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Member account transaction and attribute service reporting

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Terms we use

When we use the term:

- **provider** in this protocol, we mean the particular super fund, approved deposit fund (ADF) or retirement savings account (RSA) provider

- **member** in this protocol, we mean a member of a super fund, a depositor in an ADF or the holder of a RSA
- **employer** in this protocol, we mean the person or organisation responsible for the members salary or wages relating to super contributions that were made.

What the protocol does

This protocol:

- provides administrative guidance only and does not replace the law or technical reporting specifications
- includes an explanation of key terms contained in the law
- gives guidelines on practical administration and our perspective of industry best practice
- aims to encourage consistent practices and application of the super reporting obligations across the super industry (other than self-managed super funds)
- helps you so that when you act on the guidance provided and take into account your member's individual circumstances, you can decide whether your action is appropriate.

In scope

This protocol is designed to be used by superannuation providers and their administrators to support obligations for:

- reporting through the member account attribute service (MAAS)
- reporting through the member account transaction service (MATS)
- unclaimed super money (USM) reporting
- transfer balance account reporting (TBAR).

The guidance provided within this protocol does not have the force of law and is not binding. It is not a change-controlled protocol and does not undergo the same rigour and control as published specification material available through business implementation guides and the Data and payment standards rollover message implementation guide.

Out of scope

Providers' tax and superannuation obligations

Tax and superannuation laws impose obligations to regulate and administer providers in particular ways. You do not have discretion to act in a way that is contrary to a legislative requirement or reporting obligation, even if this would be in the interests of your members.

Do not allow directions given or requests made by members, employers and other parties prevent you from complying with the law. You should make sure that your members and their employers are aware of your fund's policy in this regard before any issues arise.

As part of good corporate governance, the accounting and control systems you have in place should be designed to:

- ensure you are complying with your legal obligation to report member information in the approved form under **Division 390** of the TAA
- meet your obligations under the relevant superannuation laws
- meet your income tax obligations.

The collection and treatment of good data at its source is essential for correct and timely reporting.

Deferrals

Exceptional and unforeseen circumstances may impact your ability to lodge or pay by a due date and requesting a deferral may help. Generally, a deferral should be granted on or before the lodgment due date.

The exceptional or unforeseen circumstances must be consistent with those outlined in PS LA 2011/15 Lodgment obligations, due dates and deferrals.

See also [Requesting a deferral of your member reporting obligations](#).

Voluntary disclosures

If you find that you have not met your obligation to report or amend material omissions or errors, you can make a voluntary disclosure to bring that to our attention. We will work with you to assist minimising potential impacts to members where it is possible and appropriate to do so. All voluntary disclosures will be considered on a case by case

basis in the context of your previous compliance history and level of engagement with us.

See also [Penalties and interest arising from voluntary corrections](#).

Penalties for incorrect reporting

If you identify a reporting or payment error, or you have difficulty meeting your obligations, contact us as soon as possible for help.

The TAA prescribes a penalty regime for non-compliance, and this applies to superannuation approved-form reporting.

An administrative penalty may apply if you:

- fail to lodge required information on time, in the approved form
- provide a statement that is false or misleading
- don't provide information for all your members or former members who held an interest in the fund at any time during the year
- fail to keep adequate and correct records.

For example, an electronic file that reports information for many members but omits reporting the information for a single member is a failure to lodge for that member and may attract a penalty.

Penalties will not apply for providing a false or misleading statement when you can demonstrate you took reasonable care.

See also

- [Tax Administration Act 1953 - Section 286-80 Amount of Penalty](#)
- [PS LA 2012/5 Administration of penalties for making false or misleading statements that do not result in shortfall amount](#)
- [Penalties – false or misleading statement](#).

Member account reporting legislation

The protocol has been developed to help superannuation providers and suppliers lodge accurate and complete member account information with us.

Legislative context

The provisions that outline superannuation member account reporting and tax file number (TFN) validation obligations are in:

- **Division 390** of Schedule 1 to the Taxation Administration Act 1953 (TAA)
- [Superannuation Industry \(Supervision\) Act 1993](#)  (SISA)
- [Retirement Savings Account Act 1997](#)  (RSAA)
- associated regulations within the
 - [Superannuation Industry \(Supervision\) Regulations 1994](#)  (SISR)
 - [Retirement Savings Account Regulations](#)  (1997) (RSAR).

Subsection 390–5(1) of Schedule 1 to the TAA states a superannuation provider in relation to a superannuation plan must give the Commissioner of Taxation (the Commissioner) a statement in relation to an individual. This is if the individual held a superannuation interest in the plan at any time during the period specified in a determination under subsection (6).

Holding a superannuation interest

You will need to decide who holds a superannuation interest and ensure that reporting correctly deals with multiple superannuation interests.

A superannuation interest is an interest in any of:

- a super fund
- an approved deposit fund
- a retirement savings account (RSA).

An interest refers to a distinct claim of any kind against a super fund or RSA provider, whether it be proprietary in character or not.

Cash held in an account for the benefit of a member or investments held on their behalf clearly indicate a superannuation interest. As a general rule, a superannuation provider's capital is most commonly increased by receiving a contribution for a member.

Less easily quantifiable entitlements for example are life or disability insurance policies held in the name of the individual or entitlement to defined benefits.

Holding a superannuation interest includes but is not limited to:

- non-member spouse accounts
- new member registration or first contribution in relation to the superannuation data and payment regulations and standards
- having no account with the super fund but have some other interest such as an insurance interest, a defined benefit interest or an annuity.

Reporting under section 390-5 of Schedule 1 to the TAA

Legislative Instrument ID F2018L00467, effective from 1 April 2018, requires every superannuation provider (excluding self-managed super funds (SMSFs)) in relation to a superannuation plan to report all member account phases and attributes. This includes new accounts, updates and closures in relation to a member's account using the member account attribute service (MAAS). This replaces Legislative Instrument ID F2017L00142, which required mandatory reporting using SuperTICK.

See also

- [Legislative Instrument ID F2018L00467](#) 
- [Legislative Instrument ID F2017L00142](#) 

The MAAS form is to be submitted no later than 5 business days after the day a member account is opened, updated or closed or such later date as the Commissioner may allow.

When you have transmitted the MAAS form within the timeframe specified above and we have responded with a technical receipt, you have given the statement to the Commissioner and discharged your obligation to lodge that form.

Once you have started using the MAAS, you will continue to use the MAAS for reporting new or updated or closed member accounts.

Minimum message requirements for TFN validations

The Commissioner may give you a TFN validation notice under section 299TD of the SISA or section 143D of the RSAA if you give the

Commissioner information you believe to be either the:

- full name, TFN and date of birth of a person
- full name, TFN and date of birth and address of a person.

Although our systems may accept a message with a reduced data set, section 299TD of the SISA or section 143D of the RSAA provides the legal requirements to receive a TFN validation notice from the Commissioner.

You can use the MAAS or SuperTICK for TFN validation as the legal requirements of the message are the same in both services. Regardless of the service used, for the purposes of TFN validation, the trustee must make the request no later than 3 business days after receiving the information.

When you receive a technical receipt through the MAAS or a GEN.OK response through SuperTICK you have discharged your obligation to call the service.

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Reporting open accounts and account changes

How to notify us of open accounts and account changes.

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Reporting open accounts

When you determine that an individual holds a superannuation interest you must notify us via the MAAS no later than 5 business days after the day the account is opened (or such later date as the Commissioner may allow). For example, generally we consider that the individual holds a superannuation interest at the time the contribution is received, and sufficient details are known to identify the member. This is even if you have not yet allocated the money to a member account.

When you notify us of newly opened accounts through the MAAS all of the mandatory account attributes are required to be reported. The mandatory account attributes are:

- unique superannuation identifier (USI)
- member account identifier
- account phase
- account status
- contributions accepted
- inward rollovers accepted
- member outward rollover requests accepted
- government rollovers accepted
- defined benefit interest
- insurance
- grandfathering
- innovative income stream product.

Example: reporting an open account

A super fund receives a contribution for a new member, Brad, from an employer on 1 May 2019. Along with the contribution, the employer provided Brad's:

- first and last name
- year of birth.

As the super fund held incomplete contribution information, it was unable to determine who the superannuation interest

belonged to at the date it received the contribution.

The super fund successfully contacted the employer and obtained complete contribution information on 10 May 2019.

The fund determined that the account was opened on the 10 May 2019 and reported this in the account status field in the MAAS form.

See also

- *TR 2010/1 Income tax: superannuation contributions*
- **Contributions reporting protocols**

A MAAS message is required when you determine that the member holds an interest in the fund even when that interest is held for a minimal period.

Where you have accounts that open and close on the same day, or you need to pay out member benefits that day, you are still required to report a MAAS for that account. This includes for when the MAAS message you submit is to report the account as closed (only requiring the 4 mandatory fields to be completed).

Example: account opened and closed on the same day

Sally opens an accumulation account and receives a contribution. On the same day, she chooses to:

- withdraw the amount as she is eligible under a condition of release
- close the accumulation account.

At minimum, a MAAS is required to be lodged with a closed status.


Reporting account changes

Whenever there is a change to the account attributes relating to a superannuation account, you must notify us within 5 business days or

such later date as the Commissioner may allow.

All of the mandatory member account attributes required to report an open account are also required to be reported in an update message, not just the attribute which is being changed.

Refer to the MAAS business implementation guide for message requirements relating to changes and updates to TFNs.

See also MAAS business implementation guide – [ATO SPRMBRINFO business implementation guide](#) .

Where you are provided with updated personal details (name, date of birth, address) follow the applicable guidance as follows:

- [Member detail update is required](#)
- [Member detail update is not required](#)
- [Changes due to a reversionary income stream](#)
- [Change of USI or member account identifier](#)
- [Reporting of grandfathering attribute](#)
- Rollovers
- Changes in 'lost' status

Member detail update is required

If you receive a request from a member to update their family name and you are holding an unmatched response, it may be possible that the difference in family name may be the cause.

Report the updated member family name along with all the other attributes of the account. When we are able to match your member with the updated family name, our systems will then return a matched response and cancel the previous unmatched form.

Member detail update is not required

If a member tells you that they have changed their name or address and you are holding a matched response for the member:

- update your own systems with the new information
- report the new details to us when you have an account attribute update to report for the member

- advise the member to ensure they update their details directly with us so that any future reporting to us is properly matched to their records.

Changes due to a reversionary income stream

A superannuation income stream stops as soon as a member in receipt of the superannuation income stream dies. This is the case unless a dependant beneficiary of the deceased member is automatically entitled, under the governing rules of the superannuation provider or the rules of the superannuation income stream, to receive an income stream on the death of the member.

If a dependant beneficiary of the deceased member is automatically entitled to receive the income stream upon the member's death, the superannuation income stream continues.

When you are notified of the death of a member and the superannuation income stream automatically transfers to the beneficiary as described above:

- this is a legitimate change of account holder and the account identifiers can be re-used for the reversionary beneficiary
- you need to close the deceased member's account and open a new account in the name of the reversionary beneficiary
- if you choose to re-use the account number, ensure you complete all member account transaction service (MATS) prior to opening the account in the name of the reversionary beneficiary
- the 'account status date' of the new account is equal to the deceased member's date of death
- your record keeping would provide sufficient evidence of the date of death notification in the event that proof is required for timeliness of your message.

When you report the open account for the new member, an error may be returned. In these instances you may reprocess the transaction or lodge a request using the **Super Enquiry Service** to process the new account.

Change of USI or member account identifier

If the unique superannuation identifier (USI) or member account identifier (also known as the member account number) changes for a member account, you should submit a:

- 'close account' request, quoting the old USI or member account identifier
- separate 'new account' request for the new account (identified by the unique combination of the USI and the new member account identifier).

Reporting of grandfathering attribute

The grandfathering attribute is applied to a member for a specific financial year based on the status date reported on the MAAS message.

If there are no MAAS records with a status date within the financial year, we will use the grandfathering attribute on the most recently processed MAAS record that has a status date from an earlier financial year. This includes when calculating excess concessional contributions and additional contribution tax for Division 293 for a financial year.

Example: latest MAAS record with a status date in the same financial year

Bill is an individual who has notional taxed contributions (NTC) reported by a defined benefit fund as at 30 June 2019. The latest processed MAAS record has a status date within the 2018–19 financial year.

Our system identifies the most recent MAAS record that holds a status date within the 2018–19 financial year. The grandfathering attribute will be applied from this record to calculate excess concessional contributions and additional contributions tax for Division 293 for this member.

Example: no MAAS record holding a status date within the same financial year

Julie is an individual who has NTC reported by a defined benefit fund as at 30 June 2019. The latest processed MAAS record does not have a status date within the 2018–19 financial year.

Our system does not identify a MAAS record holding a status date within the same financial year. It consumes the grandfathering attribute from the most recent MAAS record with a status date in an earlier financial year.

In this instance, there is a MAAS record with the member account status date of 20 April 2018. The grandfathering attribute will be applied from this record to calculate excess concessional contributions and additional contributions tax for Division 293 for this member.

Example: grandfathering attribute amended for 2018–19 financial year

Ahmed is an individual with:

- NTC reported by a defined benefit fund as at 30 June 2019
- a MAAS record with a status date of 30 January 2019
- a grandfathering attribute of True.

The fund amends the grandfathering attribute via MAAS to False with a status date of 30 June 2019. Our system identifies the latest processed MAAS record which has a status date within the same contribution year.

In this instance, the individual will not have grandfathering provisions applied to their excess concessional contributions. We will apply the grandfathering attribute from the latest MAAS record.

You must report an updated MAAS with an account status date within the relevant financial year where:

- there is a change to a member's grandfathering attribute for a particular financial year

- a member's grandfathering attribute was incorrectly reported. An updated MAAS will need to be reported for each impacted financial year. Ensure that the correct account phase and account status are reported for that period. Take care not to erroneously re-open or close an account in order to complete the grandfathering attribute update.

To update a grandfathering attribute for 2017–18 or earlier years lodge a request using the **Super Enquiry Service**.

For more information, see **Defined benefit funds – notional taxed contributions**.

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Reporting rollovers

How to notify us of rollovers.

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TFN validation notice

You must ask the Commissioner for a TFN validation notice when you receive a request to rollover an account to another provider, unless:

- you do not hold the member's TFN
- the rollover request was sent by us
- you have previously received a notice from the Commissioner validating the member's TFN.

If the Commissioner is unable to validate the member's details, you may ask the member for proof of identity information that you reasonably need to process the request to rollover.

Rollovers to SMSFs

Prior to processing a request to rollover to an SMSF, you must verify the SMSF against the records held by the Commissioner through the use of the **SMSF Verification Service**.

APRA funds and their administrators must not solely rely on the SVS to meet their 'know your client' obligations. You can request additional information from the member including:

- proof of identity documents to confirm the member's identity
- SMSF bank account information to confirm the destination of the transfer of super money.

Verifying this information will safeguard your members' retirement savings.

Further information is available in the **Request for rollover of whole balance of super benefits between funds instructions**.

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Changes in lost status and reporting closed accounts

How to report to us about changes in lost status and closed accounts.

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Changes in 'lost' status

A member of a super provider is a lost member if the member is:

- a lost RSA holder within the meaning of regulation 1.06 of the RSAR
- a lost member within the meaning of regulation 1.03A of the SISR.

These regulations define an RSA holder or member of a super provider to be a lost member at a particular time if:

- they are uncontactable
- they are an inactive member
- the member joined the fund from another super provider as a lost member.

A key underlying concept is that it is the individual that is lost – not the account.

You are required to report the lost status of your members at a minimum biannually as follows:

- assessing the lost status of your members on or after 30 June but before 31 October and if there has been a change in the member's 'lost status' account attribute, report that information on or before 31 October
- assessing the lost status of your members on or after 31 December but before 30 April and if there has been a change in the member's 'lost status' account attribute, report that information on or before 30 April.

You can report your members' lost status more frequently if you wish.

If the individual holds multiple accounts within your fund you must lodge an update for each account.

For more information, see [Lost members register protocol](#).

Reporting closed accounts

When you notify us of closed accounts via the MAAS, the mandatory account attributes that are required to be reported are:

- USI
- member account identifier

- account phase
- account status.

When you receive a 'matched' response for a closed account, the account will generally be displayed on ATO online services as a closed account. Your members will be able to see transactions made from 1 July 2018 on the closed accounts but no action can be initiated by them.

Accounts closed prior to 1 July 2018 are not displayed on ATO online services.

If you submit a closed MAAS message and receive an 'unmatched' response the individuals account will not have been successfully closed and it will remain viewable on ATO online services.

Only report a closed account once:

- all closure processes have been completed
- money has been rolled over or paid out
- no interest is remaining
- the interest has moved to the reversionary beneficiary
- it is not possible to receive further contributions.

When the account closure is complete, notification of the closed account through the MAAS should be submitted within 5 business days, or such later date as the Commissioner may allow.

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TFN validation responses

The types of responses you may get when you submit a MAAS form to open, update or close a member account.

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Responses

When you submit a MAAS form to open, update or close a member account you will receive one of the following responses from our service:

- [Matched response](#)
- [Matched and corrected response](#)
- [Unmatched](#)

Matched response

A 'matched' response confirms the TFN data you hold is correct and is a notice under section 299TD of SISA or section 143D of the RSAA, provided the minimum requirements are met.

The Commissioner may give you a TFN validation notice under section 299TD of the SISA or section 143D of the RSAA if you give the Commissioner information you believe to be either the:

- full name, TFN and date of birth of a person
- full name, TFN and date of birth and address of a person.

Note: Although our systems may accept a message with a reduced data set, section 299TD of the SISA or section 143D of the RSAA provides the legal requirements for a TFN validation message to receive a valid section 299TD or 143D notice from the Commissioner.

If a TFN has not been quoted for superannuation purposes (by another person) and has not been supplied in the MAAS, it will not be returned in our response. A matched response in this instance does not equate to a TFN validation notice.

Matched and corrected response

If you provide a TFN in the MAAS message, and the response is a corrected TFN, this is a notice under section 299TA of the SISA or section 143A of the RSAA.

If a corrected TFN is included in the response, privacy regulations do not permit you to provide the TFN to an employer.

If a TFN is not supplied in the MAAS and a TFN is returned, it is a notice under section 299TC of SISA or section 143C of the RSAA, meaning the member has provided this TFN for superannuation purposes previously.

If we have provided you with a TFN via a matched and corrected MAAS response, there is no requirement to report the updated TFN as a further MAAS update. Once the TFN number has been verified by your member, update your records with the TFN supplied. However, if the member confirms the original TFN is correct, you should lodge a request using the **Super Enquiry Service**.

When you submit a further MAAS update, you can include the correct TFN. Penalties may apply if you continue to use the incorrect TFN.

There are some circumstances where we do not return the TFN, and the TFN field is left blank e.g. when reporting an account closure, and the matching results in a correct TFN, the matching outcome will not be included in the response.

Unmatched

A response of 'unmatched' means we were unable to match the member details provided to our records with an appropriate level of confidence. In these instances, while we will hold a record of the lodgment against the superannuation provider, the account will not have been associated to the member within our systems. This means that your member will not see these details on ATO online services.

We may have been unable to match the member details for the following reasons:

- your member has provided you with incorrect details
- the records we hold are incorrect
- the TFN has a compromised or duplicate status on our systems

- our data matching system cannot establish a single match.

While an unmatched response from the MAAS is not always a 'Please resolve' notice, the MAAS message is unmatched against the member in the ATO client register.

When a MAAS open account is not properly matched to a member in the ATO client register, other MATS interactions will fail to be matched to the member.

Where you have provided a TFN in your message and subsequently receive an unmatched response you will need to determine whether the unmatched response should be treated as a 'Please resolve' notice and take reasonable steps to rectify the unmatched response as discussed in 'Your obligations to address errors and unmatched responses'.

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Member account reporting and validation errors

How to remediate errors.

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Meeting your obligations

You have met your MAAS lodgment obligations once you receive a technical receipt.

If you or your service provider receive an error response from our service, you have 30 days to remediate the error from when you become aware of it.

When will an error be returned


An error will be returned if:

- mandatory member information is not provided
- information is provided in an incorrect format. In this instance the message fails validation and an error will be returned.

An error will be returned when the MAAS message is successfully formatted but either:

- a more recent member account request has already been processed (CMN.ATO.SPRMBRINFO.099264)
- the reported account belongs to a different account holder (CMN.ATO.SPRMBRINFO.096604).

When an error is returned from our service the message is prevented from being processed in our systems. The information will not be displayed on ATO Online for your member to view nor will we be able to use it to interact with your member until you remediate the error and resubmit the message to us.

A comprehensive list of the errors returned from the MAAS can be found in the current [MAAS BIG](#) . Most of these errors are warnings or informational and require some level of remediation by you.

Your obligation to address errors and unmatched responses

Your obligation to resolve unmatched responses and remediate errors are covered under section 390-115 of Schedule 1 to the TAA.

If you receive an error after receiving a technical receipt the MAAS message will not be processed and you are required to correct the message before resubmitting it to us.

Reasonable steps need to be taken to determine if there is a material change or material omission in any information you provided. Where you become aware of a material change or omission and are required to correct an error or unmatched response, you have 30 days to provide the corrected information to the Commissioner via the MAAS. All steps taken to remediate an unmatched response should be documented in line with your record keeping obligations.

What is reasonable depends on the specifics of each case and how likely your efforts would be to achieve a result.

For example:

- if the account has been created by an employer then we recommend you contact the employer in the first instance
- if the member has a financial advisor, we recommend you contact the financial advisor
- if you are unable to confirm details through an employer or financial advisor, we recommend you contact the member directly.

Example: message will not be processed

A super fund receives a CMN.ATO.SPRMBRINFO.096604 error: the reported account belongs to a different account holder. This means the message will not be processed.

If the fund is unable to resolve the error within 30 days, they will need to either report the account as 'closed' under the different account holder or contact the ATO to confirm the identity of the account holder.

Remediation work will need to be undertaken before the MAAS message is resubmitted to the ATO.

Account phase must correspond to the correct account status

An error will be returned if you don't report the correct phase with the correct corresponding status.

If the account phase is 'Accumulation', then the account status must be either:

- open
- transition to retirement income stream.



If the account phase is 'Retirement', then the account status must be:

- non capped defined benefit income stream
- capped defined benefit income stream (1 July 2017 onwards)
- capped defined benefit income stream (pre 1 July 2017)
- market linked capped defined benefit income stream.

If the account phase is 'Insurance Only', then the account status must be Open.

If the account phase is 'Closed', then the account status must be Closed.

See also

- MAAS business implementation guide – [ATO SPRMBRINFO business implementation guide](#) 
- SuperTICK
- [MAAS legislative instrument](#) 
- Member account attribute service (MAAS) terms and conditions
- Super Enquiry Service

QC 103767

Our commitment to you

We are committed to providing you with accurate, consistent and clear information to help you understand your rights and entitlements and meet your obligations.

If you follow our information and it turns out to be incorrect, or it is misleading and you make a mistake as a result, we will take that into account when determining what action, if any, we should take.

Some of the information on this website applies to a specific financial year. This is clearly marked. Make sure you have the information for the right year before making decisions based on that information.

If you feel that our information does not fully cover your circumstances, or you are unsure how it applies to you, contact us or seek professional advice.

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