Frequently asked questions about form 196 (fiscal year 2026 and subsequent years)

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Who is required to submit form 196?

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They are required to submit form 196:

The **credit institutions** and other entities that, in accordance with current regulations, are engaged in banking or credit transactions, which will report all accounts opened in said entities or made available by them to third parties in establishments located within or outside Spanish territory.

The **payment institutions and electronic money institutions**, who will report on the accounts they manage.

The **branches in Spanish territory** from the aforementioned entities of other Member States of the European Union or of third countries, which will report all accounts opened in said branches or made available by them to third parties.

The aforementioned entities from other Member States of the European Union or from third countries that, according to the regulatory framework, operate in Spain in **free provision of services regime**, which will report on accounts opened in said entities to persons or entities resident in Spanish territory and in favor of permanent establishments in Spanish territory of persons or entities not resident in Spain.

Contents of model 196

What type of accounts are reported in form 196?

All types of accounts, both bank and non-bank, must be reported, including current accounts, savings accounts, time deposits, credit accounts, payment accounts and any other accounts regardless of their type or name, even if there is no remuneration, withholding or payment on account.

The type of accounts is defined in key L8 of Annex I of Order HAC747/2025, of June 27 (BOE of July 15).

What information must be provided in the declarations from January to November?

The declarations from January to November report the following:

- The complete identification of the accounts.
- The identifying data of its owners, including the beneficial owners, as well as representatives, authorized persons, beneficiaries or any other persons with powers of disposal.

The types of declared are set out in key L3 of Annex I of Order HAC747/2025, of June 27 (BOE of July 15).

In each reporting period, all accounts held with the entity must be included: This includes those opened during the period, those opened in previous periods that remain open, and those cancelled during the period.

What information should be provided in the December declaration?

The December statement reports:

- The complete identification of the accounts.

- The identifying data of its owners, including the beneficial owners, as well as representatives, authorized persons, beneficiaries or any other persons with powers of disposal.

- Balances as of December 31 and the average balance corresponding to the last quarter of the year.

- Total amounts of charges and credits for the year.

- The returns and withholdings associated with the declared accounts.

- The address for communication purposes of the declarant.

- In their case, the indicator of presumed abandonment.

What is the ""detail record identifier"?

What is the "detail record identifier"?

The DeclaredRegistryID is a code that must uniquely identify the record in question, freely assigned by the declarant. As an example, one could choose to use sequential codes, without it being necessary to repeat the assigned IdRegistro for each declarant in each period.

Data relating to the declarant

Should beneficial owners only be reported in those declared with Key = T (owners)?

No. The beneficial owners are informed about all those declared, whatever their status.

When should the "Exception" field be completed with the value "L17- Identification exception=1" (declared exempt from the obligation to identify the beneficial owner)?

The field "Exception" must be reported with the value "L17- Exception identification=1" when, in accordance with the provisions of article 4.2 of Law 10/2010, of April 28, there is no obligation to identify the beneficial owner.

In relation to the provisions of Article 4.2 b) of Law 10/2010, of April 28, those entities that are listed on a regulated market under the terms provided for in Article 3.6.a) are not obliged to identify the beneficial owner. i) of Directive (EU) 2015/849 and in Article 9.4 of the Regulation of Law 10/2010, of April 28, on the prevention of money laundering and the financing of terrorism, approved by Royal Decree 304/2014, of May 5.

When should the field "legal representative of the declarant" be completed?

It must be completed for declared minors or persons with disabilities, both residents and non-residents.

Should accounts held by non-residents be reported?

Yes, in form 196, non-resident accounts, with and without a permanent establishment, will be reported. The new model 196 integrates the previous informative declaration on accounts of non-residents without a permanent establishment (model 291).

*If the declarant is an entity that operates in Spain under the freedom to provide services regime, see question in section 7 entitled "On which accounts must entities under the Freedom to Provide Services (LPS) report?".

How do you report a current account with a single holder, a natural person, without division of ownership and without authorized persons other than the holder?

The data of the declarant will be reported in a single record with its corresponding IDRegistro, using the declarant key L3 = T (full ownership holder), and the account data.

How should an account be reported when the holder proves that they have legally changed their name and/or surnames?

Since it is not an error, the record will be sent with Communication Type L1= A0 (Record Registration). It should be noted that a registration cannot be submitted in a period for a record that has already been declared as registered in that same period. In other words, if a name and surname were declared in January, and subsequently changed, the new name and surname must be declared in February with code A0.

In the event that the declarant is identified with a NIF, it is remembered that the system for identifying natural persons requires a validation between NIF and name and surnames. Therefore, for the new identification to be accepted, the name and surname must have been previously modified in the census.

To minimize identification errors and ensure correct identification of those declared, please note that, for the purpose of pre-validating tax identification numbers (NIFs), a tax identification assistance service is available on the AEAT website (common, moreover, to the informative declarations to be submitted by taxpayers), at the following link:

Tax Agency: Tax identification

Is the "ClaveNoResidente" field mandatory for all types of taxpayers?

Yes, it is a required field regardless of the declared key. This refers to the tax status of the person declared (owner, authorized person, etc.).

The value "Residence indicator-L13" = "1" will be entered if the declarant is a resident or a non-resident with a permanent establishment.

The value "Residence indicator-L13" = "2" will be entered if the declarant is a non-resident without a permanent establishment.

Tax Agency: Tax identification

How is the identification of a non-resident reported?

If you have a NIF assigned by the Spanish Tax Administration, you will report this NIF in the NIF field, and the TIN in the TIN field. If you do not have a Spanish NIF, you will only report the TIN in the IDOtro field.

To identify a non-resident, the identification types used in the country of residence will be used, and their corresponding values are:

- 02: NIF-VAT

- 03: Passport

- 04: Official ID issued by the country or territory of residence

- 05: Residence certificate

- 06: Other documentary proof

How are revoked authorizations reported during the fiscal year?

The declaration for the month in which the revocation occurs will include the date of revocation, without the need to report said authorized person in subsequent declarations. Nor is it necessary to report authorizations revoked throughout the year in the December declaration.

Account details

How are the L9A/L9B high codes reported?

In the declarations from January to November, the corresponding L9A code will be used, taking into account the account situation with respect to the previous month.

L9A-High Key (periods January to November)	
Securities	**Description**
0	Pre-existing account with respect to the immediately preceding month.
1	Account opened in the month of the declaration.
2	Account cancelled in the month of the declaration.
3	It has been registered and cancelled in the month of the declaration.
4	Account whose status changes in the month of the declaration, becoming a resident account holder.
5	Account whose status changes in the month of the declaration, becoming a non-resident account holder.
6	Account opened in the month of the declaration, due to a merger or corporate restructuring of the financial entity.
7	Account whose status changes in the month of the declaration, due to circumstances other than those described in keys 4 and 5.

The December declaration will be reported using the corresponding L9B code, taking into account the account's status compared to the previous year.

L9B-High Key (December)	
Securities	**Description**
0	Pre-existing account with respect to the immediately preceding year.
1	Account number for the year of declaration.
2	Account cancelled in the tax year.
3	It has been registered and cancelled in the year of declaration.
4	Account whose status changes in the year of declaration, becoming a resident account holder.
5	Account whose status changes in the year of declaration, becoming a non-resident account holder.
6	Account opened in the year of declaration, due to merger or corporate restructuring of the financial entity.
7	Account whose status changes in the year of declaration, due to circumstances other than those described in keys 4 and 5.

If several events have occurred in the same month or year (for example, an account that becomes a resident account holder and is subsequently cancelled), the last event that occurred will be reported, so that the account status at the end of the month or year is reflected.

How are cancelled accounts reported during the fiscal year?

In the year of the cancellation, information must be provided up to the period in which the cancellation occurs, and in any case, in the declaration for the month of December.

If an account is cancelled on February 20, it will be included in the February declaration with communication type A0 (registration), code L9A=2 ("account cancelled in the month of the declaration") and indicating the cancellation date.

Subsequently, in the December declaration, it will be necessary to report with communication type A0 (registration), code L9B=2 ("account cancelled in the declaration year") and indicating the cancellation date.

When should the value 7 "Accounts whose condition is modified in the month of the declaration, due to circumstances other than those described in keys 4 and 5" of the L9A and L9B Registration Key field be used?

For example, if there is a change of ownership of the account that does not imply that it becomes a resident or non-resident account.

In what cases can there be several records of monetary returns ("RendmDinerarios") for the same declared individual and account?

It is provided for in the event that an account has negative returns (for example, penalties for non-compliance with commercial promotions). In these cases, positive and negative returns are not cumulative and must be reported separately.

Is there an obligation to report authorized account balances?

The balances are reported in the December declaration regardless of the declarant's code, therefore, it includes authorized parties.

What value of key L8 "Type of accounts" should be used to declare the "safeguard accounts" regulated in article 21 of Royal Decree-Law 19/2018, of November 23, on payment services and other urgent measures in financial matters?

The accounts that payment service providers open in a credit institution to safeguard the funds they receive from users of payment services, regulated in article 21 of Royal Decree-Law 19/2018, must be declared using the value 9 corresponding to "Other accounts".

Do we have to report in form 196 any withholdings that may have been made on accounts of non-residents without a permanent establishment?

No, withholdings and payments on account that may have been made on income derived from accounts of non-residents without a permanent establishment are reported in form 296 (Informative declaration). Annual summary of withholdings and payments on account of IRNR without a permanent establishment).

How should an account whose sole holder ceased to be a resident in Spain in April, which generated €100 of interest in March on which withholding tax was applied, and €50 in October without withholding tax, be reported in the December tax return?

In the "Declared" block, Communication Type L1= A0 (registration).

In the "Declared" section, the account holder's details will be provided, in particular, indicating the Non-Resident Code (L13) = 2, since in December the account holder is no longer a resident in Spain.

In the "Account Registration" section, you will be informed of the account details. Specifically, the keys specified below will be reported in the following way:

- High Key L9B = 05 (account whose status is modified in the year of the declaration, becoming a non-resident holder).

- RendmMonetarios Field

- MoneyReturns

- MoneyReturns

- MoneyReturns

How should a joint current account held by a married couple residing in Spain, in which there are also two individuals authorized to operate the account, be reported in the December tax return?

Each party involved in the account is reported in a separate register. Therefore, there will be four different records: two to identify each of the joint owners and another two to identify each of the two authorized persons.

In each of the two records of the co-owners the following will be recorded:

- Individual returns based on their participation. In the event that there are both positive and negative monetary returns (for example, trading penalties), they will be accumulated and reported in two separate blocks (total positive returns on one hand, and total negative returns on the other).

- The average balances for the last quarter, the balances as of December 31, and the total amounts of charges and credits for the year without individualization.

The two registers of authorized users will report balances, charges and credits. No information will be provided on earnings, withholdings, or payments on account.

How should the field "Money Returns" (RendmDinerarios) be reported?

The field Monetary Returns (RendmDinerarios)

It will be completed with the code L15 - "Indicator of withholding or payment on account" =1 or 2, depending on whether withholding or payment on account has been made or not, whether the declarant is a resident or a non-resident.

If it concerns income obtained by non-residents without a permanent establishment exempt from withholding, it will be completed with code L15 - "Indicator of withholding or payment on account" =1. In that case, it will not be necessary to fill in the Cash Returns fields.

Presentation of model 196

What is the deadline for submitting forms?

Form 196 is issued monthly and its deadline for submission will be the calendar month following the month to which the information refers.

The first declaration must be submitted in February 2026 with the data from January of that year.

In what format is model 196 presented?

Model 196 is submitted via WebService. The Tax Agency offers a WS client for small taxpayers (less than 10,000 records per submission), which allows the submission of a file of taxpayers.

How are errors in declared records corrected?

If material errors are detected (e.g., incorrect IBAN), the erroneous records can be modified or cancelled.

Modifying a record completely replaces the data in the previous record. Therefore, if Communication Type L1=A1 (modification) all fields of the record must be submitted, not just the changed fields.

In case of cancellation, Communication Type L1= A2 (registration cancellation), it is sufficient to indicate the Declared Registration ID + Declarant ID + Fiscal Year, without needing to resend the entire content of the registration.

When should "Communication Type" A1 and A2 be used?

The communication type will always be A0, except when that IdRegistro is to be modified or deactivated in the same period due to errors in the information initially reported in the same period.

The "Communication Type" A1 or A2 is only used for correcting errors in previously declared records.

A single submission can include records that correspond to different types of communication: additions, modifications or removals.

Can a correction (A1 or A2) be submitted at any time after the error was detected, even if the error occurred several months ago?

Yes. They must correct the declarations for all periods affected by the error. Each period is independent; for example, if an error in the January declaration is corrected, the error in the already submitted February declaration will not be automatically corrected; both must be corrected.

Are there defined error or response codes for the field that caused the error?

The response message includes an overall result of the submission, which can be accepted (if there are no errors in any record), partially accepted (when there are accepted and rejected records) and rejected (when all records have been rejected).

The error codes can be found at the following link:

Error documentation attachments - Developers (agenciatributaria.es)

Information on entities in the free provision of services

Which entities are affected by the reporting obligation?

The criterion for determining whether an entity is required to submit the declaration is whether the entity is registered with the Bank of Spain as an entity authorized to operate in the Freedom to Provide Services or in the Register of the European Banking Authority (EBA).

Which accounts must entities in the Free Provision of Services (LPS) report on?

Form 196 must include all accounts opened in the course of the activity for which the entity in LPS has been authorized.

Therefore, entities in LPS will report accounts in which the holder, bare owner or beneficiary is a resident or non-resident with a permanent establishment.

To determine the residence of its clients, the entity may use the due diligence procedures of CRS/DAC2, those derived from anti-money laundering obligations or any other regulations that may be applicable to them.

Should accounts with cryptocurrency balances and securities accounts be reported?

No, the type of accounts to be reported is that included in key L8 of Annex I of Order HAC747/2025, of June 27 (BOE of July 15).

Who can file the declaration?

The submission may be made by the taxpayer, an authorized representative or a social collaborator, who must have a recognized electronic certificate.

Applications that send information to web services must authenticate with the client's electronic certificate or qualified seal certificate.

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