

MEMO# 31067

February 2, 2018

FinCEN Extends FBAR Filing Deadline for Persons with Signature Authority over Foreign Accounts

[31067]

February 2, 2018 TO: ICI Members

ICI Global Members

Accounting/Treasurers Committee

ICI Global Tax Committee

Pension Committee

SEC Rules Committee

Tax Committee SUBJECTS: Tax RE: FinCEN Extends FBAR Filing Deadline for Persons with Signature Authority over Foreign Accounts

In Notice 2017-1,^[1] the Treasury Department's Financial Crimes Enforcement Network ("FinCEN") has further extended the filing due date for Form TD F90-22.1, Report of Foreign Bank and Financial Accounts ("FBAR") until April 15, 2019, for certain persons with signature authority over financial accounts.

The filing date extension in Notice 2017-1 applies to those individuals whose filing due date for reporting signature authority was previously extended by Notice 2016-1.^[2] This extension applies to the reporting of signature authority held during the 2017 calendar year, as well as all reporting deadlines extended by previous Notices 2016-1, 2015-1, 2014-1, 2013-1, 2012-1 and 2012-2, along with Notices 2011-1 and 2011-2.^[3] For all other individuals with an FBAR filing obligation, the due date remains April 15, 2018.

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endnotes

^[1] FinCEN Notice 2017-1 can be found on the FinCEN website at:
https://www.fincen.gov/sites/default/files/shared/FBAR_Notice_2017-12-22-17.pdf.

^[2] FinCEN previously extended the filing due date until April 15, 2018, in Notice 2016-1, for certain individuals with signature authority over but no financial interest in one or more

foreign financial accounts.

[3] Notice 2011-1 applied to individuals whose FBAR filing requirements may be affected by the signature authority filing exceptions in 31 CFR § 1010.350(f)(2)(i)-(v). In Notice 2011-2, FinCEN similarly extended the FBAR filing due date to June 30, 2012, for certain employees or officers of investment advisors registered with the Securities and Exchange Commission who have signature authority over but no financial interest in certain foreign financial accounts. Notice 2012-1 extended the filing due date for those persons covered by Notices 2011-1 and 2011-2 until June 30, 2013. See Institute Memorandum ([25285](#)), dated June 17, 2011, Institute Memorandum ([25913](#)), dated February 15, 2012, Institute Memorandum ([26817](#)), dated January 3, 2013, and Institute Memorandum ([28573](#)) dated December 12, 2014, regarding these previous extensions.

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