Sahamati/Circular/Governance/2026-08/01 Dated: August 20, 2026

To,

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

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

Dear All,

This is a revision to Sahamati's circular dated July 21, 2026, on [Additional Identifiers for Account Discovery with RBI-regulated FIPs in the AA Ecosystem](), aligned with ReBIT Circular Ref. No. ReBIT/CIRC/AA/2023-24/02 on the use of PAN and Di told ate of Birth for customer account discovery.

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

2. In line with ReBIT guidance, FIPs must support PAN and DOB (DOB format: DDMMYYYY) as additional identifiers for account discovery.

    2.1. Where both PAN and DOB are provided, they must be processed in the hierarchy prescribed by ReBIT. The first search parameter must be the strong identifier (e.g., mobile number), the second search parameter will be the PAN, and the last search parameter will be the DOB.

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 provided, it must be validated against the FIP customer record

    3.3. If PAN is not provided and DOB is provided, DOB must be validated

    3.4. If both PAN and DOB are provided, both inputs must be validated successfully according to the hierarchy specified by ReBIT.

4. Detailed Validation logic, along with possible scenarios, and standardised error codes and messages for such scenarios, to be adopted by

RBI-regulated FIPs in the response payload, are provided in Appendix 1 (see page 5)[1].

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

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

7. 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.

8. 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.

9. 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.

10. 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.

11. 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.

12. Transition Plan

12.1. RBI-regulated FIPs and all AAs must implement the above in both UAT and Production by **October 31, 2026** at the latest.

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

[1] Kindly refer to the table is given in Appendix 2 for reconciliation of scenarios with the earlier circular

12.3. **Implementation Reporting**: RBI-regulated FIPs must notify Sahamati of the date implementation is enabled in UAT and in Production, and confirm completion of testing with participating AAs by writing to governance@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

13. Appendix

13.1. Table 1: Revised Additional Identifier Validation Logic and Error Messages effective August 20, 2026

Scenario	Inputs Received from AA (in request payload)	What FIP Validates	Scenario Match Condition	Accounts Discovered?	Remarks to Developers	Response Expected from FIP		Response Payload Attributes expected from FIP	
						Response Code	Response Description	"errorCode":	"errorMsg":
AI-0	Mobile Only	Mobile AND (PAN OR DOB)	Only Mobile matches	No	Reject. At least one additional identifier (PAN or DOB) is required.	400	Bad Request	"InvalidRequest"	"Missing weak identifier"
AI-1	Mobile and PAN	Mobile AND (PAN OR DOB)	Both Mobile and PAN match	Yes	Valid case (AND condition satisfied).	200	OK	NA	NA
AI-2	Mobile and PAN	Mobile AND (PAN OR DOB)	Mobile matches but PAN does not match	No	Reject due to PAN failure.	400	Bad Request	"InvalidRequest"	"PAN does not match"
AI-3	Mobile, PAN and DOB	Mobile AND PAN AND DOB	Mobile matches but PAN does not match	No	DOB will be used only if PAN has matched.	400	Bad Request	"InvalidRequest"	"PAN does not match"
AI-4	Mobile, PAN and DOB	Mobile AND PAN AND DOB	Mobile and PAN match; DOB matches	Yes	Valid case. PAN is validated first, followed by DOB.	200	OK	NA	NA
AI-5	Mobile, PAN and DOB	Mobile AND PAN AND DOB	Mobile and PAN match; DOB does not match	No	DOB must be validated after successful PAN validation, as per ReBIT.	400	Bad Request	"InvalidRequest"	"DOB does not match"
AI-6	Mobile and DOB	Mobile AND (PAN OR DOB)	Mobile and DOB match	Yes	Valid case (AND condition satisfied).	200	OK	NA	NA
AI-7	Mobile and DOB	Mobile AND (PAN OR DOB)	Mobile matches but DOB does not match or is missing in FIP records	No	Reject due to DOB failure.	400	Bad Request	"InvalidRequest"	"DOB does not match"
AI-8	Mobile and (PAN/DOB)	Mobile AND (PAN OR DOB)	Mobile matches, but the additional identifier provided does not match or is unavailable in FIP records	No	The additional identifier provided cannot be validated against FIP records.	400	Bad Request	"InvalidRequest"	"PAN / DOB details not available in records"

13.2. Table 2: Scenario Mapping with July 21, 2026 Circular to Revised Logic effective August 20, 2026

July 21, 2026 Circular Scenario	Revised Scenario	Change
S1	AI-1	No change
S2	AI-2	No change
S3	AI-3	No change
S4	AI-4 / AI-5	DOB is now validated after PAN matches / DOB mismatch can result in rejection
S5	AI-6 / AI-7	DOB is validated; PAN Declaration Status is no longer the deciding validation criterion
S6	AI-6	No change
S7	AI-6 / AI-7	DOB is validated; PAN Declaration Status is no longer the deciding validation criterion
S8	AI-3	PAN does not match, as there is no PAN in FIP records.
S9	AI-2	PAN does not match, as there is no PAN in FIP records.
S10	AI-1 / AI-2 / AI-6 / AI-7 / AI-8	Scenario is split based on the additional identifier provided and validation outcome
—	AI-0	New scenario — Mobile-only request is rejected

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