Filing Guidelines for Foreign Account Tax Compliance Act (FATCA)

Part 38-03-25

Document created April 2019

The information in this document is provided as a guide only and is not professional advice, including legal advice. It should not be assumed that the guidance is comprehensive or that it provides a definitive answer in every case.
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Executive Summary

These guidelines are designed to provide information in relation to FATCA Reporting in Ireland.

1. Section 1: Customer Registering for FATCA

1.1 Register a FATCA Reporting Obligation

This step can only be completed once the Customer is registered for ROS. If the Customer is not registered for ROS, refer to Appendix I, Section 5.1.

If the Customer is only being registered with Revenue in order to file a FATCA report to fulfil their FATCA Reporting Obligations (i.e. they do not have a tax obligation in Ireland) please refer to Appendix I, Section 5.2 in order to obtain a Reporting Entity Number.

For queries relating to registering a Reporting Obligation, please contact Revenue’s VIMA (VIES, Intrastat and Mutual Assistance) office:

- Via MyEnquiries, selecting AEOI (Automatic Exchange of Information) and FATCA
- Telephone at +353 42 9353337

Follow steps 1.1.1 to 1.1.10 to register a FATCA Reporting Obligation.
1.1.1 Log into ROS.

1.1.2 Under the “My Services” tab, select “Manage Reporting Obligations” from the Other Services section.

1.1.3 Select “Register” opposite “FATCA”.
1.1.4 Enter the registration date in the format DD/MM/YYYY (i.e. start date of reporting obligation). Enter “Global Intermediary Identification Number (GIIN)” and click “Add To Your Requests”.

**Note:** The date entered must not be later than current date.
1.1.5 The registration request will be added to “Your Requests” on the right-hand side of the screen. Click “Submit”.

1.1.6 Click “Sign and Submit”.
1.1.7 The Customer will be redirected to the Sign & Submit screen. Enter the ROS Password and click “Sign and Submit”.

1.1.8 The Customer will receive a ROS Acknowledgement and a Notice Number, which the Customer may wish to print for their records. Click “OK”.

1.1.9 The Customer will receive a new notification in their Revenue Record to confirm the Customer has been registered for a FATCA Reporting Obligation. Click on the Notice Number for confirmation of the registration.

1.1.10 The following notice will appear which the Customer may wish to print for their records.

After completion of this process, the customer should allow up to 3 working days for the FATCA reporting obligation to be registered.
2. Section 2: Agents Registering Clients For FATCA

This section is only relevant where the user of the system is an Agent. If the user of the system is a Customer, please refer to Section 1 above.

2.1 Registering an existing Client for a FATCA Reporting Obligation

To link to an existing Tax Registration or Reporting Entity for whom you are not current Agents, please refer to Section 2.2 - Agent linking to new Customers/Clients for Reporting Obligations.

For queries relating to registering a Reporting Obligation, please contact Revenue’s VIMA (VIES, Intrastat and Mutual Assistance) office:

- Via MyEnquiries, selecting AEOI (Automatic Exchange of Information) and FATCA
- Telephone at +353 42 9353337

Follow steps 2.1.1 to 2.1.16 to register a FATCA Reporting Obligation.

2.1.1 Log into ROS.

2.1.2 Under the “Agent Services” tab, locate the Customer using Client Search or Client List.

Agent will be redirected to the “Client Services” tab for the relevant Customer.
2.1.3 Select “Manage Reporting Obligations” from the Other Services section.

2.1.4 Click “Select Action” opposite “FATCA”.

![Image of the Revenue website showing the Other Services section and the select action for FATCA.](image-url)
2.1.5 Select “Add and link to a new registration”.  
This option is applicable to an Agent wishing to link to a current Customer/Client to manage a FATCA Reporting Obligation.

2.1.6 The following screen will appear. Select “Confirm”.  

![Registration screen](image-url)
2.1.7 Enter the registration date in the format DD/MM/YYYY (i.e. start date of reporting obligation). Enter Global Intermediary Identification Number (GIIN), click “Add To Your Requests”.

2.1.8 The registration request will be added to “Your Requests” on the right-hand side of the screen. Click “Submit”.

![Image of the registration process](image-url)
2.1.9 Select “Generate Client Consent Letter” this will generate a Consent letter in respect of the registrations input for your client. This will be generated in PDF format. (This option is not mandatory; a standard Agent Link Notification Form may be uploaded at the next stage).

This document opens in a separate browser for editing and saving to the Agent network/drive.

[Image of a form]

 confirms that TEST (representative) is to act as the agent in respect of the following taxes.

FATCA Reporting Obligation (New) ..........................................................

understands that this arrangement will remain in place until changed by either agent or client and the change is notified to Revenue.

Signed ___________________________ (Agent) Date ___________________________

Signed ___________________________ (Client) Date ___________________________

This document opens in a separate browser for editing and saving to the Agent network/drive.
2.1.10 Once completed, click “Next”.

2.1.11 To upload the completed Agent Link Notification Form on ROS, click “Choose file” and locate the completed Agent Link Notification Form in the Agent network/drive. Tick the box “FATCA” and click “Add Attachment”.

**Standard Agent link notification may also be uploaded**
2.1.12 Click “Sign and Submit”.

2.1.13 The Agent will be redirected to the Sign & Submit screen. Enter the ROS Password and click “Sign and Submit”.

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[Image of the Revenue website's Sign & Submit page]
2.1.14 The Agent will receive a ROS Acknowledgement and a Notice Number which the Agent may wish to print for its records. Click “OK”.

2.1.15 The Agent will receive a new notification in the Client’s Revenue Record to confirm the Customer has been registered for a FATCA Reporting Obligation. Click on the Notice Number for confirmation of the registration.
2.1.16 The following notice will appear which the Agent may wish to print for their records.

![Notice](image)

This is a notice of the Registration Submitted to Revenue Commissioners on 21/04/2017

Notice Number: 578601796L
Date Submitted: 21/04/2017

FATCA Reporting Obligation (New)

Status

Success

Please use ROS Notice Number for any further correspondence or query related to this transaction

![Checkmark]

After completion of this process, the agent should allow up to 3 working days for the FATCA reporting obligation to be registered.
2.2 Agent linking to new Customers/Clients for Reporting Obligations

This section is to be used by Agents who wish to link to a Customer/Client to whom they are **not** already linked on ROS to carry out FATCA Reporting Obligations. Please note that in the example below, the Customer/Client is already registered on ROS for the FATCA Reporting Obligation. If an Agent wishes to link to a Customer/Client and the Customer/Client is not already registered for the FATCA Reporting Obligation, please refer to Section 2.1.

2.2.1 Agent logs onto ROS, access “Agent Services”.

2.2.2 Go to section “Manage Tax Registrations”.

![Image of ROS interface for managing tax registrations](image-url)
2.2.3 If an Agent wishes to register an existing Tax Registration for a Reporting Obligation, select “Tax Registrations” radio button, followed by “Tax Type” (choose existing tax type for Company), enter the “Tax Registration Number”, along with the “Name” and select “Manage Reporting Obligations” from the drop-down menu. To complete this step, click “Manage”.

2.2.4 Alternatively, if the Agent wishes to register an existing Reporting Entity for a Reporting Obligation, select the “Reporting Obligations” radio button, followed by the “Reporting Obligation Type”, enter the “Registration Number”, followed by the “Name”, and then select “Manage Reporting Obligations” from the drop-down menu. To complete this step, click “Manage”.
2.2.5 Under Registration Options, click “Select Action” and “Link only to an existing registration”.

This option is applicable to an Agent wishing to link to a Customer/Client they are not currently linked to on ROS in order to manage a FATCA Reporting Obligation.

2.2.6 Click “Confirm”.

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![Image of agent registration options and request confirmation]

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Relevant section from the Tax and Duty Manual: Part 38-03-25
2.2.7 Click “Submit”.

2.2.8 Click “Generate Client Consent Letter”, this action generates a letter for signing. Download and save for editing. (This option is not mandatory; a standard Agent Link Notification Form may be uploaded at the next stage). Once completed click “Next”.

![Image of the interface for generating a Client Consent Letter](image-url)
2.2.9 Select “Choose File” and upload the letter generated (or Agent Link Notification Form). Tick FATCA and click “Add Attachment”.

*File* Choose file No file chosen

Please indicate which reporting obligations the attachment is relevant to by checking the boxes.

FATCA

Once a suitable file has been identified click on ‘Add to Requests’ to have this request added to the ‘Your Requests’ area where it will be made available for submission.
2.2.10 Click “Sign and Submit”.

2.2.11 The Agent will be redirected to the Sign & Submit screen. Enter the ROS Password and click “Sign and Submit”.
2.2.12 Allow up to 3 working days to update on ROS.

2.2.13 The Agent will receive a new notification in the Revenue Record to confirm the Agent link. Click on the Notice Number for confirmation of the registration.
2.2.14 The following notice will appear which the Agent may wish to print for their records.

- After completion of this process, the agent should allow up to 3 working days to update.
3. Section 3 – Customer Submitting FATCA Returns

The following section details how Customers upload FATCA returns on ROS. Section 3.1 details uploading Nil FATCA returns, Section 3.2 details uploading XML files.

XML Nil Returns may also be uploaded. Please refer to FATCA XML Schema Guide (V2.0)

3.1 Customer Submitting Nil FATCA Return.

3.1.1 Customer logs on to ROS, under “Upload Form(s) Completed Off-Line” select “FATCA” from the drop-down list. Click “Upload Return”.

![Image of ROS interface showing upload of FATCA return](image-url)
The ROS upload screen is then presented to the user. If the user wishes to make an election under Regulation 6(2) of the Financial Accounts Reporting Regulations 2014, they should ensure that the check box at the top of the screen is selected. This checkbox is also relevant for selection of the Nil return option.

3.1.2 Tick election box if applicable. Click “Submit Nil Return”.

Further information on the relevant thresholds that can be applied in respect of FATCA are set out in the FATCA guidance notes.
3.1.3 Information for the nil return will be auto generated from registration as shown below. Select “Address CountryCode” from the drop-down list. (This is a mandatory field). Tick “I wish to submit a nil-return based on the above details”. Click “Submit”.

Revenue auto-generated nil-return facility

This facility provides Reporting Financial Institutions (FIs) with a simple option to submit a nil-return in the case where they have no reportable accounts for the given Reporting Period. This facility automatically generates a nil-return on behalf of the FI, based on the submission date and the customer registration details as set out below. FIs may also use the File Upload option to submit a nil-return in XML format as an alternative to this facility should they wish, or should the auto-generated details not suit their needs.

The following details will be used to automatically generate a nil-return on your behalf:

Global Intermediary Identification Number:

Reporting Period Start Date: 01-01-2018

Reporting Period End Date: 31-12-2018

Country of Tax Residence: Ireland

Name:

Filer Category: Please Select

Address CountryCode: Please Select

Address:

I wish to submit a nil-return based on the above details.
3.1.4 Enter Password, click “Sign and Submit”.

3.1.5 The following confirmation screen is shown. Click “Go to ROS” to return to Revenue Record.
3.1.6 The Customer will receive a new notification in the Revenue Record to confirm they have submitted a FATCA Nil Return. Click on the Notice Number for confirmation of the Nil Return submitted.

3.1.7 Click “Close” to return to Revenue Record.
3.2 Customer Submitting FATCA XML File

For efficient processing, it is recommended that individual FATCA XML files should not exceed 10MB in size. The absolute maximum file size is 30MB or 20,000 records. A file size of greater than 30MB or 20,000 records will be rejected by ROS.

3.2.1 Customer logs on to ROS, under “Upload Form(s) Completed Off-Line” select “FATCA” from the drop-down list. Click “Upload Return”.

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2 Further information on the FATCA XML Schema Guide (V2.0).
The ROS upload screen is then presented to the user. If the user wishes to make an election under Regulation 6(2) of the Financial Accounts Reporting Regulations 2014, they should ensure that the check box at the top of the screen is selected.\(^3\) This checkbox is also relevant for the selection of the Nil return option.

3.2.2 Tick election box if applicable. Click “Add File”, select file from computer storage. Enter ROS password and click “Upload File”.

3.2.3 The following confirmation screen appears. Click “Finished”. The Customer is directed back to My Services page.

3.2.4 The Customer will receive a new notification in the Revenue Record to confirm the successful file submission. Click on the Notice Number for confirmation of the file upload.

\(^3\) Further information on the relevant thresholds that can be applied in respect of FATCA are set out in the FATCA guidance notes.
3.2.5 Click “Close” to exit and return to Revenue Record screen.
3.2.6 ROS uses real time validation, files are validated at upload and are reflected in the Revenue Record. Click “Close” to return to My Services screen in order to rectify the issues outlined and re-submit the xml file.

FATCA Acknowledgement

× Step 1 - Failed Revenue Validation
× Step 2 - Submitted to the IRS

Your FATCA file with message reference id [REDACTED] failed Revenue validation and was not accepted by Revenue due to the following errors. Please correct the error(s) and resubmit your file.

1. Invalid DocRefId: [REDACTED]. Must be in the format: _ OR . _ OR . OPTIONAL AMENDMENT NUMBER: . A
2. The Sponsor Filer Category has to be populated with a correct Filer Category for a sponsor element.
3. When Sponsor is present, population of the Sponsor Name field is mandatory.
3.2.7 Following exchange of the FATCA file with the IRS, a notification is displayed detailing successful acceptance of the FATCA file by the IRS. Click “Close” to return to the MyServices screen.
3.2.8 Following exchange of the FATCA file with the IRS, a notification is displayed detailing unsuccessful acceptance of the FATCA file by the IRS. User should return to My Services screen in order to rectify the issues outlined and re-submit the xml file.

Each error also contains an instruction stating: “Action Due Date: Correct the errors within 120 days of the date of this notice.”
4. Section 4 – Agent Submitting FATCA Returns

The following section details how Agents upload FATCA returns on ROS. Section 4.1 details uploading NIL FATCA return, Section 4.2 details uploading XML Data returns. XML Nil Returns may also be uploaded. Please refer to FATCA XML Schema Guide (V2.0)

4.1 Agent Submitting Nil FATCA Return.

4.1.1 Agent logs on to ROS, search for Client using Client Search or Client List.

4.1.2 In the section marked “Upload Form(s) Completed Off-Line”, select FATCA from the dropdown list and click “Upload Return”.

![Image of ROS interface for uploading FATCA return](image-url)
The ROS upload screen is then presented to the user. If the user wishes to make an election under Regulation 6(2) of the Financial Accounts Reporting Regulations 2014, they should ensure that the check box at the top of the screen is selected. This checkbox is also relevant for the selection of the Nil return option.

4.1.3 Tick election box if applicable. Click “Submit Nil Return”.

4 Further information on the relevant thresholds that can be applied in respect of FATCA are set out in the FATCA guidance notes.
4.1.4 Information for the Nil return will be auto-generated from registration as shown below. Select Filer Category from drop-down list. Select “Address CountryCode” from drop-down list. (These are mandatory fields). Tick “I wish to submit a nil-return based on the above details”. Click “Submit”.

![Image of Filer Category and Address CountryCode drop-down lists]

**Revenue auto-generated nil-return facility**

This facility provides Reporting Financial Institutions (FIs) with a simple option to submit a nil-return in the case where they have no reportable accounts for the given Reporting Period. This facility automatically generates a nil-return on behalf of the FI, based on the submission date and the customer registration details as set out below. FIs may also use the File Upload option to submit a nil-return in XML format as an alternative to this facility should they wish, or should the auto-generated details not suit their needs.

The following details will be used to automatically generate a nil-return on your behalf:

- **Global Intermediary Identification Number:**
- **Reporting Period Start Date:** 01-01-2016
- **Reporting Period End Date:** 31-12-2016
- **Country of Tax Residence:** Ireland
- **Filer Category:** Please Select
- **Address CountryCode:** Please Select

Select “Address CountryCode” from drop-down list. (These are mandatory fields). Tick “I wish to submit a nil-return based on the above details”. Click “Submit”.

Submit
4.1.5 Enter ROS Password and click “Sign & Submit”.

4.1.6 Click “Go to ROS” to return to Client Services page.

Thank you.
Your FATCA Nil Return has been submitted.

Please check your ROS Revenue Record shortly for confirmation. See Notice No.: 677346002.
4.1.7 The Agent will receive a new notification in the Client Revenue Record to confirm they have submitted a FATCA Nil Return. Click on the Notice Number for confirmation of the Nil Return submitted.

4.1.8 The following notice appears which the Agent may wish to print for their records. Click “Close” to return to Revenue Record.
4.2 Agent Submitting FATCA XML File

For efficient processing, it is recommended that individual FATCA XML files should not exceed 10MB in size. The absolute maximum file size is 30MB or 20,000 records. A file size of greater than 30MB or 20,000 records will be rejected by ROS.

4.2.1 Agent logs on to ROS, search for Client using Client Search or Client List.

4.2.2 In the section marked “Upload Form(s) Completed Off-Line”, select FATCA from the dropdown list and click “Upload Return”.

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5 Further information on the FATCA XML Schema Guide (V2.0).
The ROS upload screen is then presented to the user. If the user wishes to make an election under Regulation 6(2) of the Financial Accounts Reporting Regulations 2014, they should ensure that the check box at the top of the screen is selected.\(^6\) This checkbox is also relevant for the selection of the Nil return option.

4.2.3 Tick election box if applicable. Click “Add File”, select file from computer storage. Enter ROS Password and click “Upload File”.

![ROS Upload Screen](image)

4.2.4 The following confirmation screen appears. Click “Finished”. The Agent is directed back to Client Services page.

\(^6\) Further information on the relevant thresholds that can be applied in respect of FATCA are set out in the FATCA guidance notes.
4.2.5 The agent will receive a new notification in the Client Revenue Record to confirm the successful file submission. Click on the Notice Number for confirmation of the file upload.

4.2.6 The following notice appears which the Agent may wish to print for their records. Click “Close” to exit and return to Client Revenue Record screen.
4.2.7 ROS uses real time validation, files are validated at upload and are reflected in the Revenue Record. Click “Close” to return to Agent Services screen in order to rectify the issues outlined and re-submit the xml file.

4.2.8 Following exchange of the FATCA file with the Internal Revenue Service (IRS), a notification is displayed detailing successful acceptance of the FATCA file by the IRS. Click “Close” to return to the Agent Services screen.
4.2.9 Following exchange of the FATCA file with the IRS, a notification is displayed detailing unsuccessful acceptance of the FATCA file by the IRS. Agent should return to Agent Services screen in order to rectify the issues outlined and re-submit the xml file.

Each error also contains an instruction stating: “Action Due Date: Correct the errors within 120 days of the date of this notice.”
5. Appendix I – ROS Registration & Reporting Entity Registration

5.1 Register for ROS

This step is only relevant if the Customer is not already registered for ROS.

The Customer must register for ROS using the Tax Registration Number provided by Revenue. If the Customer does not have a Tax Registration Number but has a FATCA Reporting Obligation in Ireland please see Section 5.2 in order to obtain a Reporting Entity Number.

Details on how to register for ROS are available on the Revenue website.

For queries relating to ROS please contact the Revenue ROS Technical Helpdesk:

- Email at roshelp@revenue.ie
- Telephone at 01 738 3699, International customers may contact via the email address above or call +353 1 738 3699
5.2 Register as a Reporting Entity

This is a Customer that is only being registered with Revenue in order to file Reporting Obligations (i.e. they have no tax obligations in Ireland).

If the Customer does not have a Tax Reference number and is not registered for ROS, but is obliged to fulfil a FATCA Reporting Obligation, the Customer must register with Revenue as a 'Reporting Entity'. This process should not be confused with a Tax Registration. Where a Customer registers as a Reporting Entity, it will only be able to fulfil its FATCA Reporting Obligations, that is, it is not required to file tax returns e.g. Corporate Tax returns.

In order to register as a Reporting Entity, the Customer must contact VIMA on +353 42 9353337. The Customer will be issued with a Reporting Entity Registration Number, which will be in the format of 7 digits followed by 2 letters (e.g. 1234567AA).
6. Appendix II – Agent Creating Reporting Entity Number

6.1 Creating a Reporting Entity as an Agent

A Reporting Entity is created only in cases where the Customer has no tax obligations in Ireland, but needs to register with Revenue in order to fulfil their Reporting Obligations.

If the Customer does not have a Tax Reference Number and is not registered on ROS, but is obliged to register on ROS to fulfil a FATCA Reporting Obligation, the Agent must register the Customer with Revenue as a ‘Reporting Entity’. This process should not be confused with a Tax Registration. Where a Customer is registered as a Reporting Entity, the Customer will only be able to fulfil its FATCA Reporting obligations, that is, the Customer is not required to file tax returns e.g. Corporate Tax returns. Where a Client already has an Irish Tax Registration Number or Reporting Entity Number, this option should not be used as it will create duplicate filing obligations.

When an Agent is registering a Customer as a Reporting Entity for FATCA Reporting purposes, it is possible for an Agent to register a FATCA Reporting Obligation at the same time. The process is set out in steps 6.1.1 to 6.1.12 below.

For queries relating to ROS please contact the ROS Technical Helpdesk:

- Email at roshelp@revenue.ie
- Telephone at 01 738 3699, International customers may contact via the email address above or call +353 1 738 3699

For queries relating to registering a Reporting Obligation, please contact Revenue’s VIMA (VIES, Intrastat and Mutual Assistance) office:

- Via MyEnquiries, selecting AEOI (Automatic Exchange of Information) and FATCA
- Telephone at +353 42 9353337
6.1.1 Log into ROS.

6.1.2 On the “Agent Services” tab, select “Register New Reporting Customer” on the bottom right-hand corner of the screen.

6.1.3 Select “FATCA Reporting Obligation” and click “Next”.
6.1.4 Enter the required details for the Customer. Click “Next”.
6.1.5 Enter the “Registration date (i.e. start date of reporting obligation)” in the format DD/MM/YYYY. Enter “Global Intermediary Identification Number (GIIN)”, click “Next”.

![FATCA Registration](image)
6.1.6 Select “Generate Client Consent Letter”.

When the Generate Client Consent Letter button is selected, a pdf document is downloaded for completion. Download and save for editing. (This option is not mandatory; a standard Agent Link Notification Form may be uploaded at the next stage).

Once completed, click “Next”.

![Image of eRegistration with Generate Client Consent Letter button highlighted]
Test confirms that TEST [REDACTED] is to act as the agent in respect of the following reporting obligations.

Customer Registration Request (Reporting Entity)
FATCA Reporting Obligation (New)

Registered Contact Details
Name
Address
Address1
Address2

Test understands that this arrangement will remain in place until changed by either agent or client and the change is notified to Revenue.

Signed____________________________(Agent) Date________________________

Signed____________________________(Client) Date________________________
6.1.7 To upload the completed Agent Link Notification Form on ROS, click “Choose file” and locate the completed Agent Link Notification Form in the Agent network/drive. Select the box “FATCA” and click “Add Attachment”.

**Standard Agent link notification may also be uploaded**

6.1.8 Click “Sign and Submit”.

---

![Image of eRegistration system](image-url)

**File:** Choose file. 

**FATCA**

Click on “Add Attachment”.

**Completed Agent Link Notification Form:**

Click on “Add Attachment”.

**Sign and Submit**
6.1.9 The Agent will be redirected to the Sign & Submit screen. Enter the ROS Password and click “Sign and Submit”.

6.1.10 The Agent will receive a ROS Acknowledgement and a Notice Number, which the Agent may wish to print for its records. Click “OK”.
6.1.11 The Agent will receive a new notification in the Client Revenue Record to confirm a FATCA Reporting Entity registration. Click on the Notice Number for confirmation of the registration.

6.1.12 The following notice will appear which the Agent may wish to print for their records.

![Notice Example]

- After completion of process, the agent should allow up to 3 working days for the FATCA reporting entity to be registered.
7. Appendix III – FATCA Additional Schema Guidance

Following the first filing of FATCA returns and exchange with the United States, Revenue wishes to advise Financial Institutions (FI) of the following changes to file validation, which will be applied to the filing Financial Institution of FATCA 2015 financial account information in 2016, and to subsequent filings.

Financial Institutions should note that Revenue will allow a standard naming convention and an alternative naming convention. Financial Institution should apply one or other of these naming conventions and the two naming conventions cannot be mixed. For example, where a Financial Institution chooses the alternative naming convention for the MessageRefID element (as illustrated at 7.2 below), the alternative naming convention for the DocRefID element (as illustrated at 7.4) must also be used. This is to ensure compliance with the IRS validation of the DOCREFID which must start with the GIIN and followed by a full stop.

FATCA Returns should be based on the FATCA XML SCHEMA GUIDE (V2.0)

7.1 XML schema element reference – MessageRefID

One of the main issues experienced with rejected FATCA xml files was in relation to this field. FI’s failed to populate this field or included a reference which was duplicated in other files. Each FATCA xml file submitted by an FI should have a unique value in this field.

For FATCA files submitted to Revenue since 2016, the following naming convention should be applied for the MessageRefID field:

<table>
<thead>
<tr>
<th>Element</th>
<th>MessageRefID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Datatype:</td>
<td>xsd: string</td>
</tr>
<tr>
<td>Pattern:</td>
<td>&lt;Reporting FI GIIN&gt;.<em>&lt;Reporting Year&gt;.</em>&lt;Unique Sequence ID&gt;</td>
</tr>
</tbody>
</table>
| Description: | • <Reporting FI GIIN> is the GIIN for the reporting FI associated with the reporting group  
• Period character (.)  
• <Reporting Year> is the 4-digit reporting year that the data in the file relates to  
• Underscore  
• <Unique 4-digit Sequence ID> is a sequence id for each file being uploaded to Revenue. The first file uploaded to Revenue should have a Sequence ID of 0001, and this number should be incremented for each individual file uploaded. The sequence number must be unique within each FATCA year. |
| Example:  | AB012R.00001.ME.372.2015_0001  
Where  
AB012R.00001.ME.372 = Reporting FI GIIN  
2015 = Reporting Year  
0001 = This is the first file that this FI has uploaded to Revenue |
7.2 Alternative MessageRefID Naming Convention

<table>
<thead>
<tr>
<th>Element</th>
<th>MessageRefID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Datatype:</td>
<td>xsd:string</td>
</tr>
<tr>
<td>Pattern:</td>
<td>&lt;TimestampWhenMessageCreated&gt;_&lt;ReportingFIGIIN&gt;</td>
</tr>
</tbody>
</table>
| Description:     | • <TimestampWhenMessageCreated> Timestamp when the message is created in the format: YYYYMMDDTHHMMSSZ  
|                  | • Underscore character ( _ )  
|                  | • <ReportingFIGIIN> is the GIIN for the reporting FI associated with the reporting group |

Example: 20160226T093830Z_AB012R.00001.ME.372  
Where  
20160226T093830Z = TimestampWhenMessageCreated  
AB012R.00001.ME.372 = ReportingFIGIIN

7.3 XML Schema element reference – DocRefID

The IRS recently issued guidance in relation to the format for this field and the format should be applied to filings made from 2016 onwards. As is the case with the MessageRefID element, every record, inside every FATCA xml file submitted by an FI should have a unique value in this field. The following format is required by Revenue for standardised DocRefID’s:

<table>
<thead>
<tr>
<th>Element</th>
<th>DocRefID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Datatype:</td>
<td>xsd: string</td>
</tr>
<tr>
<td>Pattern:</td>
<td>&lt;MessageRefID&gt;_&lt;Record Sequence Number&gt;</td>
</tr>
<tr>
<td>Note:</td>
<td>This pattern conforms to the IRS Schema Guidance</td>
</tr>
</tbody>
</table>
| Description:     | • <MessageRefID> is the MessageRefID of the file in which the record appears – format for this outlined above  
|                  | • Underscore (_)  
|                  | • <Record Sequence Number> is a unique 10-digit sequence id that uniquely identifies the record within a particular file. For Example – the 5th record in a particular file should have Record Sequence number 0000000005 |

Example: AB012R.00001.ME.372.2015_0001_0000000005  
Where  
AB012R.00001.ME.372 = Reporting FI GIIN  
2015 = Reporting Year  
0001 = This is the first file that this FI has uploaded to Revenue  
0000000005 = Unique 10-digit sequence id that uniquely identifies the record within a particular file.
### 7.4 Alternative DocRefID Format

The alternative DocRefID format has a different format for the 5 elements that should contain a DocRefId. The 5 elements are:

1. Reporting FI
2. Sponsor
3. Intermediary
4. Account Report
5. Nil Report

#### 7.4.1 Reporting FI DocRefId Format

<table>
<thead>
<tr>
<th>Element</th>
<th>DocRefID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Datatype:</td>
<td>xsd:string</td>
</tr>
<tr>
<td>Pattern:</td>
<td>&lt;ReportingFIGIIN&gt;.&lt;ReportingYear&gt;.RF&lt;SequenceNumber&gt; [OPTIONAL AMENDMENT NUMBER:.A&lt;AmendmentSequenceNumber&gt;]</td>
</tr>
</tbody>
</table>
| Description:  | • <ReportingFIGIIN> is the GIIN for the reporting FI associated with the reporting group.  
• Period character (.)  
• <ReportingYear> is the 4-digit reporting year that the data in the file relates to.  
• .RF  
• <SequenceNumber> is a unique ID to ensure the uniqueness of the reference.  
• [OPTIONAL AMENDMENT NUMBER:.A<AmendmentSequenceNumber>] is used to identify an amendment. This should only be used for amendments. The AmendmentSequenceNumber should represent the amendment numbers i.e. the first amendment should have .A1. |
| Example:      | Original: AB012R.00001.ME.372.2015.RF1  
Amendment: AB012R.00001.ME.372.2015.RF1.A1 |
### 7.4.2 Sponsor DocRefId Format

<table>
<thead>
<tr>
<th>Element</th>
<th>DocRefId</th>
</tr>
</thead>
<tbody>
<tr>
<td>Datatype:</td>
<td>xsd:string</td>
</tr>
<tr>
<td>Pattern:</td>
<td>&lt;SponsoringFIGIIN&gt;.&lt;ReportingYear&gt;.SP&lt;SequenceNumber&gt; [OPTIONAL AMENDMENT NUMBER: .A&lt;AmendmentSequenceNumber&gt;]</td>
</tr>
</tbody>
</table>
| Description:       | • <SponsoringFIGIIN> is the GIIN in the Sponsor element.  
                     • Period character (.)  
                     • <ReportingYear> is the 4-digit reporting year that the data in the file relates to.  
                     • .SP  
                     • <SequenceNumber> is a unique ID to ensure the uniqueness of the reference.  
                     • [OPTIONAL AMENDMENT NUMBER: .A<AmendmentSequenceNumber> is used to identify an amendment. This should only be used for amendments. The AmendmentSequenceNumber should represent the amendment numbers i.e. the first amendment should have .A1. |
| Example:           | Original: AB012R.00001.ME.999.2015.SP1  
                     Amendment: AB012R.00001.ME.999.2015.SP1.A1 |
### 7.4.3 Intermediary DocRefId Format

<table>
<thead>
<tr>
<th>Element</th>
<th>DocRefId</th>
</tr>
</thead>
<tbody>
<tr>
<td>Datatype:</td>
<td>xsd:string</td>
</tr>
</tbody>
</table>
| Pattern: | `<ReportingFIGIIN>`.`<ReportingYear>`.*IN`<SequenceNumber>
[OPTIONAL AMENDMENT NUMBER:
`A`<AmendmentSequenceNumber>]` |
| Description: | - `<ReportingFIGIIN>` is the GIIN for the reporting FI associated with the reporting group.  
- Period character (.)  
- `<ReportingYear>` is the 4-digit reporting year that the data in the file relates to.  
- `IN`  
- `<SequenceNumber>` is a unique ID to ensure the uniqueness of the reference.  
- [OPTIONAL AMENDMENT NUMBER:  
`A`<AmendmentSequenceNumber>] is used to identify an amendment. This should only be used for amendments. The AmendmentSequenceNumber should represent the amendment numbers i.e. the first amendment should have .A1. |

| Example: | Original: AB012R.00001.ME.372.2015.IN1  
Amendment: AB012R.00001.ME.372.2015.IN1.A1 |
### 7.4.4 Account Report DocRefID Format

<table>
<thead>
<tr>
<th>Element</th>
<th>DocRefID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Datatype:</td>
<td>xsd:string</td>
</tr>
<tr>
<td>Pattern:</td>
<td><code>&lt;ReportingFIGIIN&gt;.&lt;ReportingYear&gt;.AR&lt;AccountNumber&gt;.ID&lt;SequenceNumber&gt;[OPTIONAL AMENDMENT NUMBER:.A&lt;AmendmentSequenceNumber&gt;]</code></td>
</tr>
</tbody>
</table>
| Description:  | - `<ReportingFIGIIN>` is the GIIN for the reporting FI associated with the reporting group.  
- Period character (.)  
- `<ReportingYear>` is the 4-digit reporting year that the data in the file relates to.  
- `.AR`  
- `<AccountNumber>` is the AccountNumber from the AccountReport element.  
- `.ID`  
- `<SequenceNumber>` is a unique ID to ensure the uniqueness of the reference.  
- [OPTIONAL AMENDMENT NUMBER:.A<AmendmentSequenceNumber>] is used to identify an amendment. This should only be used for amendments. The AmendmentSequenceNumber should represent the amendment numbers i.e. the first amendment should have .A1. |

| Example:      | Original:  
AB012R.00001.ME.372.2015.AR12345678.ID1  
Amendment:  
AB012R.00001.ME.372.2015.AR12345678.ID1.A1 |
### 7.4.5 NilReport DocRefID Format

<table>
<thead>
<tr>
<th>Element</th>
<th>DocRefID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Datatype:</td>
<td>xsd:string</td>
</tr>
<tr>
<td>Pattern:</td>
<td><code>&lt;ReportingFIGIIN&gt;.&lt;ReportingYear&gt;.NR&lt;SequenceNumber</code></td>
</tr>
<tr>
<td></td>
<td><code>[OPTIONAL AMENDMENT NUMBER:</code></td>
</tr>
<tr>
<td></td>
<td><code>.A&lt;AmendmentSequenceNumber&gt;]</code></td>
</tr>
<tr>
<td></td>
<td>or</td>
</tr>
<tr>
<td></td>
<td><code>&lt;ReportingFIGIIN&gt;.&lt;ReportingYear&gt;.ID&lt;SequenceNumber</code></td>
</tr>
<tr>
<td></td>
<td><code>[OPTIONAL AMENDMENT NUMBER:</code></td>
</tr>
<tr>
<td></td>
<td><code>.A&lt;AmendmentSequenceNumber&gt;]</code></td>
</tr>
<tr>
<td>Description:</td>
<td>• <code>&lt;ReportingFIGIIN&gt;</code> is the GIIN for the reporting FI associated with the reporting group.</td>
</tr>
<tr>
<td></td>
<td>• Period character(.)</td>
</tr>
<tr>
<td></td>
<td>• <code>&lt;ReportingYear&gt;</code> is the 4-digit reporting year that the data in the file relates to.</td>
</tr>
<tr>
<td></td>
<td>• <code>.NR</code></td>
</tr>
<tr>
<td></td>
<td>• <code>&lt;SequenceNumber&gt;</code> is a unique ID to ensure the uniqueness of the reference.</td>
</tr>
<tr>
<td></td>
<td>• <code>[OPTIONAL AMENDMENT NUMBER:</code></td>
</tr>
<tr>
<td></td>
<td><code>.A&lt;AmendmentSequenceNumber&gt;</code> is used to identify an amendment. This should only be used for amendments. The AmendmentSequenceNumber should represent the amendment numbers i.e. the first amendment should have .A1.</td>
</tr>
<tr>
<td></td>
<td>or</td>
</tr>
<tr>
<td></td>
<td>• <code>&lt;ReportingFIGIIN&gt;</code> is the GIIN for the reporting FI associated with the reporting group.</td>
</tr>
<tr>
<td></td>
<td>• Period character(.)</td>
</tr>
<tr>
<td></td>
<td>• <code>&lt;ReportingYear&gt;</code> is the 4-digit reporting year that the data in the file relates to.</td>
</tr>
<tr>
<td></td>
<td>• <code>.ID</code></td>
</tr>
<tr>
<td></td>
<td>• <code>&lt;SequenceNumber&gt;</code> is a unique ID to ensure the uniqueness of the reference.</td>
</tr>
<tr>
<td></td>
<td>• <code>[OPTIONAL AMENDMENT NUMBER:</code></td>
</tr>
<tr>
<td></td>
<td><code>.A&lt;AmendmentSequenceNumber&gt;</code> is used to identify an amendment. This should only be used for amendments. The AmendmentSequenceNumber should represent the amendment numbers i.e. the first amendment should have .A1.</td>
</tr>
</tbody>
</table>
Example:

<table>
<thead>
<tr>
<th>Original:</th>
<th>Amendment:</th>
</tr>
</thead>
</table>

7.5 **Xml schema element reference – BirthDate**

Reporting FIs should include a date of birth if a U.S. TIN is not available for a U.S. resident account holder or substantial owner. The date of birth must be properly formatted per IRS Publication 5124 and placed in the Birth Info/Birthdate sub-element of the Accountholder or Substantial Owner element, as appropriate. If a date of birth is provided in lieu of a TIN, in line with IRS Notice 2017-46, filers should include a string of nine consecutive capital letter “A”s (“AAAAAAAAA”) in the TIN sub-element for the Accountholder or Substantial Owner element. This TIN should be marked with the “issuedBy” attribute set to “US”.

7.6 **Xml schema element reference – 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:

- 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”)

The Account Holder TIN must be provided and cannot be blank characters in the TIN data sub-element. If an individual or entity Account Holder does not have a TIN, enter nine consecutive capital letter “A”s (“AAAAAAAAA”) in the TIN data sub-element, otherwise you will receive an error message. The former TIN placeholder of 9 zeros (“000000000”) will no longer be accepted in the FATCA XML file. The “issuedBy” attribute of the TIN should be populated with a value of “US” for a US TIN.

Sequencing of TIN’s: If supplying multiple TIN numbers – i.e: an Irish TIN and a US TIN for an Account Holder, the US TIN should be the first TIN that appears in the record.
It should be noted that the inclusion of a valid US TIN is mandatory for all accounts from 2017 except in cases covered by IRS Notice 2017-46 i.e. for individual account holders that meet the criteria in the Notice, but not for entity account holders.

7.7 Xml schema element reference – FilerCategory
Filer Category is mandatory, either on the sponsor or in the ReportingFI element.
If a Sponsor is present, the Sponsor element must contain a FilerCategory and the ReportingFI element must not. If a Sponsor is not present, the ReportingFI must contain a FilerCategory.
Please refer to FATCA XML Schema Guide (V2.0) for further guidance.

7.8 Character Encoding
All FATCA files should be character encoded UTF-8 without Byte Order Marker (BOM).

7.9 ROS Valid Characters

Only the following characters are permitted:

```
abcdefghijklmnopqrstuvwxyz
ABCDEFGHIJKLMNOPQRSTUVWXYZ
0123456789
áéíóúÁÉÍÓÚ
£$€%&*+-=()<>:,.'@~#!\
```
8. Appendix IV – Setting Sub-User Permissions on ROS

This section details how to allow registration permissions on a ROS user sub certificate for FATCA Reporting Obligations.

Instructions for creating new sub-users are available here.

Please contact the ROS Technical Helpdesk if further assistance is required:

- Email at roshelp@revenue.ie
- Telephone at 01 738 3699, International customers may contact via the email address above or call +353 1 738 3699

8.1.1 ROS Administrator logs onto ROS.

8.1.2 Click on “Admin Services”.

![Administration Services Image]
8.1.3 Select the individual’s Name and click “Revise”.

Administration Services

- To select an individual, click on the Select item radio button to the left of the name.
- To add/revise a certificate for an individual to act on your company’s behalf, click the Add New button.
- You can View or Revise the permissions of the selected individual by clicking on the relevant option box below.
- Additional information about these functions.
8.1.4 Select the Reporting Obligation and place tick under “File”. 
Ensure Reporting Obligation is selected to enable filing.

8.1.5 Select “Yes” under “Submit Registration”. Click “Confirm”.

---

**Permissions on Tax/Procedures Services**

<table>
<thead>
<tr>
<th>Taxes/Procedures No Permissions</th>
<th>View</th>
<th>Prepare</th>
<th>File</th>
</tr>
</thead>
<tbody>
<tr>
<td>Solid Fuel Comp. Tax</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Gas</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comp. Tax</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dom. Levy</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Electricity Tax</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensh. Levy - Incl. Le</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ensh. Levy - Excl. Le</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>MRT Duty - Fin. Le</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>MRT Duty - Inc. Le</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pension Tax</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Light Dues Tax</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>MDOC Tax</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cherished Numbers</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ASSS (Fair Deal)</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TRS</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PDRO Tax</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>DAC2 CRP</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
<tr>
<td>DAC4-Cec</td>
<td>✔</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Permissions on Administration Services**

- No: Permission not available, Yes: Permission available

<table>
<thead>
<tr>
<th>Service</th>
<th>No</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Add New</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Revise</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Amend Email Addresses</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Revoke</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Set Signature Requirements</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Invoice Administration</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Submit Registration</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Access Direct Debit Instruction</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Access Electronic Funds Transfer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Access Secure Upload</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Access Manage Tax Clearance</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Access Verify Tax Clearance</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Access DPD System</td>
<td>✔</td>
<td></td>
</tr>
</tbody>
</table>

All Administration Services | All No | All Yes | Confirm
8.1.6 The following screen confirms permissions.

The permissions changes that you have specified for [REDACTED] are now in place.

To return to Administration Services page now click the OK button.

- After completion of this process, the certificate should update immediately.