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## **Purpose of This Document:**

This document is an SOP covering the steps required to be taken by Regional Rural Banks as a result of the amalgamation pursuant to the Gazette notification dated 7th April 2025 issued by the Department of Financial Services (DFS), GOI vis-a-vis the Sahamati Central Registry that maintains a repository of the identification of the participants in Account Aggregator ecosystem. All other applicable legal and/ or regulatory action(s) are out of scope from this document.



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## **Background**

On 7th April 2025, Department of Financial Services (DFS), GOI <u>notified the amalgamation of 26 Regional Rural banks (RRBs)</u> on the principle of "One State One RRB" in its fourth phase of amalgamation of RRBs.

As part of a national consolidation effort, 26 RRBs have been amalgamated into larger, sponsor bank–aligned entities in 10 States and 1 UT. At the time of the notification, 43 RRBs were functioning across 26 States and 2 UTs, and after amalgamation, there will be only 28 RRBs across 26 States and 2 UTs.

These changes have a direct bearing on the Account Aggregator (AA) ecosystem, especially with respect to the 15 Transferor RRBs that have amalgamated:

- Discovery and linking of customer accounts for such RRBs acting as Financial Information Providers (FIPs)
- Validity of active consents (i) raised against such FIP RRBs and (ii) raised by such RRBs acting as Financial Information User (FIUs),
- Entity IDs for such RRBs are maintained in the Central Registry (CR) by Sahamati.

Sahamati, as the custodian of the Central Registry, plays a critical role in ensuring smooth transitions for all ecosystem participants - especially AAs, FIPs, and FIUs. On account of the amalgamation, consequent changes/ updates would be needed in the Entity IDs of the 15 Transferor RRBs that amalgamate.

# **Impact Summary**

Out of 43 RRBs assessed:

- Category A: 15 Transferor RRBs as they amalgamate:
  - Post Amalgamation the 15 Transferor RRBs as FIPs and FIUs must be marked as deleted in the Central Registry for FIP and FIU roles respectively.
- <u>Category B</u>: 11 Transferee RRBs (Amalgamated Entities) are amalgamating, either as distinct entities under new names or with minor name changes.
  - These require updates to the entity name in the CR, with no change to their FIP/FIU Entity IDs.
- Category C: 17 RRBs have no impact—they continue unchanged with the same FIP/FIU Entity IDs and entity names.



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## **Central Registry Changes Summary:**

| Category | Description   | Count | FIP Entity ID             | FIU Entity ID          |
|----------|---|-------|---------------------------|------------------------|
| А        | Transferor RRBs (whose CBS will cease to exist)     | 15    | Deleted                   | Deleted                |
| В        | Transferee RRBs (amalgamated with a name change)    | 9     | Retain ID,<br>update name | Retain ID, update name |
| С        | Transferee RRBs (amalgamated without a name change) | 2     | No change                 | No change              |
| D        | RRBs unaffected (no amalgamation impact)            | 17    | No change                 | No change              |

Please refer to <u>Annexure I</u> below for the complete list of affected RRBs, their updated statuses, corresponding changes in FIP/FIU Entity IDs, and required actions.

# **Next Steps for RRBs**

Based on the categorization above, the following actions are to be taken by respective RRBs:

#### Category A - Transferor RRBs - Ceasing to exist after Amalgamation

These entities that are no longer operate out of the same CBS systems and/or exist in their current legal form.

#### FIP Role:

- No action required from the entity.
- Sahamati will delete the FIP Entity ID in the Central Registry latest by September 15th, 2025, as per guidelines issued by Department of Financial Services, GOI.
- AAs will stop routing fetch requests to these FIPs post-deprecation.
- Entities must notify customers of the change and facilitate the delinking of accounts linked via the AA framework.
- Once accounts are delinked, associated consents will be automatically invalidated by the AA.



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#### FIU Role:

- The FIU Entity ID must be deleted as well, as the entity no longer exists in its previous legal form.
- All active consents will be invalidated by the AA upon deprecation.
- The RRB must notify customers about the change and initiate the process of raising fresh consents under the new amalgamated entity.
- The entity must inform AAs about the FIU ID deprecation, and AAs must stop routing FI requests to the deprecated ID.
- The FIU ID will be removed from the Central Registry by Sahamati after the notified cut-off date.
- Illustrations provided in Annexure II

#### Category B - Transferee RRBs - RRBs Surviving with Name Change

These entities continue to operate, but their legal names (as per Department of Financial Services (DFS), Gol Guidelines issued on 7th April 2025) have changed.

#### FIP Role:

- The FIP Entity ID remains unchanged, but the entity must submit a name update request to Sahamati for the Central Registry.
- Since there is no impact on account linking or consent validity, no customer-facing action is required.
- It is recommended to communicate the name change to AAs and Customers

#### FIU Role:

- The FIU Entity ID can be retained, but the name associated with the ID must be updated in the CR.
- The entity must submit a request to Sahamati with the updated legal name.
- It is recommended to communicate the name change to AAs and Customers

### Category C - RRBs Surviving Without Name Change

No action required from these entities. Their existing CR entries remain valid.

#### Category D - Unaffected RRBs

No action needed. These entities continue unchanged.



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### **Action from Sahamati**

To coordinate the ecosystem-wide transition and provide technical support where necessary.

- 1. Announce a cut-off date for:
  - Receiving and implementing name update requests for both FIP and FIU roles.
  - o **Deprecation of FIP Entity IDs** for RRBs that are ceasing to exist.
- **Update the Central Registry** accordingly and circulate the revised entity list to all AAs, FIUs, and FIPs.



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# **Annexure I - Categorisation of RRBs based on Amalgamation**

| Sr. No | Entity name as per Sahamati Records | Category   | Status of Old Entity | New Entity Name              | Sponsor Bank (Post amalgamation) |
|--------|-------------------------------------|------------|----------------------|------------------------------|----------------------------------|
| 1      | Baroda Gujarat Gramin Bank          | Category B | Transferee           | Gujarat Gramin Bank          | Bank of Baroda                   |
| 2      | Saurashtra Gramin Bank              | Category A | Transferor           | Gujarat Gramin Bank          | Bank of Baroda                   |
| 3      | Andhra Pradesh Grameena Vikas Bank  | Category A | Transferor           | Andhra Pradesh Grameena Bank | Union Bank of India              |
| 4      | Andhra Pragathi Grameena Bank       | Category A | Transferor           | Andhra Pradesh Grameena Bank | Union Bank of India              |
| 5      | Chaitanya Godavari Grameena Bank    | Category B | Transferee           | Andhra Pradesh Grameena Bank | Union Bank of India              |
| 6      | Saptagiri Grameena Bank             | Category A | Transferor           | Andhra Pradesh Grameena Bank | Union Bank of India              |
| 7      | Karnataka Gramin Bank               | Category B | Transferee           | Karnataka Grameena Bank      | Canara Bank                      |
| 8      | Karnataka Vikas Gramin Bank         | Category A | Transferor           | Karnataka Grameena Bank      | Canara Bank                      |
| 9      | Prathama UP Gramin Bank             | Category A | Transferor           | Uttar Pradesh Gramin Bank    | Bank of Baroda                   |
| 10     | Aryavart Bank                       | Category A | Transferor           | Uttar Pradesh Gramin Bank    | Bank of Baroda                   |
| 11     | Baroda UP Bank                      | Category B | Transferee           | Uttar Pradesh Gramin Bank    | Bank of Baroda                   |
| 12     | Maharashtra Gramin Bank             | Category C | Transferee           | Maharashtra Gramin Bank      | Bank of Maharashtra              |
| 13     | Vidharba Konkan Gramin Bank         | Category A | Transferor           | Maharashtra Gramin Bank      | Bank of Maharashtra              |
| 14     | Paschim Banga Gramin Bank           | Category A | Transferor           | West Bengal Gramin Bank      | Punjab National Bank             |
| 15     | Bangiya Gramin Vikash Bank          | Category B | Transferee           | West Bengal Gramin Bank      | Punjab National Bank             |
| 16     | Uttar Banga Kshetriya Gramin Bank   | Category A | Transferor           | West Bengal Gramin Bank      | Punjab National Bank             |
| 17     | Madhyanchal Gramin Bank             | Category A | Transferor           | Madhya Pradesh Gramin Bank   | Bank of India                    |
| 18     | Madhya Pradesh Gramin Bank          | Category C | Transferee           | Madhya Pradesh Gramin Bank   | Bank of India                    |



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| Sr. No | Entity name as per Sahamati Records    | Category   | Status of Old Entity | New Entity Name                | Sponsor Bank (Post amalgamation) |
|--------|--|------------|----------------------|--------------------------------|----------------------------------|
| 19     | Ellaquai Dehati Bank                   | Category A | Transferor           | Jammu and Kashmir Grameen Bank | The Jammu and Kashmir Bank Ltd.  |
| 20     | J&K Grameen Bank                       | Category B | Transferee           | Jammu and Kashmir Grameen Bank | The Jammu and Kashmir Bank Ltd.  |
| 21     | Rajasthan Marudhara Gramin Bank        | Category B | Transferee           | Rajasthan Gramin Bank          | SBI                              |
| 22     | Baroda Rajasthan Kshetriya Gramin Bank | Category A | Transferor           | Rajasthan Gramin Bank          | SBI                              |
| 23     | Utkal Grameen Bank                     | Category A | Transferor           | Odisha Grameen Bank            | Indian Overseas Bank             |
| 24     | Odisha Gramya Bank                     | Category B | Transferee           | Odisha Grameen Bank            | Indian Overseas Bank             |
| 25     | Dakshin Bihar Gramin Bank              | Category B | Transferee           | Bihar Gramin Bank              | Punjab National Bank             |
| 26     | Uttar Bihar Gramin Bank                | Category A | Transferor           | Bihar Gramin Bank              | Punjab National Bank             |
| 27     | Jharkhand Rajya Gramin Bank            | Category D | No Change            | Jharkhand Rajya Gramin Bank    |                                  |
| 28     | Assam Gramin Vikash Bank               | Category D | No Change            | Assam Gramin Vikash Bank       |                                  |
| 29     | Tripura Gramin Bank                    | Category D | No Change            | Tripura Gramin Bank            |                                  |
| 30     | Uttarakhand Gramin Bank                | Category D | No Change            | Uttarakhand Gramin Bank        |                                  |
| 31     | Arunachal Pradesh Rural Bank           | Category D | No Change            | Arunachal Pradesh Rural Bank   |                                  |
| 32     | Mizoram Rural Bank                     | Category D | No Change            | Mizoram Rural Bank             |                                  |
| 33     | Puduvai Bharathiar Grama Bank          | Category D | No Change            | Puduvai Bharathiar Grama Bank  |                                  |
| 34     | Tamil Nadu Grama Bank                  | Category D | No Change            | Tamil Nadu Grama Bank          |                                  |
| 35     | Telangana Grameena Bank                | Category D | No Change            | Telangana Grameena Bank        |                                  |
| 36     | Chhattisgarh Rajya Gramin Bank         | Category D | No Change            | Chhattisgarh Rajya Gramin Bank |                                  |
| 37     | Nagaland Rural Bank                    | Category D | No Change            | Nagaland Rural Bank            |                                  |
| 38     | Meghalaya Rural Bank                   | Category D | No Change            | Meghalaya Rural Bank           |                                  |



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| Sr. No | Entity name as per Sahamati Records | Category   | Status of Old Entity | New Entity Name              | Sponsor Bank (Post amalgamation) |
|--------|-------------------------------------|------------|----------------------|------------------------------|----------------------------------|
| 39     | Kerala Gramin Bank                  | Category D | No Change            | Kerala Gramin Bank           |                                  |
| 40     | Himachal Pradesh Gramin Bank        | Category D | No Change            | Himachal Pradesh Gramin Bank |                                  |
| 41     | Manipur Rural Bank                  | Category D | No Change            | Manipur Rural Bank           |                                  |
| 42     | Punjab Gramin Bank                  | Category D | No Change            | Punjab Gramin Bank           |                                  |
| 43     | Sarva Haryana Gramin Bank           | Category D | No Change            | Sarva Haryana Gramin Bank    |                                  |



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### **Annexure II - Illustrations**

### Illustration 1: When 2 RRBs with Different Sponsor Banks Are Amalgamating

#### Example:

- Amalgamating RRBs:
  - Madhyanchal Gramin Bank (sponsored by Central Bank of India) Category
     A Transferor RRB
  - Madhya Pradesh Gramin Bank (sponsored by Bank of India) Category C Transferee RRB
- Post-Amalgamation Entity: Madhya Pradesh Gramin Bank
- Final Sponsor Bank: Bank of India

#### **Changes Recommended:**

- 1. For Madhyanchal Gramin Bank (Transferor):
  - FIP Entity ID:
    - To be **deleted** in the Central Registry by Sahamati.
    - Customers must delink previously linked accounts.
    - Associated consents will be auto-invalidated by AAs once delinking occurs.
    - RRB to communicate to customers regarding delinking and closure of data access.
    - AAs must be informed of the deprecation timeline.
  - FIU Entity ID:
    - To be **deleted** as the entity no longer exists in its earlier legal form.
    - All existing consents will become invalid.
    - RRB must notify customers and raise fresh consents post-amalgamation via the surviving entity.
    - AAs must be notified to disable routing for the old FIU Entity ID.
- 2. For Madhya Pradesh Gramin Bank (Transferee):
  - No changes needed in the Central Registry.
  - o Existing FIP and FIU Entity IDs remain valid.
  - No customer action is required if already linked.
  - Should coordinate with AAs to ensure continuity in fetch operations.



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## Illustration 2: When Three RRBs With One or More Sponsor Banks Are Amalgamating

#### Example:

- Merging RRBs:
  - Aryavart Bank (sponsored by Bank of India) Category A Transferor RRB
  - Prathama UP Gramin Bank (sponsored by Punjab National Bank) –
     Category A Transferor RRB
  - Baroda UP Bank (sponsored by Bank of Baroda) Category B Transferee RRB, renamed as Uttar Pradesh Gramin Bank
- Post-Amalgamation Entity: Uttar Pradesh Gramin Bank
- Final Sponsor Bank: Bank of Baroda

#### **Changes Recommended:**

- For Aryavart Bank and Prathama UP Gramin Bank (Transferee RRBs):
  - o FIP Entity IDs:
    - To be deleted in the Central Registry.
    - Customers must delink all linked accounts.
    - Associated consents will be invalidated.
    - RRBs to communicate to customers about the transition and urge delinking.
    - Inform AAs of deprecation dates and stop-fetch timeline.
  - o FIU Entity IDs:
    - To be deleted.
    - All active consents become void; customers must re-consent using the new entity.
    - RRBs must communicate with customers and initiate fresh consents post-amalgamation.
    - AAs must be notified to reject FI requests from deleted IDs.
- For Baroda UP Bank (Transferor RRB Renamed to Uttar Pradesh Gramin Bank):
  - FIP/FIU Entity IDs:
    - **Retain IDs**, but submit **name change request** to Sahamati for Central Registry update.
    - Communicate updated name to AAs and other ecosystem participants.
  - No action required from customers with existing account linkages.
  - Ensure **technical and compliance readiness** under new name.



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### Annexure III - SOP for updating Sahamati Central Registry

All Category B RRBs undergoing amalgamation (i.e.,

entities with name changes) must formally request changes to their Central Registry (CR) entries via Sahamati. The process applies to both FIP and FIU roles and must be completed in the UAT environment first before production rollout.

### <u>Category A - Mailing Instructions for Deletion of Entries in Central Registry</u>

If the Transferor RRB has completed migration to the Transferee RRB and all related regulatory actions before 15th September 2025, they can inform Sahamati for early deletion of their entries.

1. **Request -** Send an email to **memberservices@sahamati.org.in** with the subject line:

[RRB Name] - Request for Deletion of Entry Central Registry
[UAT / Production] environment

2. Provide the Following Details in the Request

| Sr. No. | Field                      | Details   |
|---------|----------------------------|---|
| 1       | Environment                | Specify whether the update is for UAT or PRODUCTION   |
| 2       | Entity ID Type             | FIP or FIU  |
| 3       | Entity ID                  | Entity ID as registered in the CR (FIP or FIU)  |
| 4       | Organisation Name          | Legal name of the organisation as per Gazette Notification  |
| 5       | Sponsor Bank               | Legal name of the Sponsor Bank as per the latest Gazette Notification                                   |
| 6       | Reason for Deletion        | Amalgamation  |
| 7       | Transferee RRB Name        | Name of the RRB into which this entity is amalgamated   |
| 8       | Transferee RRB Admin       | Name and Email ID of the individual who is the Admin / SPOC from Transferee Bank for future discussion. |
| 9       | Effective Date of Deletion | DD-MM-YYYY  |



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### Category B - Mailing Instructions for Update of Entries in Central Registry

1. **Request -** Send an email to **memberServices@sahamati.org.in** with the subject line:

[RRB Name] - Request for Central Registry Update [UAT /
Production] environment

2. Provide the Following Details in the Request

| Sr. No. | Property Name              | Description   |
|---------|----------------------------|---|
| 1       | Environment                | Specify whether the update is for <b>UAT</b> or <b>PRODUCTION</b> |
| 2       | Entity ID                  | Entity ID as registered in the CR (FIP or FIU)                    |
| 3       | Entity ID Type             | FIP or FIU  |
| 4       | Organisation Name          | Legal name of the organisation as per Gazette Notification        |
| 5       | Admin Name                 | Name of the individual who will be assigned as <b>User Admin</b>  |
| 6       | Admin Email                | Official email address of the User Admin                          |
| 7       | Admin Mobile<br>(Optional) | Mobile number of the User Admin                                   |
| 8       | Effective Date             | DD-MM-YYYY  |

## 3. Attach Updated CR Entry

- Include the updated JSON structure with changes (e.g., new entity name, changes in IPs if any, etc.)
- Ensure the JSON complies with the CR schema used in the Sahamati Registry.

### Other Recommendations for Update in Central Registry

- 1. All changes should be implemented and verified in the UAT environment first.
- 2. Upon confirmation of successful UAT Testing, send a separate confirmation to apply the same changes to the Production environment.
- 3. RRBs should ensure **Access Tokens** (both User and Entity Tokens) associated with deprecated entries are revoked before the cut-off date.
- 4. Automatic Deletion by Cut-Off Date



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- Sahamati will automatically delete deprecated entries in the Central Registry on the cut-off date: 15 September 2025.
- No further action is required from your end post this date regarding deletion.

#### 5. Log Retention and Disposal

 In all Categories of RRBs, it is recommended to retain logs of all transactions involving deprecated or ceasing entities in accordance with your internal data retention and system security policies and respective regulatory norms.

### 6. Base URL/IP Changes Due to Infrastructure Updates

- In case of changes in TSPs or sponsor bank infrastructure, the RRBs endpoints (Base URLs) and IPs might be subject to change.
- Surviving Entities are recommended to update their respective JSON configurations in the Central Registry accordingly by sending a Request to sahamati (for Prod).

#### 7. Note on Migration to New Token Service Endpoint

- Sahamati has introduced new token generation APIs, effective immediately.
   The old endpoints will be deprecated on 15th August 2025.
- The new endpoint will enforce a rate limit of 300 token refresh requests per day.
- o If this limit is exceeded, a "429 Limit Exceeded" error code will be returned.
- The details of the new API are published here: <a href="https://developer.sahamati.org.in/sahamatinet-poc/integration-steps/iam-apis#">https://developer.sahamati.org.in/sahamatinet-poc/integration-steps/iam-apis#</a>
   <a href="post-entity-token-generate">post-entity-token-generate</a>

| Environment | Deprecated API   | New API  |
|-------------|--|--|
| UAT         | https://uattokens.sahamati.org.i<br>n/auth/realms/sahamati/protoco<br>l/openid-connect/token | https://api.uat.sahamati.org.<br>in/iam/v1/entity/token/gener<br>ate |
| Prod        | https://tokens.sahamati.org.in/a<br>uth/realms/sahamati/protocol/o<br>penid-connect/token    | https://api.sahamati.org.in/i<br>am/v1/entity/token/generate         |

## **Further Information and References**

 Full details on the token service API migration: <u>Token Service API Migration Circular – July 2025</u>

#### 2. Developer documentation for integration:

- Token Service Integration Steps
- Central Registry Integration Steps