Sahamati/Circular/Governance/2026-07/02 Dated: July 21, 2026

To,
1. Live and Live-enabled FIPs registered and regulated by the RBI, and
2. AAs
3. FIUs

Subject: Additional Identifiers for Account Discovery with RBI-regulated FIPs in the AA Ecosystem

Dear All,

This circular is issued for implementation by AAs and FIPs registered by the RBI, further to ReBIT circular dt. November 08, 2023, (Ref.No. ReBIT/CIRC/AA/2023-24/02) on the use of additional identifiers "PAN" and "Date of Birth" for customer account discovery.

1. RBI-regulated FIPs must require additional weak identifiers, "PAN" or "Date of Birth," along with Strong identifiers to successfully discover customer accounts.

2. Based on the deliberation in the AA and RBI-regulated FIPs council, RBI-regulated FIPs must adopt a "**PAN-priority approach"** for the use of additional identifiers in account discovery:

    2.1. PAN must be the primary Weak Identifier; when available in the FIP records, it must be used for validation. Requests with DOB alone, even when PAN is available, must be rejected.

    2.2. Date of Birth (DOB, format: DDMMYYYY) must be treated as a secondary Weak Identifier only where PAN is not available for the customer, as per FIPs' records.

3. Hence, RBI-regulated FIPs are expected to implement the following validation logic:

    3.1. The Strong Identifier (mobile number) must always be validated first.

    3.2. If **PAN is seeded in FIP records**:

        3.2.1. PAN must be used for validation.

        3.2.2. Requests that do not contain a PAN should be rejected, even if DOB is provided.

3.3. **If PAN is not seeded in FIP records,** and the Form 97 or 60[1] declaration is made available by the customer to the FIP, or the applicable law does not require PAN or a PAN declaration to be obtained for the account (exempt category):

3.3.1. FIPs must validate the DOB (or an equivalent identifier for non-individuals).

3.4. **When both PAN and DOB** are provided by the customer to the AA for Account Discovery:

3.4.1. If PAN exists in the FIP records, FIP must validate the PAN as an additional identifier and ignore DOB.

3.4.2. If Form 97 or 60 is declared (or exempt category), FIP must reject the discovery request, as the customer does not have a "PAN" per FIP records but has passed the same to AA.

4. Detailed Validation logic, along with possible scenarios, is given in Appendix - Table 1.

5. Standardised error codes and messages for such scenarios, to be adopted by RBI-regulated FIPs in the response payload, are given in Appendix - Table 2.

6. FIP must successfully discover customer accounts only when both the Strong Identifier and the applicable Weak Identifier uniquely identify the customer.

7. Upon successful validation, the FIP must return all accounts associated with the identified customer.

8. AAs must validate the customer's PAN pattern prior to sharing it with FIPs to ensure data quality and reduce downstream validation failures during account discovery.

9. AAs and FIPs should also align with the guidance provided in the relevant circular issued by ReBIT on the use of PAN and DOB in account discovery.

10. FIUs are recommended to verify that the customer's PAN is active before redirecting new-to-AA customers to the AA Client, using the PAN as the identifier. This helps ensure that only customers with valid PANs enter the AA ecosystem, thereby improving ecosystem hygiene.

[1] *Form 60 as per IT Rules, 1962 or Form 97 as per IT Rules, 2026 as applicable, is a declaration form used by account holders who do not possess a Permanent Account Number (PAN) but need to perform certain banking or financial transactions as listed under Rule 114B and 114BA of IT Rules, 1962, and Rules 159 (1) and 159 (2) of IT Rules, 2026. Also refer, respective RBI Master Directions on Responsible Business Conduct Directions, 2025 (Updated as on July 1, 2026).*

11. To ensure consistent adoption of dual-identifier validation, Sahamati recommends that all future account linking for RBI-regulated FIPs be based solely on AccRefNumbers issued after successful validation of both the Strong Identifier and the applicable Weak Identifier. Previously issued, unlinked AccRefNumbers which were generated using only a single identifier shall not be used for account linking any further. AccRefNumbers that have already been used in linking and are associated with existing consents must remain unaffected.

12. AAs are recommended to revalidate customer accounts linked through single-identifier discovery at RBI-regulated FIPs if no active consents are associated with those accounts.

13. Transition Plan

13.1. RBI-regulated FIPs and all AAs must implement the above in both UAT and Production by **September 30, 2026** at the latest.

13.2. FIPs should enable the implementation in UAT sufficiently in advance to allow AAs to complete interoperability testing before production deployment.

13.3. **Implementation Reporting**: RBI-regulated FIPs must notify Sahamati of the date on which the implementation is enabled in UAT; the date on which the implementation is enabled in Production; and confirm the completion of testing with participating AAs by writing to fip-response@sahamati.org.in.

If you have any questions regarding these guidelines or the implementation requirements, please check the FAQs section for more details. In case your question is not addressed, please write to governance@sahamati.org.in.

Regards,

Sahamati Governance Team

14. Appendix

14.1. Table 1 - Additional Identifier Validation Logic

Scenario	Identifier Available in FIP Records	Inputs Received from AA (in request payload)	What FIP Validates	Scenario Match Condition	Accounts Discovered	Remarks to developers
S1	PAN	Mobile and PAN	Mobile AND PAN	Both Mobile AND PAN	Yes	Valid case (AND condition satisfied)
S2	PAN	Mobile and PAN	Mobile AND PAN	Mobile Matches but mismatch in PAN	No	Reject due to PAN failure
S3	PAN	Mobile, PAN and DOB	Mobile AND PAN	Mobile Matches but mismatch in PAN; DOB ignored	No	DOB will not be used for matching
S4	PAN	Mobile, PAN and DOB	Mobile AND PAN	Both Mobile AND PAN Match; DOB ignored	Yes	DOB will not be used for matching
S5	PAN	Mobile and DOB	Mobile AND PAN	Mobile Match but PAN is missing	No	Reject (PAN required as per FIP records)
S6	Form 97 / 60 / exempt	Mobile and DOB	Mobile AND PAN Declaration Status AND DOB	Mobile AND DOB both Match	Yes	Valid case (PAN not available)
S7	Form 97 / 60 / exempt	Mobile and DOB	Mobile AND PAN Declaration Status AND DOB	Mobile Matches but mismatch in DOB or missing in FIP records	No	Reject due to DOB failure
S8	Form 97 / 60 / exempt	Mobile, PAN and DOB	Mobile AND PAN Declaration Status	PAN Declaration Status Mismatch	No	PAN is not seeded in FIP records, DOB ignored
S9	Form 97 / 60 / exempt	Mobile and PAN	Mobile AND PAN Declaration Status	PAN Declaration Status Mismatch	No	PAN is not seeded in FIP records
S10	Blank[2]	Mobile and PAN or DOB	Mobile AND PAN Declaration Status	PAN Declaration Status Mismatch	No	PAN is not available in FIP records

[2] *Blank indicates that neither PAN nor Form 60/Form 97 declaration is available in the FIP records, or the account is exempt from declaration of the same as described in Footnote 1.*

14.2. Table 2 - Standardised Error Codes against validation of Additional Identifiers

Scenario	Identifier Available in FIP Records	Inputs Received from AA (in request payload)	Accounts Discovered	Remarks to developers	Response Expected from FIP		Response Payload Attributes expected from FIP	
					Response Code	Response Description	"errorCode":	"errorMsg":
S1	PAN	Mobile and PAN	Yes	Valid case (AND condition satisfied)	200	OK	NA	NA
S2	PAN	Mobile and PAN	No	Reject due to PAN failure	400	Bad Request	"InvalidRequest"	"PAN does not match"
S3	PAN	Mobile, PAN and DOB	No	DOB will not be used for matching	400	Bad Request	"InvalidRequest"	"PAN does not match"
S4	PAN	Mobile, PAN and DOB	Yes	DOB will not be used for matching	200	OK	NA	NA
S5	PAN	Mobile and DOB	No	Reject (PAN required as per FIP records)	400	Bad Request	"InvalidRequest",	"PAN missing in request"
S6	Form 97 / 60 / exempt	Mobile and DOB	Yes	Valid case (PAN not available)	200	OK	NA	NA
S7	Form 97 / 60 / exempt	Mobile and DOB	No	Reject due to DOB failure	400	Bad Request	"InvalidRequest",	"DOB does not match"
S8	Form 97 / 60 / exempt	Mobile, PAN and DOB	No	PAN is not seeded in FIP records, DOB ignored	400	Bad Request	"InvalidRequest",	"PAN details not available in records"
S9	Form 97 / 60 / exempt	Mobile and PAN	No	PAN is not seeded in FIP records	400	Bad Request	"InvalidRequest",	"PAN details not available in records"
S10	Blank	Mobile and PAN or DOB	No	PAN is not available in FIP records	400	Bad Request	"InvalidRequest",	"PAN details not available in records"

**** End of Document****