



# Beneficial Ownership Information Report

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## System-to-System API User Guide

Financial Crimes Enforcement Network  
U.S. Department of the Treasury  
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## Revision History

Version Number	Date	Change Description
1.0	1/1/2024	Initial version
1.0.1	2/13/2024	II. BOIR API Access: Updated “User Test” API references to “Sandbox” API (Note: This update does not impact the API URLs; however, the “scope” used in the HTTP request to obtain the Sandbox access token is changed from “BOSS-EFILE-USER-TEST” to “BOSS-EFILE-SANDBOX”. Also removed the statement that the same ClientID/secret can be used for both sandbox and production APIs; rather, approved API users are issued unique credentials for each environment.

*Disclaimer:* These instructions are explanatory only and do not supplement or modify any obligations imposed by statute or regulation. FinCEN may also revise these instructions to clarify or update content. For additional and latest information, consult [www.fincen.gov/boi](http://www.fincen.gov/boi).

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## **I. BOIR System-to-System Filing Introduction**

The Beneficial Ownership Information Report (BOIR) collects information about the beneficial owner(s) and company applicant(s) associated with a reporting company. FinCEN supports two primary methods of filing when it comes to the BOIR: (1) “Form” based data collection via PDF BOIR or Online BOIR (which require very minimal setup to use), and (2) “System-to-System” based data collection via a REST API. This guide focuses on the System-to-System API filing method, specifically how to access the BOI E-Filing API and submit your BOIR information to FinCEN, interpret the submission response JSON, and understand what data validations and potential system processing errors may occur during the filing process.

**IMPORTANT:** This guide does NOT include instructions regarding how to format your BOIR data prior to filing, which must follow FinCEN’s XML standard format. Please refer to the associated “Beneficial Ownership Information Report System-to-System XML User Guide” for more details.

## II. BOIR API Access

To obtain access to the BOI E-Filing API, contact FinCEN via the following contact us form to request access: <https://www.fincen.gov/contact>. Please be sure to include the following in your inquiry:

1. Select the topic associated with the Beneficial Ownership (BO) / Corporate Transparency Act (CTA)
2. Select the subject associated with API requests.
3. Indicate in the message body that you are requesting API access credentials to connect to the BOI E-Filing API.

This will prompt FinCEN to reach out to you directly to coordinate the creation of your access credentials (i.e., clientId and secret) to use with the BOI E-Filing API. FinCEN also provides access credentials to use with its BOI E-Filing \*SANDBOX\* API, which allows you to test the submission process before submitting live data in production. Credentials will be provided if access is approved by FinCEN. Note the following hostnames associated with the BOI E-Filing \*Sandbox\* and \*Production\* APIs:

*Table 1 - BOI E-Filing API URLs: Sandbox & Production*

Environment	URL to use in API request
BOI E-Filing *Sandbox* API	<a href="https://boiefiling-api.user-test.fincen.gov/preprod">https://boiefiling-api.user-test.fincen.gov/preprod</a>
BOI E-Filing *Production* API	<a href="https://boiefiling-api.fincen.gov/prod">https://boiefiling-api.fincen.gov/prod</a>

After access credentials are obtained and you are ready to submit a BOIR, the user's system will need to retrieve an access token to access the API. The token will be valid for one hour after retrieval and can be used for multiple API requests across multiple different submissions. The HTTP request to obtain the token is as such:

*Table 2 - HTTP request to obtain access token*

			Comments
Endpoint	POST	https://iam.fincen.gov/am/oauth2/realms/root/realms/Finance/access_token	
Request Headers	Authorization	"Basic <credentials>"	<credentials> is the base64-encoded value of "clientId:secret" (without the quotes)
Request Body		grant_type: client_credentials scope: <scope>	<scope> is "BOSS-EFILE-SANDBOX" for Test or "BOSS- EFILE" for Production (without the quotes)
	Content-Type	application/x-www-form-urlencoded	
Response	Body	{ "access_token": "<access_token>", "scope": "BOSS-EFILE", "token_type": "Bearer", "expires_in": 3599 }	<access_token> will be used in the Authorization header for all BOI E-Filing API requests

### III. BOIR Submission & Tracking Process

As noted above, before you can begin the filing process, you must obtain an access token from FinCEN's system by presenting your valid clientId and secret (see above section "BOIR API Access" for details) via a REST API call. Once the access token is retrieved, it must be included in the request header throughout the BOIR filing process which can be used for multiple BOIR filings as long as it is no later than one hour after retrieval.

The following is an overview of the BOIR filing processing via API:

1. Initiate BOIR Submission via /processId: To initiate the BOIR filing process, the user's system sends a GET request to the /processId resource, resulting in a process ID returned (e.g., "BOIR230921650c447660").
2. Upload Identifying Document Image(s) via /attachments: User's system uploads the identifying document image for each Company Applicant and Beneficial Owner reported in the BOIR via the /attachments resource, resulting in an upload status returned (e.g., "upload\_success"). If no Company Applicant and/or Beneficial Owner are being reported in the BOIR, then skip this step.

NOTE: The filenames for each image attachment in the BOIR must be unique and referenced in the associated BOIR XML under the element "OriginalAttachmentFileName" for each Company Applicant and Beneficial Owner being reported.

3. Upload BOIR XML via /upload: User's system uploads a single BOIR as an XML file binary via the /upload resource, returning a submission status for the process ID (e.g., "submission\_initiated")
4. Track Submission Status via /submissionStatus: User's system begins querying the status of the submission via the /submissionStatus resource (e.g., "submission\_accepted").

Retrieve the BOIR Transcript via /transcript: If a status of "submission\_accepted" or "submission\_rejected" is returned, filer's system retrieves the transcript PDF of the BOIR as binary data via the /transcript resource. The /transcript resource also produces the status of the submission.

NOTE: The binary data for the transcript is base64-encoded. As an example, in JavaScript, to create the PDF file, the binary data will need to be decoded from base64 and then downloaded as a blob with the mime-type "application/pdf".

The final status of your BOIR filing is either "submission\_accepted", "submission\_rejected", or "submission\_failed". If you receive a status with "failed" or "rejected" in the value, this means that FinCEN could NOT process your BOIR submission and you should take steps to resolve the reason for the failure/rejection (refer to the list of common response codes and errors later in this guide for additional information).

### 3.1.1 Initiate BOIR Submission via /processId

*Table 3 - GET /processId*

			Comments
Endpoint	GET	/processId	Retrieves a processId
Path Parameters		N/A	
Request Headers	Authorization	"Bearer <access_token>"	
Request Body		N/A	
Response	Content-Type	application/json	
	Body	JSON payload for successful request: { processId: <processId> }	



### 3.1.2 Upload Identifying Document Image(s) via /attachments

Table 4 - POST /attachments

			Comments
Endpoint	POST	/attachments/{processId}/{fileName}	Upload a single image file  Note: uploading another image file with same fileName will replace the previous one
Path Parameters	processId	processId from /processId	
	fileName	Image filename, with extension (must match a value recorded for the OriginalAttachmentFileName element in the BOIR XML)	File name for the image must end in .jpg, .jpeg, .png, or .pdf and must be URI encoded.  Filename limitations: Letters, numbers, _ ! @ # \$ % ( ) = + [ ] { }   ; ~ _
Request Headers	Content-Type	application/binary	
	Authorization	"Bearer <access_token>"	
Request Body		Image file's binary data	Image file should be no greater than 4MB in file size
Response	Content-Type	application/json	
	Body	JSON payload: { status: <upload status>, message: <Additional details> }	Upload status values: • upload_success • upload_failed

### 3.1.3 Upload BOIR XML via /upload

Table 5 - POST /upload

			Comments
Endpoint	POST	/upload/BOIR/{processId}/ {xmlFileName}	Upload and submit the BOIR XML
Path Parameters	processId	processId from /	
	xmlFileName	XML file name	File name for the XML file must end in .xml and must be URI encoded.  Filename limitations: Letters, numbers, _ ! @ # \$ % ( ) = + [ ] { }   ; ~ _
Request Headers	Content-Type	application/xml	
	Authorization	"Bearer <access_token>"	
Request Body		XML file binary data	
Response	Content-Type	application/json	
	Body	JSON payload for successful upload:  { processId: <processId>, status: "submission_ initiated" }	

### 3.1.4 Track Submission Status via /submissionStatus

*Table 6 - GET /submissionStatus*

			Comments
Endpoint	GET	/submissionStatus/ {processId}	Check the status of a submitted BOIR
Path Parameters	processId	processId from /processId	
Request Headers	Authorization	"Bearer <access_token>"	
Request Body		N/A	
Response	Content-Type	application/json	
	Body	JSON payload - submission status	Status values: <ul style="list-style-type: none"> <li>• submission_initiated</li> <li>• submission_processing</li> <li>• submission_validation_passed</li> <li>• submission_validation_failed</li> <li>• submission_accepted</li> <li>• submission_rejected</li> <li>• submission_failed</li> </ul>

### 3.1.5 Retrieve the BOIR Transcript via /transcript

Table 7 - GET /transcript

			Comments
Endpoint	GET	/transcript/{processId}	Retrieve the transcript (and status) of a submitted BOIR
Path Parameters	processId	processId from /processId	
Request Headers	Authorization	"Bearer <access_token>"	
Request Body		N/A	
Response	Content-Type	application/json	
	Body	submission status: {status: <status>} OR submission status + PDF file binary: {status: <status>, pdfBinary: <PDF binary>}	

### 3.1. Common Response Codes

Table 8 - Common Response Codes

Response Code	Description	Comments
200	Successful API call	(none)
400	Validation Failure	Initial validation failed
401	Authentication	Unauthorized
403	Authorization	Forbidden
404	Not Found	Unable to retrieve status/transcript
413	Payload Too Large	Image attachment file exceeds 5MB
415	Unsupported Media Type	Image attachment file type is not supported
429	Throttling	Too many requests
502/504	Dependency Issues	Bad Gateway/Gateway Timeout
500/503	Unhandled Errors	Internal Server Error, Service unavailable

### 3.1. Response Examples

#### 3.1.0.1. *"/processId: BOIR XML submission initiation"*

/processId

```
{  
    statusCode: 200,  
    body: {  
        "processId": "BOIR230928X6515f3081"  
    }  
}
```

#### 3.1.0.2. *"/attachment: Attachment upload success"*

/attachment/BOIR230928X6515f3081/bill\_spencer.jpg

```
{  
    statusCode: 200,  
    body: {  
        "code": "upload_success",  
        "message": "bill_spencer.jpg has been successfully uploaded."  
    }  
}
```

### 3.1.0.3. *"/attachment: Invalid attachment file type"*

/attachment/BOIR230928X6515f3081/bill\_spencer.gif

```
{
  statusCode: 400,
  body: {
    "error": {
      "code": "file_name_invalid",
      "message": "Invalid file name: bill_spencer.gif",
      "details": "The file name provided is invalid. Allowed characters:
alphanumeric ! @ # $ % ( ) _ - = + [ ] { } | ; ~ and space.",
      "help": "Refer to the provided API documentation from FinCEN for
guidance."
    }
  }
}
```

### 3.1.0.4. *"/upload: BOIR XML file upload"*

/upload/BOIR/BOIR230928X6515f3081/BOIR.xml

```
{
  statusCode: 200,
  body: {
    "processId": "BOIR230928X6515f3081",
    "submissionStatus": "submission_initiated"
  }
}
```

3.1.0.5. *"/upload: Invalid/Incomplete submitter information"*

/upload/BOIR/<processId>/BOIR.xml

```
{
  statusCode: 200,
  body: {
    "error": {
      "code": "submitter_info_invalid",
      "message": "Invalid Submitter information: Email, first name, last name,
and processId are required",
      "details": "Please validate the submitter information in the XML.",
      "help": "Refer to the provided API documentation from FinCEN for
guidance."
    }
  }
}
```

3.1.0.6. *"/submissionStatus: submission\_validation\_passed"*

/submissionStatus/BOIR230928X6515f3081

```
{
  statusCode: 200,
  body: {
    "processId": "BOIR230928X6515f3081",
    "submissionStatus": "submission_validation_passed",
  }
}
```

3.1.0.7. *"/submissionStatus: submission\_rejected"*

/submissionStatus/BOIR230928X6515f3081

```
{
  statusCode: 200,
  body: {
    "processId": "BOIR230928X6515f3081",
    "submissionStatus": "submission_rejected",
    "BOIRID": "",
    "fincenID": "",
    "errors": [
      {
        "ErrorElementName": "FinCENID",
        "ErrorContextText": "Party[PartySeqNum=4, DocumentSeqNum=2,
BORXmlSubmissionSeqNum=1]",
        "ErrorLevelText": "FATAL",
        "ErrorText": "Initial BOIR already has been filed for the reporting
company recorded in the initial BOIR filing. Please try again. If this problem persists, please
contact the FinCEN Contact Center for assistance.",
        "ErrorCode": "SBE02",
        "ErrorTypeCode": "SBE02"
      }
    ],
    "initiatedTimestamp": "2023-09-28T21:56:58Z",
    "firstName": "Test",
    "lastName": "Tester",
    "email": "test@test.net"
  }
}
```



3.1.0.8. *"/submissionStatus: validation\_failed (attachments not uploaded)"*

/submissionStatus/BOIR2309286515f80dD0

```
{
  statusCode: 200,
  body: {
    {
      "processId": " BOIR2309286515f80dD0",
      "submissionStatus": "submission_validation_failed",
      "validationErrors": [
        {
          "errorMessage": "Unable to find joe_hamilton.jpg in uploaded attachments."
        },
        {
          "errorMessage": "Unable to find bill_spencer.jpg in uploaded attachments."
        }
      ]
    }
  }
}
```

### 3.1.0.9. *"/submissionStatus: submission\_accepted"*

/submissionStatus/BOIR2309286515fa4eY0

```
{
  "processId": "BOIR2309286515fa4eY0",
  "submissionStatus": "submission_accepted",
  "BOIRID": "50000000003688",
  "fincenID": "200000000843",
  "errors": [
    {
      "ErrorElementName": "",
      "ErrorContextText": "",
      "ErrorLevelText": "",
      "ErrorText": "",
      "ErrorCode": "",
      "ErrorTypeCode": ""
    }
  ],
  "initiatedTimestamp": "2023-09-28T22:12:48Z",
  "firstName": "Test",
  "lastName": "Tester",
  "email": "test@test.net"
```

3.1.0.10. *"/submissionStatus: incorrect processID"/submissionStatus/  
BOIR2309286515fa4eY0*

```
{
  "processId": "BOIR2309286515fa4eY0",
  "submissionStatus": "submission_accepted",
  "BOIRID": "50000000003688",
  "fincenID": "200000000843",
  "errors": [
    {
      "ErrorElementName": "",
      "ErrorContextText": "",
      "ErrorLevelText": "",
      "ErrorText": "",
      "ErrorCode": "",
      "ErrorTypeCode": ""
    }
  ],
  "initiatedTimestamp": "2023-09-28T22:12:48Z",
  "firstName": "Test",
  "lastName": "Tester",
  "email": "test@test.net"
}
```

3.1.0.11. *"/transcript: submission\_rejected (Initial filing exists for this entity)"*

/transcript/BOIR230928X6515f3081

```
{
  statusCode: 200,
  body: {
    "status": {
      "processId": "BOIR230928X6515f3081",
      "submissionStatus": "submission_rejected",
      "BOIRID": "",
      "fincenID": "",
      "errors": [
        {
          "ErrorElementName": "FinCENID",
          "ErrorContextText": "Party[PartySeqNum=4,
DocumentSeqNum=2, BORXmlSubmissionSeqNum=1]",
          "ErrorLevelText": "FATAL",
          "ErrorText": "Initial BOIR already has been filed for the
reporting company recorded in the initial BOIR filing. Please try again. If this problem persists,
please contact the FinCEN Contact Center for assistance.",
          "ErrorCode": "SBE02",
          "ErrorTypeCode": "SBE02"
        }
      ],
      "initiatedTimestamp": "2023-09-28T21:56:58Z",
      "firstName": "Test",
      "lastName": "Tester",
      "email": "test@test.net"
    },
    "pdfBinary":
"JVBERi0xLjcKJf/////8KOCAwIG9iago8PAovVHlwZSAvRXh0R1N0YXRlCi9jYSAxCj4..."
  }
}
```

#### IV. Error Codes List

The following list of errors will result in a final status of submission\_rejected. This means that your BOIR submission could not be assigned a BOIR ID by FinCEN and you must take action to fix the error and resubmit. As stated in the error descriptions below, if the problem (error) persists, please contact FinCEN's contact center for further assistance:

*Table 9 - Rejection Error Codes*

Error code	Error description	Type of filing	Associated party	How you should respond...
SBE01	BOIR could not be processed by FinCEN at this time. Please try again. If this problem persists, please contact the FinCEN Contact Center for assistance.	N/A	N/A	Resubmit the BOIR as-is.
SBE02	Initial BOIR already has been filed for the reporting company recorded in the initial BOIR filing. Please try again. If this problem persists, please contact the FinCEN Contact Center for assistance.	Initial report	Reporting Company	Resubmit the BOIR after the following: <ul style="list-style-type: none"><li>• If you are attempting to file an initial report, ensure the name and TIN for the Reporting Company (Part I) is correct.</li><li>• If you are not attempting to file an initial report, ensure the correct filing type is indicated.</li></ul>
SBE03	FinCEN ID entered for a Company Applicant or Beneficial Owner cannot be matched to an existing FinCEN ID. Please try again. If this problem persists, please contact the FinCEN Contact Center for assistance.	Initial report	Company Applicant Beneficial Owner	Resubmit the BOIR after the following: <ul style="list-style-type: none"><li>• Ensure that the FinCEN ID(s) recorded in the BOIR are correct.</li></ul>

SBE04	Reporting Company information entered in Type of filing Items 1(e)-(h) cannot be matched to an existing Reporting Company. Please try again. If this problem persists, please contact the FinCEN Contact Center for assistance.	Update prior report Correct prior report Newly exempt entity	Reporting Company	Resubmit the BOIR after the following: <ul style="list-style-type: none"><li>• Ensure the name and TIN recorded for Item 1 (Type of filing) for the Reporting Company matches the Reporting Company name and TIN for the most recent BOIR filing.</li></ul>
SBE05	Reporting Company information recorded in Type of filing Items 1(e)-(h) cannot be matched to a prior BOIR filing. Please try again. If this problem persists, please contact the FinCEN Contact Center for assistance.	Update prior report Correct prior report Newly exempt entity	Reporting Company	Resubmit the BOIR after the following: <ul style="list-style-type: none"><li>• Ensure the name and TIN recorded for Item 1 (Type of filing) for the Reporting Company matches the Reporting Company name and TIN for the most recent BOIR filing.</li></ul>
SBE06	FinCEN ID entered for a Company Applicant or Beneficial Owner cannot be matched to an existing FinCEN ID. Please try again. If this problem persists, please contact the FinCEN Contact Center for assistance.	Update prior report Correct prior report Newly exempt entity	Company Applicant Beneficial Owner	Resubmit the BOIR after the following: <ul style="list-style-type: none"><li>• Ensure that the FinCEN ID(s) recorded in the BOIR are correct.</li></ul>