



St. Kitts and Nevis Competent Authority

FATCA/CRS PORTAL DEMONSTRATION

**International Tax Unit
October 8, 2020**

BACKGROUND

- ▶ In 2010, the U.S Government enacted the Foreign Account Tax Compliance Act (FATCA) with the objective to combat tax evasion by U.S taxpayers holding assets in non- U.S financial accounts / institutions. FATCA requires Foreign Financial Institutions (FFIs) to report to the U.S Internal Revenue Service (IRS) information on assets held by U.S taxpayers, or by foreign entities in which U.S taxpayers hold substantial (greater than 10%) ownership interest.
- ▶ The Government of St. Kitts and Nevis signed a Model 1B Intergovernmental Agreement (IGA) with the US Government on August 31, 2015. The Agreement requires the Financial Institutions in the Federation to be registered with the IRS for FATCA purposes, to submit such information to the SKN Competent Authority and subsequent transmission to the IRS.

BACKGROUND

- ▶ **The Common Reporting Standard (CRS), developed in response to the G20 request and approved by the Organisation for Economic Co-operation and Development (OECD) Council in 2014, calls on jurisdictions to obtain information from their Financial Institutions (FI) and automatically exchange that information with other jurisdictions on an annual basis.**
- ▶ **The CRS sets out the financial account information to be exchanged, the financial institutions required to report, the different types of accounts and taxpayers covered, as well as common due diligence procedures to be followed by financial institutions.**

BACKGROUND

- ▶ There are three major differences between FATCA and CRS:
 - ▶ FATCA requires a financial institution to find US persons; however, with more than 100 countries currently committed, CRS requires a much broader scope of tax residency.
 - ▶ Under CRS, the definition of a “reporting financial institution” is different. So, even if a Client is not required to report on financial accounts under FATCA, you may be required under CRS.
 - ▶ There is currently no threshold under CRS. FATCA, by contrast, kicks in for individual accounts with balances exceeding \$50,000 – companies have different limits.

BACKGROUND

- ▶ **St. Kitts and Nevis began its FATCA reporting in 2016 for the 2014 period.**
- ▶ **St. Kitts and Nevis currently has 62 partners for CRS exchange purposes. Our first exchanges began in 2018 for the 2017 period.**
- ▶ **We refer all FIs to the Legislation and resources located under the AEOI tab on the SKNIRD website for further guidance. These include but will not be limited to FATCA and CRS.**

WEB BROWSER COMPATIBILITY

- ▶ The recommended minimum computer requirements for using St. Christopher (St. Kitts) and Nevis AEOI Portal are Microsoft Internet Explorer version 8 or above, or Firefox version 4 or above or Google Chrome version 10 or above.
- ▶ It is also recommended that the screen resolution be at least 1024x768 or higher for optimal display.

ENROLLMENT

ENROLLMENT

This presentation will provide an explanation of the process of enrolling in the St. Christopher (St. Kitts) and Nevis AEOI Portal along with completing and submitting filings. At the end of the demonstration, an FI should be able to:

- ❖ Complete an enrollment
- ❖ Log into the SKN AEOI Portal
- ❖ Create a filing
- ❖ Select and Complete a filing
- ❖ Submit a filing
- ❖ Review and Correct Validation Issues
- ❖ View filings

ENROLLMENT

- ▶ All Financial Institutions are required to complete an Enrollment form before accessing the system.
- ▶ This form is publicly accessible at www.sknird.com
- ▶ <https://sknfatca.org/publicform/publicform.aspx> - direct link
- ▶ Select the Exchange of Information tab on the website, select FATCA or CRS Reporting Portal and select Enrollment form.

Enrollment

- ▶ **Enrollment Requirements:**
 - ▶ **Financial Institution Name**
 - ▶ **Institution Type**
 - ▶ **Reporting Type**
 - ▶ **Financial Institution GIIN**
(issued by IRS for FATCA)

Enrol for FATCA & CRS

Please use the form below to enrol for FATCA and CRS reporting with the St. Kitts and Nevis Competent Authority.

AEOL Institution & Primary User Enrolment

In accordance with the OECD's Multilateral Competent Authority Agreement, entered into by this government and participating partner jurisdictions for the purposes of exchanging tax information on an annual basis, all Financial Institutions are required to enroll with the St. Kitts and Nevis Competent Authority using the form below.

If you are enrolling on behalf of a Financial Institution who is also reporting to the IRS for the purposes of FATCA compliance, please also enter your GIIN below. Please ensure that you have already registered with the IRS (<http://www.irs.gov/Businesses/Corporations/FATCA-Foreign-Financial-Institution-Registration-Tool>) and received your Global Intermediary Identification number (GIIN) before completing this enrolment.

Financial Institution Information

Financial Institution Name	<input type="text"/>	*
Institution Type	<input type="text"/>	*
Reporting Type	<input type="text"/>	*
Financial Institution GIIN (issued by IRS)	<input type="text"/>	?
Identification Number (Issued by Tax Authority)	<input type="text"/>	?
Fiscal Year End (format: dd/mm)	<input type="text"/>	

Enrollment

- ▶ Enrollment requirements cont'd:
 - ▶ Registered Office Address
 - ▶ Primary User Information
 - ▶ Passport Data Page – PDF or JPEG
 - ▶ Authorisation letter –
PDF or JPEG – no greater than 20mb

Registered Office Address or Sponsoring Entity Address

Street Address

City/Town

State/Province/Region

Country

Post Code

Institution Email Address

Primary User Information

First name

Surname

Email Address

Confirm Email Address

Telephone number

Position

Please attach a scan of your passport

Browse

Please attach a letter, signed by a director of the company, which specifies you as the responsible person for FATCA and/or CRS compliance.

Browse

Your enrolment will be submitted for approval by the St. Kitts and Nevis Competent Authority. You will receive notification by email once your enrolment information has been reviewed.

Submit

Enrollment

- ▶ All Financial Institutions should have already registered with the IRS and obtained a GIIN (Global Intermediary Identification Number).
- ▶ Format: XXXXXXX.XXXXX.XX.XXX -19 characters.
 - ▶ FATCA ID
 - ▶ Financial Institution Type
 - ▶ Category Code
 - ▶ Country Identifier (659)

Enrollment – ACKNOWLEDGEMENT MESSAGE

- ▶ Enrollment must be reviewed by the Competent Authority before confirmation.
 - ▶ “ONCE WE HAVE REVIEWED YOUR ENROLLMENT, WE WILL EMAIL YOU WITH YOUR CONFIRMATION DETAILS, OR THE REASON YOUR ENROLLMENT DECLINED.”

Enrollment – ERROR MESSAGES

- ▶ Mandatory fields that are not filled will produce validation issues.

Form Validation Issues

Some rules have been broken on this form. Please review the issues below and correct before continuing.

Rule name	Type	Problem	Additional information
	Mandatory Error	1. Please enter the Financial Institution name	Enter data in mandatory inputs.

- ▶ Invalid GIIN will produce validation issues.

Form Validation Issues

Some rules have been broken on this form. Please review the issues below and correct before continuing.

Rule name	Type	Problem	Additional information
GIIN Validation	Error	1. You've entered your financial institution's GIIN in the wrong format. The correct format is XXXXXX.XXXXXX.XX.XXX	Please enter a valid GIIN.

Portal Access



ACCESSING THE PORTAL

- ▶ Once the Enrollment has been processed, the Primary User (PPoC) will be created in the portal.
- ▶ The User will receive a username and temporary password via a system-generated email sent to the email address entered on the Enrollment form.
- ▶ The login page can be accessed directly from the SKNIRD website.
<https://sknfatca.org/>
- ▶ Once prompted, enter the User email address and password and select Login.

ACCESSING THE PORTAL

- ▶ **Upon first login to the AEOL Portal, the User will be asked to change their password, the following rules are enforced for the password:**
 - ▶ **It must contain one upper case, one number and one special character (e.g. #*!\$).**
 - ▶ **It must be at least eight characters and no more than 30 characters.**
 - ▶ **It must not contain any spaces.**
- ▶ **It is strongly advised that portal login details are not shared.**



USER DETAILS

UPDATING USER DETAILS

► The Primary User can update their:

- Name
- Email address
- Phone number
- Password

► My Details >>View/Edit My Details >>Update Password

Menu
☰

My User Details

Your contact details can be changed below.

To change the principal user for your financial institution, you will need to contact the St. Christopher (St. Kitts) and Nevis Inland Revenue Department. The new principal user will be required to provide the required documentation before the change is made.

First name: *

Surname: *

Email address: *

Telephone number:

Int'l Area code Number

Update

Assigned permissions / roles:

Assigned to	Type	Roles
UNIVERSAL LTD	Financial Institution	FI - Primary User

PRIMARY USER ROLES

- ▶ The designated Primary User can create Secondary Users, update Secondary Users and deactivate Secondary Users.
- ▶ Secondary Users cannot create or manage other users.

The Primary User should receive authorization from an FI before adding a Secondary User.

Menu



Create St. Christopher (St. Kitts) and Nevis AEOI Portal User

This functionality allows you to create users with access to St. Christopher (St. Kitts) and Nevis AEOI Portal. Please enter the details for the new user.

First name: *

Surname: *

Email address: *

Telephone number:
Int'l Area code Number

Permission: ☐ [FI - Secondary User](#)

Create

FORGOTTEN PASSWORD

- ▶ A User must follow the steps in order to replace a forgotten password:
 1. Click the forgotten password link on the log in page.
 2. Enter the registered email address.
 3. An email with a temporary password will be received (if registered on the Portal).
 4. Go to the AEOI Portal and insert a new password and confirm that new password.
 5. An email confirming the change of password will be received.
 6. Go to the log in page to insert the new password.



FILING PROCESS

CREATING A FILING

- ▶ **Creating a filing is the responsibility of the Financial Institution**
- ▶ **Using the Menu, navigate to Manage Filings > Create Filings**
 - ▶ **Enter Filing Name**
 - ▶ **Select the Filing Type**
 - ▶ **XML or Manual Entry for FATCA and CRS filings**
 - ▶ **Enter Period end date - 31/12/2019**
 - ▶ **Select Create**

Create Filing

We need details about your filing so you will be able to identify it in the future. Please enter the details requested below.

The period end date identifies the reporting period for the filing. This should always be December 31st in the case of FATCA and CRS filings.

Filing name:

Filing type:

☐ CRS Filing Summary
☐ CRS Manual Entry Filing
☐ CRS XML Upload Filing
☐ Primary User Change Notice
☐ US FATCA Manual Entry Filing
☐ US FATCA XML Upload Filing

Period end date:



Create

CREATING A FILING

- ▶ **Once the filing has been created, it will appear in the DRAFT Filings sub menu.**
- ▶ **You will see a notification stating that ‘Your filing named New Data – 2019 has successfully been created with the reference FF02122. You can now access the filing in the Draft Filings area.’**

DELETING A FILING

- ▶ The only reason for a filing to be deleted is if it is created in error.
- ▶ Submitted filings can never be deleted.
- ▶ Deletion action is available via the Manage Filings tab.

COMPLETING A FILING – XML UPLOAD

















- ▶ **Go to DRAFT FILINGS and select a filing by simply clicking on the Filing name.**
- ▶ **If the user is completing an XML Upload filing type, filings in a “No Data” state require XML upload for completion.**
- ▶ **Click on the “Upload Data” link and browse for and select the XML file to upload.**
 - ▶ **The Portal will only accept files in the IRS FATCA XML v2.0 format and the OECD CRS Schema v1.0**
- ▶ **A successful upload message will be received once all validation checks have been cleared.**

COMPLETING A FILING – MANUAL ENTRY

- ▶ **The FATCA/CRS Manual Entry filing is a web form that allows FI users to type in all relevant information for each reportable account.**
- ▶ **The filing is split into three forms:**
 - ▶ **General Information**
 - ▶ **Reporting FI Information**
 - ▶ **Account Holder Information.**

COMPLETING A FILING – MANUAL ENTRY

- ▶ After selecting a Filing, a Filer must complete the “General Information” form.
- ▶ Select Edit to open the form for editing.
- ▶ All mandatory forms within the filing must be in validated status, which is indicated by a green checkmark icon.

Sample Manual Entry Return			Status: Ready to Submit
	 US FATCA Manual Entry		Clear
	 Info	General Information	Clear Edit View
	 FF	US FATCA Return	 Delete All Clear All
	 US FATCA Return		Clear Delete
	 FI	Reporting FI Information	Clear Edit View
	 ACT	Account Information	 Delete All Clear All
	 Sample Fund		Delete Clear Edit View

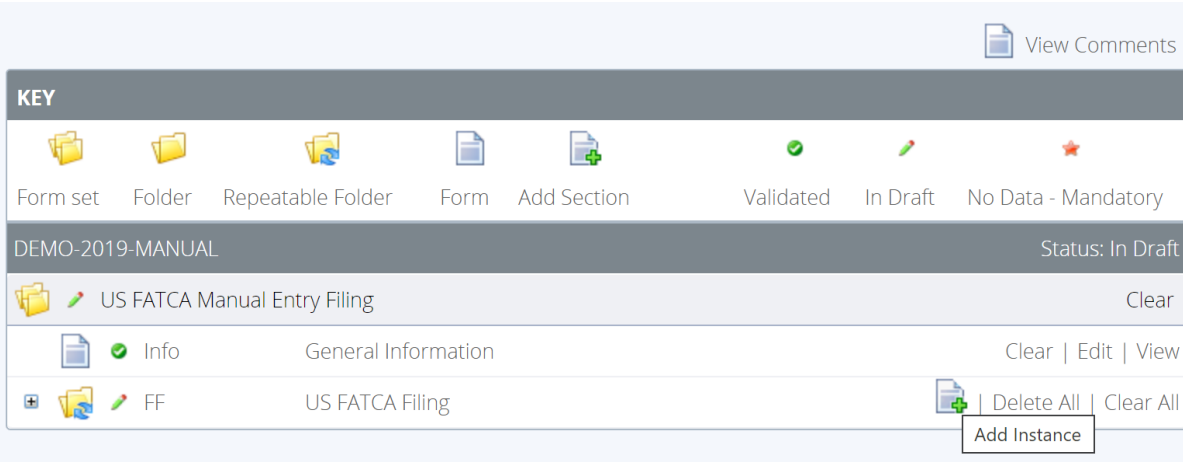
COMPLETING A FILING – MANUAL ENTRY

A Financial Institution can create several folders of the filing (Head office with a number of branches etc.).

User simply clicks on the add section icon.

There is a threshold of 50 repeatable folders allowed for adding filings.

This does not affect XML Uploads



The screenshot displays a software interface for managing filings. At the top right, there is a 'View Comments' link. Below this is a 'KEY' section that defines various icons used in the interface: a folder icon for 'Form set', a folder icon for 'Folder', a folder with a plus icon for 'Repeatable Folder', a document icon for 'Form', a document with a plus icon for 'Add Section', a green checkmark for 'Validated', a pencil for 'In Draft', and a red star for 'No Data - Mandatory'. The main area shows a filing titled 'DEMO-2019-MANUAL' with a status of 'In Draft'. Below this, there is a section for 'US FATCA Manual Entry Filing' with a 'Clear' button. Further down, there are two rows of filing details. The first row shows 'Info' (with a green checkmark) and 'General Information', with 'Clear | Edit | View' buttons. The second row shows 'FF' (with a pencil icon) and 'US FATCA Filing', with 'Delete All | Clear All' buttons. A 'Add Instance' button is located at the bottom right of the interface.

KEY	
	Form set
	Folder
	Repeatable Folder
	Form
	Add Section
	Validated
	In Draft
	No Data - Mandatory

DEMO-2019-MANUAL		Status: In Draft
	US FATCA Manual Entry Filing	Clear
	Info	General Information
		Clear Edit View
	FF	US FATCA Filing
		Delete All Clear All
		Add Instance

COMPLETING A FILING – MANUAL ENTRY

- ▶ **All Filings begin as “No Data”. Arriving at the “Ready to Submit” state, means all mandatory items have been completed.**
- ▶ **All validation is expressed by the XSD (XML Schema Definition). (Note: even though the data has not been entered in XML format, the system ensures that the data is as valid as if it had been uploaded via XML).**



SUBMIT

SUBMITTING MANUAL FILINGS

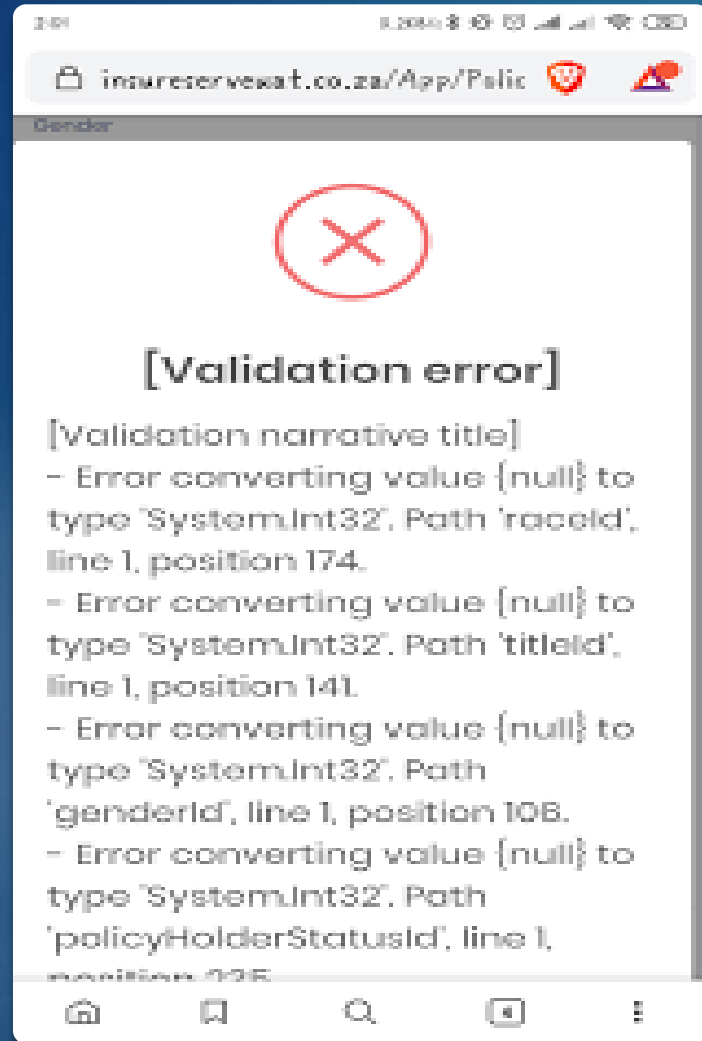
- ▶ XML Uploads are automatically submitted once validated.
- ▶ All mandatory Filing sections must have a status of 'Ready to Submit' for the Filing to be submitted.
- ▶ Submission rules are executed on submission and must be corrected before the Filing can be successfully submitted.
- ▶ Upon successful submission, the filing is no longer available in Draft Filings and is now available for review by the CA or Submission History.

SUBMITTING MANUAL FILINGS

- ▶ **Navigate to the Submission section from the main menu**
- ▶ **Click Submit Filing link in the sub menu.**
- ▶ **User is then navigated to the Submit Filing page which notes all filings ready to be submitted.**
- ▶ **Select the Validate link beside the filing you wish to submit.**
- ▶ **Validation errors are checked and displayed to the Portal user once the file is selected for submission.**
- ▶ **Failed validation errors are in line with the IRS FATCA and OECD CRS Schema Requirements.**

SUBMITTING MANUAL FILINGS

- ▶ **A confirmation screen will be displayed requesting you to confirm your actions.**
- ▶ **Click on the Submit button to complete the action and send the applicable file.**
- ▶ **Upon successful submission, you will be presented with a message informing you of the successful submission of your file.**



VALIDATION


REVIEWING AND CORRECTING VALIDATION ISSUES

- ▶ If there are validation issues with your filing, you can view the details in order to determine any corrections that need to be made.
- ▶ Go to Draft Filings to view the files with errors. The error icon will be displayed beside the filing's status.

Draft Filings

Please select the name of the filing you wish to complete.

To create new filings, please use the "Create Filing" functionality.

Filing name	Reference	Revision	Categories	Receiving Country	Status	Filing end date	Due date
DEMO	FF25471	0.1	Waiting	n/a	No Data 	31/12/2019	14/09/2020
DEMO-2019-MANUAL	FF25472	0.1	Waiting	n/a	In Draft	31/12/2019	14/09/2020

An error occurred during file upload

CORRECTING VALIDATION ISSUES

- ▶ **Click on the error icon to display the validation errors.**
- ▶ **Return to the Draft filings page and select the erroneous filing.**
- ▶ **Manual Entry Filing: Select the Edit link next to the form(s) that need correcting, update the data, and select Validate & Save.**
- ▶ **XML Upload Filing: Select the Upload data link and select a new XML file to upload.**

File Upload Issues

This file was submitted with errors and/or warnings which are displayed below.

Type	Problem	Additional information
Error	1. Timestamp couldn't be converted because of wrong Format. Please use the following format: YYYY-MM-DDTHH:MM:SS	

VIEW Submission



VIEWING SUBMITTED FILINGS

- ▶ **Once your filings have been successfully submitted, you can no longer edit or delete them.**
- ▶ **You can review the filings and view the data within them.**
- ▶ **For XML Upload filings, you can view and download any files uploaded during the submission process.**
- ▶ **Go to the Submission menu, then Submission History. You will be presented with the Submission History page, which presents the filings that have been submitted for your financial institution.**
- ▶ **Select the name of the filing you wish to view from the Filing name column of the Submission History table.**

FILING SUMMARY

- ▶ **The Summary should only be created after all CRS filings for the same reporting period have been submitted, otherwise it may represent the wrong number of accounts per Reportable Jurisdiction.**
- ▶ **Navigate to Manage Filings > Create Filing**
- ▶ **Select CRS Filing Summary**
- ▶ **Enter the Filing name**
- ▶ **Enter the Period End Date**
- ▶ **Submit the CRS Filing Summary**
- ▶ **Go to DRAFT filings to View the filing. Review, Validate and Save.**

FILING SUMMARY

- ▶ Financial Institutions can submit a single CRS Filing Summary to confirm its reporting obligation for the relevant period.
- ▶ The CRS filing summary displays the number of Reportable Accounts the FI has reported on for each Reportable Jurisdiction.
- ▶ The Filing Summary is also used as a Nil Filing submission.
 - ▶ NIL Filings are not mandatory for FATCA Reporting currently.
 - ▶ NIL Filings are required for CRS Reporting.

VIEWING SUBMITTED FILINGS

- ▶ You will be presented with the View Filing page for the selected filing.
- ▶ Select each form in the filing to view the data within it, or
- ▶ Select the View Upload History icon to download XML files for XML Upload filings only.

AMENDED, VOID and CORRECTED FILINGS

- ▶ **Generally, there are three scenarios for updating a previously filed and accepted Filings:**
 - ▶ **Amended:** Used to correct a User error when the original return is in a 'Received' status
 - ▶ **Void:** When a filing was submitted in error, then you can void either the whole filing, or individual account reports at any time.
 - ▶ **Corrected:** Used to correct specific account reports listed in an IRS error notification, the filing will be in a 'Record/field level error' status.

AMENDED, VOID and CORRECTED FILINGS

- ▶ **The Period End Date entered on the new filing must match the original filing which is to be revised.**
- ▶ **Follow the steps to Create and Submit a Manual filing.**
- ▶ **Once the new filing is created, select it from the DRAFT Filings menu.**

AMENDED, VOID and CORRECTED FILINGS

► Key information required:

- Take note of the message reference ID from the General Information form. Document type will be set to specific situation (Amend, Void, Correct).
- The message reference is prepopulated.
- Enter the Message Reference noted from the original filing into the Corresponding Message Reference ID.

General Information

Document Type:

Amended Data ▼ *

Message Reference:

fd0d2871-e59a-42dc-8b58-e3d *

If this report represents a change to a previously submitted report, please enter the corresponding Message Reference here:

ed3r25571-g74a-37dc-8b58-e3d *

?

Save as Draft

Validate & Save

AMENDED, VOID and CORRECTED FILINGS

Take note of the Document Reference ID from the Reporting FI Information form.

- ▶ Select the Add Section icon beside the FATCA/CRS folder.
- ▶ Expand the folder
- ▶ Select the Reporting Financial Information form
 - ▶ Set the Document Type to Amend, Void or Correct
 - ▶ Document Reference ID is prepopulated
 - ▶ Complete the remainder of the form, including all amends.
 - ▶ Validate and save.

AMENDED, VOID and CORRECTED FILINGS

Take note of the Document Reference ID from the Account Information form(s).

- ▶ Select the Account Information form.
 - ▶ Set the Document Type to Amend, Void or Correct
 - ▶ Document Reference ID is prepopulated and does not require User input.
 - ▶ Enter the Message Reference noted from the original filing into the Corresponding Message Reference ID.

AMENDED, VOID and CORRECTED FILINGS

- ▶ **Creating an XML Amended, Void of Corrected Filing**
 - ▶ **Navigate to View Submitted Filings, Download and save the XML file so it can be edited.**
 - ▶ **Follow the steps to create a filing.**
 - ▶ **Period End Date must match the original filing.**
 - ▶ **Changes must be made within the DocSpec element of the XML file.**
 - ▶ **Consult the Schemas for further guidance.**
- ▶ **Complete the XML file submission.**

IRS NOTIFICATIONS

- ▶ **The ICMM Notifications User Guide includes detailed explanations regarding the error notifications Users should receive in response to FATCA Filings submitted and the required steps to address them.**
 - ▶ **An FI MUST submit all FATCA Filings via the AEOI Portal notwithstanding anything to the contrary in the ICMM Notifications User Guide regarding submissions via the IRS IDES or by a paper submission of Form 8966.**
 - ▶ **An FI MUST address IRS error notifications promptly by submitting the appropriate Filing so that the CA, in turn, is able to transmit that Filing within the prescribed 120-day period.**

DOWNLOADING IRS NOTIFICATIONS

- ▶ **Log in to the AEOI Portal.**
 - ▶ **If a User has access to multiple FI's, they should select the FI which relates to the email received.**
 - ▶ **Using the menu bar navigate to Submission > Submission History**
 - ▶ **Review the Transmission Progress column.**
 - ▶ **Select the Filing**
 - ▶ **In the View Filing page, select the Form icon next to View Comments.**
 - ▶ **Right click the file, save, open with Internet Explorer and examine for further action. Consult the ICMM Manual for error codes and corrective actions.**

CRS STATUS MESSAGES

- ▶ **Competent Authorities of Receiving Countries use the CRS Status Message XML Schema to provide structured information on any file and/or record errors in CRS Filings submitted by SKN FIs. Competent Authorities of Receiving.**
- ▶ **You MUST carefully follow the file preparation instructions in the OECD CRS Status Message XML Schema: User Guide for Tax Administrations before addressing any CRS Status Messages.**
- ▶ **When the receiving Competent Authority indicates a validation error within a return, a CRS Status Message will be issued. The AEOI Team will contact the PPoC to advise which return is affected and what actions are required.**

THANK YOU!

