FATCA group requests: Important business and validation rules for SEI XML and FATCA XML

Please note: Delivered information packages of concerned Swiss financial institutions will be checked against the business and validation rules below. If the business and validation rules are not complied with the information packages will be rejected and need to be redelivered to the Federal Tax Administration (FTA)[1].

General rules

1. The business and validation rules of the FATCA XML Schema v2.0 User Guide of the IRS and the document "FATCA Information Delivery - Technical Specification and User Guide for Financial Institutions according to FATCA IGA 2" of the FTA have to be fulfilled.
2. The FATCA XML must validate against the FATCA XSD (currently FATCA XML Schema v2.0).
3. The SEI XML must validate against the SEI XSD (currently SEI-XML Schema V.1.2).

Rules concerning the information package[2]

4. Each information package must contain exactly one SEI XML, one FATCA XML and one PDF.

Rules concerning the validation of the SEI XML[3]

5. There may only be exactly one AccountHolder (SEI504). The Accountholder's XML node "RelationToAccount" contains the value SEI504 and it must also contain either SEI501 or SEI502 or SEI503. Please note that the the combination of SEI503 and SEI504 should not occur (see the answer to question 35 of the FAQ – FATCA group requests).
6. If the AccountCategory is "Individual", the AccountType must be omitted.
7. If the AccountCategory is "Organisation", the AccountType cannot be empty.
8. For an account of NPFFI (AccountType = SEI103), USAccount must be "No"; for all other cases USAccount must be "Yes".
9. For an account with AccountCategory = "Individual", IndividualAccountUSIndicia cannot be empty.
10. If the AccountCategory is "Organisation", IndividualAccountUSIndicia must be omitted.
11. For an account with IndividualAccountUSIndicia = SEI211, IndividualAccountUSIndiciaComments cannot be empty.
12. If the AccountCategory is "Organisation", IndividualAccountUSIndiciaComments must be omitted.
13. For an account with AccountCategory = "Organisation" and USAccount = "Yes", OrganisationAccountUSIndicia cannot be empty.
14. If the AccountCategory is "Individual", OrganisationAccountUSIndicia must be omitted.

---

15. For an account of NPFFI (AccountType = SEI103), OrganisationAccountUSIndicia must be omitted.
16. For an account with OrganisationAccountUSIndicia = SEI307, OrganisationAccountUSIndiciaComments cannot be empty.
17. If the AccountCategory is "Individual", OrganisationAccountUSIndiciaComments must be omitted.
18. For an account of NPFFI (AccountType = SEI103), OrganisationAccountUSIndiciaComments must be omitted.
19. If the AccountType is not SEI102, CommentsPassiveNFFE must be omitted.
20. If the AccountType is not SEI103, CommentsNPFFI must be omitted.
21. For a person with PersonCategory = SEI401 and PersonType = "Organisation", ConfirmationSpecifiedUSPerson cannot be empty.
22. For a person with PersonType = "Individual", FirstName cannot be empty.
23. For a person with PersonType = "Individual", LastName cannot be empty.
24. For a person with PersonType = "Organisation", OrganisationName cannot be empty.

Rules concerning the validation of the FATCA XML[4]

25. PoolReportReportingFIGIIN, PoolReportMessageRefId and PoolReportDocRefId of the CARREF (FATCA XML) cannot be empty. They must contain the information associated with the original pool report (see ReportingGroup, PoolReport, DocSpec).
26. The TIN of the ReportingFI (FATCA XML) must meet the GIIN format (e.g. 98Q96B.00000.LE.250).
27. The TIN of the AccountHolder / SubstantialOwner must meet one of the following formats:
    • Nine consecutive digits without hyphens or other separators (e.g. 123456789)
    • Nine digits with two hyphens (e.g. 123-45-6789)
    • Nine digits with a hyphen entered after the second digit (e.g. 12-3456789)
    • GIIN format (e.g. 98Q96B.00000.LE.250)
    • If the TIN is not known for the AccountHolder and / or the SubstantialOwner, the TIN element should be left blank. Do not substitute any other characters (such as AAAAAAAAA) for the TIN in this case.
    This reflects the current state of knowledge of the FTA. The final confirmation of the IRS on this matter is still pending and the FTA is not yet in possession of an updated FATCA-XML XSD-schema that would reflect the above-mentioned change.
    Updated on 2 October 2020: If the TIN is not known for the AccountHolder and/or the SubstantialOwner, the TIN element should be omitted. Alternatively, the TIN element can be filled in with one or more (up to 200) space characters.
    Updated on 26 October 2021: If there is no foreign TIN available for the foreign individual/entity in the case of a passive NFFE (FATCA102/SEI102) the FI may include its country code in the "TIN Issued by" element and the characters "NA" (to indicate "Not Available") in the TIN element (cf. ICMM FAQs of the IRS, Populating the TIN field, Q3).

28. If the TIN is not known and the date of birth is completely filled out in the SEI-XML (YYYY-MM-DD), it must also be filled out in the FATCA-XML and it must be identical.
29. The element FilerCategory cannot be included for the tax years 2014 and 2015.
30. Under the ReportingFI element, the element FilerCategory must be included for the tax years 2016 and later if the report does not contain a sponsoring entity. For the

---

[4] See also the FATCA XML Schema v2.0 User Guide of the IRS at
https://www.irs.gov/businesses/corporations/fatca-xml-schemas-and-business-rules-for-form-8966.

FilerCategoryValue see the Filer category list in Table 16 of the FATCA XML Schema v2.0 User Guide of the IRS.

31. If the report contains a sponsoring entity, the element FilerCategory must be included under the Sponsor element for the tax years 2016 and later, whereas the element FilerCategory for the ReportingFI element must be omitted. For the FilerCategoryValue see the Filer category list in Table 16 of the FATCA XML Schema v2.0 User Guide of the IRS.
32. The element FilerCategory is not allowed under the Intermediary element.
33. The element AccountClosed cannot be included for the tax years 2014 and 2015.
34. The AcctNumberType attribute is optional and it cannot be included for the tax years 2014 and 2015.
35. The element ReportingPeriod specified in the FATCA XML (format YYYY-MM-DD) must correspond to the requested reporting year (see disclosure order of the FTA).

Rules concerning the cross validation of the FATCA XML and the SEI XML

36. The DocRefId in the Account Report (DocSpec) of the FATCA XML must match the DocRefId in the SEI XML.
37. The ReportingFIGIIN in the SEI XML must match the TIN of the ReportingFI in the FATCA XML.
38. The AccountNumber has to be the same in the SEI XML and the FATCA XML.
39. The AccountHolder according to the FATCA XML must be identical to the AccountHolder (RelationToAccount = SEI504) according to the SEI XML: In case of an organisation, the name of the organisation must be identical. In case of an individual, the individual must have the same FirstName and the same LastName and the BirthDate needs to meet the following requirements:
    - If the date of birth is completely filled out in the SEI-XML (YYYY-MM-DD), it must also be filled out in the FATCA-XML and it must be identical (irrespective of whether the TIN is known or not).
    - The date of birth in the FATCA-XML may only be empty (= not be included) if the date of birth in the SEI-XML is also empty (= not included) or contains only YYYY or YYYY-MM.
    - If the date of birth is filled out in the FATCA-XML (YYYY-MM-DD), then it must also be completely filled out in the SEI-XML and it must be identical.
40. Each Controlling Person (RelationToAccount = SEI503) in the SEI-XML must match a Substantial Owner in the FATCA-XML (for the elements to be identical, see the requirements above with regard to the AccountHolder).
41. The AccountCategory in the SEI XML must match the element of the AccountHolder in the FATCA XML (Individual / Organisation).
42. The AccountType in the SEI XML must match the AcctHolderType in the FATCA:
    - FATCA104 = SEI101 (specified US entity)
    - FATCA102 = SEI102 (passive NFFE)
    - FATCA103 = SEI103 (NPFFI)