



# MANUAL TRANSMITTAL

Department of the Treasury  
Internal Revenue Service

4.65.1

DECEMBER 4, 2025

## EFFECTIVE DATE

(12-04-2025)

## PURPOSE

- (1) This transmits revised IRM 4.65.1, FATCA Foreign Financial Institution (FFI) Operational Procedures and Compliance, IRS FFI List Publishing Process.

## MATERIAL CHANGES

- (1) IRM 4.65.1.1 - Program Scope and Objectives - Revised Audience and various organizational name changes. Added paragraph (6) for contact information.
- (2) IRM 4.65.1.1.3 - Roles and Responsibilities - Revised Responsibilities to reflect organizational name changes and to ensure the section complies with IRM 1.11.2, Internal Management Documents System.
- (3) IRM 4.65.1.1.4 - Program Management and Review - New section added in accordance with IRM 1.11.2, Internal Management Documents System.
- (4) IRM 4.65.1.1.5 - Program Controls - New section added in accordance with IRM 1.11.2, Internal Management Documents System.
- (5) IRM 4.65.1.1.6 - Terms and Acronyms - Revised title of subsection and added the following acronyms:
  - DFO - Director of Field Operations
  - EUP - Employee User Portal
  - HIRE - Hiring Incentives to Restore Employment Act
  - KYC - Know Your Customer
  - MPA - Management Program Analyst
  - POC - Point of Contact
  - RA - Internal Revenue Agent
  - SDN List - Specially Designated Nationals and Blocked Persons List
  - TA - Tax Analyst
  - TLS - Tax Law Specialist
- (6) IRM 4.65.1.1.7 - Related Resources - Modified resources to reflect updated source titles.
- (7) IRM 4.65.1.2 - FATCA Registration Overview:
  - a. Paragraph (8) - Deleted content to comply with IRM 1.11.6.2.
  - b. Paragraph (9) - Deleted content to comply with IRM 1.11.6.2.
  - c. Paragraph (10) - Deleted content to comply with IRM 1.11.6.2.
  - d. Paragraph (11) - Deleted content to comply with IRM 1.11.6.2.
  - e. Paragraph (12) - Deleted content to comply with IRM 1.11.6.2.
  - f. Paragraph (13) - Moved content to IRM 4.65.1.3.2 , paragraph (2).
  - g. Paragraph (14) - Moved content to IRM 4.65.1.3.2, paragraph (1).
  - h. Paragraph (15) - Deleted content to comply with IRM 1.11.6.2.
  - i. Paragraph (16) - Deleted content to comply with IRM 1.11.6.2.

- (8) Prior IRM 4.65.1.3:
- a. Paragraph (1) - Moved to IRM 4.65.1.4 # , paragraph (1).
  - b. Paragraph (2) - Moved to IRM 4.65.1.4 # , paragraph (2).
- (9) IRM 4.65.1.3 - FATCA Compliance Program - Registration Operations Overview - Subsection was renamed.
- a. Paragraph (1) - New subsection with information moved from prior IRM 4.65.1.4, paragraph (1).
  - b. Paragraph (2) - New content added.
  - c. Paragraph (3) - New subsection with information moved and reworded from prior IRM 4.65.1.4, paragraph (2).
- (10) IRM 4.65.1.3.1 - Registration Review Process Overview - New section added to describe the FATCA review process.
- a. Paragraph (1) - New paragraph to provide information on instructions to FATCA Compliance team members.
  - b. Paragraph (2) - New paragraph to provide information on how incomplete registrations are handled.
  - c. Paragraph (3) - New paragraph to provide information on OFAC-SDN registrations.
  - d. Paragraph (4) - New paragraph with information moved and reworded from prior IRM 4.65.1.4, paragraph (3).
- (11) IRM 4.65.1.3.2 - Login Assistance - New section added to include procedures for technical support and operations team responsibilities.
- a. Paragraph (1) - New paragraph with information moved from prior IRM 4.65.1.2, paragraph (14).
  - b. Paragraph (2) - New paragraph with information moved and reworded from prior IRM 4.65.1.2, paragraph (13).
  - c. Paragraph (3) - New paragraph with new content to provide instructions for the Operations Team.
- (12) Prior IRM 4.65.1.4:
- a. Paragraph (1) - Moved to IRM 4.65.1.3, paragraph (1).
  - b. Paragraph (2) - Moved to IRM 4.65.1.3, paragraph (3).
  - c. Paragraph (3) - Moved to IRM 4.65.1.3.1, paragraph (3).
  - d. Paragraph (4) - Deleted due to obsolete procedures.
- (13) #
- a. Paragraph (1) - New subsection with prior information from IRM 4.65.1.3, paragraph (1).
  - b. Paragraph (2) - New subsection with prior information from IRM 4.65.1.3, paragraph (2).
- (14) Prior IRM 4.65.1.5 - Deleted subsection to remove obsolete procedures.
- (15) Various editorial changes throughout the IRM. Reviewed and updated grammar, plain language, titles, and website addresses.

#### **EFFECT ON OTHER DOCUMENTS**

IRM 4.65.1, dated February 22, 2024 is superseded.

**AUDIENCE**

Large Business & International (LB&I), Withholding Exchange & International Individual Compliance (WEIC), Foreign Payments Practice (FPP) and Automatic Exchange of Information (AEOI) program office FATCA Compliance team employees.

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4.65.1

IRS FFI List Publishing Process

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4.65.1.1  
(12-04-2025)  
**Program Scope and Objectives**

- (1) **Purpose:** This IRM provides an overview of the governance process in administering Foreign Account Tax Compliance Act (FATCA) compliance specific to the FATCA registration Foreign Financial Institution (FFI) list publishing process.
- (2) **Audience:** These policies and procedures apply to FPP & AEOI employees who are engaged in activities related to FATCA compliance including:
  - Internal Revenue Agents (RA)
  - Tax Law Specialists (TLS)
  - Management Program Analysts (MPA)
  - Tax Analysts (TA)
- (3) **Policy Owner:** LB&I Policy under the Strategy, Policy and Governance office in the Assistant Deputy Commissioner Compliance Integration (ADCCI) organization and Director, Withholding Exchange and International Individual Compliance (WEIIC).
- (4) **Program Owner:** Director of Field Operations, LB&I WEIIC-FPP & AEOI.
- (5) **Primary Stakeholders:** The LB&I, WEIIC FPP & AEOI program office FATCA Compliance Team analysts.
- (6) **Contact Information:** To recommend changes or to make any other suggestions to this IRM section, contact the IRM author or see SPDER's IMD Contacts by referencing guidelines provided in IRM 1.11.6.5, Providing Feedback About an IRM Section - Outside of Clearance. A request or inquiry can also be made at *LB&I Policy Gateway*.

4.65.1.1.1  
(07-25-2022)  
**Background**

- (1) Under the Hiring Incentives to Restore Employment Act (HIRE) of 2010 the Foreign Account Tax Compliance Act (FATCA) Pub. L. 111-147 (H.R. 2847) (the Act) was enacted by Congress to target non-compliance by U.S. taxpayers using foreign accounts. Section 501(a) of the Act added chapter 4 (sections 1471-1474) to Subtitle A of the Code. Chapter 4 generally requires that FFIs and certain other non-financial foreign entities (NFFE) report on the foreign assets held by their U.S. account holders or be subject to 30% withholding on withholdable payments. In addition, U.S. financial institutions (USFIs) and other types of U.S. withholding agents are required to withhold 30% on certain U.S. source payments made to foreign entities if they are unable to document such entities for purposes of FATCA.
- (2) FATCA is intended to increase transparency with respect to U.S. taxpayers holding assets in non-U.S. financial accounts and non-U.S. entities. The overall purpose is to detect, deter and discourage offshore tax abuses through increased transparency, enhanced reporting, and strong sanctions.
- (3) FATCA requires FFIs to 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 are encouraged to either directly register with the IRS to comply with the FATCA regulations (and FFI agreement, if applicable) or comply with the FATCA Intergovernmental Agreements (IGA) treated as in effect in their jurisdictions. For access to the FATCA regulations and administrative guidance related to FATCA and to learn about taxpayer obligations please visit *Foreign Account Tax Compliance Act (FATCA)*.

## 4.65 FATCA Foreign Financial Institution (FFI) Operational Procedures and Compliance

- (4) Intergovernmental Agreements (IGAs) under FATCA are bilateral agreements between the United States and foreign governments that implement or facilitate the implementation of FATCA through the reporting and exchange of financial account data. The FFI agreement (Revenue Procedure 2017-16) provides guidance on the FATCA requirements for participating FFIs and reporting Model 2 FFIs. This agreement sets forth the FFI's due diligence, withholding, information reporting, tax return filing, and other obligations as a participating FFI. Refer to *Revenue Procedure 2017-16 Updated FFI Agreement* and view the *Table of FATCA Agreements and Understandings in Effect by Jurisdiction* to find a list of Model Intergovernmental Agreements and assorted additional statements related to FATCA and its implementation. A general description of each model type as it relates to FATCA is found below:
  - a. Model 1 IGAs: Pursuant to Model 1 Intergovernmental Agreement (IGAs), host country tax authorities (HCTAs) agree to report annually to the IRS specified information about the U.S. accounts maintained by all relevant FFIs located in their jurisdictions. HCTAs must create an account with the International Data Exchange Service (IDES) to securely transmit FATCA data to the IRS.
  - b. Model 2 IGAs: Pursuant to Model 2 IGAs, all relevant FFIs located in the partner jurisdiction must report specified information about their U.S. accounts directly to the IRS. Such FFIs must create an account with IDES and obtain a GIIN to securely transmit FATCA data to the IRS. FFIs must agree to comply with the terms of the FFI agreement, which includes due diligence, reporting, and withholding requirements.
  - c. Non-IGA: An FFI located in a jurisdiction that is not treated as having in effect an IGA, to avoid being withheld upon under Chapter 4, must register and agree to comply with the terms of an FFI agreement and obtain a GIIN, unless it is able to qualify as a certified deemed-compliant FFI or exempt beneficial owner.
- (5) While the focus of this IRM is the FATCA registration review of foreign financial institutions (FFIs), please note that the HIRE Act also contains legislation requiring U.S. persons (individuals) to report, depending on the value, their foreign financial accounts, and foreign assets. Certain assets are reported to the IRS generally using Form 8938, Statement of Specified Foreign Financial Assets. For more information, please refer to *FATCA Information for Individuals*, and *Summary of FATCA Reporting for U.S. Taxpayers*.
- (6) The IRS FFI List is issued by the IRS and includes all financial institutions, branches, direct reporting non-financial foreign entities, sponsored entities, and sponsored subsidiary branches that have submitted a registration and have been assigned a GIIN at the time the list was compiled. The FFI list is compiled monthly and published the first day of each month. The IRS ensures that all FFIs that ultimately appear on the FFI list do so in accordance with FATCA legislation. The FFI list publishes the legal name, GIIN and country for tax purposes of approved entities meeting the criteria for inclusion on the list. Financial Institution (FI) registration information includes the names of registered FFIs, GIINs, responsible officers, contact and other information that is self-reported by the FFIs through the FATCA registration portal during the registration process.

4.65.1.1.2  
(07-25-2022)  
**Authority**

- (1) Legal authority is derived from Income Tax Regulations (26 CFR Part 1) under chapter 4 (sections 1471 through 1474) commonly known as the Foreign Account Tax Compliance Act (FATCA).

4.65.1.1.3  
(12-04-2025)  
**Roles and Responsibilities**

- (1) Director, WEIIC, is the executive responsible for the policies and procedures in this IRM section.
- (2) Director of Field Operations (DFO), FPP & AEOI is the executive responsible for the FPP & AEOI areas.
- (3) The program manager provides oversight for the FPP & AEOI program office programs.
- (4) Team managers provide oversight to the FATCA Compliance Team(s) operations and are responsible for upholding the integrity of the FFI List by ensuring that all FFIs that appear on the list do so in accordance with the FATCA legislation.
- (5) The FATCA Compliance Team(s) is responsible for reviewing FFI registrations to ensure accuracy and completeness, maintaining the integrity of the published FFI List, and issuing Global Intermediary Identification Number (GIIN), in accordance with established compliance procedures.

4.65.1.1.4  
(12-04-2025)  
**Program Management and Review**

- (1) Program Reports: The program manager for program office prepares periodic briefing reports for Director, WEIIC, focusing on:
  - Significant accomplishments and opportunities for improvement.
  - Approved changes to procedures that have been implemented.
  - Operational and emerging technical issues.
  - Staffing and other key information related to the FATCA Compliance Program.
- (2) The FATCA team manager(s) report progress on their projects and work-streams to the program office program manager.

4.65.1.1.5  
(12-04-2025)  
**Program Controls**

- (1) The Director of the WEIIC Practice Area Reports to LB&I executive leadership on a continuous basis.
- (2) DFO of FPP & AEOI, as the program owner, monitors activities of FATCA Compliance by:
  - a. Overseeing the administration, procedures, and updates related to FATCA Compliance.
  - b. Identifying goals and objectives to be achieved by the organization.
  - c. Compiling periodic reports from the program office program manager.
- (3) FATCA Compliance has developed program controls to oversee registration operations including:
  - a. SharePoint Site
  - b. Organizational mailbox - FATCA FI mailbox
- (4) FATCA Compliance daily registration review for first and second reviewers is assigned by the team manager(s) and published on the program SharePoint site and strictly adheres to the following requirements:

## 4.65 FATCA Foreign Financial Institution (FFI) Operational Procedures and Compliance

- a. Registration status changes require two levels of review.
- b. Registration status changes to Agreement Terminated requires the program manager's concurrence.

4.65.1.1.6  
(12-04-2025)

### Terms and Acronyms

- (1) The table below lists the common acronyms and their definitions:

Acronym	Definition
ADCCI	Assistant Deputy Commissioner Compliance Integration
AEOI	Automatic Exchange of Information
DFO	Director of Field Operations
EAG	Expanded Affiliated Group
EUP	Employee User Portal
FATCA	Foreign Account Tax Compliance Act
FFI	Foreign Financial Institution
FI	Financial Institution
FPP	Foreign Payments Practice
GIIN	Global Intermediary Identification Number
HCTAs	Host Country Tax Authorities
HIRE	Hiring Incentives to Restore Employment Act
IDES	International Data Exchange Service
IGAs	Intergovernmental Agreements
KYC	Know Your Customer
MPA	Management Program Analyst
NFFE	Non-Financial Foreign Entity
OFAC	Office Foreign Assets Control
PFFI	Participating Foreign Financial Institution
POC	Point of Contact
RA	Internal Revenue Agent
RDCFFI	Registered Deemed-Compliant Foreign Financial Institution
RO	Responsible Officer
SDN	Specially Designated Nationals
SDN List	Specially Designated Nationals and Blocked Persons List
TA	Tax Analyst

Acronym	Definition
TLS	Tax Law Specialist
USFI	United States Financial Institution
WEIIC	Withholding Exchange & International Individual Compliance

- (2) Refer to Pub 5118, FATCA Online Registration User Guide, for more definitions and acronyms. Note that the abbreviations FFI and FI are sometimes used interchangeably.

4.65.1.1.7  
(12-04-2025)  
**Related Resources**

- (1) *IRS FATCA Website*
- (2) Pub 5118, FATCA Online Registration User Guide
- (3) *Intergovernmental Agreements (IGA) List*
- (4) *FATCA Registration Country Jurisdiction Listing*
- (5) IRM 4.60.1.10.1, FATCA Overview
- (6) Key FATCA Provisions: *Summary of Key FATCA Provisions*
- (7) The monthly listing of approved foreign institutions that have obtained a GIIN, is available using the *FATCA Foreign Financial Institution (FFI) List Search and Download Tool*
- (8) Pub 5147, (FATCA) Foreign Financial Institution (FFI) List Search and Download Tool User Guide
- (9) *Rev. Proc. 2017-16*, FFI Agreement for Participating FFI and Reporting Model 2 FFI.
- (10) *Frequently Asked Questions (FAQs) related to FATCA registration system*
- (11) *General Frequently Asked Questions (FAQs) related to FATCA*
- (12) *International Data Exchange Service (IDES)*
- (13) *FATCA Reporting for US Taxpayers*
- (14) *FATCA Related Forms*
- (15) *FATCA Information for Governments*
- (16) *FATCA Information for United States Entities*

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4.65.1.2  
(12-04-2025)  
**FATCA Registration Overview**

- (1) For a comprehensive description of the FATCA registration process including detailed registration steps for each FI type and jurisdiction, refer to Pub 5118, FATCA Online Registration User Guide.

## 4.65 FATCA Foreign Financial Institution (FFI) Operational Procedures and Compliance

- (2) The FATCA Online Registration System is a secure, web-based system that financial institutions (FIs) and direct reporting non-financial foreign entities (NFFEs) may use to register themselves (and FI branches, if any).

**Note:** The FATCA Online Registration System is compatible with the following browsers: Microsoft Edge, Google Chrome, and Mozilla Firefox.

- (3) Once registered and approved, the FI will receive a global intermediary identification number (GIIN), which will appear on the next published IRS FFI list.
- (4) An FI will create a FATCA account and select an FI type. A financial institution can be one of the following FI types:
- Lead - Lead of an expanded affiliated group (EAG) that is authorized to carry out most aspects of its member FIs' FATCA registrations and will initiate the FATCA registration process for each of its member FIs.
  - Member - An FFI registering as a member FI of an EAG that is not acting as a lead FI. A member FI will need to obtain its FATCA ID from its lead FI. The FATCA ID is used to identify the member FI for purposes of registration and is not the same number as the GIIN.
  - Single - An FI that is not part of an EAG.
  - Sponsoring Entity - An entity that will perform the due diligence, withholding, and reporting obligations of one or more sponsored entities.
- (5) FATCA Classifications: Responses to FI type (registration question 1) determine what classifications options are available. An FI's classification response is also a factor in the FATCA registration system determining whether the FI is required to submit a renewal of the FFI agreement and/or a FATCA certification. Below are the classification options available for selection. Note that an FFI may modify its FATCA classification after registering.
- Participating Foreign Financial Institution (PFFI) (including a reporting FI under a Model 2 Intergovernmental Agreement (IGA))
  - Direct Reporting NFFE
  - Registered Deemed-Compliant FFI (RDCFFI) that is a Local FFI
  - Registered Deemed-Compliant FFI that is a Non-Reporting Member of a PFFI Group
  - Registered Deemed-Compliant FFI that is a Qualified Collective Investment Vehicle
  - Registered Deemed-Compliant FFI that is a Qualified Credit Card Issuer or Servicer
  - Registered Deemed-Compliant FFI that is a Restricted Fund
  - Reporting Financial Institution under a Model 1 IGA
  - Sponsoring Entity of Sponsored Direct Reporting NFFEs
  - Sponsoring Entity of Sponsored FFIs
  - Sponsoring Entity of Sponsored FFIs and Sponsored Direct Reporting NFFEs
  - Trustee of a Trustee-Documented Trust
  - U.S. Financial Institution
- (6) Relating to its FATCA registration, an approved FFI, a U.S. financial institution (USFI) acting as a Lead FFI, a sponsoring entity, and a direct reporting NFFE will be issued a global intermediary identification number (GIIN) and will be identified on the IRS FFI List. The IRS FFI List is updated monthly to add or remove approved entities (or their branches). A separate GIIN will be issued to

an FFI to identify each jurisdiction where the FFI maintains a branch. A direct reporting NFFE will receive only one GIIN, irrespective of where it maintains its branches.

- (7) Entities assigned a GIIN can use it to identify themselves to withholding agents and tax administrators for FATCA reporting purposes. The GIIN, formatted as XXXXXX.XXXXXX.XX.XXX, is an identification number made up of several identifiers. These characters will never contain the letter “O”. For more information on GIIN composition, refer to Pub 5118, FATCA Online Registration User Guide, and *FATCA registration and FFI list: GIIN composition information*. A listing of country/jurisdiction can be found at *FATCA registration System country jurisdiction listing*.

4.65.1.3  
(12-04-2025)  
**FATCA Compliance  
Program - Registration  
Operations Overview**

- (1) The IRS FFI List Publishing Process review includes standardized reviews performed by IRS analysts on each FATCA registration submitted. The purpose of the review is to prevent the erroneous issuance of a GIIN to an entity that is sanctioned by the U.S. Department of Treasury, Office of Foreign Asset Control, to a fictitious entity or test entity, one that is lacking required information, or one that is otherwise inappropriate to appear on the IRS FFI List.
- (2) The FPP upholds the integrity of the IRS FFI List by ensuring entities listed comply strictly with FATCA requirements. The FPP applies specific procedural checks to scrutinize the IRS FFI List before publication, identifying and managing questionable registrations.
- (3) An account placed into incomplete status allows the registrant the ability to edit their information and re-submit for IRS review. Edits can also be made while in “Registration Submitted” or “Approved” statuses. Accounts placed unto “Under Review” status will not be able to access their registration while it is being reviewed.

4.65.1.3.1  
(12-04-2025)  
**Registration Review  
Process Overview**

- (1) FATCA Compliance team members will:
  - a. Review registration reports and conduct thorough research of the FI using internal systems and external public sites to ensure the registration information is complete and accurate.
  - b. Make appropriate status changes within the EUP system.
- (2) **Incomplete Registrations** are registrations identified as having incomplete information and/or conflicting data, potentially warranting temporary status changes to “**Registration Incomplete**” within the EUP system to allow the registrant the ability to edit their registration and re-submit for IRS review.
- (3) **OFAC-SDN Registrations** are registrations involving entities appearing on the Specially Designated Nationals and Blocked Persons list (“SDN List”) or

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## 4.65 FATCA Foreign Financial Institution (FFI) Operational Procedures and Compliance

4.65.1.3.2  
(12-04-2025)

### Login Assistance

- (1) Technical Support for FATCA Registration System – In the event that a Financial Institution (FI) or an authorized party is unable to access their FATCA account, system support for the online FATCA Registration System is available. This includes assistance with login issues, error messages, and other system-related technical problems.
- (2) Technical Support may be requested by contacting the *FATCA Financial institution (FI) technical support* or by contacting the FATCA Registration System technical support team via the IRS Help Desk following the appropriate internal ticketing process or public facing support channels, as applicable.
- (3) FATCA Compliance team's responsibilities – When assigned a login related technical support request, employees must:

Step	Action	Description
1.	Acknowledge and Log the Request	received, GIIN, FI name, issue type) are accurately completed.
2.	Conduct Initial Review	Review the ticket for completeness. Identify whether additional information or documentation is required.
3.	Correspond with Responsible Officer (RO) or Point of Contact (POC)	Send an information request if the submission lacks required details (e.g., screenshots, error messages, legal name, GIIN). Provide clear instructions to the RO/POC, including acceptable formats for supporting documentation.
4.	Coordinate with Internal Stakeholders	When necessary, collaborate with other IRS functions or internal technical teams to resolve complex login or account access issues. Escalate cases to Subject Matter Experts (SMEs) or IT support as appropriate.
5.	Review Know Your Customer (KYC)/Supporting Documentation	Examine identity verification documents or business documentation submitted in support of the access request to validate the legitimacy of the requestor. Authenticate the data provided by requestor(s) to data recorded on EUP.
6.	Update System Records as Authorized	If a change to the RO or POC email address is approved, update the FATCA Registration System accordingly. Ensure proper documentation is attached to justify changes.
7.	Respond and Resolve	Communicate resolution steps or outcomes to the RO/POC. Confirm that the issue has been resolved or provide next steps.
8.	Close and Document the Ticket	Ensure any relevant correspondence is archived according to retention guidelines.

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