Functional Requirements for the AEOI/CRS Portal of Georgia

# Receiving Information from RFIs

## Registration of RFI for CRS purposes;

According to our existing legislation and practice, all FIs including RFIs are already registered taxpayers.

**Registration** for CRS Reporting purposes

* Registration for using the Online Service for CRS reporting purposes, is only required for the Reporting Financial Institution.
* In order to be able to use the Online Service, the Reporting Financial Institutions need to enroll the application ‘*name of application*’[[1]](#footnote-1) via the taxpayer’s electronic portal of Georgia Revenue Service (<https://eservices.rs.ge>).
* After the application is approved by Georgia Revenue Service, the Reporting Financial Institutions (RFIs) will be enabled to use the Online Service.
* RFI will be able to input details of the appointed representative who will be responsible for filing CRS data on their behalf with the tax administration as well as to assign users of this portal, to change the details with adequate logging of former appointed representatives and dates between which they were authorized to act on the RFI’s behalf. Once an RFI registration is approved the solution must automatically create the appointed representative detailed on the registration form as the RFI’s “primary user“ and assign them access to the associated RFI.
* Tax administration users should be able to review successfully submitted RFIs’ registration forms and to approve or reject successfully submitted RFIs’ registration forms.
* The registration process system must flag (for further investigation) where an RFI is double registered.

## Uploading the CRS data by RFIs

**XML file**

The Financial Institutions must submit the message to the Revenue Service only in XML format set by the OCED via GRS’s CRS Portal or APIs. Reporting must be made in the prescribed XML format.

Concerning reporting obligations and timing, below article of secondary legislation (Draft Instruction for the RFIs, to be approved by the Minister of Finance of Georgia) shall be taken into account:

**(Article 14. Reporting the Information)**

* The reporting financial institution of Georgia defined in accordance with the Agreement is obliged to transfer to tax authorities the information referred to in that Agreement concerning each reportable financial account of those persons who are residents in the jurisdictions with whom the above agreement has already entered into force. This information is to be reported to the tax authority after completion of the calendar year, the information is related to, but no later than June 30 of the next calendar year.
* The Financial Institution is obliged to transfer the reportable information, which must be reported in accordance with the residency jurisdictions of the account holders.
* If the Financial Institution does not have any reportable account, then it is obliged to submit a Nill-report to the Revenue Service.
* The Financial Institution is obliged to report the CRS information in XML (Extensible Markup Language) file format (Annex II), separately to each jurisdiction (Annex I).
* No later than June 30, the Financial Institution may submit the message for unlimited number of times. In addition, the last message submitted, among others, will be deemed to be an Initial Message and the information before the Initial Message, will not be taken into consideration.
* The possibility of submitting the message by the Financial Institution to the Revenue Service is restricted in a time period starting on 20 September until the message status is received from the competent authority of the recipient jurisdiction.
* The system should maintain a list of those jurisdictions with which there are the necessary agreements to exchange information.

## Validation of the CRS Data submitted by the RFIs.

All reports submitted must be in accordance with the XML format and must be valid in accordance with OCED’s XML schema and any additional validation added by Georgia Revenue Service.

The GRS’s CRS Portal should have the following functionalities:

* Quality control of submitted data which should include at a minimum, validation checks to ensure information meets the CRS XML schema requirements (see Subsections 7.2.2 and 7.2.3 of the toolkit).
* Ability to carry out sense checks (see Subsection 7.2.3 of the toolkit) on data submitted by RFI for any errors.
* All abovementioned checks and validations shall be applied at the moment of submission of the XML files by RFIs.
* RFIs must be enabled to check message meta data visibility, including errors/corrections concerning XML files, related to the submitted CRS Data. The GRS’s CRS Portal must have the communication channel with the RFIs.
* Data submitted must be subject to the security policies being enforced at GRS.

# Sending CRS data to the partner Jurisdictions

## Preparation packages for exchange partners

* The system should be in place to collate and package files (received from the RFIs) into one file per jurisdiction within file size limits for the receiving jurisdiction or split into the appropriate size. Validation against the CRS XSD must be carried out on the file before packaging for transmission.
* The system should maintain a list of those jurisdictions with which there are the necessary agreements to exchange information.

## Encryption and transmission of data via the CTS

* All CRS data being transmitted via the CTS portal must be encrypted and packaged as per the guidelines issued by the CTS User Guide;
* The system should check for the valid encryption keys on the CTS for each of the jurisdictions;
* Encryption key should be at least 2048 bits for asymmetric encryption and 256 bits for symmetric encryption;
* Keys should be managed properly and the tax administration should hold its own keys or monitor its storage when outsourcing;
* Only certain approved encryption keys can be used for the CTS.

## Processing of responses relating to data transmitted

* The solution should be capable of receiving/processing notifications received in response to data files that have been transmitted to other jurisdictions. It should also be able to update the status of the filing to reflect the type of notification received.
* Where the processed notification indicates further action is required by the RFI user, there should be a possibility of notification.
* There must be automatic notification system
* Upon receipt of a notification, a RFI or tax administration user should be able to log into the solution and view the actual notification file that was received. There should also be the capability for a tax administration user to download notifications.
* Where the processed notification indicates further action is required by the tax administration user, the latter should be notified automatically.
* Where a data file is amended, either by the tax administration or resubmitted by the RFI, the system should be able to produce a complete log of the activity.
* There needs to be a view of all sent and received files to deal with any queries.
* There needs to be a system to match corrections to original files.

# Receiving the information from the International partners

* The solution should be capable of processing CRS data files received from other jurisdictions via CTS.
* The system should be able to check the inbound file and to determine whether the file meets the standards of the appropriate XML schema.
  + The CRS file needs to be unpackaged, decrypted and decompressed using the correct keys.
  + The CRS file is checked for validity based on CRS XML schema. If there are any critical errors in the file, it will need to be automatically rejected. If there are some acceptable errors , these need to be captured for the competent authority to decide whether it would like to accept or reject the file, and, if accepted, the errors will need to be advised to the sending country upon receipt of which a correction file must be sent.

# Managing the data received

The solution should support the usage of the data, whether that be by enabling the data to be imported into GRS’s existing Business Intelligence System for compliance activities (directly or via export in a CSV or similar file), or by the creation of some sort of audit function as additional module (data analytics).

# General requirements of the GRS’s CRS Portal

## Types of Users

There must be 3 types of users:

* The domestic RFIs within the jurisdiction that will provide the data to be exchanged with other jurisdictions.
* The tax administration employees who will need access, either because they are involved in AEOI administration and need to instigate actions or check/monitor progress, or because they are involved in the exploitation of data received from other jurisdictions.
* Persons involved in the administration of the system, both developers and operators.
* Some of the users might need to be able to have a full overview (monitor and manage functions) of all transactions. Others only in view mode and upload mode.

## Reporting and Analytic functions:

The GRS’s CRS Portal, as well as GRS’s existing Business Intelligence System must be able to provide Reporting and analytic functions. Such requirements are:

* Standard reports and enable ad-hoc interrogation of data
* The solution should contain a report which will show:
  + the status of all CRS filling.
  + a list of RFIs who have not submitted a CRS file , as appropriate, for the current year, along with contact details of the RFIs’ primary users.
  + to view all RFIs’ user details
* The solution should enable other reporting, with the ability to select search criteria and sort functions for batch and individual data for RFIs. It should be able to sort data based on all field criteria, and to search data based on multiple fields. Where dates are specified, there should be a possibility to enter a range of dates instead of a single one.
* Management and statistical reports are required, including reports on single and batches received/uploaded from RFIs, reports on information received from CTS, reports on the number of records received over time periods, and on account balances from RFIs.
* The solution should allow for collection and visualization of various metrics (key data points) for developing an effective compliance strategy, including: o the number of RFIs that have reported o the number of financial accounts that been reported (overall and by RFI) o the number of financial accounts reported without tax identification number (overall and by RFI) o the number of financial accounts reported without dates of birth (overall and by RFI).
* The solution should provide tools to make use of all transactions and data to elaborate dashboards. Those dashboards should correlate data and metrics to give the competent authority to identify areas of improvements / issues / errors / rejections or other relevant parameters.

1. The name of the application for CRS reporting purposes will be agreed and inserted later. [↑](#footnote-ref-1)