Foreign Account Tax Compliance Act (FATCA)

Inland Revenue user guide

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Date: 11/04/2016
This user guide should be read in conjunction with the documents listed below.

The following documents are available on our website at www.ird.govt.nz (select Business & employers › International › Financial Institutions with US customers › Foreign Account Tax Compliance Act (FATCA) › Important FATCA documents):

- Inland Revenue FATCA Due Diligence Guidance Notes
- Intergovernmental Agreement (IGA) between New Zealand and the United States of America
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2 Introduction

2.1 Background

The Foreign Account Tax Compliance Act (FATCA) was enacted by the United States (US) in 2010, and requires overseas financial institutions (for instance, New Zealand (NZ) banks or managed funds), unless exempt, to provide details about the accounts and investments they hold for U.S. citizens, tax residents and certain entities controlled by such US persons, to the U.S. Internal Revenue Service (IRS).

On 12 June 2014, the New Zealand Government signed an Intergovernmental Agreement (IGA) with the U.S. Government to assist New Zealand financial institutions (NZFIs) to comply with FATCA.

On 30 June 2014, the legislation enabling NZFIs to meet their FATCA obligations became law. Financial institutions and (where permitted) third-party service providers can begin collecting and/or reporting FATCA information from 1 July 2014.

We (Inland Revenue) will act as an intermediary between NZFIs and the IRS and provide services to collect and securely store FATCA-related information from NZFIs, sponsoring entities and third-party service providers and then transmit this information in a timely manner to the IRS.

Our FATCA system, the International Data Exchange Portal (IDEP) is available on our website (www.ird.govt.nz) for all NZ reporting entities to upload their disclosures to.

2.2 Purpose

The purpose of this user guide is to provide information and guidance to NZ reporting entities.

You will learn how to:
1. access the International Data Exchange Portal (IDEP), our FATCA online service
2. prepare and submit your FATCA disclosure
3. view history of your FATCA disclosures
4. manage and change FATCA account details

We expect all New Zealand reporting entities to use IDEP to manage their FATCA responsibilities.

Note: Your financial institution does not need to enrol for IDEP if it doesn’t need to send a FATCA disclosure. More information is contained in the section Nil returns.

2.3 Inland Revenue support role

If you require assistance you can phone Inland Revenue on 0800 443 773, between 8.00am - 4.30pm Monday to Friday. From a mobile or overseas, the phone number is +64 4 916 7118. Alternatively you can email us at fatca@ird.govt.nz.
2.4 Due diligence

We expect all FATCA-reporting entities to read and understand the FATCA Due Diligence Guidance Notes available on our website at www.ird.govt.nz (search keyword FATCA), before proceeding with the rest of the document.

2.4.1 Recalcitrant accounts

A recalcitrant account holder is an individual who has not responded to your requests for information about their account, or for whom you have not been able to establish their FATCA status.

Note: If a Reporting NZFI has already determined the account holder’s status as being a financial institution, the account will not be a recalcitrant account. The financial institution account will only be reportable (for the 2015 and 2016 FATCA years) if the account holder is a non-participating financial institution.

Where you have not been able to establish the account holder’s status, you should treat the account holder as a passive non-financial foreign entity (NFFE) and report the substantial owners as U.S. controlling persons where they have been identified as such. If you have not been able to identify the owner as a U.S. controlling person, or have been unable to collect all of the information required about the substantial owner, the below values should be used to indicate that the account holder is recalcitrant.

<table>
<thead>
<tr>
<th>Element</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tin_Type</td>
<td>TIN* 000000000</td>
</tr>
<tr>
<td></td>
<td>TIN** NZ</td>
</tr>
<tr>
<td>NamePerson_Type</td>
<td>FirstName NFN</td>
</tr>
<tr>
<td></td>
<td>LastName NLN</td>
</tr>
<tr>
<td>Address_Type</td>
<td>CountryCode NZ</td>
</tr>
<tr>
<td></td>
<td>AddressFree Address unknown</td>
</tr>
<tr>
<td>Account Report</td>
<td>AcctHolderType FATCA102 (passive NFFE) or</td>
</tr>
<tr>
<td></td>
<td>FATCA104 (specified U.S. person)</td>
</tr>
</tbody>
</table>

* Must be 9 numeric characters
** Attribute - issued by

2.4.2 Nil returns

Nil reports are not required, nor permitted to be received by us. We expect NZFIs to comply with their FATCA due diligence obligations (even if they result in no reportable accounts), and retain these records for the statutory seven-year period so that you can demonstrate your compliance, if required.

2.5 File population

We expect the FATCA disclosure data to:
- be submitted in XML¹ file

¹ If you are unfamiliar with Extensible Markup Language (XML), there are a number of online resources devoted to this human and machine readable document format.
be structured according to the standards specified in the Intergovernmental FATCA XML Schema (IRS's schema)
follow the data requirements specified in the FATCA XML User Guide.
follow our additional file and data validation requirements in section 5 of this guide.

For more information about the XML Schema standards and user guide, go to:
Enrolling with us

The International Data Exchange Portal (IDEP) is the online system for NZFIs to use for reporting their FATCA disclosures to us.

Your financial institution won’t need to enrol for IDEP if it doesn’t need to send a disclosure itself. This is most likely the case for financial institutions who have a sponsoring entity, as the sponsoring entity will enrol and send the disclosure to us.

3.1 Enrolment requirements

Financial institutions (including sponsoring entities) registered with the IRS, may enrol for IDEP, once the complete Global Intermediary Identification number (GIIN) has been allocated.

A principal user must have the authority to enrol for IDEP and access the IDEP account. As this is confidential information stored by us, we do require that an organisation has already established an identity with Inland Revenue and has an IRD number. By linking your IDEP account to your other Inland Revenue accounts, we’re able to determine the names of people who have authority to access confidential records.

The following roles have the authority to access an organisation’s Inland Revenue information:

- a director of the company
- a trustee of the trust
- a partner of the partnership
- an executive office holder approved by Inland Revenue

If you do not hold one of the above positions (eg, you are a third-party service provider or tax agent managing FATCA obligations on behalf of a financial institution), you may be nominated as a responsible officer for FATCA compliance. A signed letter of authorisation must be uploaded at enrolment, signed by one of the above positions and detailing the following:

- full name of the nominated person
- date of birth
- address
- phone number(s)
- relationship to customer
- state that the nomination is for FATCA services only
- nomination start and/or end dates

If you have registered as a sponsoring entity with the IRS you will only need to enrol for IDEP once, using the GIIN issued to you as a sponsoring entity.

3.2 The enrolment form

To enrol for FATCA services, go through Get it done online section of our website: www.ird.govt.nz (Figure 1). Alternatively, go to https://www.ird.govt.nz/online-services/keyword/ and select the Foreign Account Tax Compliance Act link. After choosing FATCA, select FATCA IDEP enrolment (Figure 2).
After you have submitted the enrolment form, we will review your enrolment and send you an email to let you know whether your enrolment has been successful.

If your enrolment has been approved, your notification email will give you the details of how to log into IDEP. If we have declined your enrolment, your notification email will give you the reasons for this.

3.2.1 FATCA enrolment form
Figure 3: Enrolment form
4 Using the International Data Exchange Portal (IDEP)

Once we have approved your enrolment, you will receive an email from us containing a temporary password and a link to IDEP. Alternatively, you can log in to IDEP at https://www.ird.govt.nz/online-services/keyword/, and select FATCA from the list displayed.

The principal user can edit their personal details and assign IDEP access to other individuals in their organisation (or their third-party service providers).

Only the principal user will be able to amend or view any of their financial institution’s corporate or user information. Other users will only have access to view and update disclosure files.

Users may have access to multiple financial institutions, if this is the case, they will be asked at login to select the financial institution they wish to access.

Users will be able to:
- create, validate and upload disclosure files
- view their disclosure history
- view financial institution details
- edit their own personal details

In addition, principal users will be able to:
- edit financial institution details
- allocate IDEP access to other users
- edit user details

4.1 Maintaining your IDEP details

4.1.1 Create new users

If you are the principal user for your financial institution, you will be able to appoint other users who can complete and submit your disclosures to us.

To create a new user, select Create user from the Manage users menu.
Enter the user details and select the permission you want to assign to them. FATCA users may only be allocated permission to view submission history, create disclosures and upload XML files. FATCA users (other than the principal user) won’t be able to view financial institution or other user details.

If you are the principal user, you can view users who have access to your financial institution’s disclosure records and edit their details, by selecting View/edit user from the Manage users menu.

4.1.2 View/update your details

You may view or update your own user details by selecting View/edit my details from the My details menu. This screen is similar to the View/edit user screen, but includes a list of the financial institutions you have permission to access through IDEP.

<table>
<thead>
<tr>
<th>Assigned to</th>
<th>Type</th>
<th>Roles</th>
</tr>
</thead>
<tbody>
<tr>
<td>ABC Bank, Wellington branch</td>
<td>Financial institution</td>
<td>User - View data and transfer files only</td>
</tr>
<tr>
<td>ABC Bank, Dunedin branch</td>
<td>Financial institution</td>
<td>Principal User</td>
</tr>
<tr>
<td>DEF Bank</td>
<td>Financial institution</td>
<td>Principal User</td>
</tr>
</tbody>
</table>

Figure 5: Assigned permissions (View/edit my details screen)

4.1.3 View/update your financial institution’s details

If you are a principal user, you can view your financial institution’s details by selecting FI Profile from the menu bar. This will show the details we hold for your financial institution, and the details of the principal user.

To change your financial institution’s details you will need to contact us on 0800 443 773, between 8.00am - 4.30pm Monday to Friday. If you are calling from a mobile phone or from overseas, the phone number to call is +64 4 916 7118.

To change the principal user you will need to use the FATCA enrolment link provided on the Inland Revenue website (see section 3).

The new principal user will be required to complete the enrolment form and provide us with a scanned copy of their proof of identity or IRD number and their authority to act on behalf of the financial institution.

Figure 6: FI profile
5 Creating a disclosure file and testing

This section covers data validation requirements and testing options.

FATCA data files failing to comply with the validation requirements steps will be rejected completely by our IDEP system.

We will enforce data validation mechanisms to ensure that the uploaded data follows the U.S. FATCA schema and the guidelines specified in the Intergovernmental FATCA XML Schema. For more information about the schema and the IRS validations go to: 

5.1 Submitting a disclosure as a sponsoring entity

If you are a sponsoring entity and are sending data on behalf of other FIs, you can either submit:
- one disclosure – this will include data for your FI and all entities you sponsor
- multiple disclosures:
  - a disclosure file for your data,
  - one for each entity you sponsor

5.2 Inland Revenue data validations

The following is a list of validations we will perform on any transferred file:

File size validation
Files exceeding 15MB in size may be rejected by the IDEP system. If the data exceeds this limit, you will need to split the data into multiple files before uploading or transferring.

Virus scan
We will reject files containing viruses.

File type
We will only accept correctly formatted XML files that contain the extension `.xml`.

FATCA schema
We will reject files that do not conform to the FATCA XSD schema (FATCA XML User Guide). This is available on the U.S. IRS website: 

Prohibited characters
Currently the following characters are prohibited from being accepted by the IRS where they are contained within your element contents: `&` and `<`. These can be replaced using the entity references `&amp;` and `&lt;`.

The IRS have also prohibited the following combinations of characters: `—` (double dash), `*/` (slash asterisk) and `&#` (ampersand hash). Files with these character combinations within the element contents will be rejected by IDEP.

Invalid reporting types specified
Only FATCA1 (new data), FATCA2 (corrected data), FATCA3 (void data) and FATCA4 (amended data) are allowed in the following fields of the submitted XML data.
- FATCA_OECD/FATCA/ReportingFI/DocSpec/DocTypeIndic
- FATCA_OECD/FATCA/ReportingGroup/Sponsor/DocSpec/DocTypeIndic

The following codes may also be used for testing purposes only, and shouldn’t be used when submitting a final disclosure to us: FATCA11 (new test data), FATCA12 (corrected test data), FATCA13 (void test data) and FATCA14 (amended test data).

Missing or incorrect corresponding message reference IDs
If a reporting type of FATCA2 (corrected data), FATCA3 (void data) and FATCA4 (amended data) is specified, a corresponding message reference ID must be provided in the FATCA_OECD/MessageSpec/CorrMessageRefID field.

We will reject files that refer to unknown message reference IDs in FATCA_OECD/MessageSpec/CorrMessageRefID. Your amended file must have the same message reference ID as in the original file that you provided.

Invalid DocRefID
We will reject files containing DocRefIDs that do not match the format specified by the IRS. This can be found at http://www.irs.gov/Businesses/Corporations/FATCA-XML-Schemas-Best-Practices-for-Form-8966-DocRefID.

Multiple sponsor details
We will reject files containing multiple sponsor details in the FATCA_OECD/FATCA/ReportingGroup/Sponsor elements of the submitted XML data.

Same reporting type
We will reject files containing multiple reporting types in FATCA_OECD/FATCA/ReportingGroup/AccountReport/DocSpec/DocTypeIndic elements.

Account report
We will reject files with no AccountReport data inside the FATCA_OECD/FATCA/ReportingGroup elements in submitted XML data.

Wrong reporting period
We will reject files that contain a reporting period in FATCA_OECD/MessageSpec/ReportingPeriod elements that does not end with 31st March. The New Zealand reporting period must end on 31st March.

Wrong receiving country
We will reject files that do not contain a ReceivingCountry element value of ‘US’
GIIN validations
We will reject files that do not contain a correctly formatted GIIN in the following elements:

- FATCA_OECD/MessageSpec/SendingCompanyIN
- FATCA_OECD/FATCA/ReportingFI/TIN fields.

We will also reject files that contain Sponsor details in FATCA_OECD/FATCA/ReportingGroup but do not contain a valid GIIN in the FATCA_OECD/FATCA/ReportingGroup/Sponsor/TIN field.

Go to: http://www.irs.gov/PUP/businesses/corporations/giin_composition.pdf to see the GIIN composition standard published by the IRS for more details.

Intermediary element
We will reject files that contain intermediary elements in FATCA_OECD/FATCA/ReportingGroup/Intermediary.

Duplicates
We will reject any file where we have already received a matching FATCA_OECD/MessageSpec/MessageRefID for that GIIN.

Missing TIN after 31 March 2018
We will reject files that do not contain the TIN on or after 31 March 2018 in the following fields of the submitted XML data:

1) FATCA_OECD/FATCA/ReportingGroup/AccountReport/AccountHolder/Individual/TIN
2) FATCA_OECD/FATCA/ReportingGroup/AccountReport/SubstantialOwner/TIN

Note: The IRS currently sends an error notification when the TIN element isn’t populated with 9 digits.

Reporting group element
We will reject files containing data in FATCA_OECD/FATCA/ReportingGroup/PoolReport elements of the submitted XML data.2

5.3 Checking your test files
Your financial institution must be enrolled in IDEP before you can use it to validate your test XML files. The enrolment process is set out in section 3 of this user guide.

You will then be able to create your disclosures (section 5.4.1) and upload your XML files (section 5.4.2). During your tests, the following reporting types should be used. These reporting types are for testing purposes only and shouldn’t be used when submitting disclosures to us for transmission to the US IRS.

FATCA11: New test data
FATCA12: Corrected test data
FATCA13: Void test data
FATCA14: Amended test data

2 This validation will be updated in the IDEP system from March 2016.
You will also be able to upload these files and perform final validation on them as detailed in steps 1 to 3 of section 5.4.3 to complete your test. If your file passes all validations, an error relating to the invalid reporting type will be the only message returned.

**Please do not complete step 4 of section 5.3.3 and submit any test files to us.** Files submitted to us in error can only be amended by submitting a new XML file with reporting types FATCA2 (corrected data), FATCA3 (void data) or FATCA4 (amended data).

### 5.4 Uploading a file to IDEP

There are three steps to submitting a FATCA disclosure:

1. Create a disclosure summary
2. Upload your XML file
3. Validate and submit your completed disclosure

#### 5.4.1 Step 1 - Creating a disclosure summary

We require that you provide certain details about your disclosure to help us to differentiate between your disclosure files and assist with answering your queries.

1. To create your disclosure, click on the Manage disclosures menu, and select Create disclosure.

![Image: Create disclosure](image)

*Figure 7: Create disclosure*

2. Complete the required fields. The period end date should always be the 31 March and indicates the end of the reporting period for your disclosure.

![Image: Create disclosure summary](image)

*Figure 8: Create disclosure summary*

After your disclosure has been created, you can access it from the Disclosure details menu.
5.4.2 Step 2 – Uploading your disclosure file

After a disclosure summary is created, you can upload your XML file to the disclosure.

1. Select the Disclosure details menu. The disclosure that you have created should be listed.

![Disclosure details list](image)

2. Click on the name of the disclosure you wish to upload data to, then select Upload data.

![Draft disclosure](image)

3. Click on Browse to select the file you wish to upload.

![Upload XML](image)
4. A success message will display when your file has uploaded. Your file will also undergo the following checks before being uploaded:
   - file extension (must be .xml)
   - virus scan
   - file size (must be under 15MBs)
   - initial XSD schema validations (further complex validations will be carried out when the file is submitted to us)

   ![Select file to upload:](image1)
   ![2013/14 Disclosure (18MB)](image2)

   Figure 12: Successful upload

If your file contains errors and cannot be uploaded an error message will notify you of the errors in your file.

   ![Invalid txt file.txt](image3)
   ![Errors](image4)

   Figure 13: Unsuccessful upload

5.4.3 Step 3: Final validation and submission to Inland Revenue

1. Select Validate and submit disclosure from the Submissions menu

   ![Validate and submit disclosure](image5)

   Figure 14: Submissions menu

2. It will list the disclosures that you are ready to submit. Click on Validate next to the disclosure that is ready for final validation.

   ![Final validation](image6)

   Figure 15: Final validation
3. The file will be validated and any errors listed. If your XML contains errors, you must delete your disclosure by selecting Delete disclosure from the Manage disclosures menu (Figure 17: Delete disclosure). You will then need to correct any errors in the XML, create a new disclosure and upload your corrected XML to the new disclosure.

4. If the final validation is successful, you will be asked to confirm your submission to us. Once your disclosure has been submitted, it cannot be changed. Any file submitted to Inland Revenue will be transmitted to the United States Internal Revenue Service. Disclosures can only be amended by submitting a new XML (see section 5.5 - Amending previously submitted files).
5.5 Amending previously submitted files

Once a disclosure has passed all IDEP validations and been submitted to us, there is no way to amend this file. If you need to amend/void/correct a previously submitted file, you should submit an additional file with DocTypeIndic values FATCA2 (corrected data), FATCA3 (void data) or FATCA4 (amended data).

A DocTypeIndic value of FATCA2 should only be used when the IRS has returned record-level validation errors and requested that you correct the data you have previously submitted. If you become aware that you have submitted incorrect data to us, an additional file should be submitted to void (FATCA3) or amend (FATCA4) the incorrect records.

When submitting corrected, void or amended data, the following fields must be included:

- A CorrMessageRefID should be included in the MessageSpec element, referencing the MessageRefID from the original file submitted.
- A CorrDocRefID should be included in the AccountReport element, referencing the DocRefID from the AccountReport element that you are correcting in your original file.
6 Submission history

You can check the results of your successful FATCA XML file transfers under the Submissions menu. Files will display a status of Accepted when they have been successfully received by us.

![International Data Exchange Portal](image)

Figure 19: Submission history

6.1 Disclosure status and category

You can check the status of the disclosures you have created under the Submissions menu.

The status of your disclosures could display as:

<table>
<thead>
<tr>
<th>Status</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>No data</td>
<td>You have created your disclosure but not yet uploaded an XML file</td>
</tr>
<tr>
<td>Valid XML</td>
<td>You have uploaded an XML file</td>
</tr>
<tr>
<td>Accepted</td>
<td>You have submitted your disclosure to us</td>
</tr>
</tbody>
</table>

The category of your disclosure could display as:

<table>
<thead>
<tr>
<th>Disclosure Category</th>
<th>Description:</th>
<th>Action to be taken:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pending submission</td>
<td>You have not yet submitted your disclosure to us.</td>
<td></td>
</tr>
<tr>
<td>Submitted</td>
<td>You have submitted your disclosure to us.</td>
<td></td>
</tr>
<tr>
<td>Received</td>
<td>We have passed your disclosure on to the IRS and they have accepted it</td>
<td></td>
</tr>
<tr>
<td>Accepted: Record level</td>
<td>We have passed your disclosure on to the IRS and they have accepted it however</td>
<td>You must submit a disclosure correcting the record level error that was present</td>
</tr>
<tr>
<td>errors</td>
<td>one or more record level errors have been discovered</td>
<td>in the original</td>
</tr>
</tbody>
</table>


<table>
<thead>
<tr>
<th>Disclosure Category</th>
<th>Description:</th>
<th>Action to be taken:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accepted: Field level errors</td>
<td>We have passed your disclosure on to the IRS and they have accepted it however one or more field level errors have been discovered</td>
<td>You must submit a disclosure correcting the field level error that was present in the original submission. See Section 7.3 Correcting field and record-level errors</td>
</tr>
<tr>
<td>Rejected: Invalid MessageRefID</td>
<td>We have passed your disclosure on to the IRS however they have rejected the file. This error notification could be returned if the MessageRefID within your disclosure: - is blank - contains more than 200 characters</td>
<td>You must submit a new disclosure with a valid MessageRefID. See Section 7.4 Correcting file-level errors</td>
</tr>
<tr>
<td>Rejected: Duplicate MessageRefID</td>
<td>We have passed your disclosure on to the IRS however they have rejected the file. This error notification could be returned if you have already used the MessageRefID in a previous file.</td>
<td>You must submit a new disclosure with a valid MessageRefID. See Section 7.4 Correcting file-level errors</td>
</tr>
<tr>
<td>Rejected: Invalid DocRefID</td>
<td>We have passed your disclosure on to the IRS however they have rejected the file. This error notification could be returned if one of the DocRefIDs in your disclosure: - is not unique - is blank - contains more than 200 characters</td>
<td>You must submit a new disclosure with a valid DocRefID. See Section 7.4 Correcting file-level errors</td>
</tr>
<tr>
<td>Rejected: Failed threat scan</td>
<td>We have passed your disclosure on to the IRS however they have rejected the file. This notification code could be returned if you have used prohibited characters, hyperlinks, JavaScript components or executable files within your XML file.</td>
<td>You must submit a new disclosure that does not contain any prohibited components. See Section 7.4 Correcting file-level errors</td>
</tr>
<tr>
<td>Disclosure Category</td>
<td>Description</td>
<td>Action to be taken</td>
</tr>
<tr>
<td>------------------------------------------</td>
<td>------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Rejected: Failed schema validation</td>
<td>We have passed your disclosure on to the IRS however they have rejected the file. Files could be rejected if they do not meet the FATCA XML Schema. The XML schema can be found at <a href="http://www.irs.gov/Businesses/Corporations/FATCA-XML-Schemas-and-Business-Rules-for-Form-8966">http://www.irs.gov/Businesses/Corporations/FATCA-XML-Schemas-and-Business-Rules-for-Form-8966</a>. The FATCAXML_v1.1.xsd (for publication 5124) can be checked using any widely accepted XML validation tool.</td>
<td>You must submit a new disclosure that meets the IRS’ FATCA Schema. See Section 7.4 Correcting file-level errors</td>
</tr>
<tr>
<td>Rejected: Test data found in FATCA report</td>
<td>We have passed your disclosure on to the IRS however they have rejected the file. This error code could be returned if you have used test codes in the DocTypeIndic sub-elements of your XML. Test codes are indicated by FATCA11-FATCA14. DocTypeIndics of FATCA1–FATCA4 should be used in production data files.</td>
<td>You must submit a new disclosure that contains DocTypeIndics of FATCA1 – FATCA4. See Section 7.4 Correcting file-level errors</td>
</tr>
</tbody>
</table>
7 Notifications

Once your disclosure has been received by the IRS, they will return a notification to you. This notification will tell you whether your disclosure has been accepted by the IRS, and if so, whether there are any errors within it that you will need to correct.

7.1 Viewing notifications

Notifications are loaded to IDEP and can be found by viewing your disclosure’s correspondence notes.

1. Find the disclosure you wish to view the notification for in your submission history. You can access your submission history through the Submissions menu.

2. Click on the disclosure name in your submission history

3. When on the View disclosure screen, click on the View notification icon in the top right corner of your disclosure

![Figure 20: Submission history](image)

![Figure 21: View notification](image)
4. Click on the payload link to view the notification. This will open in another screen.

7.2 Understanding your notification

7.2.1 File error notification

Notifications that indicate a file error have not been able to be accessed by the IRS. These are indicated by a “FATCAFileErrorNotification” attribute as shown below. The FATCANotificationCd (also shown below) indicates the reason that your disclosure has not been accepted.

Figure 23: File error notification

Notification codes and the possible reasons for your disclosure to return a file error notification can be found in Section 6.1 (Disclosure status and category).

7.2.2 Valid file notification

Notifications that return a valid file notification have been accessed by the IRS and are in a valid file format. These are indicated by a "FATCAValidFileNotification" attribute as shown below and a FATCANotificationCd of NVF.

Valid file notifications may still contain record-level errors that you will need to correct.

Figure 24: Valid file notification

7.3 Correcting field and record-level errors

Disclosures that return the notification code NVF, but contain a FATCARecordErrorGp have been accepted by the IRS but contain record-level errors. Details of the error and how to remedy it can be found in the ActionRequestedTxt field of the notification XML.
Disclosures that return the notification code NVF, but contain record level errors should be corrected. To do this the FI must submit a new file via IDEP, with the following sub-elements:

- **MessageRefID**: Unique file identifier
- **CorrMessageRefID**: MessageRefID from the original file

The records to be corrected should also contain the following:

- **DocRefID**: Unique record identifier
- **CorrDocRefID**: DocRefID of the original record that is being corrected
- **DocTypeIndic**: FATCA2

### 7.4 Correcting file-level errors

File-level errors are indicated by a notification code that is not NVF. Disclosures that return notification codes other than NVF have been rejected by the IRS. You will need to submit a new file, with the following sub-elements:

- **MessageRefID**: Unique file identifier
- **CorrMessageRefID**: This field should remain blank

All records within the file should also contain the following:

- **DocRefID**: Unique record identifier
- **CorrDocRefID**: This field should remain blank
- **DocTypeIndic**: FATCA1
## 8 Glossary of Terms

<table>
<thead>
<tr>
<th>Term/Acronym</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>FATCA</td>
<td>Foreign Account Tax Compliance Act</td>
</tr>
<tr>
<td>GIIN</td>
<td>Global Intermediary Identification number - issued by the United States Internal Revenue Service (IRS)</td>
</tr>
<tr>
<td>IDEP</td>
<td>Inland Revenue’s International Data Exchange Portal</td>
</tr>
<tr>
<td>IGA</td>
<td>Intergovernmental Agreement - Agreement between the US and NZ to support implementation of FATCA.</td>
</tr>
<tr>
<td>IRS</td>
<td>United States Internal Revenue Service</td>
</tr>
<tr>
<td>NFFE</td>
<td>Non-financial foreign entity</td>
</tr>
<tr>
<td>NZFI</td>
<td>Financial Institutions. This is from the perspective of administering FATCA within New Zealand. A financial institution is defined in the IGA as meaning a custodial institution, a depository institution, an investment entity, or a specified insurance company.</td>
</tr>
<tr>
<td>SE</td>
<td>Sponsoring Entity. It is an entity that will perform the due diligence, withholding, and reporting obligations of one or more sponsored investment entities or controlled foreign corporations (Sponsored FIs). Sponsoring Entities are required by the US IRS to register twice, as an FI and as a SE.</td>
</tr>
<tr>
<td>XML</td>
<td>Extensible Markup Language</td>
</tr>
<tr>
<td>XSD</td>
<td>XML Schema Definition</td>
</tr>
</tbody>
</table>