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| Standard Business Reporting  Australian Taxation Office –  Tax Return for Attribution Managed Investment Trusts (TRTAMI.0003) 2021  Business Implementation Guide  Date: 9 December 2021  Status: Final  This document and its attachments are Official  For further information, raise an enquiry via [Online Services for DSPs](https://softwaredevelopers.ato.gov.au/OnlineservicesforDSPs)*.* If you are unable to access this, contact [SBRServiceDesk@sbr.gov.au](mailto:SBRServiceDesk@sbr.gov.au) or call 1300 488 231. International callers may use +61-2-6216 5577. | |
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Version control

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| --- | --- | --- |
| **Version** | **Release date** | **Description of changes** |
| 1.0 | 09/12/2021 | Final copy endorsed for publishing |

Endorsement

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| --- |
| Deborah Robinson - endorsed for business context |
| Director, New Measures – Public Groups International |

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| --- |
| David Baker - endorsed for publication |
| Director, Project and Systems Support – Individuals and Intermediaries |

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1. Introduction

This document assist Digital Service Providers (DSPs) to understand the Tax Return - Attribution Managed Investment Trust (TRTAMI) service and interpret how the technical implementation relates back to the business context and process.

The ATO TRTAMI service refers to the interaction with the ATO for a user, depending on their role, to:

* lodge a TRTAMI
* lodge an amendment to a TRTAMI.

It is designed to be read in conjunction with the ATO SBR documentation suite including the:

* web service/platform information
* ATO Common Business Implementation and Taxpayer Declaration Guide
* ATO SBR Service Registry
* test information, for example conformance suites
* Message Structure Tables
* validation rules.
  1. Glossary

This table only contains terms that need specific explanation for this document. For a glossary of terminology, **See also**:

* [SBR glossary](https://www.sbr.gov.au/digital-service-providers/developer-tools/glossary)
* [ATO glossary](https://www.ato.gov.au/Definitions/?anchor=top)
* The Common Business Implementation and Taxpayer Declaration Guide.

| **Term** | **Definition** |
| --- | --- |
| AMIT | Attribution Managed Investment Trust |

* 1. Changes to the Tax Return for Attribution Managed Investment Trust services

In the 2021 Attribution Managed Investment Trust return the main changes are:

Trust information:

* country field is at ‘Trust information’, current post address
* country field is at ‘Trust information’, postal address on previous tax return.

Additional information:

* significant global entity is at ‘Additional information’
* country-by-country reporting entity is at ‘Additional information’.

Key financial information:

* select your aggregated turnover range (select range A to P) is at ‘Key financial information’
* aggregated turnover is at ‘Key financial information’.

Capital allowances:

* are you making a choice to opt out of temporary full expensing for some or all of your eligible assets? (A – Some eligible assets, B – All eligible assets) is at ‘Capital allowances’
* number of assets you are opting out for is at ‘Capital allowances’
* value of assets you are opting out for is at ‘Capital allowances’
* temporary full expensing deductions is at ‘Capital allowances’
* number of assets you are claiming for is at ‘Capital allowances’
* are you making a choice to opt out of Backing Business Investment for some or all of your eligible assets? (A – Some eligible assets, B – All eligible assets) is at ‘Capital allowances’
* number of assets you are opting out for is at ‘Capital allowances’
* value of assets you are opting out for is at ‘Capital allowances’.

Taxpayer’s declarations:

* declarer position is at declarations, ‘Taxpayer’s declaration’
* declarer identifier is at declarations, ‘Taxpayer’s declaration’
* contact name is at declarations, ‘Taxpayer’s declaration’
* telephone number is at declarations, ‘Taxpayer’s declaration’.

1. What are the tax return for Attribution Managed Investment Trust services?

The Tax Return - Attribution Managed Investment Trust (TRTAMI) is an interaction that enables an AMIT to report information to the Commissioner, including its:

* assessable income and deduction
* exempt income
* non-assessable non-exempt income
* tax offsets.

This information is then used to make an assessment of the amount payable (or that there is no amount payable) by the trustee of an AMIT.

* 1. Where SBR fits into TRTAMI lodgment obligations

The TRTAMI service provides numerous functions for lodgment of the AMIT’s reporting obligations. These include the lodgment of:

* the Tax Return - Attribution Managed Investment Trust
* amendments to the Tax Return - Attribution Managed Investment Trust.

The pre-lodge and lodge interactions are the core part of the SBR-enabled TRTAMI business process. When the trustee or intermediary has gathered all information required, they would then complete and validate the return and correct any labels (if required) before lodgment.

**Table 1: SBR interactions and TRTAMI process**

|  |  |
| --- | --- |
| **Initiating party** | **SBR service offering** |
| **Step 1**: Complete Attribution Managed Investment Trust Tax Return | TRTAMI.*prelodge*\*  Validate report data |
| **Step 2**: Is submission rejected?   * Yes – Revisit step 1 * No – Lodge | TRTAMI.*Lodge*  Lodge the report |
| **Step 3**: View success message | Not applicable |

* 1. Schedules

A TRTAMI lodgment can include a schedule that contains additional information required to assess an AMIT trustee. The lodgment of the TRTAMI **must include at least one** Attribution Managed Investment Trust Schedule (TRTAMIS). Valid schedules that can be included in the TRTAMI message are:

Table 2: Valid schedules

| **Schedule** | **SBR collaboration** | **SBR Core Services** | **SBR ebMS3.0** |
| --- | --- | --- | --- |
| Attribution Managed Investment Trust Schedule | ato.trtamis.0004.2020.01.00 | Yes | Yes |
| Non-individual PAYG payment summary schedule | ato.pss.0002.2018.01.00 | Yes | Yes |
| Rental property schedule | ato.rs.0002.2018.01.00 | Yes | Yes |
| International dealings schedule | ato.ids.0009.2021.01.00 | Yes | Yes |
| Capital Gains Tax schedule | ato.cgts.0006.2018.01.00 | Yes | Yes |

For more information on the validation rules and circumstances that determine when a schedule should be used, **see also**:

* TRTAMI Message Structure Table
* schedule structure tables
* TRTAMI validation rules.
  1. Interactions

The TRTAMI lodgment process could consist of the following interactions:

Table 3: Interactions available in the TRTAMI lodgment process

| **Service** | **Interaction** | **Detail** | **Single** | **Batch** | **Optional** |
| --- | --- | --- | --- | --- | --- |
| TRTAMI | *TRTAMI.Prelodge* | Validate TRTAMI message before lodgment (2021) | Yes | Yes | Yes |
| TRTAMI | *TRTAMI.Lodge* | Lodge TRTAMI (2021) | Yes | Yes | No |

* 1. Channels

The TRTAMI interactions available in the following channels:

Table 4: Channel availability of TRTAMI interactions

|  |  |  |
| --- | --- | --- |
| **Interaction** | **SBR Core Services** | **SBR ebMS3.0** |
| *TRTAMI.Prelodge* | No | Yes |
| *TRTAMI.Lodge* | No | Yes |

1. Authorisation
   1. Intermediary relationship

The SBR services an intermediary can use on behalf of their clients depends on the activity being undertaken and whether the intermediary has a relationship with the client. For instance, an intermediary who has the appropriate authorisation for the interaction being performed on behalf of the taxpayer recorded in ATO systems.

To use the TRTAMI interaction, a business intermediary must be appointed by a business in Access Manager to use the available services on their behalf.

**Note**:

* The tax agent to taxpayer relationship is a fundamental precondition to interacting with SBR for TRTAMI interactions
* If the relationship doesn’t exist, the SBR Add Client Relationship interaction of the Client Update services can be used to establish a relationship between the intermediary and the taxpayer.

For further information, **See also:**

* Client Update Business Implementation Guide
* Client Update Message Implementation Guide.
  1. Access and initiating parties

ATO systems will check that the initiating party is authorised to use the interaction that is received through the SBR channel.

**See also:**

* [Access Manager - ATO website](https://www.ato.gov.au/general/online-services/access-manager/),for more information on Access Manager.
* [Australian Business Register's website](https://abr.gov.au/AUSkey/), for further information on AUSkey.
* Common Business Implementation Guide and Taxpayer Declaration, Section 3 – Access.

The table below displays the interactions available to each initiating party via SBR for TRTAMI:

Table 5: TRTAMI permissions

| **Service** | **Interaction** | **Activity** | **Tax agent** | **BAS agent** | **Business** | **Business Intermediary** |
| --- | --- | --- | --- | --- | --- | --- |
| TRTAMI | *TRTAMI.Prelodge* | Validate data inputted into TRTAMI before submitting for processing | Yes | No | Yes | Yes |
| TRTAMI | *TRTAMI.Lodge* | Lodge TRTAMI for processing | Yes | No | Yes | Yes |

A user must be assigned the appropriate authorisation permissions to use the TRTAMI service. The below table references the SBR service to the relevant permission in Access Manager:

Table 6: Access Manager permissions

| **Service** | **Access Manager permission** |
| --- | --- |
| TRTAMI | Trust Tax Return   * *Lodge* check box |

1. Constraints and known issues

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| **Constraints when using this service** |
| A TRTAMI request with up to 100 associated schedules may be submitted via single mode in SBR ebMS3.0; whereas a TRTAMI request submitted via batch mode can process an unlimited number of schedules. |

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| **Known issues when using this service** |
| If the AMIT doesn’t choose to treat classes separately, then only one CGT schedule is required to be lodged with the AMIT return the AMIT chooses to apply separate treatments to classes, then a CGT schedule is required for each class. |

* 1. usage restrictions

Digital Service Providers (DSPs) must be aware of the usage restrictions, which are described within the Reasonable Use policy. The ATO actively monitors the use of services and will notify DSPs that contravene this policy. Continued breaches may result in de-whitelisting.

**Find out about:**

* The[Reasonable Use policy](https://softwaredevelopers.ato.gov.au/Usingourservices#Reasonableuse).

1. Taxpayer declarations

Each time an intermediary lodges an approved form on behalf of a taxpayer the law requires the intermediary to have first received a signed written declaration from that taxpayer.

Developers of SBR-enabled software products may elect to provide a printable version of the taxpayer declaration within their products to assist intermediaries.

**Note:** A taxpayer declaration must be obtained by the intermediary for all lodgment obligations performed on behalf of their client.

These declarations apply, not just for original lodgments, but also when lodging amendments to Tax Return - Attribution Managed Investment Trust.

**Find out about:**

* Information on the retention of declarations and frequently asked questions, on the [ATO website](https://www.ato.gov.au/tax-professionals/prepare-and-lodge/managing-your-lodgment-program/client-declarations-and-lodgment-online/)**.**
  1. Suggested wording

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| **Privacy**  The ATO is authorised by the *Taxation Administration Act 1953* to request the provision of tax file numbers (TFNs). The ATO will use the TFNs to identify each beneficiaryin our records. It is not an offence not to provide the TFNs. However, lodgments cannot be accepted electronically if the TFN is not quoted.  Taxation law authorises the ATO to collect information and to disclose it to other government agencies. For information about your privacy go to ato.gov.au/privacy  **Declaration**  I declare that:   * All of the information I have provided to the agent for the preparation of this document is true and correct * I authorise the agent to give this document to the Commissioner of Taxation. |

1. TRTAMI guidance
   1. Using the additional free text field

The TRTAMI message contains a free text field, *Additional information* (SBR alias: TRTAMI101), to enable appropriate information to be added to a return for assessment.

While validation cannot control what information is provided in the additional field, below is some advice users can follow to ensure returns lodged with the field are processed without unnecessary delays:

* Free text content must only be used under the correct circumstances and be clear, concise and necessary to determine the outcome of the assessment for the return being lodged and the Information entered that doesn’t meet these criteria may cause processing delays.
* Software developers are encouraged to include ‘help’ or informational message concerning use of this field would be beneficial for tax agents.

**See also:**

* [ATO website](https://www.ato.gov.au/individuals/tax-return/2018/in-detail/publications/attribution-managed-investment-trust-(amit)-tax-return-instructions-2018/), for further information on the additional information field in the TRTAMI.
  1. TFN and ABN algorithm validation

**See also**, the ATO software developer page on this topic:

* <http://softwaredevelopers.ato.gov.au/obtainTFNalgorithm>, to obtain access to the algorithm to validate TFNs in a BMS product
* <http://softwaredevelopers.ato.gov.au/ABNformat>, for information on ABN validation see this page.
  1. Future years

The functionality to enable lodgment of future year (early lodged) returns is available as part of this service.

A future year return is a lodgment by a client or their authorised intermediary, prior to the end of the current reporting period. For example, a client lodging their 2018-19 Income Tax Returns before the end of the TRTAMI year of 30 June 2019 (or the end of their Substituted Accounting Period [SAP]).

For a client or their authorised intermediary to lodge a future year return, the year cannot be greater than one year (Current Year + 1) into the future and certain criteria must be met.

* 1. Truncating amounts

Most fields in the TRTAMI require only whole dollars (and no cents) to be shown. To ensure users of your software products complete TRTAMI correctly, the following examples show how to enter amounts in whole dollar only fields:

**Example 1:** $24.37 would be reported as $24

**Example 2:** $12.89 would be reported as $12

**Example 3:** $6.50 could be reported as $6.

Once truncation has been performed, the truncated amount must be used in any calculation rather than the original amount.

The requirement to truncate amounts is in accordance with section 388-85 of Schedule 1 to the *Taxation Administration Act 1953*.