

Understanding Common Reporting Standard Requirements

An overview of the Common Reporting Standard (CRS)

What is it?

- The Common Reporting Standard (CRS) is the standard for automatic exchange of financial account information (AEOI) developed by the OECD
- Based upon the Foreign Account Tax Compliance Act (FATCA), CRS is a legal basis for exchange of tax data among participating jurisdictions
- Onboarding requirements for jurisdictions that are early adopters starts on January 1, 2016
- Reporting will be due between January and September of 2017 in early adopter jurisdictions
- 100+ participating jurisdiction to date

FATCA vs. CRS

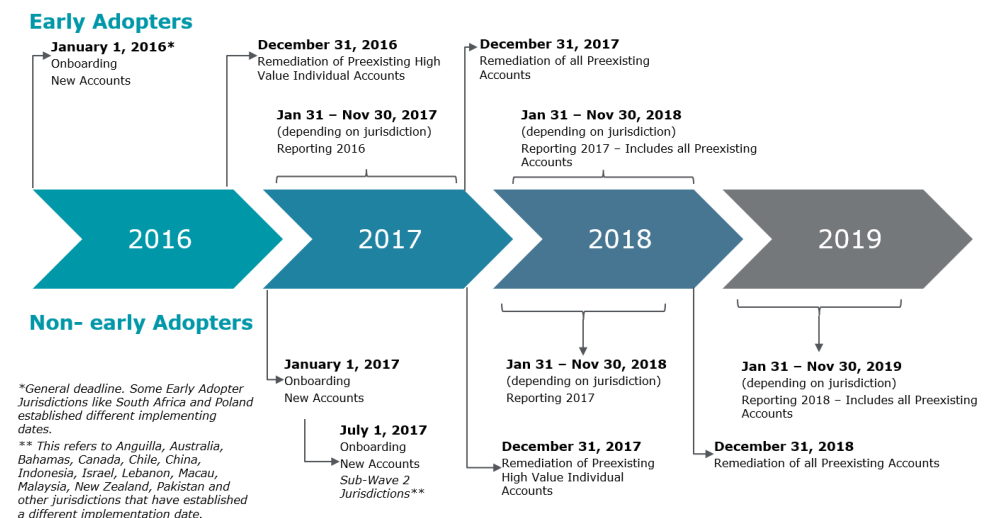
	FATCA	CRS	Key Takeaways for CRS
For Governing Authority	United States	100+ separate tax jurisdictions	Requires monitoring local jurisdictions enforcement provisions to determine compliance risk—jurisdictions subject to peer review by Global Forum
Withholding	30% withholding on non-compliant payees/Intermediaries	No withholding	Enforcement by the tax authorities of the signatory jurisdictions. Specific requirement for signatory jurisdictions to establish a penalties scheme
Account Scope	US Individual Accounts, US Entity Accounts and Passive NFFE accounts held by substantial US owners	Individual and Entity accounts held by tax residents of any CRS participating jurisdiction or Passive NFEs with controlling persons that are resident in any CRS participating jurisdiction	The number of CRS reportable accounts may be greater than reportable accounts under US FATCA
Thresholds	New Individual: \$50,000 New Entity: N/A Preexisting Individual: \$50,000 (generally) and \$250,000 (cash value insurance) Preexisting Entity: \$250,000	With the exception of preexisting entity accounts, no thresholds applicable	Potentially limited impact for financial institutions that did not apply thresholds
Documentation Requirements	Forms W-8/W-9 may be used to capture all tax data	US tax forms are not acceptable to capture all CRS data. CRS self-certifications must be developed	Self-cert will be needed to capture CRS specific data such as multiple tax residency, CRS legal entity classification. Controlling persons generally required to provide their own self-certification including the type of Controlling Person under CRS

Account scope of CRS may be significantly greater than US FATCA

Countries to Implement CRS (105*)



CRS Timelines



There are a number of additional requirements not considered in this chart and that vary depending on the jurisdiction such as:

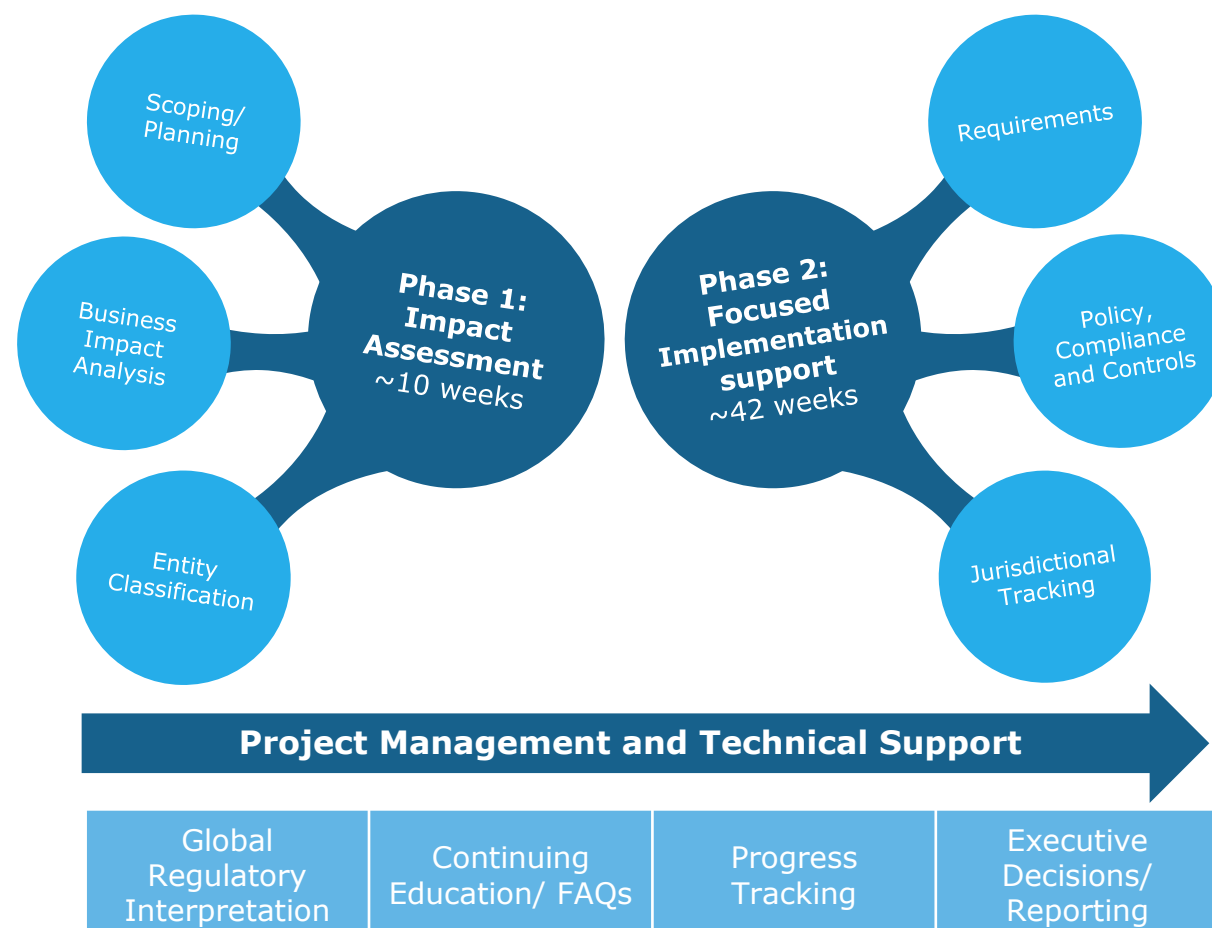
- Local Registration/ Notification Requirements
- Notification Requirements to Accountholders
- Relationship Manager Annual Certification/ Other Compliance-Specific Requirements

Implementing Common Reporting Standard Solution

Introducing Deloitte's Rapid Phased Approach

Our CRS approach leverages Deloitte's global tax reporting knowledge and experience and footprint to quickly and effectively identify impacted lines of business within the organization, consistently apply a global interpretive standard and jointly develop tested implementation processes within applicable timelines.

Phase 1	<p>Education and governance: Inform and educate stakeholders of upcoming regulatory changes, form project team and institute governance structure</p> <p>Legal entity classification: Classify organizational entities under CRS and implement guidelines proscribed per their classification</p> <p>Rapid understanding of business impact: Determine how organization and Lines of Business (LOBs) are affected by CRS protocol</p>
Phase 2	<p>Joint development of business requirements and policies: Provide consistent organizational guidance and develop high level CRS Business Requirement Documents and functional specifications</p> <p>Implementation of ongoing support model: Develop processes and technical capabilities to monitor and implement ongoing country/jurisdiction CRS requirements support model</p>



Output	<ul style="list-style-type: none"> Finalized Impact Assessment including Implementation Timeline with Key Milestones CRS product matrix CRS legal entity classification and key considerations by LOBs CRS Internal communications plan
Output	<ul style="list-style-type: none"> Business requirements per legal entity/ line of business Reviewed policies and procedures Country updates

Contact our leaders



Denise Hintzke
Managing Director
Deloitte Tax LLP
+1 212 436 4792
dhintzke@deloitte.com



David Charlton
Principal
Deloitte Tax LLP
+1 617 437 2118
dcharlton@deloitte.com



Andrea G. Castelao
Senior Manager
Deloitte Tax LLP
+1 212 436 3785
acastelao@deloitte.com

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