

# FATCA Newsletter

July 2018 | Kingdom of Bahrain

## keypoint

## Updated FATCA classifications, certification of pre-existing accounts and periodic certification

We expect the IRS to shortly update the FATCA registration system. All FATCA-registered entities should login and update their FATCA classification after the update. Features to be added to the system as part of the upgrade include:

- Existing FATCA classification choices updated – Entities must update their classification by selecting COPA or periodic certification. Failure to do so will result in an overdue certification status.
- Certification of pre-existing accounts (COPA) – Accessible using the link on the home page for approved entities. The responsible officer must answer qualifier questions and, based on this, may be required to answer certain certification questions. This is a one-time exercise designed to confirm that any due diligence related to pre-existing accounts has been completed.

- Periodic certification – This is a reoccurring certification following the third full calendar year of the entity's effective date. Responsible officers answer a set of qualifier and certification questions (similar to COPA).



To receive notifications, entities should ensure their login credentials are valid and that their email addresses are up-to-date. **The below table lists the COPA and periodic certifications required according to the type of FI.**

FI's FATCA classification in its country or tax residence jurisdiction	Certification required?	
	COPA	Periodic
Participating FFI, including a reporting financial institution under a model 2 IGA <sup>1,2</sup>	Yes	Yes
Registered deemed-compliant FFI that is a local FFI	Yes	Yes
Registered deemed-compliant FFI that is a non-reporting member of a PFFI group	No	Yes
Registered deemed-compliant FFI that is a qualified collective investment vehicle	No	Yes
Registered deemed-compliant FFI that is a qualified credit card issuer or servicer	No	Yes
Registered deemed-compliant FFI that is a restricted fund	Yes	Yes
Reporting financial institution under a model 1 IGA	No <sup>1</sup>	No <sup>1</sup>
Direct reporting NFFE	No	Yes
Sponsoring entity of sponsored direct reporting NFFEs	No	Yes
Sponsoring entity of sponsored FFIs	Yes	Yes
Sponsoring entity of sponsored FFIs and sponsored direct reporting NFFEs	Yes <sup>2</sup>	Yes
Trustee of a trustee-documented trust	No	Yes
US financial institution <sup>1</sup>	No	No

<sup>1</sup> Except on behalf of branches operating outside of Model 1 jurisdictions (other than related branches)

<sup>2</sup> Only on behalf of sponsored FFIs

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