leading to the erroneous field value
- A detailed description for each field-level error the record, for all records in the file.

Each ‘valid file with errors’ notification will include data for all record-level errors found in a file; errors found on one submitted file will always be documented on a single notification, and never be split across multiple notifications.

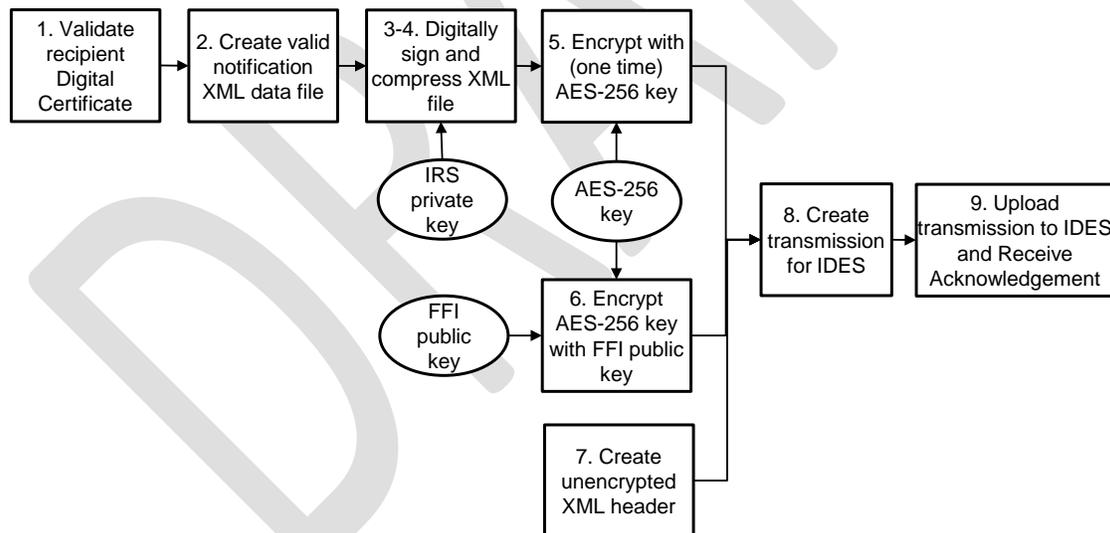
Records for Forms 8966 filed in paper are also subject to record processing, and paper filers are notified of errors requiring correction. However there are important differences from the notification process for electronic filers, as described below:

- Since the paper Form 8966 is not subject to any XML validation prior to record processing, the range of errors that can be detected on paper Forms 8966 is larger than those detected during record processing of electronically filed XML version of the Form 8966.
- Notifications indicate the Part and Line number on Form 8966 in which the error occurred.
- No notifications are sent for paper Forms 8966 on which no errors are detected.
- Notifications are sent by mail to the filer of the paper form (as identified in Part 1).

4.6.4 IRS Notification Uploads Notification to IDES

ICMM will use an automated process to transmit the notification resulting from file processing back to the FFI or HCTA which sent the file. This sub-process essentially duplicates many of the actions in the “FFI/HCTA Upload to IDES” sub-process. Also, at one or more stages in this process ICMM scans the resulting files for potential threats and viruses before transmitting. This sub-process is outlined in Figure 4-3 and described in the steps below (note: in the following sub-process the sender is now the IRS, and the FFI/HCTA is now the recipient):

Figure 4-3 IRS Notification Upload to IDES



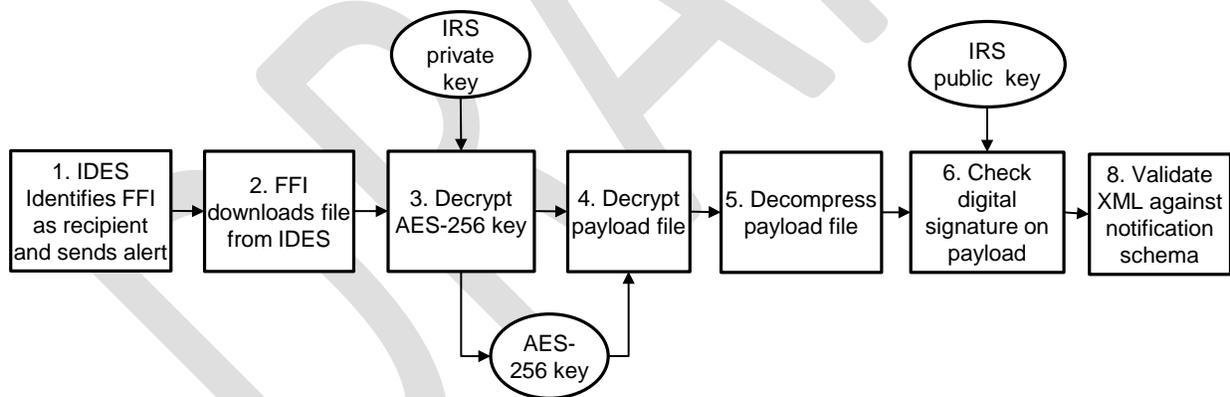
1. The validity of the FFI/HCTA recipient’s digital certificate on IDES is evaluated (this should almost always succeed under normal circumstances)
2. The notification is prepared in XML format according to the IRS notification XML schema. This step includes importing information from the FFI/HCTA’s original transmission to allow the recipient to link the notification to the appropriate original transmission.
3. The XML file is digitally signed using the IRS’s private key corresponding to the IRS’s certificate and public key on IDES.
4. The signed XML file is compressed using Zip or a similar utility.

5. ICMC generates a one-time AES-256 encryption key, and encrypts the compressed file with this key to create the payload file as the first file for the transmission.
6. ICMC then encrypts AES-256 key using the original sender's (FFI or HCTA) public key on IDES, thus generating the second file for the transmission.
7. ICMC creates the XML header file which identifies the IRS as sender and how the transmission should be routed.
8. The IDES transmission is formed by creating an archive with all files (XML header, AES-encrypted payload, and encrypted AES key).
9. ICMC uploads the transmission to IDES, and receives an acknowledgement from IDES that the transmission was received.

4.6.5 FFI/HCTA Filer Downloads Notification from IDES

The FFI or HCTA receiving a notification from the IRS on an earlier FATCA transmission will essentially repeat the steps ICMC uses to download and extract the XML data file. However, many FFIs (and even HCTAs) are likely to perform these steps manually, using software tools but with no automation support similar to what ICMC can provide. The discussion below is a summary of how individual FFIs may download notifications from the IRS (though the IRS has limited control over the sequence and completeness if events in this sub-process). This sub-process is outlined in Figure 4-4 and described in the steps below (note: in the following sub-process the sender is the IRS, and the FFI/HCTA is now the recipient):

Figure 4-4 FFI/HCTA Notification Download from IDES



1. IDES identifies the notification recipient (original FFI or HCTA) by unzipping the transmission archive and examining the unencrypted XML header, and sends an alert to the recipient.
2. The recipient logs into IDES, validates the IRS's digital certificate on IDES before downloading, and downloads the transmission in response to the IDES alert.
3. The recipient decrypts the AES-256 key file in the transmission with the recipient's private key.
4. The AES-256 key is used to decrypt the encrypted payload file.
5. The recipient decompresses the decrypted payload file, using software utilities available on their local operating system.
6. The IRS's digital signature is validated using the IRS public key available on IDES.

7. The user validates the notification XML file against the FATCA notification schema, and opens the XML file to examine the notification contents.

A failure at any point in this process may prompt a request for assistance from the FFI or HCTA recipient. Problems relating to step 2 above are IDES-related, and cannot be resolved by IRS. However, if the IRS's preparation of the transmission leads to recipient difficulties in steps 3 through 7 the recipient may contact the IRS to resolve the issue.

5 IRS ICMM FATCA Report Processing

As previously explained, ICMM will download and process Form 8966 XML files transmitted to the IRS through IDES by FFIs and HCTAs. ICMM processing will occur in two stages:

1. **File-level Processing**, in which the ICMM system will download and perform various actions on received files to assess the overall integrity of the file and to check for file level errors. Files passing this stage will result in an informational notification to the sender that the file has been validated and will be processed further at the record level, while failures at this stage will generate error notifications to the sender of the file.
2. **Record level Processing** will decompose and evaluate individual FATCA account and pooled report records within files passing the file-level processing stage, and store the resulting records in a database for downstream use in tax compliance.

5.1 File-level Processing Steps – Detailed Description

There are a number of processing activities that occur in IRS's file-level processing of the Intergovernmental FATCA XML files, which is performed as part of the "IRS Download and Process Transmission from IDES" sub-process described in Section 4.6.2. It is important to note that these activities are **not** entirely lineal, sequential steps - for example, decryption and threat and virus detection all occur at multiple levels as the file is processed. Each activity will generate an error notification to the sender if the processing activity is not completed or is unsuccessful. ***The specific notification number, content and appropriate response scripts for each of the error notifications generated is included in the Appendix of this document.***

1. **Transmission Download:** When the IRS receives an alert from IDES that a transmission has been received from an FFI or HCTA and is awaiting download, ICMM will attempt to download the transmission from IDES. The alert provides the sender, received timestamp, and other transmission information to ICMM. ICMM will use this alert information to request download of the transmission from IDES. However, there may be circumstances that prevent this download from occurring when ICMM initially receives the alert. For example, either system (IDES or ICMM) may be down for scheduled maintenance or due to an unscheduled outage. ICMM will regularly attempt to download a transmission after receiving the initial alert from IDES. If ICMM is not able to download the transmission within seven days after initial receipt by IDES, IDES will delete it. ICMM will continue to attempt to download the transmission until IDES provides a response saying it has been deleted. At this point, ICMM will consider the download step to have failed, and will issue an error notification to the sender (Notification code NDW below) using transmission identification information provided in the original IDES alert, allowing the sender to identify specifically which transmission has been lost. The remedy for the sender will be to upload the transmission to IDES again.

2. **File Decryption:** ICMM will attempt to decrypt the AES key used to encrypt the payload using the valid IRS public key, available on IDES. It will then attempt to use the AES key to decrypt the payload file. If either the AES key or the payload cannot be decrypted in this manner, ICMM will generate an error notification (Notification code NDC or NKS below) to the sender using file identification information received from IDES stating that the file could not be decrypted (NDC) or that the encryption key size is incorrect, most likely due to incorrect cyphering technique (NKS). The remedy for the user will be to first ensure that they are using the correct encryption method (EBC for files submitted prior to July 11, 2016 or CBC for files submitted on or after July 11, 2016) and that the IRS public key in use on their encryption system is the valid key that is available on IDES. The sender would then need to re-encrypt the digitally-signed and compressed plain text version of the referenced file with a new AES key, encrypt the new AES key with the valid IRS public key and upload a new transmission containing the file to IDES. Please note that prior to the July 11, 2016 Cipher Conversion, the NDC notification is the only notification regarding Decryption issues. Effective with the conversion, the NKS notification will be added to indicate cases in which it appears the filer has not switched to the new encryption method and the NDC notification will be modified slightly to indicate any other decryption issues.
3. **File Decompression:** Since the payload is compressed, ICMM must decompress the file. The IDES User Guide provides a list of recommended compression tools. While other tools may be used, the compression method must be recognized by one of the recommended tools for the file to be successfully decompressed by ICMM. If the decompression fails, ICMM will issue an error notification (Notification code NDP below) to the sender using file identification information received from IDES stating that file could not be decompressed. The sender will need to re-compress using a recognized compression method and upload a new transmission containing the file to IDES.
4. **Digital Signature Check:** After decompressing the payload, ICMM will attempt to verify the digital signature. The digital signature should have been generated by the sender of the file and proves that a) a FATCA file was sent by a FATCA partner (FFI or HCTA) and b) the FATCA file was not altered or corrupted during compression, encryption, decryption or decompression processes and not altered or corrupted during transmission to or from IDES. If the digital signature cannot be verified as belonging to the sender, ICMM will issue an error notification to the sender (Notification code NSC below) to the sender using file identification information received from IDES stating that the digital signature on the file could not be verified. The remedy for the sender will be to re-sign the file using the procedures provided in the IDES User Guide, re-compress, and upload a new transmission containing the file to IDES.
5. **Threat Scanning:** Files will be scanned for non-virus threats that could pose security threats to the IRS IT environment after each processing stage involving the archive and the enclosed files. These processing stages include “unzipping” the transmission archive, decryption of the AES key file, and decryption and decompression of the signed XML payload file. Potential threats include, but are not limited to the following:
 - prohibited characters (Apostrophe (‘), Double Dash (--)) and Hash (#))
 - hyperlinks
 - executable files
 - JavaScript components
 - compressed archive files

If any such items are detected ICMM will reject the file, send an error notification (Notification code NTD below) to the sender of the file, and stop further processing of the file. The error notification will inform the sender that a non-virus threat was found, but will not identify the specific type of threat. The sender will need to ensure any prohibited characters are removed from both the payload and sender metadata files; re-create the transmission, using up-to-date antivirus software to scan for and remove any viruses and/or threats at each of the processing steps; then upload the clean transmission to IDES.

6. **Virus Scanning:** Files will be checked by ICMM for known viruses after each processing stage. If a virus is found, ICMM will reject the file, send an error notification (Notification code NVS below) to the sender of the file, and stop further processing of the file. The error notification will inform the sender that a virus was found on the file, but will not identify the specific virus. The sender will need to re-create the transmission, using up-to-date antivirus software to scan for and remove any viruses and/or threats at each of the processing steps, then upload the clean transmission to IDES.
7. **Schema Validation:** Once a file has been decrypted, decompressed, validated and found to contain no cyber security threats, ICMM will determine whether it is a) a properly formed XML file (vs. a picture, Word document, or other file type) and b) that it is valid against the FATCA XML schema. This validation step ensures that the file structure conforms to the structure of the schema (e.g., data elements and sub-elements possess the proper relationships, data field contents conform to the schema specification). Both of these checks have a pass/fail outcome. If a file fails either of these checks, ICMM will reject the file, send an error notification (Notification code NSV below) to the sender of the file, and stop further processing of the file. The error notification will inform the sender that the file is not a valid FATCA XML file, but will not identify the specific problem or error within the validation process that was encountered. [Since file validation against a known XML schema is a fairly routine process, the IRS will not be allocating resources to inform a sender of specific validation errors.]
8. **Specific Schema Field Value Validations:** After the file passes schema validation, ICMM will then run the following field-specific checks:
 - the MessageRefId field, to ensure it contains at least one non-blank, alphanumeric character and is within the 200 character limit established for the field
 - the MessageRefId field, to ensure it is not duplicative with any other file the sender has submitted
 - the DocRefId fields (note: a file may include multiple DocRefId fields), to ensure they follow the required format and are within the 200 character limit established for the fieldRefIdRefId.
 - DocTypeIndic values for submitted records will be checked to ensure no test data, as indicated by DocTypeIndic values form FATCA11-14, is processed in the production environment
 - During testing periods, DocTypeIndic values for submitted records will be checked to ensure no production data, as indicated by DocTypeIndic values form FATCA01-04, is processed in test environments

While a file containing a duplicative value or blank spaces for MessageRefId RefId or an invalid format for DocRefId would pass schema validation, it would cause significant issues with business rules for unique file/record identification and file/record processing and therefore cannot be accepted by IRS. If these validation checks fail, ICMM will generate the appropriate error

notification code NMR; code NDM; or code NDR below, respectively) informing the sender of the invalid data. The sender will need to correct the invalid field(s) and upload a new transmission containing the file to IDES.

Interim Valid File Notification - If file processing successfully completes these steps, the filer receives a notification that the file has been received and its format validated, but that individual records have not yet been processed and the filer will receive additional notification once these records are processed as to the outcome of the record-level processing. This “valid file” notification is the Interim Valid File Notification.

5.2 Detailed Record Processing

Once all file-level processing steps on a received file are successfully completed, ICMM will then begin to identify and process individual records within these files.

Prior to record processing, all data in the received file will have been found to be valid according to the FATCA XML schema. However, there are record-level errors possible in records which conform to the FATCA schema. ICMM record-level processing will identify if there are any record-level errors, and will generate additional notifications (either that the records were processed successfully or of the specific error(s) identified) to filers at that time.

6 EPSS Support for ICMC File-Level Processing Error Notifications

This section describes the File Level Error Notifications generated by ICMC.

6.1 Error Notification Structure and Support

When ICMC generates an error notification, the file sender will receive an alert email from IDES notifying them that there is a file (the notification) ready for download. The email correspondence includes the file name of the "TransmissionID" in the original file. The original file sender will then access IDES to download the notification and would go through the same process IRS goes through in processing the original file (decrypting the AES key and payload, decompressing the payload, validating the digital signature, and validating the notification XML file against the IRS Notification Schema. Further instructions for retrieving the notification and processing the elements contained in it can be found in the *IDES User Guide*, available on the [IRS IDES Homepage](#) and the **FATCA Reports ICMC Notification XML Schema Guide (Publication 5189)**, respectively.

6.1.1 Sample Error Notification

The following Figure 6-1 is an example of what a file-level Error Notifications looks like in XML; this specific example is for the failed decryption (NDC) case:

Figure 6-1 Example XML Notification – Failed Decryption (NDC)

```

<?xml version="1.0" encoding="UTF-8"?>
- <!--
Sample XML file generated by XMLSpy|v2014 rel. 2 (http://www.altova.com)
-->
- <n1:FATCAFileErrorNotification xmlns="urn:fatca:fatcanotificationbase"
xmlns:n1="urn:fatca:fatcafileerrornotification"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" version="2.0">
- <FATCANotificationHeaderGrp>
<FATCANotificationCreateTs>2014-11-14T00:00:00Z</FATCANotificationCreateTs>
<FATCANotificationRefId>Notif12345</FATCANotificationRefId>
<FATCANotificationCd>NDC</FATCANotificationCd>
<FATCAEntitySenderId>000000.000000.TA.840</FATCAEntitySenderId>
<FATCAEntityReceiverId>S519K4.99999.SL.392</FATCAEntityReceiverId>
<CopiedToFATCAEntityId>000000.000000.TA.392</CopiedToFATCAEntityId>
<ContactInformationTxt>(url will be provided in actual
notification)</ContactInformationTxt>
</FATCANotificationHeaderGrp>
- <OriginalFileMetadataGrp>
<IDESTransmissionId>a7c6363de36f4c2192856b4d3283747c</IDESTransmissionId
>
<IDESSendingTs>2014-11-10T00:00:00Z</IDESSendingTs>
<OriginalIDESTransmissionId>c646151fe7ed4bd696efc8efe49226ac</OriginalIDESTr
ansmissionId>
<SenderFileId>SenderFile1</SenderFileId>
<UncompressedFileSizeKBQty>100000</UncompressedFileSizeKBQty>
</OriginalFileMetadataGrp>
<NotificationContentTxt>The IRS could not decrypt the referenced file following
download from IDES because the AES-256 key file was either blank, missing or
could not be decrypted, or because the decryption process failed to complete.
Please do not submit a request to correct, amend or void any of the records in this
file until you receive a notification that this file has been received as valid.
For more information on this notification, please see: (url will be provided in
actual notification)</NotificationContentTxt>
- <ActionRequestedGrp>
<ActionRequestedTxt>Resubmit file.</ActionRequestedTxt>
<ActionRequestedDueDateTxt>Your organization's due date for filing Form
8966.</ActionRequestedDueDateTxt>
</ActionRequestedGrp>
<HCTATreatyStampTxt>This information is furnished under the provisions of an
income tax treaty or tax information exchange agreement (TIEA) with a foreign
government, its use and disclosure must be governed by the provisions of that
treaty or TIEA.</HCTATreatyStampTxt>

</n1:FATCAFileErrorNotification>

```

The notification will inform the sender of the file with the processing error, the type of error encountered, and what to do about the error, as well as provide a link to additional resources on irs.gov where the sender can find more information on the type of error encountered and the steps required for resolution.

The irs.gov link to additional resources takes the filer to a web page with an email link which can be used to create a request for support to the IRS. This allows the filer to generate an email to the IRS which will be routed to EPSS for action. The contents of each notification, a description of the problem, error

resolution steps, links to additional resources, and Frequently Asked Questions (FAQs) for each of these file-level processing error notifications are described below in Section 6.3.

6.1.2 Notification Content

Key data elements in a FATCA file-level error Notification are described below:

- Notification Timestamp: time and date notification was generated
- Notification Reference ID: unique identifier for the notification created by ICMM
- Notification Code: 3-letter mnemonic indicating the type of trigger for the notification
- Sender ID: IRS's GIIN identifier (000000.00000.TA.840)
- Receiver ID: GIIN of receiving entity (FFI or HCTA)
- "Copy to" FATCA entity ID: GIIN of HCTA receiving a notification copy (for select Model 2 cases only)
- Contact Information Text: (included on error notifications only) provides a URL to a "hidden" web page with error notification FAQs, links to supporting information, and contact email addresses and phone numbers for EPSS
- Notification Content Text: brief description of reason for the notification
- Action requested: brief description of what recipient must do next
- Action requested by date: due date for action (typically will be filing date for Form 8966)
- HCTA treaty stamp: brief statement that exchanged data referenced in notification is covered by terms of a tax treaty (specific language will depend on jurisdiction of FFI).

6.2 Addressing Out of Scope Inquiries

EPSS will only be providing support related to the specific Error Notifications, identified in the introduction to this section (section 6.0). All other inquiries are considered out of scope. For out of scope inquiries, EPSS should document the question/issue as out of scope and close the case by providing referral information to the inquirer per the following as follows:

For **FFI online Registration support**, including help with Registration system login problems, error messages, and other technical issues, advise the inquirer to visit the FFI Registration website at <http://www.irs.gov/Businesses/Corporations/FATCA-Foreign-Financial-Institution-Registration-Tool>. This site includes links to FAQs as well as contact information for Registration technical support and additional questions.

For **IDES technical questions**, including onboarding/enrollment, IDES alerts, data transmission, file retention, public keys, or test files, advise the inquirer to visit the [IDES Support website](#) or contact the Help Desk by phone at 1-800-613-IDES (4773) or 605-271-0311. IDES Help Desk Hours are from 8am to 5pm Monday-Friday in your Time Zone. The Help Desk is English only.

For questions regarding FATCA Report data and/or file preparation, please advise the inquirer to review the "Data Preparation for FATCA XML Report" section of see the **IDES User Guide**, available on the [IRS IDES Homepage](#).

For inquiries dealing with questions regarding **Intergovernmental Agreements, Competent Authority Arrangements, or specific Competent Authority Requests**, instruct the inquirer to send their question to lbi.fatca.government@irs.gov. These questions will be reviewed and responded to on a weekly basis.

For questions dealing with **general FATCA compliance (including FFI requirements for compliance with FATCA registration and/or reporting, FFI list schema, and test file questions)**, instruct the inquirer to visit <http://www.irs.gov/Businesses/Corporations/Frequently-Asked-Questions-FAQs-FATCA-->

[Compliance-Legal](#) for a list of Frequently Asked Questions and Responses. If their question is not addressed, they can send it to the Foreign Payments Practice Group at lbi.fi.qiwpissues@irs.gov. FPP is the office within LB&I that is responsible for monitoring and enforcing compliance with FATCA and international withholding requirements.

6.3 Error Notification Response Repository by Error Notification

ICMM Notification 1: Failed Download (NDW)

Notification Contents	<p>Notification Code: NDW</p> <p>Notification Content: The IRS could not download the referenced file that had been posted to IDES. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</p> <p>Action Requested: Please repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp*: "This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement."</p>
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Cause of Problem	<ul style="list-style-type: none"> You successfully uploaded the transmission with the IDES Sender File ID and IDES Transmission ID to IDES The IRS could not download the transmission before expiration of the 7 day IDES retention period This may have been the result of an outage between IDES and the IRS, but did not involve any system or transmission components on your end However, as a result the transmission is no longer available in IDES for download.
Potential Resolution	<ul style="list-style-type: none"> Because the transmission is no longer present on IDES, you will need to upload the transmission referenced by the listed IDES Sender's File ID and IDES Transmission ID in the error notification again Please ensure that the IRS encryption key you used for the initial transmission has not changed. If it has, please re-encrypt the plain text version of the file you are sending with the new IRS key, and upload this new encrypted transmission to IDES The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> IRS IDES Homepage IDES Form 8966 instructions (including electronic filing instructions)
FAQs	<ol style="list-style-type: none"> What could have prevented the IRS from downloading this transmission? The IRS automatically downloads transmissions from IDES after receiving an alert from IDES that a transmission is available for download. We do not divulge the exact cause or reason for the failure of the automated process, but a system failure or outage on either side of the IRS-IDES connection led to the failure to download. What do I need to do as a result of this notification? Please upload the referenced transmission to IDES again by the due date that pertains to your organization, which is included in the notification body. The IRS will be notified when the transmission is available, and will download it at that time. Why can't the IRS download the transmission now? Because IDES automatically deletes transmissions that are not downloaded within seven days of upload, your transmission is no longer available on IDES. You must upload the transmission to IDES again to satisfy FATCA requirements. Please refer to the <i>IDES User Guide</i>, available on the IRS IDES Homepage, if you have any questions on how to prepare and upload transmissions to IDES. The IRS will be notified by IDES when your transmission is available, and will download it at that time. Was there a problem with the contents of my file? The IRS has not been able to process your file, so we cannot provide any feedback at this time on whether it is valid or not. After we have downloaded your transmission from IDES, we will process it and notify you of the results, including whether the file was successfully processed or if any additional errors were identified.

ICMM Notification 2: Failed Decryption (NDC)

Notification Contents	<p>Notification Code: NDC</p> <p>Notification Content: The IRS could not decrypt the referenced file following download from IDES because the AES-256 key file was either blank, missing or could not be decrypted, or because the decryption process failed to complete. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, including the classification of a failed file decryption under an intergovernmental agreement (IGA), please see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</p> <p>Action Requested: Please ensure the key/initialization vector file is encrypted using the valid IRS certificate on IDES, and the encrypted file is included in the IDES transmission packet. Please repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp*: "This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement."</p>
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Cause of Problem	<ul style="list-style-type: none"> • You are receiving this notice because the IRS was unable to decrypt your file after download from IDES • There are several situations that may have occurred: <ul style="list-style-type: none"> • the AES key provided with the file was not the same as the AES key used to encrypt the payload • the AES key used to encrypt is of the wrong type or, for files submitted prior to July 11, 2016, potentially the wrong size (Please note, for files submitted after July 11, 2016, incorrect key size, indicating incorrect cyphering technique, will be indicated by the NKS notification) • the AES key used to encrypt is missing completely • the public IRS key used to encrypt the AES key was not valid • the encryption settings were incompatible with the IRS decryption algorithm • the payload and/or encrypted AES key file was changed or modified after encryption.
Potential Resolution	<ul style="list-style-type: none"> • Ensure you have the valid IRS public encryption key on your system, downloaded from IDES • Please encrypt the digitally-signed and compressed payload of the referenced file with a new AES key and then encrypt the new AES key with the valid IRS public key. Ensure you are using the IRS recommended encryption settings and following all of the procedures and file naming conventions in the “Data Preparation for FATCA XML Report” section of the <i>IDES User Guide</i>, available on the IRS IDES Homepage. • Insert the re-encrypted payload and AES key files and a new XML header in an archive to create the IDES transmission • Finally, upload the transmission to IDES following all additional procedures (see <i>IDES User Guide</i>, available on the IRS IDES Homepage) for transmission preparation and upload • The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> • IRS IDES Homepage • IDES • Form 8966 instructions (including electronic filing instructions)
FAQs	<ol style="list-style-type: none"> 5. Which specific decryption step failed? For security reasons the IRS does not disclose which situation caused the decryption failure. However, if your file was submitted after the July 11, 2016 conversion to CBC encryption, this notification is used to indicate any decryption issue other than an AES key size issue. After the July 11, 2016 conversion, AES key size issues (which indicate potential use of the legacy ECB encryption) are identified specifically by the NKS notification. 6. What key should I use to encrypt my files? Please follow the procedures in the <i>IDES User Guide</i>, available on the IRS IDES Homepage, and your local encryption software to generate a unique, one-time use AES-256 key. You should be using this unique, one-time use AES-256 key to encrypt your payload and the valid IRS public key available on IDES to encrypt the AES key. 7. How can I determine if the IRS public key I am using is the correct version? The valid IRS key is available on IDES. Please see the <i>IDES User Guide</i>, available on the IRS IDES Homepage, for additional information and instructions on how to find and download the IRS public key for encrypting the AES key for transmission. 8. How do I download the valid public key for the IRS? Please see the <i>IDES User Guide</i>, available on the IRS IDES Homepage, for additional information and instructions on how to find and download the IRS public key for encrypting the AES key for transmission to the IRS. Also, please consult the documentation for your encryption software application for assistance in importing the IRS public key into your system after downloading.

ICMM Notification 2.1: Incorrect AES Key Size (NKS)

Notification Contents	<p>Notification Code: NKS</p> <p>Notification Content: The IRS could not decrypt the referenced file because the size of AES key file was incorrect. The IRS expects a 48 byte AES key file, consisting of a 32 byte (256 bit) key and 16 byte (128 bit) initialization vector combined in a 48 byte encrypted file. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, including the classification of a failed file decryption under an intergovernmental agreement (IGA), please see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications. For more information on formatting the AES key file, please consult the IDES User Guide at https://www.irs.gov/pub/fatca/p5190idesuserguide.pdf.</p> <p>Action Requested: Please ensure that you are using AES-256 encryption with CBC ciphering to encrypt your payload file, and that your 16-byte initialization vector is included with your AES key is in the encrypted key file. Please repost your corrected package to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp*: "This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement."</p>
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Cause of Problem	<ul style="list-style-type: none"> The IRS expects a 48 byte AES key file, consisting of a 32 byte (256 bit) key and 16 byte (128 bit) initialization vector combined in a 48 byte encrypted file. You are receiving this notice because your AES key file size was not consistent with these expectations. The most probable cause of this notification is that you are using the incorrect cyphering technique. Effective July 11, 2016, the IRS switched from ECB to CBC encryption. This notification indicates that a file may have been encrypted using ECB vs. CBC encryption based on the size of the AES key file. However, it will also be generated in response to other circumstances in which the AES key size is incorrect.
Potential Resolution	<ul style="list-style-type: none"> Ensure you are using AES-256 encryption with CBC ciphering to encrypt your payload file, and that your 16-byte initialization vector is included with your AES key in the encrypted key file Please encrypt the digitally-signed and compressed payload of the referenced file with the new AES key and then encrypt the new AES key with the valid IRS public key. Ensure you are using the IRS recommended encryption settings and following all of the procedures and file naming conventions in the “Data Preparation for FATCA XML Report” section of the <i>IDES User Guide</i>, available on the IRS IDES Homepage. Insert the re-encrypted payload and AES key files and a new XML header in an archive to create the IDES transmission. Finally, upload the transmission to IDES following all additional procedures (see <i>IDES User Guide</i>, available on the IRS IDES Homepage) for transmission preparation and upload. The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> IRS IDES Homepage IDES Form 8966 instructions (including electronic filing instructions)
FAQs	<ol style="list-style-type: none"> Which specific decryption step failed? This notification indicates an issue specifically with the AES key file size. You may not be using the CBC cipher, required as of July 11, 2016 or the AES key file size may be incorrect for another reason. What key should I use to encrypt my files? Please follow the procedures in the <i>IDES User Guide</i>, available on the IRS IDES Homepage, and your local encryption software to generate a unique, one-time use AES-256 key with CBC ciphering. You should be using this unique, one-time use AES-256 key to encrypt your payload and the valid IRS public key available on IDES to encrypt the AES key. Ensure that your 16-byte initialization vector is included with your AES key in the encrypted key file. How do I ensure I am using the right encryption method? Please refer to the <i>IDES User Guide</i>, available on the IRS IDES Homepage, and your local encryption software for specific instructions on using the CBC ciphering encryption process.

ICMM Notification 2.2: Failed Decompression (NDP)

Notification Contents	<p>Notification Code: NDP</p> <p>Notification Content: The IRS could not decompress the referenced file following download from IDES. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</p> <p>Action Requested: Please compress the file (before encrypting) and repost the file to IDES</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp*: "This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement."</p>
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Cause of Problem	<ul style="list-style-type: none"> You are receiving this notice because the IRS was unable to decompress your file after download from IDES The decompression failure occurred either because the file was compressed using an unsupported compression tool or method, one or more files in the transmission are missing compression (not zipped), or because the file became corrupted after compression but before the AES encryption step.
Potential Resolution	<ul style="list-style-type: none"> Please recompress the digitally signed XML file using a ZIP compression tool and the standard Deflate compression method. Then create a new IDES transmission with this file, following all procedures (see the <i>IDES User Guide</i>, available on the IRS IDES Homepage) for IDES transmission preparation and upload For a list of recommended tools and additional instructions for compression and file naming requirements, please refer to the <i>IDES User Guide</i>, available on the IRS IDES Homepage. The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> IRS IDES Homepage IDES Form 8966 instructions (including electronic filing instructions)
FAQs	<p>12. <i>What tool should I be using to compress the file?</i> For a list of recommended tools and additional instructions for compression, please refer to the <i>IDES User Guide</i>, available on the IRS IDES Homepage.</p>

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ICMM Notification 3.1: Failed Threat Scan (NTD)

Notification Contents	<p>Notification Code: NTD</p> <p>Notification Content: The IRS detected one or more potential security threats within the decrypted version of the referenced file following download from IDES. Such threats include but are not limited to hyperlinks, Java script, and executable files. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</p> <p>Action Requested: Please scan the file for known threats and viruses, remove all detected threats and viruses prior to encryption and re-encrypt and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp*: "This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement."</p>

Cause of Problem	<ul style="list-style-type: none"> The IRS detected one or more security threats or prohibited characters embedded in the decrypted version of the payload and/or Sender Metadata files. We cannot accept files with embedded security threats or prohibited characters. Note that the Apostrophe ('), Double Dash (--) and Hash (#) characters are prohibited by IRS as they could pose a security threat. (For a full list of character restrictions, see FATCA XML Schema Best Practices for Form 8966). As these characters would not be detected by an antivirus product, you will need to take other measure to ensure these characters are not present in any of your files. The IRS scans each transmission archive file and all files contained in the archive for viruses and other threats after each processing stage involving the archive and the enclosed files. These processing stages include “unzipping” the transmission archive, decryption of the AES-key file, and decryption and decompression of the signed XML payload file. One of these scans detected a non-virus security threat, which triggered this notification.
Potential Resolution	<ul style="list-style-type: none"> Please remove all prohibited characters from the payload and Sender Metadata files, then rebuild the full transmission by following all additional procedures (see the <i>IDES User Guide</i>, available on the IRS IDES Homepage) and scanning for viruses and other security threats with up-to-date antivirus software at each step in the process (digital signature, compression, encryption of the payload and AES key files, creation of the IDES metadata file, creation of the full transmission files). Upload the full transmission to IDES. The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> None identified
FAQs	<p>13. What threat did the IRS detect? For security reasons the IRS does not disclose specific threats identified on electronic communications received from third parties, or what we use to identify these threat. However, these threats can include items such as:</p> <ul style="list-style-type: none"> hyperlinks embedded within received files JavaScript components executable files (e.g., .exe files) compressed archive files prohibited characters (Apostrophe ('), Double Dash (--) and Hash (#)) <p>These items should not be part of any submitted file.</p> <p>14. What antivirus product should I use to clean my file? As prohibited characters would not be detected by an antivirus product, you will need to take other measures to ensure these characters are not present in any of your files. Generally, any up-to-date and widely accepted antivirus software product should be capable of finding any other threat the IRS detected. The IRS uses such products for virus and threat detection and removal. However, the IRS does not recommend the use of a particular product for this purpose.</p> <p>15. What should I do if I need help with scanning my file for threats? It is the sender’s responsibility to ensure all files are virus and threat free and comply with all IRS requirements and restrictions. Please contact your local IT support staff for assistance with this step, or consult the IDES User Guide and documentation provided by your antivirus software provider. The IRS cannot provide technical assistance with this process.</p>

ICMM Notification 3.2: Failed Virus Scan (NVS)

Notification Contents	<p>Notification Code: NVS</p> <p>Notification Content: The IRS detected one or more known viruses within the decrypted version of the referenced file following download from IDES. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</p> <p>Action Requested: Please scan the file for known threats and viruses, remove all detected threats and viruses prior to encryption, and re-encrypt and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp*: "This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement."</p>

Cause of Problem	<ul style="list-style-type: none"> • The IRS detected one or more computer viruses embedded in the decrypted version of the file. We cannot accept a file with viruses present • The IRS scans each transmission archive file and all files contained in the archive for viruses and other threats after each processing stage involving the archive and the enclosed files. These processing stages include “unzipping” the transmission archive, decryption of the AES key file, and decryption and decompression of the signed XML payload file • One of these scans detected a virus, which triggered this notification.
Potential Resolution	<ul style="list-style-type: none"> • Rebuild the full transmission for this payload file by following all procedures (see the IDES User Guide, available on the IRS IDES Homepage) and scanning for viruses and other security threats with up-to-date antivirus software at each step in the process (digital signature, compression, encryption of the payload and AES key files, creation of the IDES metadata file, creation of the full transmission files). • Upload the full transmission to IDES. • The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> • None identified
FAQs	<p>16. What virus did the IRS detect? For security reasons the IRS does not disclose specific viruses identified on electronic communications received from third parties, or what we use to identify viruses. However, the viruses we detect are typically found using up-to-date commercial anti-virus products.</p> <p>17. What antivirus product should I use to clean my file? Generally, any up-to-date and widely accepted antivirus software product should be capable of finding the virus the IRS detected. The IRS uses such products for virus and threat detection and removal. However, the IRS does not recommend the use of a particular product for this purpose.</p> <p>18. What should I do if I need help with scanning my file for viruses? It is the sender’s responsibility to provide clean files, and to ensure all files are virus free. Please contact your local IT support staff for assistance with this step, or consult the documentation provided by your antivirus software provider. The IRS cannot provide technical assistance with this process.</p>

ICMM Notification 4: Failed Schema Validation (NSV)

Notification Contents	<p>Notification Code: NSV</p> <p>Notification Content: The referenced file failed validation against the Intergovernmental FATCA XML Schema. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</p> <p>Action Requested: Please re-validate the file against the Intergovernmental FATCA XML Schema, resolve any validation errors, and re-encrypt and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp*: "This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement."</p>
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Cause of Problem	<ul style="list-style-type: none"> The referenced file has one or more XML schema validation errors
Potential Resolution	<ul style="list-style-type: none"> Please revalidate the referenced file against the FATCA XML Schema (IRS Publication 5124 available at FATCA XML Schema) to identify and resolve the specific validation issue. Also, please be aware that use of the ampersand (&) and less than (<) symbols are prohibited as they are not allowed by XML syntax rules and will cause the transmission to be rejected with a failed schema error notification. These symbols must be replaced with entity references. Use this inspected file to recreate an IDES transmission and upload to IDES following all procedures (see the <i>IDES User Guide</i>, available on the IRS IDES Homepage) for transmission preparation and upload The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> IRS Publication 5124 (FATCA XML Schema) Form 8966 instructions (including electronic filing instructions) IRS IDES Homepage
FAQs	<p>19. What was the specific validation error that the IRS detected on my file? There were one or more validation errors identified on your file. The IRS does not provide specific error information for this type of file error, but these errors can be identified by using any widely accepted XML validation tool.</p> <p>20. Are there any characters that are not allowed due to XML syntax rules and should be avoided in submitted XML documents? Use of the ampersand (&) and less than (<) symbols are prohibited as they are not allowed by XML syntax rules and will cause the transmission to be rejected with a failed schema error notification. These symbols must be replaced with entity references. Substituting any ampersand symbols with "&" and less than symbols with "<" in XML files will prevent the generation of the error notification.</p>

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ICMM Notification 4.1: File Contains Invalid MessageRefId (NMR)

Notification Contents	<p>Notification Code: NMR</p> <p>Notification Content: The referenced file has an invalid MessageRefId field consisting of all blank characters or exceeding 200 characters. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</p> <p>Action Requested: Please replace any all-blank character MessageRefId field values with non-blank entries, and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp*: "This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement."</p>

Cause of Problem	<ul style="list-style-type: none"> • The MessageRefId schema field in the referenced file consists of one or more blank characters or exceeds 200 characters in length • This field should be a unique identifier for a report file and is required to be at least one, but no more than 200, alphanumeric characters, and cannot be all blank characters.
Potential Resolution	<ul style="list-style-type: none"> • Please correct the file by including a unique, valid alphanumeric character string in the MessageRefId field per the FATCA XML Schema User Guide (IRS Publication 5124 available at FATCA XML Schema) that does not consist of all blanks and that is no more than 200 characters in length. Use this file to recreate an IDES transmission and upload to IDES following all procedures (see <i>IDES User Guide</i>, available on the IRS IDES Homepage) for transmission preparation and upload • The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> • IRS Publication 5124 (FATCA XML Schema) • Form 8966 instructions (including electronic filing instructions) • IRS IDES Homepage
FAQs	<p>21. Why was this issue not identified by my XML validation tool? The FATCA XML Schema User Guide (IRS Publication 5124 available at FATCA XML Schema) states that the MessageRefId should be a unique identifying number (created by the sender) that identifies the particular message being sent. Although a MessageRefId consisting of all blanks is valid against the schema, the IRS does not consider a blank MessageRefId to be unique. Furthermore, we have limited the MessageRefId and DocRefId fields to 200 characters. We require non-blank MessageRefIds and DocRefIds that are no more than 200 characters in length in order to be able to accept your file.</p>

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ICMM Notification 4.2: File Contains Duplicate MessageRefId (NDM)

Notification Contents	<p>Notification Code: NDM</p> <p>Notification Content: The referenced file has a duplicate MessageRefId value that was received on a previous file. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</p> <p>Action Requested: Please replace the MessageRefId field value with a unique value (not containing all blanks), and repost the file to IDES.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp*: "This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement."</p>
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Cause of Problem	<ul style="list-style-type: none"> The MessageRefId schema field in the referenced file is duplicative of another file you have submitted. This field should be a unique identifying number for a report file and is required to be a string of at least one alphanumeric character.
Potential Resolution	<ul style="list-style-type: none"> Please correct the file by including a unique, valid alphanumeric character string in the MessageRefId field per the FATCA XML Schema User Guide (IRS Publication 5124 available at FATCA XML Schema) that does not consist of all blanks. Use this file to recreate an IDES transmission and upload to IDES following all procedures (see <i>IDES User Guide</i>, available on the IRS IDES Homepage) for transmission preparation and upload The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> IRS Publication 5124 (FATCA XML Schema) Form 8966 instructions (including electronic filing instructions) IRS IDES Homepage
FAQs	<p>22. Why was this issue not identified by my XML validation tool? While your file is in the valid XML format, comparison of MessageRefIds takes place outside of XML validation. The FATCA XML Schema User Guide (IRS Publication 5124 available at FATCA XML Schema) states that the MessageRefId should be a unique identifying number (created by the sender) that identifies the particular message being sent. The IRS cannot accept more than one file from the same sender with the same MessageRefId.</p>

DRAFT

ICMM Notification 4.3: File Contains Invalid DocRefId (NDR)

Notification Contents	<p>Notification Code: NDR</p> <p>Notification Content: The referenced file has Refldone or more invalid DocRefId values. Please do not submit a request to correct, amend or void any of the records in this file until you receive a notification that this file has been received as valid. For more information on this notification, please see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</p> <p>Action Requested: Please replace any blank DocRefId field values with alpha numeric names and repost the file to IDES. Also, please consider using the recommended FATCA DocRefId naming conventions when assigning DocRefId values for this file and future files.Refld</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp*: "This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement."</p>

Cause of Problem	<ul style="list-style-type: none"> • One or more records with DocRefId schema fields in the submitted file consist of one or more blank characters or exceed 200 characters in length or otherwise do not follow the required format of (<ReportingGIIN>.<UniqueValue>) • These fields should contain the unique identifier of the specific account or pooled report record they reference and are required to follow the specified format of <ReportingGIIN>.<UniqueValue>. They must contain no more than 200, alphanumeric characters, and cannot be all blank characters
Potential Resolution	<ul style="list-style-type: none"> • Please correct the file by ensuring DocRefIds for all records follow the required DocRefId format (<ReportingGIIN>.<UniqueValue>) per the FATCA XML Schema Best Practices guidance at FATCA XML Schemas Best Practices for Form 8966 DocRefId and are no more than 200 characters in length. Use this file to recreate an IDES transmission and upload to IDES following all procedures (see <i>IDES User Guide</i>, available on the IRS IDES Homepage) for transmission preparation and upload.ReflD • The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> • IRS Publication 5124 (FATCA XML Schema) • FATCA XML Schemas Best Practices for Form 8966 DocRefId • Form 8966 instructions • IRS IDES Homepage
FAQs	<p>23. Why was this issue not identified by my XML validation tool? The FATCA XML Schema User Guide (IRS Publication 5124 available at FATCA XML Schema) states that the DocRefId data element should contain the unique identifier of the specific account or pooled report it references. Currently the IRS's more specific requirements for DocRefIds are not reflected in the XML schema so DocRefId validation errors will not be detected by a schema validation tool.</p> <p>ReflDReflDReflDReflDThe IRSrequires non-blank ReflDDocRefIds that follow the format of <ReportingGIIN>.<UniqueValue>,and are no more than 200 characters in length in order to be able to accept your file.</p>

ICMM Notification 4.4: File Contains Test Data for Production Environment (NTP)

Notification Contents	<p>Notification Code: NTP</p> <p>Notification Content: The referenced file contains one or more records with a DocTypeIndic value in the range FATCA11-FATCA14, indicating test data. As a result, the IRS cannot accept this file as a valid FATCA Report submission. Valid FATCA Reports must have DocTypeIndic values in the range FATCA1-FATCA4 for all account and/or pooled report records. For more information on the DocTypeIndic data element, please consult IRS Publication 5124 or For more information on this notifications see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</p> <p>Action Requested: If this file was intended to be submitted to the IRS as a valid FATCA Report, please resubmit with DocTypeIndic values in the range FATCA1-FATCA4 for all account and/or pooled report records in the file. If this file was intended as a test file, please submit to the IDES test environment during an IRS-provided test window.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp*: "This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement."</p>
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Cause of Problem	<ul style="list-style-type: none"> • One or more records in the indicated file has a DocSpecIndic value for test data (FATCA11-FATCA14), and the IRS cannot accept any of the records in this file as valid FATCA submissions • The IRS has mandated that test and production data cannot be mixed in the same file.
Potential Resolution	<ul style="list-style-type: none"> • Please review the data in the indicated transmission to determine if the data is meant to be submitted as an actual FATCA submission or is simply test data. If the data must be resubmitted, the DocTypeIndic value must be set (to FATCA01-FATCA04) for each record in the file. • Please review the IDES and ICMM testing schedules on the IRS IDES Homepage to determine IDES and ICMM testing schedules and availability
Other Links/ Resources	<ul style="list-style-type: none"> • IRS Publication 5124 (FATCA XML Schema) • Form 8966 instructions (including electronic filing instructions) • IRS IDES Homepage
FAQs	<p>24. <i>Do I need to void or correct this record?</i> Since this data is considered to be test data, and the IRS discourages submission of test data in its production environments, no further action should be taken with respect to this record.. Please do not attempt to void, correct, or amend this record with additional test data. However, if you determine that the record is a valid record please resubmit with the proper DocSpecIndic value through IDES to the ICMM production environment.</p>

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ICMM Notification 4.5: File Contains Production Data for Test Environment (NPT)

Notification Contents	<p>Notification Code: NPT</p> <p>Notification Content: The referenced file was received by the IRS in a test environment with one or more records having a DocTypeIndic value in the range FATCA1-FATCA4. These DocTypeIndic values indicate data in this file may have been intended as a valid FATCA Report submission. FATCA Reports received in test environments are not accepted by the IRS as a valid FATCA Report submissions. Submissions to the test environment should only include records with DocTypeIndic in the range FATCA11-FATCA14, indicating test files. For more information on this notification, please see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</p> <p>Action Requested: If this file was intended to be submitted to the IRS as a valid FATCA Report, please resubmit this data with DocTypeIndic values in the range FATCA1-FATCA4 for all account and/or pooled report records in the file to the correct link in IDES. If this file was intended as a test file, please correct the DocTypeIndic for all records and resubmit to the IDES test link.</p> <p>Action Requested By Date: Your organization's due date for filing Form 8966.</p> <p>HCTA Model 1/Model 2 Treaty Stamp*: "This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement."</p>
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Cause of Problem	<ul style="list-style-type: none"> • One or more records submitted to the ICMM test environment in the indicated file has a DocSpecIndic value for production data (FATCA01-FATCA14), and the IRS cannot accept any of the records in this file as valid FATCA submissions • The IRS has mandated that test and production data cannot be mixed in the same file.
Potential Resolution	<ul style="list-style-type: none"> • Please review the data in the indicated transmission to determine if the data is meant to be submitted as an actual FATCA submission or is simply test data. If the data must be resubmitted, the DocTypeIndic value must be set (to FATCA01-FATCA04) for each record in the file. • Please ensure that all future test data has DocTypeIndic values for test data (FATCA11-FATCA14). • Please review the IDES and ICMM testing schedules on the IRS IDES Homepage to determine IDES and ICMM testing schedules and availability
Other Links/ Resources	<ul style="list-style-type: none"> • IRS Publication 5124 (FATCA XML Schema) • Form 8966 instructions (including electronic filing instructions) • IRS IDES Homepage
FAQs	<p>25. <i>Do I need to void or correct this record?</i> This record does not need to be voided or otherwise modified in the test environment. If the records are valid production submissions, please submit through IDES to the ICMM production environment.</p>

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7 ICMC Record –Level Processing

7.1 Overview

In the first seven months of 2015 the IRS has been using ICMC to check in coming electronically submitted FATCA XML files for basic readability by ensuring no file level errors are present, and transcribing paper-filed Forms 8966. However, none of the data elements have been reviewed or stored in a database. In August 2015 ICMC begins record-level on both data sets, extracting individual account and pooled reports, reviewing data elements in each against various business rules, and storing the reviewed records in a database. As each electronic file is processed a “Valid File” notification in XML form will be sent to the filer, and if there are record-level errors present these will be documented in the “Valid File” notification. As paper records are processed, a paper error notification listing record-level errors on a single Form 8966 will be sent to the filer (FFI) sending the paper form; these filers do not receive any notification if record-level processing detects no errors. Regardless of the presence of errors, however, all processed records are stored in the ICMC database, along with their processing status and identified errors.

7.2 Record-level Errors

The types of conditions on specific data elements that are flagged as record-level errors primarily address the presence and/or format of data elements in relation to IRS filing instructions for Form 8966 and usage of the FATCA schema in Publication 5124. Some of the types of business rules that are applied to FATCA account data include:

- Presence of filer or Reporting FI name
- Presence and/or formatting of filer/Reporting FI GIIN or EIN
- Presence of city or town for various parties on Form 8966 (e.g., filer, account holder, etc...)
- Valid numeric asset value or account balance (must be a numeric value)

For electronically filed data, many of the checks for presence and/or formatting of data elements are actually built into the schema, and will not be flagged as record-level errors; instead, absence or formatting errors will cause the electronic filer to receive a file-error notification for schema validation failure. Therefore, the range of error conditions for paper record processing is larger than for electronic submissions. Because there is no schema “pre-check” for paper forms prior to processing the number of errors for paper account or pooled reports is somewhat larger than the corresponding number for electronic data. For example, for pooled reports the filer is required to specify the type of pool by choosing one of six pool types. For paper records, the filer must select one box in Part V, line 1 for a pooled report; failure to select one box, or checking more than one results in a record-level error for that paper Form 8966. For electronic records, this data is part of the schema (the AccountPooledReportType element within the PoolReport element), and the checks on this element are part of schema validation, and not record processing. Another example is currency code used for an account or pooled report value. For electronic records the currency code must be drawn from a valid value that is part of the schema, and this check is part of schema validation in file processing; however, for paper records, the currency codes in Part IV line 2 or Part V line 5 are not checked until record processing.

7.3 Generation of Records from Submissions

There are similarities between ICMC and the legacy information return process in terms of how records are generated for paper Form 8966 data. Essentially, each paper Form 8966 will result in a single account or pooled report in the ICMC database (only one account or pooled report may be declared on a single Form 8966). Similar to information return processing, each submitted paper Form 8966 is

converted into a standalone record. However, for electronically filed FATCA reports each account or pooled report record in the ICM database is generated using data from different segments of the XML file. Each FATCA XML file will consist of a **MessageSpec** element, containing metadata about the file and transmission, and one or more **FATCA** elements (element name is "FATCA") with actual data being reported. Each FATCA element consists of a single **ReportingFI** element, identifying the financial institution maintaining the accounts or assets being reported on or makes reportable payments being documented in the FATCA block, and one or more **ReportingGroup** element, containing the actual account or pooled reports in **AccountReport** and **PoolReport** elements, respectively along with possible (optional) information on other FFIs (sponsors, intermediaries) involved with these reports. The hierarchy of these elements, or how they are embedded within each other, is illustrated in Figure 7-1.

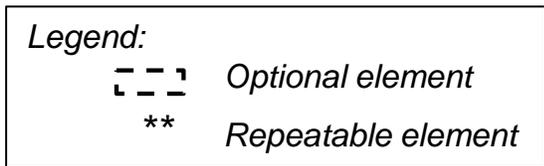
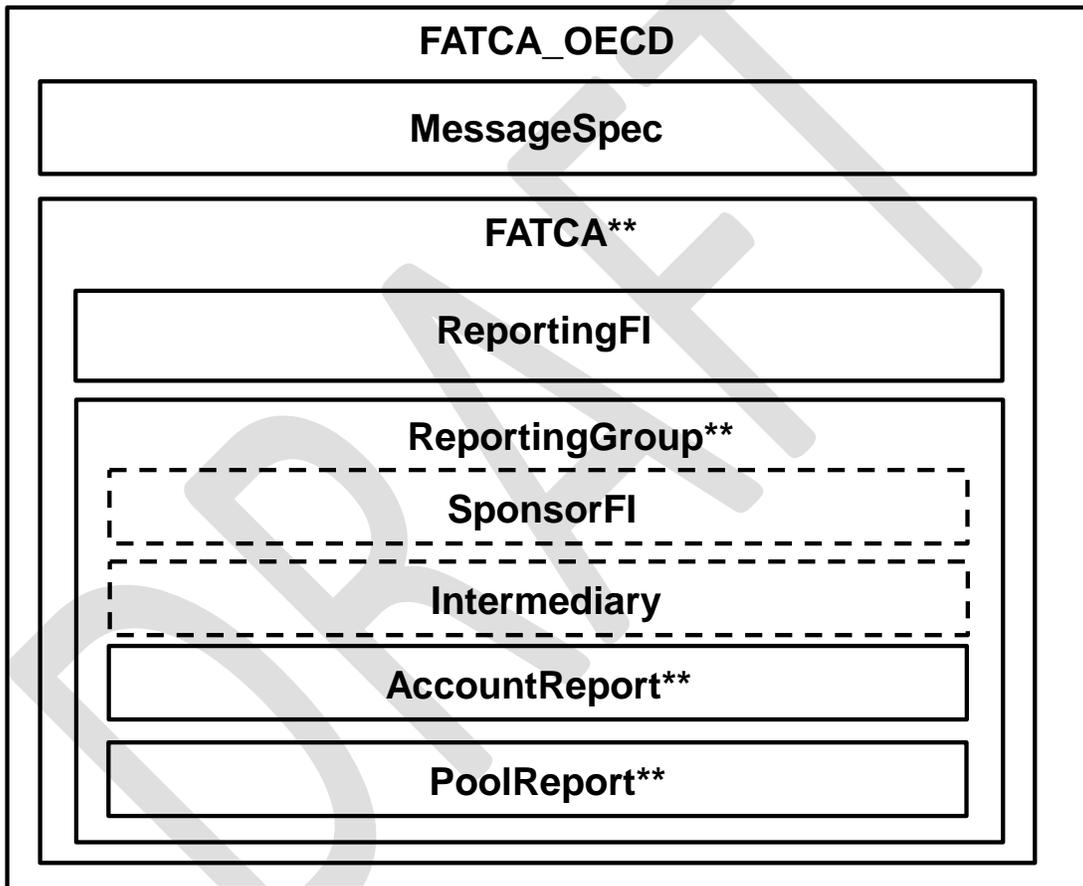


Figure 7-1 FATCA XML File Structure

ICMM creates database records from this file structure at the account and pooled report level by appending data from the XML file above each record in the XML hierarchy. Figure 7-2 shows how data records are formed from a hypothetical FATCA XML file containing two account reports and a pooled

report submitted by a reporting FFI with a sponsor. Each record is generated with unique data from each account or pooled report, but with common data from the shared elements further up the XML hierarchy.

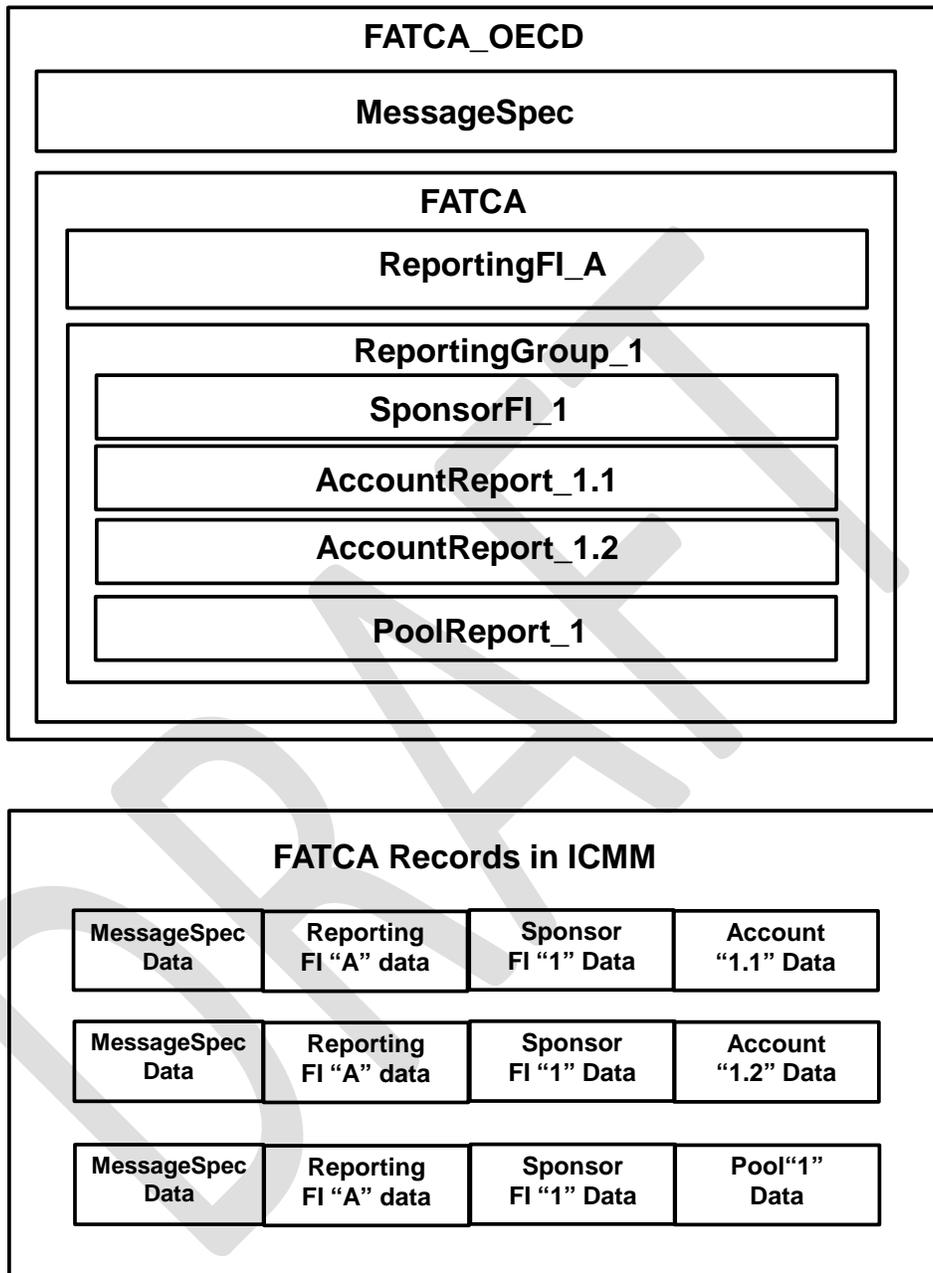


Figure 7-2 FATCA XML File Structure

8 EPSS Support for ICMM Record-Level Processing Error Notifications - Electronic Filing

EPSS support for ICMM includes assisting filers receiving notifications of record-level errors with their FATCA filings, both electronic and paper. This section describes how electronic filers will be notified by ICMM of record-level errors, the types of errors ICMM will detect, and how filers must resubmit their data in response to these errors.

8.1 Valid File Notification

When a file passes all file processing and validation checks, it is considered a “valid”, or readable, file. However, though valid/readable, one or more individual records contained in the file may contain errors which prevent erroneous records from being considered usable. ICMM record-level processing detects these errors, and includes record-level error information for each detected error with valid file notification for the file containing the record error. All “valid file notifications” will provide the following:

- The Name and TIN/GIIN of the reporting FFI
- The Name and GIIN of the sponsoring FFI (sponsoring the reporting FFI) submitting the file, if there is one
- A count of records processed (total, account report records, pooled report records)

In addition, if a valid file contains errors at the record level, the “valid file notification” will also provide the following information in addition to the above:

- The identifying information for each record in which errors were detected (including MessageRefId for the file and the DocRefId field from the “DocSpec” element for the record)
- Type of record (account or pooled)
- The “Document Type Indicator Code” for the record, indicating whether the submitted record is original, corrected, or amended, or a “void” record nullifying a previously submitted record.
- The 4-digit record level error code for the error found in the record; “8001” denotes a “Pooled Report Error” and one or more field-level errors in a pooled report record, “8007” denotes a “Account Report Error” and one or more field-level errors in an account report record, etc...

8.2 Record-level Processing Errors

If the record-level error is due to field-level errors resulting from problems with data element values, each field level error is listed with the following information:

- Field Name: path for XML data elements ending in the sub-element causing the error
- Error Description: short text description of the error or omission found in the field.

This pattern will be repeated for all field level errors identified in each record, for all records in a file. The following table shows the data for record level errors that will be provided in the “valid file with errors” notification, and supporting elements for addressing these notifications.

The following is an illustrative rendering of an ICMM Valid File Notification for a file with a single account report which documents the presence and location of 2 record level errors within the account record. The actual XML version for this Valid File Notification, which is what the recipient will actually see, is provided in Appendix C.

ICMM Notification 5: Valid File Notification (NVF) (With Record Level Errors)

Notification Contents	<p>Notification Code: NVF</p> <p>Notification Content: The IRS has determined that the referenced file is in a valid format. Individual records submitted within the file have been processed and any errors detected during processing are provided in the Error Details included. For more information about record level errors, including their classification under an intergovernmental agreement (IGA), see: http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</p> <p>IRS Processing Data for Received File: File Type: <new, revised, duplicate> # of Records in File: <number> # of Account Reports in File: <number> # of Pooled Reports in File: <number></p> <p>Record Level Errors for Received File: Sponsor FI Name: Sponsor_name_(if any) Sponsor FI GIIN: XXXXXX.XXXXXX.XX.XXX Reporting FI Name: Reporting_FI_name Reporting FI GIIN: XXXXXX.XXXXXX.XX.XXX (may be EIN is Sponsor is present)</p> <p>(The following is for an account report record with two field-level errors)</p> <p>FATCA Report Code; ACCOUNT_REPORT Document Type Indicator Code: FATCA1 <denotes "Original FATCA Report"> DocRefId: ARDOCRefId2 Record Level Error Code: 8007 <denotes account report with field level errors></p> <p>Field Name: ReportingGroup/AccountReport/AccountHolder/Individual/Name Error Description: Name of Account Holder or Recipient Not Provided</p> <p>Field Name: ReportingFI/Address/AddressFix/City; ReportingFI/Address/AddressFree Error Description: City or Town Not Provided for Filer</p> <p>[Continued]</p>
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Notification
Contents
[Continued]

Action Requested:

Please correct all records with errors. Ensure the corrected record has a CorrDocRefId that matches the Doc RefId and a CorrMessageRefId that matches the MessageRefId for the original(s) record submitted for which the IRS is requesting a correction and post the file with corrected records to IDES. If the record has an error in the Reporting FI GIIN, the original record must be voided and a new record submitted to correct the GIIN.

Action Requested By Date:

Your organization's due date for filing Form 8966.

HCTA Model 1/Model 2 Treaty Stamp*:

"This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement."

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Cause of Problem	<ul style="list-style-type: none"> • One or more fields within the record level details failed validation text. These record level errors are identified in the error details section of the notification with the field name and field error text for each error. Refer to the table below for specific error types and resolutions.
Potential Resolution	<ul style="list-style-type: none"> • Please correct all individual record errors within the file. • Ensure the corrected record has a CorrDocRefId that matches the Doc RefId and a CorrMessageRefId that matches the MessageRefId for the original record(s) submitted for which the IRS is requesting a correction. • If the record has an error in the Reporting FI GIIN, the original record must be voided and a new record submitted to correct the GIIN. • Set the DocTypeIndic value for the DocSpec element for the corrected record to "FATCA2" to denote corrected data submission • Use this file to recreate an IDES transmission and upload to IDES following all procedures (see IDES User Guide, available on the IRS IDES Homepage) for transmission preparation and upload • The IRS will send another notification to you through IDES after we have downloaded and processed your file further.
Other Links/ Resources	<ul style="list-style-type: none"> • IRS Publication 5124 (FATCA XML Schema) • Form 8966 instructions (including electronic filing instructions) • IRS IDES Homepage

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FAQs

26. **What does this notification mean?** The IRS has received and successfully completed processing of your file. At this time, one or more record level errors have been identified in your file and require correction. You will need to correct all identified record level errors and resubmit the file.
27. **Why weren't these errors identified by my XML validation tool?** It is possible for a FATCA XML file to validate against the FATCA Intergovernmental Schema while not complying with FATCA reporting requirements. The FATCA XML V1.1 User Guide (IRS Publication 5124) details rules for FATCA data elements needed to validate against the FATCA schema, as well as mandatory data elements and values which extend beyond validation but are needed to satisfy reporting requirements.
28. **Which record contained the detected errors?** The record indicated by the DocRefId value included with the error descriptions in the notifications is the record that must be corrected and resubmitted
29. **What do the record level error codes in the notification mean?** The 12 record-level error codes, descriptions, and remedial actions are provided in the Table 4-1 below.
30. **Do I need to resubmit the entire file or just the corrected record?** Only the record with the corrected data needs to be resubmitted. However, since the record must be transmitted in a valid FATCA Report file, the full file must have sufficient data from the original file to pass XML validation and other checks, as defined in IRS Publication 5124, including MessageSpec and ReportingFI data elements. In addition, the following changes from the original file are necessary:
- The DocTypeIndic value should be "FATCA2" for corrected data
 - The MesRefId and DocRefId values for the file being corrected must be provided in the CorrMesRefId and CorrDocRefId fields for the submitted file.
31. **What triggers a "TIN not valid" error message?** The "TIN not valid" error is generated when a non-GIIN value for a TIN data element is not in a valid format for a U.S. 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 when filed:
- 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")
- If a filer has confirmed that the US TIN is correct and receives an Valid File Notification (NVF) with a "TIN not valid" error because the original TIN was not in one of the above formats, then the filer does not need to re-file to correct the "TIN not valid" error. Any other errors included in the notification must be corrected and the filer should re-submit a corrected file for those errors only.
- 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 a "TIN not populated" error.

32. ***I have verified that the US TIN (in SSN or EIN form) for my reporting FI, intermediary, account holder, or substantial owner is correct; why am I getting the "TIN not valid" error?*** Though the nine digits in the US TIN you have provided are the correct TIN for the person or entity being documented, you may have used an incorrect format for the TIN. Please see Question 28 above for the correct formats to be used for US TINs in FATCA reporting.
33. ***How do I submit a Date of Birth in place of a TIN for a U.S. account holder if I am reporting from a Model 1 or Model 2 jurisdiction and do not have a TIN?*** Per provisions of Model 1 and Model 2 IGA's, for 2014 accounts reported in 2015, Model 1 HCTAs and Reporting FIs in Model 2 jurisdictions 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 Publication 5124 and placed in the BirthInfo/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. 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 "TIN not populated" error.
34. ***What do the record-level error codes in the notification mean?*** The 12 record-level error codes, descriptions, and remedial actions are provided in Figure 5-1 below.
35. ***Do I need to correct data submitted in my FATCA Record file?*** The record-level error codes 8001 (Pooled Report Error) and 8007 (Account Report Error) indicate errors found with specific data elements in the record that must be corrected through a resubmission. In these cases the notifications will contain a "FieldErrorGrp" for each field-level error, with a description of the error ("FieldErrorTxt") and the XML path for the data element ("FieldNm") in error. Field-level errors are provided alphabetically by description Figure 5-2 below. Each field-level error must be corrected to resolve the record-level error.
36. ***How do I submit my corrected, amended, or void data?*** For the procedures to correct, amend, or void specific records, please see Section 5.4 of this guide.

The following table in Figure 8-1 provides the codes, descriptions, and remedial actions needed for record level errors ICMM will detect for records in electronically submitted files. Four digit record level errors codes are always provided when record level errors are present, and are found in the “/FATCARecordErrorDetailGrp/RecordLevelErrorCd” data element within the XML version of a Valid File Notification. The notification illustration above shows this code as “**Record Level Error Code: 8007**”.

Figure 8-1 ICMM Record-level Processing Error Codes (electronic filing)

Error Code	Description	Record Error Detail	Remedial Actions
8001	Pooled Reporting Error	One or more field-level errors were found on the indicated pooled reporting record.	Correct field level errors and resubmit
8002	Duplicate Pooled Report Record	A duplicate pooled report was received, based on the MessageRefId and DocRefId values in the record.	The filer should research the duplicate record to determine if it should be resubmitted with unique identifiers
8003	Pooled Report Correction with Error	One or more field-level errors were found on the indicated pooled report record which was submitted as a correction to a prior account report record.	To correct a corrected pooled report record with an error, the filer should consult the field-level error messages on the initial record error report for the pooled report record the filer is attempting to correct (record error code 8001), and resubmit a corrected record for the original record which addresses the specific field-level errors in the original record.
8004	Pooled Report Correction without Matching Original	The filer submitted a corrected pooled report, but the values in the CorrMessageRefId and CorrDocRefId fields did not tie to a pooled report received	The filer should research the CorrMessageRefId and CorrDocRefId fields of the submitted file to determine if it should be resubmitted with CorrMessageRefId and CorrDocRefId values corresponding to a record with errors
8005	Void Pooled Report without Matching Original	The filer submitted a void pooled report, but the values in the CorrMessageRefId and CorrDocRefId fields did not tie to a pooled report received	The filer should research the CorrMessageRefId and CorrDocRefId fields of the submitted file to determine if it should be resubmitted with CorrMessageRefId and CorrDocRefId values corresponding to a previously submitted file
8006	Amended Pooled Report without Matching Original	The filer submitted an amended pooled report, but the values in the CorrMessageRefId and CorrDocRefId fields did not tie to a pooled report received	The filer should research the CorrMessageRefId and CorrDocRefId fields of the submitted file to determine if it should be resubmitted with CorrMessageRefId and CorrDocRefId values corresponding to a previously submitted file
8007	Account Reporting Error	One or more field-level errors were found on the indicated account reporting record.	Correct field level errors and resubmit

Error Code	Description	Record Error Detail	Remedial Actions
8008	Duplicate Account Report Record	A duplicate account report was received, based on the MessageRefId and DocRefId values in the record.	The filer should research the duplicate record to determine if it should be resubmitted with unique identifiers
8009	Account Report Correction with Error	One or more field-level errors were found on the indicated account report record which was submitted as a correction to a prior account report record.	To correct a corrected account report record with an error, the filer should consult the field-level error messages on the initial record error report for the account report record the filer is attempting to correct (record error code 8007), and resubmit a corrected record for the original record which addresses the specific field -level errors in the original record.
8010	Account Report Correction without Matching Original	The filer submitted a corrected account report, but the values in the CorrMessageRefId and CorrDocRefId fields did not tie to a account report received	The filer should research the CorrMessageRefId and CorrDocRefId fields of the submitted file to determine if it should be resubmitted with CorrMessageRefId and CorrDocRefId values corresponding to a record with errors
8011	Void Account Report without Matching Original	The filer submitted a void account report, but the values in the CorrMessageRefId and CorrDocRefId fields did not tie to a account report received	The filer should research the CorrMessageRefId and CorrDocRefId fields of the submitted file to determine if it should be resubmitted with CorrMessageRefId and CorrDocRefId values corresponding to a previously submitted file
8012	Amended Account Report without Matching Original	The filer submitted an amended account report, but the values in the CorrMessageRefId and CorrDocRefId fields did not tie to a account report received	The filer should research the CorrMessageRefId and CorrDocRefId fields of the submitted file to determine if it should be resubmitted with CorrMessageRefId and CorrDocRefId values corresponding to a previously submitted file

The following table in Figure 8-2 provides the field level errors ICMM will detect in pooled and account report records in electronically submitted files. The entries in this table are sorted first by “Error Description” and, second by the “Schema Path” for the data element in which the error is detected; both of these are provide in the notification for each field level error.

Figure 8-2 ICMM Field-level Errors for Electronic FATCA XML Reports

Error Description	F8966 Part Reference Mapping	Schema Path (“FieldNm”)	Description
Account Balance not > \$0	Part IV	ReportingGroup/ AccountReport/ AccountBalance	The account balance entered was either less than or equal to zero. This amount must be greater than zero
Account Balance not populated	Part IV	ReportingGroup/ AccountReport/ AccountBalance	The account balance was not populated. This amount must be populated and must be greater than zero
Account Number is Not Provided	Part IV	ReportingGroup/ AccountReport/ AccountNumber	The account number was not provided. This data element must be populated must be populated and must be greater than zero
City or town not populated	Part I Line 3c or 8c	ReportingFI/ Address/ AddressFix/ City ReportingFI/ Address/ AddressFree	Either the AddressFree or Address/City data elements for the Reporting FI contains only blanks. The city or town for the Reporting FI must be included
City or town not populated	Part I Line 3c	ReportinGroupI/ Sponsor/ Address/ AddressFix/City/ ReportinGroupI/ Sponsor/ Address/ AddressFree	Either the AddressFree or Address/City data elements for the Sponsor data element contains only blanks. The city or town for the sponsor must be included when a sponsor is provided

Error Description	F8966 Part Reference Mapping	Schema Path ("FieldNm")	Description
City or Town Not Provided for Account Holder or Recipient	Part II	ReportingGroup/ AccountReport/ AccountHolder/ Individual / Address ReportingGroup/ AccountReport/ AccountHolder/ Organisation / Address	Either the AddressFree or Address/City data elements for the Account Holder or Payee contain only blanks. The city or town for the Account Holder or Payee must be provided
City or Town Not Provided for Sponsored Entity or Intermediary	Part I Line 3a Part I Line 8a	ReportingGroup/ Intermediary/ Address/ AddressFix/ City ReportingGroup/ Intermediary/ Address/ AddressFree	The City data element for an intermediary has been left blank. The City for intermediaries must be provided if they are present
City or Town Not Provided for Asset Owner	Part III	ReportingGroup/ AccountReport/ SubstantialOwner/ Address	Either the AddressFree or Address/City data elements for the Substantial U.S. Owner, Controlling Person, or Specified U.S. Person owning debt or equity interests in an Owner-Documented FFI contain only blanks. The city or town for the Substantial U.S. Owner, Controlling Person, or Specified U.S. Person owning debt or equity interests in an Owner-Documented FFI must be included

Error Description	F8966 Part Reference Mapping	Schema Path ("FieldNm")	Description
Country Not Provided for Account Holder	Part II Line 3c	ReportingGroup/AccountReport/AccountHolder/Organisation/ Address ReportingGroup/AccountReport/AccountHolder/Individual/ Address	The country for the account holder was left blank. The country must be provided for the account holder
Country Not Provided for Asset Owner	Part III Line 3c	ReportingGroup/ AccountReport/ SubstantialOwner/ Individual/ Address	The country for the asset owner was left blank. The country must be provided for the asset owner
Country Not Provided for Sponsor or Intermediary	Part I Line 8c	ReportingGroup/ Intermediary /ResCountryCode ReportingGroup/ Sponsor /ResCountryCode	For electronic filing the country code for an intermediary or sponsor must be provided
Currency Code not populated	Part IV Line 2	ReportingGroup/AccountReport/AccountBalance/currCode	The currCode attribute for the AccountBalance element is blank, and must be populated with a valid 2-character currency code.
Currency Code Not Valid in Account Report	Part IV Line 2	ReportingGroup/AccountReport/AccountBalance/currCode	The currCode attribute for the AccountBalance element is not a valid 2-character currency code. Please select a code from the FATCA Schema XSD files.
Currency Code Not Valid in Pooled Report	Part V Line 5	ReportingGroup/PoolReport/PoolBalance/currCode	The currCode attribute for the PoolBalance element is not a valid 2-character currency code. Please select a code from the FATCA Schema XSD files.
Dividends Not in Numeric Format	Part IV Line 4b	ReportingGroup/AccountReport/Payment	The Payment element amount must be in numeric format.

Error Description	F8966 Part Reference Mapping	Schema Path ("FieldNm")	Description
DOB not populated	N/A	ReportingGroup/ AccountReport/ AccountHolder/ Individual /BirthInfo/BirthDate	For Model 1 filers in TY2014, 2015, and 2016, the individual Account Holder DOB may be provided if the Account Holder TIN is not available for an account maintained as of June 30, 2014. The DOB was provided, but was not in YYYY-MM-DD format. The record must be resubmitted with the DOB in the correct YYYY-MM-DD format.
DOB not populated	N/A	FATCA/ReportingGroup/ AccountReport/ SubstantialOwner/ BirthInfo/BirthDate	For Model 1 filers in TY2014, 2015, and 2016, the Controlling Person DOB may be provided if the Controlling Person TIN is not available with respect to a non-U.S. entity account maintained as of June 30, 2014. The DOB was provided, but was not in YYYY-MM-DD format. The record must be resubmitted with the DOB in the correct YYYY-MM-DD format.
EIN Format Not Valid for Intermediary	Part I Line 10	ReportingGroup/ Intermediary/ TIN	The EIN provided for the intermediary does not have the valid format (9 numeric characters). If an EIN is provided it must be in a valid format with nine numeric characters

Error Description	F8966 Part Reference Mapping	Schema Path ("FieldNm")	Description
GIIN Does Not Match Registered Entity for Filer	Part I Line 5 or Line 10	ReportingFI/ TIN	The GIIN provided for the Reporting FI or Sponsor does not match to a GIIN for a registered entity on the FATCA FFI List issued at some time in the past year
GIIN Format Not Valid for Filer	Part I Line 5 or Line 10	ReportingFI/ TIN	The GIIN for the Reporting FI must be in the valid format
GIIN Format Not Valid for Sponsor	Part I Line 5 or Line 10	ReportingGroup/ Sponsor/ TIN	The GIIN for the Sponsor is required and must be in the valid format
GIIN not populated	Part I Line 5 or Line 10	ReportingFI/ TIN	The GIIN for the Reporting FI must be populated and in the valid format
GIIN not populated	Part I Line 5	ReportingGroup/Sponsor/TIN	The GIIN for the Sponsor must be populated and in the valid format
GIIN Not Valid for Filer	Part I Line 5 or Line 10	ReportingFI/ TIN	The GIIN for the Reporting FI must be in the valid format
GIIN Not Valid for Intermediary	Part I Line 9	ReportingGroup/ Intermediary/ TIN	The format for the GIIN provided for the intermediary must in the valid format.
GIIN Not Valid for Sponsor	Part I Line 5 or Line 10	ReportingGroup/Sponsor/TIN	The GIIN for the Sponsor must be in the valid format

Error Description	F8966 Part Reference Mapping	Schema Path ("FieldNm")	Description
Gross Proceeds/ Redemptions Not In Numeric Format	Part IV Line 4c	ReportingGroup/AccountReport/Payment	The Payment element amount must be in numeric format.
Interest Not In Numeric Format	Part IV Line 4a	ReportingGroup/AccountReport/Payment	The Payment element amount must be in numeric format.
Name not populated	Part I Line1 or Line 6	ReportingFI/ Name	The name of the Reporting FI must be provided, and cannot be all blank characters in the Name data subelement
Name not populated	Part I Line1	ReportingGroup/Sponsor/Name	The name of the Sponsor must be provided, and cannot be all blank characters in the Name data subelement
Name of Account Holder or Recipient Not Provided	Part II	ReportingGroup/ AccountReport/ AccountHolder/ Individual/ Name ReportingGroup/ AccountReport/ AccountHolder/ Organisation/ Name	The name of the account holder or payee must be provided, and cannot be all blank characters in the Name data subelement
No GIIN or EIN Provided for Intermediary	Part I Line 10	ReportingGroup/ Intermediary/ TIN	Neither a GIIN nor an EIN has been provided for an intermediary. If the intermediary is not required to have either a GIIN or an EIN, it should enter nine zeros in the TIN element.

Error Description	F8966 Part Reference Mapping	Schema Path ("FieldNm")	Description
No Name of US Owner	Part III	ReportingGroup/ AccountReport/ SubstantialOwner/ Name	The name data element of the Substantial U.S. Owner, Controlling Person, or Specified U.S. Person owning a debt or equity interest in an Owner-Documented FFI consisted of all blanks. A name must be provided in the appropriate field
Number of Accounts not valid	Part V Line 2	ReportingGroup/PoolReport/AccountCount	The number of accounts declared in a pooled report must be a number greater than zero
Other Value Not In Numeric Format	Part IV Line 4d	ReportingGroup/AccountReport/Payment	The Payment element amount must be in numeric format.
Sponsored Entity or Intermediary Name Not Provided	Part I Line 6	ReportingGroup/Intermediary/Name	The name of an intermediary must be provided
TIN not populated	Part I Line 5 or Line 10	ReportingFI/ TIN	The Reporting FI TIN or GIIN must be provided, and cannot be all blank characters in the TIN data subelement
TIN not populated	Part II Line 4	ReportingGroup/ AccountReport/ AccountHolder/ Individual /TIN ReportingGroup/ AccountReport/ AccountHolder/ Organisation/ TIN	The AccountHolder TIN must be provided, and cannot be all blank characters in the TIN data subelement. If an entity account holder does not have a TIN, enter all zeros in the TIN data subelement.

Error Description	F8966 Part Reference Mapping	Schema Path ("FieldNm")	Description
TIN not populated	Part III Line 4	ReportingGroup/AccountReport/SubstantialOwner/Address/TIN	The SubstantialOwner/TIN must be provided, and cannot be all blank characters in the TIN data subelement.
TIN not valid	Part I Line 5 or Line 10	ReportingFI/ TIN	The TIN provided for a Reporting FI is not a GIIN, and was not in the correct US TIN format. The US TIN provided must be 9 consecutive numeric digits (no hyphens), 9 numeric digits with one hyphen as "NN-NNNNNN", or 9 numeric digits with two hyphens as "NN-NN-NNNN".
TIN not valid	Part I Line 5	ReportingGroup/ Sponsor /TIN	The TIN provided for the Sponsor of a Reporting FI is not a GIIN, and was not in the correct US TIN format. The US TIN provided must be 9 consecutive numeric digits (no hyphens), 9 numeric digits with one hyphen as "NN-NNNNNN", or 9 numeric digits with two hyphens as "NN-NN-NNNN". If an entity Account Holder does not have a TIN, enter all zeros in the TIN data subelement.

Error Description	F8966 Part Reference Mapping	Schema Path ("FieldNm")	Description
TIN not valid	Part II	ReportingGroup/ AccountReport/ AccountHolder/ Individual /TIN ReportingGroup/ AccountReport/ AccountHolder/ Organisation/ TIN	The TIN provided for the Substantial US Owner was not in the correct US TIN format. The US TIN provided must be 9 consecutive numeric digits (no hyphens), 9 numeric digits with one hyphen as "NN-NNNNNN", or 9 numeric digits with two hyphens as "NN-NNN-NNNN". If an entity Account Holder does not have a TIN, enter all zeros in the TIN data subelement.
TIN not valid	Part III	ReportingGroup/ AccountReport/ SubstantialOwner/ Address/ TIN	The TIN provided for the Substantial US Owner was not in the correct US TIN format. The US TIN provided must be 9 consecutive numeric digits (no hyphens) , 9 numeric digits with one hyphen as "NN-NNNNNN", or 9 numeric digits with two hyphens as "NN-NNN-NNNN".

8.3 Electronic Resubmission Process

When a filer resubmits corrected record data in response to a “valid file with errors” notification from the IRS for an electronically submitted file, the following changes must be made within the “DocSpec” element for the corrected record:

- The “DocTypeIndic” element must be “FATCA2” to denote a corrected record
- The “CorrMessageRefId” element must be set equal to the “MessageRefId” for the original file in which the record being corrected was contained
- The “CorrDocRefId” element must be set equal to the “DocRefId” for the original record being corrected
- All fields identified in the error listing for the record in the notification must be corrected.

In addition, all other record elements from the original record submission must be included, and of course the resubmitted file with the corrected record data must represent a valid FATCA XML file.

Amended records, in which a filer chooses to amend (change or edit) a previously submitted record, are prepared similarly to corrected records. To submit an amended record the filer the filer must make the following changes with the resubmitted record:

- The “DocTypeIndic” element must be “FATCA4” to denote an amended record
- The “CorrMessageRefId” element must be set equal to the “MessageRefId” for the original file in which the record being amended was contained
- The “CorrDocRefId” element must be set equal to the “DocRefId” for the original record being amended
- All fields in the amended record must have values that the filer wishes to report to the IRS for the relevant account or pooled report.

Voided records, in which a filer wishes to delete a previously submitted record, are submitted in the following manner:

- The “DocTypeIndic” element must be “FATCA3” to denote a voided record
- The “CorrMessageRefId” element must be set equal to the “MessageRefId” for the original file in which the record being voided was contained
- The “CorrDocRefId” element must be set equal to the “DocRefId” for the original record being voided
- All fields in the voided record must have the same values as the original record being voided (deleted).

9 EPSS Support for ICMM Record-Level Processing Error Notifications - Paper Filing

This section describes how filers of paper Forms 8966 will be notified by ICMM of record-level errors, the types of errors ICMM will detect on paper filings, and how filers must resubmit their paper filings in response to these errors.

9.1 Record-level Processing Errors

When a data record from a paper Form 8966 is processed, ICMM will apply business rules to evaluate the captured data and identify errors requiring resolution. ICMM will generate a notification only if errors are detected in the record associated with a paper Form 8966; unlike the electronic filing case the filer of a paper form with no errors receives no acknowledgement from the IRS. Also, unlike the XML notifications sent to electronic filers, this notification will be printed and mailed to paper filers. These paper notifications will provide the following:

- Notification identification information
- The Name and TIN/GIIN of the reporting FFI
- The Name and GIIN of the sponsoring FFI (sponsoring the reporting FFI) submitting the file, if there is one
- Type of record (account or pooled)
- The “Document Type Indicator Code” for the record, indicating whether the submitted record is original, corrected, or amended, or a “void” record nullifying a previously submitted record.
- The 4-digit record level error code for the error found in the record; “8001” denotes a “Pooled Report Error” and one or more field-level errors in a pooled report record, “8007” denotes a “Account Report Error” and one or more field-level errors in an account report record, etc...
- Details on specific field-level errors identified within the paper record, including the part and line number on the form where the error occurs and a description of the error itself.

A sample paper error notification is shown below for a record error on an account revord with field level errors.

ICMM Notification 12: Paper Account Report Error Notification (NPA)

Paper Account Report Error Notification

Notification Header:

Notification Timestamp: Thu May 21 09:09:06 EDT 2015

Notification RefID: 1

Notification Code: NPA

From: IRS

To: Apollo Ausgewogen

CC: N/A

Original Data for Received Record:

IRS Reference Number: 39140010000001

FFI Name: Apollo Ausgewogen

FFI GIIN: AB08LY.99999.SL.040

Document Type: NEW

Report Type: ACCOUNT_REPORT

Notification Content:

An account report submitted on Form 8966 by the organization indicated on the Form has one or more errors. These errors are described below. For more information on this notification, please see: <http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications>

IRS Processing Data for Received Record:

Record Level Error Code: No Record Level Errors Occurred

Field ID: Part 2, Line 4, TIN

Field Error Description: TIN not valid

Action Requested:

Please send the complete account report on a paper Form 8966 with corrections to the errors indicated above and the "Corrected report" boxed checked to the IRS, as indicated by instructions for Form 8966. If the record has an error in the Reporting FI GIIN, the original record must be voided and a new record submitted to correct the GIIN.

Action Requested By Date:

Your organization's due date for filing Form 8966.

Potential Effect: Failure to correct errors by the date required may result in a determination by the IRS that the Financial Institution has defaulted under its FFI Agreement and/or is in Significant Non-Compliance with the terms of the IGA.

HCTA Model 1/Model 2 Treaty Stamp:

This information is furnished under the provisions of an income tax treaty, tax information exchange agreement (TIEA), or other agreement for the exchange of information with a foreign government, and its use and disclosure must be governed by the provisions of that treaty, TIEA, or other agreement.

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Cause of Problem	<ul style="list-style-type: none"> One or more fields within the paper Form 8966 you submitted failed our validation tests. These errors are identified in the “IRS Processing Data for Received Record” section of the notification with the part and line number and a description for each error. [Refer to the tables in Figures 9-1 and 9-2 below for specific error types and resolutions.]
Potential Resolution	<ul style="list-style-type: none"> Please correct all individual record errors within the file. Send the correction on a separate Form 8966 marked as “Corrected” on the top of the form If the record has an error in the Filer FI GIIN in Part I line 4, the original record must be voided and a new Form 8966 submitted to correct the GIIN. In this case you will need to send 2 Forms 8966: <ul style="list-style-type: none"> A Form 8966 marked as “Void” with the original Filer GIIN in Part I line 4 A Form 8966 marked as “New” with the actual Filer GIIN in Part I line 4 Please note that all communications regarding this Form 8966 account or pooled report must be via paper for the remainder of the tax year.
Other Links/ Resources	<ul style="list-style-type: none"> Form 8966 instructions (including electronic filing instructions)
FAQs	<p>37. What does this notification mean? The IRS has received your Form 8966 and we have identified errors and inconsistencies in your document that require correction. You will need to correct all identified record level errors and resubmit the Form. Please mark the new form as “Corrected” by checking the box at the top of the first page, and send to the address indicated in the instructions</p> <p>38. Do I need to resubmit the complete form or just corrections to the errors? Corrected Forms 8966 must have complete entries for all required fields. Please resubmit all data, including corrected data, from your original Form 8966 on your corrected form.</p>

The following table in Figure 8-1 provides the codes, descriptions, and remedial actions needed for record level errors ICMM will detect for records on paper Forms 8966. Four digit record level errors codes are always provided when record level errors are present, and are found in the “/FATCARecordErrorDetailGrp/RecordLevelErrorCd” data element within the XML version of a Valid File Notification. The notification illustration above shows this code as “**Record Level Error Code: 8007**”.

Unlike the electronic case, in which a single file can contain multiple account reports and pooled reports as records, a single Form 8966 is considered to be a single, standalone record. A filer can only document a single account or pooled report on each paper Form 8966, and cannot file both types of reports on a single form. Also, unlike the electronic case, there is no way to identify a specific Form 8966 submitted by a filer; that is, there is no analog on the paper filing side to the MessageRefId and DocRefId data elements in the FATCA XML schema which can be used to exactly identify prior paper records. The IRS will need to analyze filing history from a given filer to determine if corrections to errors on specific paper account and pooled reports have been provided. Because there is no way to directly correlate corrections to original submissions with errors, the record level errors in electronic filing centered on corrected or amended reports with no matching originals have no paper counterparts, so the range of paper record-level errors is smaller.

Figure 9-1 ICMM Record-level Processing Error Codes (paper filing)

Error Code	Description	Record Error Description	Remedial Actions
8001	Pooled Reporting Error	One or more field-level errors were found on the indicated pooled reporting record.	Correct field level errors and resubmit
8003	Pooled Report Correction with Error	One or more field-level errors were found on the indicated pooled report record which was submitted as a correction to a prior account report record.	To correct a corrected paper Form 8966 pooled report with an error, the filer should consult the field-level error messages on the initial error notification for the Form 8966 pooled report the filer is attempting to correct (record error code 8001), and resubmit a corrected Form 8966 for the original pooled report which addresses the specific field-level errors in the original pooled report.
8007	Account Reporting Error	One or more field-level errors were found on the indicated account reporting record.	Correct field level errors and resubmit
8009	Account Report Correction with Error	One or more field-level errors were found on the indicated account report record which was submitted as a correction to a prior account report record.	To correct a corrected paper Form 8966 account report with an error, the filer should consult the field-level error messages on the initial error notification for the Form 8966 account report the filer is attempting to correct (record error code 8007), and resubmit a corrected Form 8966 for the original account report which addresses the specific field-level errors in the original account report.

The following table in Figure 9-2 provides the field level errors ICMC will detect in pooled and account report records Forms 8966 filed on paper. The entries in this table are sorted first by “Error Description” and, second by the “Field Name (Form part and line number)” for the part and line in which the error is detected; both of these are provide in the notification for each field level error. There are more entries in this table for paper field-level errors than Table 8-2 for electronic reports because paper record processing because paper record processing does not have the benefit of the FATCA XML schema to constrain user data entry before this stage.

Figure 9-2 ICMC Field-level Errors for Paper Reports

Error Description	F8966 Part Reference Mapping	Field Name (Form part and line number)	Description
Account Balance not populated	Part IV	Account Balance (Part IV, line 3)	The account balance or asset value is missing and must be provided
Account Balance not valid	Part IV	Account Balance (Part IV, line 3)	The entry is not in numeric format and must be resubmitted
Account Holder Type not valid	Part I Lines 6-10	Entity type (Part II, line 5)	More than one check box was selected on this line, while only one is permissible
City or town not populated	Part I Lines 1-5	City or town (Part I, Line 3a)	The city or town for the Filer must be included
City or Town Not Provided for Sponsored Entity or Intermediary	Part I Lines 6-10	City or town (Part I, line 8a)	The city or town for a Sponsored Entity or Intermediary must be included
City or Town Not Provided for Account Holder or Recipient	Part I Lines 6-10	City or town (Part II, line 3a)	The City or Town line for the Account Holder was left blank. The city or town for the Account Holder must be included
City or Town Not Provided for Asset Owner	Part III	City or town (Part III, line 3a)	The City or Town line for Substantial Owner was left blank. The city or town for the Substantial Owner must be included
Country Not Provided for Account Holder	Part I Lines 6-10	Country (including postal code) (Part II, line 3c)	The Country line for the Account Holder was left blank. The Country for the Account Holder must be included
Country Not Provided for Asset Owner	Part III	Country (including postal code) (Part III, line 3c)	The Country line for Substantial Owner was left blank. The Country for the Substantial Owner must be included

Error Description	F8966 Part Reference Mapping	Field Name (Form part and line number)	Description
Currency Code Not Valid in Account Report	Part IV	Currency Code (Part IV, line 2)	The currency code provided was not a recognized was not a valid 3 character ISO 4217 currency code. The currency code should be changed to the ISO currency code that is appropriate for the currency involved
Dividends Not In Numeric Format	Part IV	Dividends (Part IV, line 4b)	The dividends amount must be in numeric format.
EIN Format Not Valid for Intermediary	Part I Lines 6-10	TIN (Part I, line 10)	The EIN provided for the intermediary does not have the valid format (9 numeric characters). If an EIN is provided it must be valid
GIIN Does Not Match Registered Entity for Filer	Part I Lines 1-5 (pooled)	GIIN (Part 1, Line 4) ==	The GIIN provided does not match to a GIIN for a registered entity on the FATCA FFI List issued at some time in the past year
GIIN Does Not Match Registered Entity for Filer	Part I Lines 1-5	GIIN (Part I, Line 4)	The GIIN provided does not match to a GIIN for a registered entity on the FATCA FFI List issued at some time in the past year
GIIN Does Not Match Registered Entity for Sponsored Entity or Intermediary	Part I Lines 6-10	GIIN (Part I, line 9)	The Sponsored Entity or Intermediary GIIN provided in line 9 did not match a GIIN for a registered entity. The GIIN for the entity should be checked and resubmitted; if sponsored entity does not have a GIIN, it can use an EIN if available
GIIN Format Not Valid for Filer	Part I Lines 1-5	GIIN (Part I, Line 4)	The GIIN for the Filer is required and must be in the valid format if Sponsored Entity data is present (the filer is the sponsor, in this case)
GIIN Format Not Valid for Sponsor	Part I Lines 1-5	GIIN (Part I, Line 4)	The GIIN for the Reporting FI as Sponsor is required and must be in the valid format
GIIN not populated	Part I Lines 1-5	GIIN (Line 4) TIN (Part I, Line 5)	The GIIN for the Reporting FI is required and must be in the valid format if the ReportingGroup/Sponsor data element is not present (Reporting FI is the filer, in this case)
GIIN Not Valid for Intermediary	Part I Lines 6-10	GIIN (Part I, line 9)	The format for the GIIN provided for the intermediary must in the valid format.

Error Description	F8966 Part Reference Mapping	Field Name (Form part and line number)	Description
GIIN Not Valid for Sponsor	Part I Lines 1-5 (pooled)	GIIN (Part 1, Line 4) ==	The GIIN for the Filer as Sponsor is required and must be in the valid format
GIIN Not Valid for Sponsor	Part I Lines 1-5	GIIN (Part I, Line 4)	The GIIN for the Filer as Sponsor is required and must be in the valid format
Gross Proceeds/Redemptions Not In Numeric Format	Part IV	Gross proceeds/Redemptions (Part IV, line 4c)	The Gross Proceeds/Redemptions amount must be in numeric format.
Interest Not In Numeric Format	Part IV	Interest (Part IV, line 4a)	The interest amount must be in numeric format.
Name not populated	Part I Lines 1-5	Name of Filer (Part I, Line 1)	The name of the Filer as Reporting FI must be provided, and cannot be left blank
Name of Account Holder or Recipient Not Provided	Part I Lines 6-10	Name of Account Holder or Payee (Part II, Line 1)	The name of the Filer as Reporting FI must be provided, and cannot be left blank
No GIIN or EIN Provided for Intermediary	Part I Lines 6-10	TIN (Part I, line 10)	Neither a GIIN nor an EIN has been provided for an intermediary. If the intermediary is not required to have either a GIIN or an EIN, it should enter nine zeros in the TIN field in Part I, Line 10.
No Name of US Owner	Part III	Name of Owner (Part III, Line 1)	The name data element of the Substantial Owner consisted of all blanks. A name must be provided in the appropriate field
Number of Accounts not > 0	Part V (pooled)	Number of Accounts (Part V, line 2)	The filer's entry was zero, a blank entry, or some other alphanumeric value not appropriate for this field. This field must contain a number greater than zero
Number of Accounts not populated	Part V (pooled)	Number of Accounts (Part V, line 2)	The filer's entry was zero, a blank entry, or some other alphanumeric value not appropriate for this field. This field must contain a number greater than zero
Number of Accounts not valid	Part V (pooled)	Number of Accounts (Part V, line 2)	The filer's entry was zero, a blank entry, or some other alphanumeric value not appropriate for this field. This field must contain a number greater than zero

Error Description	F8966 Part Reference Mapping	Field Name (Form part and line number)	Description
Other Value Not In Numeric Format	Part IV	Other (Part IV, line 4d)	The amount for "Other" income must be in numeric format.
Pooled Reporting Type not populated	Part V (pooled)	Pooled Reporting Type (Part V, line 1)	There are entries in Part V line items and none in Parts II- IV, indicating a pooled report, but none of the check boxes on line 1 were marked
Pooled Reporting Type not valid	Part V (pooled)	Pooled Reporting Type (Part V, line 1)	More than one entry was made in the check boxes in Part V, line 1. Only one box (pooled report type) can be checked on a single Form 8966
Sponsored Entity or Intermediary Name Not Provided	Part I Lines 6-10	Name of Sponsored Entity or Intermediary (Part I, line 6)	Information was provided on the Sponsored Entity or Intermediary lines in Part I, but the name was left blank. The name of the Sponsored Entity or Intermediary must be provided, and cannot be left blank.
TIN not populated	Part I Lines 1-5 (pooled)	GIIN (Line 4) ==TIN (Part 1, Line 5)	The US Account Holder TIN is missing. This TIN must be provided as 9 numeric digits, whether the account holder is an individual or entity
TIN not populated	Part I Lines 1-5	GIIN (Line 4) TIN (Part I, Line 5)	The US Account Holder TIN is missing. This TIN must be provided as 9 numeric digits, whether the account holder is an individual or entity
TIN not populated	Part III	TIN of Owner (Part III, line 4)	The US Account Holder TIN is missing. This TIN must be provided as 9 numeric digits, whether the account holder is an individual or entity
TIN not valid	Part II	TIN (Part II, line 4)	The US Account Holder or Payee TIN is not in the correct US TIN format. The US TIN provided must be 9 numeric digits, whether the account holder is an individual or entity. The US TIN provided must be 9 consecutive numeric digits (no hyphens), 9 numeric digits with one hyphen as "NN-NNNNNN", or 9 numeric digits with two hyphens as "NN-NN-NNNN". If an entity Account Holder does not have a TIN, enter all zeros in the TIN data subelement.

Error Description	F8966 Part Reference Mapping	Field Name (Form part and line number)	Description
TIN not valid	Part III	TIN of Owner (Part III, line 4)	The US Account Holder TIN is not in the correct US TIN format. The US TIN provided must be 9 consecutive numeric digits (no hyphens), 9 numeric digits with one hyphen as “NN-NNNNNNN”, or 9 numeric digits with two hyphens as “NN-NN-NNNN”. If an entity Account Holder does not have a TIN, enter all zeros in the TIN data subelement.

9.2 Paper Resubmission Process

To resubmit a Form 8966, paper filers should submit a new Form 8966 with all appropriate fields populated with either data from the originally filed form or changes to reflect corrections or amendments:

- To correct an account or pooled report in response to error notifications received from the IRS, make corrections to the fields in the part and line numbers specified in the error notification and check the “Corrected form” box
- To amend or change an account or pooled report submitted on a previously filed Form 8966, change the fields needing edits and check the “Amended form” box
- To void or delete a previously filed Form 8966, check the “Voided form” box.

In all cases, fields from the original submission that are not being corrected or edited must be populated with the same data as from the original filing (note: voided forms must include the same data as the original form being voided).

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Appendix A Comparison of FATCA Form 8966 and FATCA Intergovernmental Schema

The purpose of this section is to compare and contrast the FATCA XML Schema and the paper Form 8966 which are used to collect data on foreign accounts and assets from FFIs under the FATCA legislation. Both instruments collect essentially the same account and pooled report data, but there are important differences between them.

A.1 Component Alignment

The table below shows how the main Parts I-V of the paper Form 8966 align to data elements within the FATCA XML Schema (note that FATCA/ and MessageSpec/ element paths in the table begin with /FATCA_OECD/).

Form 8966 Part	FATCA XML Schema Data Elements*	Comments
Part I, Identification of Filer	MessageSpec	See Section B.2 for detailed alignment
Name of Filer (Lines 1-5)	FATCA/ReportingFI	
Part I, Identification of Filer	FATCA/Sponsor	
Name of Sponsored Entity or Intermediary, if applicable (Lines 6-10)	FATCA/Intermediary	
Part II Account Holder or Payee Information	FATCA/ReportingGroup/AccountReport/AccountHolder	
Part III, Identifying Information of U.S. Owners that are specified U.S. Persons	FATCA/ReportingGroup/AccountReport/SubstantialOwner	
Part IV, Financial Information	FATCA/ReportingGroup/AccountReport <ul style="list-style-type: none"> • /AccountNumber • /AccountBalance • /Payment (optional) 	Currency Code (line 2) included in /AccountBalance and Payment elements (XML) Payment Type (line 4a-d) included in /Payment element
Part V, Pooled Reporting Type	FATCA/ReportingGroup/PoolReport	Currency Code (line 5) included in /PoolBalance element
Check boxes for "Corrected", "Amended", "Void"	/DocSpec/DocTypeIndic, found within the following elements: <ul style="list-style-type: none"> • FATCA/ReportingFI • FATCA/ReportingGroup/Sponsor • FATCA/ReportingGroup/Intermediary • FATCA/ReportingGroup/AccountReport • FATCA/ReportingGroup/PoolReport 	/DocSpec/DocTypeIndic allows identification of test data, while paper Form 8966 does not

A.2 Reporting FIs, Sponsors, Intermediaries, and Filers

There are significant differences in how the FATCA XML Schema and the paper Form 8966 collect information on Reporting FIs and their sponsors, and how this impacts which entity is considered the filer. As a recap, definitions of these terms from Form 8966 instructions and the FATCA XML User Guide (Publication 5174) are provided below:

- Reporting FI: financial institution that maintains the reported accounts or payments
- Sponsor or Sponsoring Entity: an entity that has registered with the IRS to perform the due diligence, withholding, and reporting obligations of one or more Sponsored FFIs or Sponsored Direct Reporting NFFEs
- Filer: financial institution filing Form 8966 (paper)
- Intermediary: a Territory Financial Institution that is acting as an intermediary and is not treated as a U.S. person, or a certified deemed-compliant FFI that is acting as an intermediary and providing the filer with information on a substantial U.S. owner of a passive NFFE account holder.

Reporting FIs and sponsors are directly reported in the FATCA XML schema, while filers and sponsored entities (not sponsors) are reported on the paper Form 8966. The following table outlines how each FATCA instrument (schema or paper form) documents these entities for specific filing scenarios.

Filing Scenario	FATCA XML Schema Reporting	Paper Form 8966 Reporting
Single financial institution maintaining account or asset	Financial institution maintaining account or asset is identified as the Reporting FI and documented in the FATCA/ReportingFI data element	Financial institution maintaining account or asset is identified as the “Filer” in Part I lines 1-5 Part I lines 6-10 are left blank
Financial institution holding and reporting an account or asset, or making a payment, is sponsored by another institution	Financial institution maintaining account or asset is identified as the Reporting FI and documented in the FATCA/ReportingFI data element Sponsor of financial institution maintaining account or asset is documented in the FATCA/ReportingGroup/Sponsor data element	Sponsor of financial institution maintaining account or asset is identified as the “Filer” in Part I lines 1-5 Financial institution maintaining account or asset is identified as the “Sponsored Entity” in Part I lines 6-10

<p>An intermediary is involved in the relationship between the account holder and the financial institution holding and reporting an account or asset</p>	<p>The intermediary is always documented in the FATCA/ReportingGroup/Intermediary data element</p>	<p>Either the financial institution maintaining account or asset or its sponsor (if there is one) is identified as the “Filer” in Part I lines 1-5</p> <p>The intermediary is always identified as the “Sponsored Entity” in Part I lines 6-10</p> <p>If there are both a sponsor and intermediary involved these are both documented in Part I; the institution maintain the account or asset is not documented</p>
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Appendix B FATCA Notifications in XML Form

B.1 File Level Error Notification

The following is an example of the xml text for a "File-Level Error" Notification generated by the inability to decrypt the received file.

```
<?xml version="1.0" encoding="UTF-8" ?>
<n1:FATCAFileErrorNotification xmlns="urn:fatca:fatcanotificationbase"
xmlns:n1="urn:fatca:fatcafileerrornotification"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" version="1.4">
  <FATCANotificationHeaderGrp>
    <FATCANotificationCreateTs>2014-11-14T00:00:00Z</FATCANotificationCreateTs>
    <FATCANotificationRefId>Notif12345</FATCANotificationRefId>
    <FATCANotificationCd>NDC</FATCANotificationCd>
    <FATCAEntitySenderId>000000.00000.TA.840</FATCAEntitySenderId>
    <FATCAEntityReceiverId>S519K4.99999.SL.392</FATCAEntityReceiverId>
    <CopiedToFATCAEntityId>000000.00000.TA.392</CopiedToFATCAEntityId>
    <ContactInformationTxt>(url will be provided in actual notification)
  </ContactInformationTxt>
</FATCANotificationHeaderGrp>
  <OriginalFileMetadataGrp>
    <IDESTransmissionId>a7c6363de36f4c2192856b4d3283747c</IDESTransmissionId>
  >
    <IDESSendingTs>2014-11-10T00:00:00Z</IDESSendingTs>
    <OriginalIDESTransmissionId>c646151fe7ed4bd696efc8efe49226ac</OriginalIDESTransmissionId>
    <SenderFileId>SenderFile1</SenderFileId>
    <UncompressedFileSizeKBQty>100000</UncompressedFileSizeKBQty>
  </OriginalFileMetadataGrp>
  <NotificationContentTxt>The IRS could not decrypt the referenced file following
download from IDES because the AES-256 key file was either blank, missing or
could not be decrypted, or because the decryption process failed to complete.
Please do not submit a request to correct, amend or void any of the records in this
file until you receive a notification that this file has been received as valid.
For more information on this notification, please see: (url will be provided in
actual notification)</NotificationContentTxt>
  <ActionRequestedGrp>
    <ActionRequestedTxt>Resubmit file.</ActionRequestedTxt>
    <ActionRequestedDueDateTxt>Your organization's due date for filing Form
8966.</ActionRequestedDueDateTxt>
  </ActionRequestedGrp>
  <HCTATreatyStampTxt>This information is furnished under the provisions of an
income tax treaty, tax information exchange agreement (TIEA), or other
agreement for the exchange of information with a foreign government, and its use
and disclosure must be governed by the provisions of that treaty, TIEA, or other
agreement.</HCTATreatyStampTxt>
```

B.2 Valid File Notification

The following is an example of the xml text for a “Valid File” Notification with record-level errors. The “FATCARecordErrorGrp” data element and related sub-elements identifying record-level and field-level errors are highlighted in yellow. These elements will not be included in the valid file notification for a file that contains no record-level errors. That is, the “FATCARecordErrorGrp” data element will be missing from a Valid File Notification with no record-level errors.

```

<?xml version="1.0" encoding="UTF-8" standalone="yes" ?>
<ns3:FATCAValidFileNotification xmlns="urn:fatca:fatcanotificationbase"
  xmlns:ns2="urn:fatca:fatcapaperrecorderrornotification"
  xmlns:ns3="urn:fatca:fatcavalidfilenotification" xmlns:ns4="urn:fatca:fatcafileerrornotification">
  <FATCANotificationHeaderGrp>
    <FATCANotificationCreateTs>2015-04-30T19:12:30Z</FATCANotificationCreateTs>
    <FATCANotificationRefId>1</FATCANotificationRefId>
    <FATCANotificationCd>NVF</FATCANotificationCd>
    <FATCAEntitySenderId>000000.00000.TA.840</FATCAEntitySenderId>
    <FATCAEntityReceiverId>B64D0N.00178.ME.724</FATCAEntityReceiverId>
    <ContactInformationTxt>http://www.irs.gov/Businesses/Corporations/FATCA-Error-
      Notifications</ContactInformationTxt>
    </FATCANotificationHeaderGrp>
  <OriginalFileMetadataGrp>
    <IDESTransmissionId>AR-TEST-INTERMEDIARY-1</IDESTransmissionId>
    <IDESSendingTs>2015-04-30T19:06:29.029Z</IDESSendingTs>
    <SenderFileId>AccountReport_Payload</SenderFileId>
    </OriginalFileMetadataGrp>
  <OriginalFileMessageSpecGrp>
    <MessageRefId>ARPart2</MessageRefId>
    <SendingCompanyGIIN>B64D0N.00178.ME.724</SendingCompanyGIIN>
    <TransmittingCountryCd>ES</TransmittingCountryCd>
    <ReceivingCountryCd>US</ReceivingCountryCd>
    <MessageTypeCd>FATCA</MessageTypeCd>
    <ReportingPeriodDt>2015-01-01-05:00</ReportingPeriodDt>
    </OriginalFileMessageSpecGrp>
    <NotificationContentTxt>The IRS has determined that the referenced file is in a valid format. Individual
      records submitted within the file have been processed and any errors detected during processing
      are provided in the Error Details included. For more information about record level errors,
      including their classification under an intergovernmental agreement (IGA), see:
      http://www.irs.gov/Businesses/Corporations/FATCA-Error-Notifications</NotificationContentTxt>
  <OriginalFileProcessingDataGrp>
    <FileTypeCd>NEW</FileTypeCd>
    <FinancialInstitutionCnt>1</FinancialInstitutionCnt>
    <RecordCnt>1</RecordCnt>
    <DupAccountReportRecordCnt>0</DupAccountReportRecordCnt>
    <NonDupAccountReportRecordCnt>1</NonDupAccountReportRecordCnt>
    <PooledReportRecordCnt>0</PooledReportRecordCnt>
    </OriginalFileProcessingDataGrp>
  <ns3:FATCARecordErrorGrp>
    <RecordErrorInfoHeaderTxt>Record level error details from the file submitted are provided and are
      organized by financial institution.</RecordErrorInfoHeaderTxt>
  </ns3:FATCARecordErrorGrp>
  <SponsorGIIN>B64D0N.00178.ME.724</SponsorGIIN>
  <SponsorNm>Conaraz Inversiones, SICAV, S.A.</SponsorNm>
</ns3:FATCAValidFileNotification>

```

“FATCARecordErrorGrp” included to provide details on record level errors (including field-level errors, if present)

```

<ReportingFIGIIN>111223333</ReportingFIGIIN>
<ReportingFINm>sfa:Name</ReportingFINm>
- <ns3:FATCARecordErrorDetailGrp>
  <FATCAReportTypeCd>ACCOUNT_REPORT</FATCAReportTypeCd>
  <DocTypeIndicCd>FATCA1</DocTypeIndicCd>
  <DocRefId>ARDOCRefId2</DocRefId>
  <RecordLevelErrorCd>8007</RecordLevelErrorCd>
- <FieldErrorGrp>
  <FieldNm>ReportingGroup/AccountReport/AccountBalance</FieldNm>
  <FieldErrorTxt>Account Balance not > $0</FieldErrorTxt>
  </FieldErrorGrp>
- <FieldErrorGrp>
  <FieldNm> ReportingGroup/AccountReport/AccountHolder/Individual/Name </FieldNm>
  <FieldErrorTxt> Name of Account Holder or Recipient Not Provided </FieldErrorTxt>
  </FieldErrorGrp>
- <ActionRequestedGrp>
  <ActionRequestedTxt>Please correct all records with errors. Ensure the corrected record has a
    CorrDocRefId that matches the DocRefId and a CorrMessageRefId that matches the MessageRefId
    for the original(s) record submitted for which the IRS is requesting a correction and post the file
    with corrected records to IDES. If the record has an error in the Reporting FI GIIN, the original
    record must be voided and a new record submitted to correct the GIIN.</ActionRequestedTxt>
  <ActionRequestedDueDateTxt>Correct the errors within 120 days of the date of this
    notice.</ActionRequestedDueDateTxt>
  </ActionRequestedGrp>
  </ns3:FATCARecordErrorDetailGrp>
  </ns3:FATCARecordErrorFIGrp>
  <PotentialEffectTxt>Failure to correct errors by the date required may result in a determination by the
    IRS that the Financial Institution has defaulted under its FFI Agreement and/or is in Significant
    Non-Compliance with the terms of the IGA.</PotentialEffectTxt>
  </ns3:FATCARecordErrorGrp>
  </ns3:FATCAValidFileNotification>

```

“FATCARecordErrorGrp” included to provide details on record level errors (including field-level errors, if present)

Appendix C Glossary of Terms and Acronyms

Acronym	Definition
AES	Advanced Encryption Standard
CAR	Competent Authority Request
EIN	Employer Identification Number
FATCA	Foreign Account Tax Compliance Act
FFI	Foreign Financial Institution
FIRE	Filing Information Returns Electronically
GIIN	Global Intermediary Identification Number
HCTA	Host Country Tax Authority
ICMM	International Compliance Management Model
IDES	International Data Exchange Service
IEP	Integrated Enterprise Portal
IGA	Intergovernmental Agreement
IRS	Internal Revenue Service
MeF	Modernized e-File
NFFE	Non-Financial Foreign Entities
PFFI	Participating Foreign Financial Institutes – those that are FATCA compliant
TIN	Taxpayer Identification Number
XML	Extensible Markup Language