

Compliance Matters.

DevelopAid Guidance Note

Filing FC-6C for Designated/Another Bank Account

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Form FC-6C is the form that must be filed online for intimating the FCRA Department when you change your designated FCRA receipt account to SBI NDMB. This form is also used when you open or change 'another' FCRA bank account of your choice for keeping or utilising foreign contribution. This form should be filed even if there is simply a change in the branch or the account number, due to internal reorganisation or merger of a bank. Please do not file this form for changes in any bank accounts you have opened for utilisation of funds. The form can be used by organisation which have FCRA registration as well as those who have only a prior-permission.

According to the Act and rules, the designated bank account should be used only for accepting receipt of foreign contribution. It should not be used for utilisation of funds.¹

¹ In practice, SBI is reportedly allowing NGOs to use the SBI NDMB account for utilisation as well. The online form FC-6C also continues to refer to SBI NDMB account as 'Designated Receipt-cum-Utilisation Bank Account'.



I. Due Date

This form should be filed within 15 days of the change. However, you can not submit another form while a previous one is under processing.

1. Intimation or Approval?

Rule 17A uses the word ‘intimate’ for form FC-6C. A proviso added to this rule² makes it clear that the changes becomes effective only when it is finally approved by FCRA Department.

2. Processing Time

a. Designated Account

FCRA Department takes about 1-2 weeks to approve form FC-6C. A copy of the MHA approval letter should then be provided to SBI NDMB. After that, SBI NDMB takes about 10 working days to activate the account. You can not start using the new designated SBI NDMB account till the account is activated. Can you continue using the old designated account till then? Under the rules, the change of designated account becomes effective only when approved by FCRA Department. Therefore, it appears that there is no restriction on using the old account till then (or till 30-Jun-21, whichever is earlier). However, in its guidelines, FCRA Department has asked NGOs to stop receiving money in the old account when the SBI NDMB account is opened.

b. Another FCRA Account

FCRA Department takes about 1-2 weeks to approve form FC-6C. After that your bank may takes some time to activate the account. You can not start using the new account till the account is activated. Can you continue using the old bank account till then? Under the rules, the change of another account becomes effective only when approved by FCRA Department. Therefore, it appears that there is no restriction on using the old FCRA account (whether designated or another) till then for *keeping or utilising* FCRA funds.

If you are changing the status of your designated account to another FCRA account, you must stop accepting funds in this after form FC-6C is approved or 30-Jun-21, whichever is earlier.³

II. Filling Up the Form

The form has to be filled online at fcraonline.nic.in. You can save the form and come back to edit it if you don't have all the information.

1. Association Details

Organisation's existing name, present address, phone number, FCRA number, registration date, Darpan ID, etc., are automatically picked up from your login ID and displayed.

² 10-Nov-2020

³ Rules and instructions issued by FCRA Department are apparently contradictory. Therefore, you could be exposed to compounding fees if you continue accepting funds in old designated FCRA account after the SBI NDMB account has been opened.



2. Present Designated Bank Account Details

The existing designated bank account number, bank name, IFSC code, etc. are automatically picked up from the online data and displayed.

3. Intimated Designated FCRA Account?

If SBI NDMB account (11 Sansad Marg) is showing as your present designated account, and all details are correct, then you should select 'yes'. If a different bank account is showing as your designated bank account or any details of SBI NDMB account are wrong, then you should select 'No'.

4. SBI NDMB Bank Account Details

If you selected 'No', will be asked to provide details of your FCRA account with SBI NDMB. This account will become the new designated FCRA account.

In the past, it was not necessary to open a new account - you could use an existing account for the change-over. However, under the new procedures, you must open a new bank account with SBI NDMB exclusively for FCRA purposes.

The bank name and branch address are linked to the IFSC code that you provide, and are picked up automatically.

Just below this, you should fill up details of city, district, state and pin code where your NGO is located.

Below this, you must provide the bank account number, bank email ID, bank phone number and date of opening the account. The account number must be complete and correct. The Department checks this with the details provided by SBI NDMB in its letter.

5. Communication Details

Check and update the name, email ID and phone number of the Chief Functionary. The approval letter for the change will be sent to this email ID.

You should save the data before you can proceed to the next screen.

6. 'Another' Bank Account Details

The next screen is for tagging a bank account as 'another FCRA account'. This is a new type of account introduced in Sep'20.⁴ You can not receive FCRA funds directly in this account, but you can transfer funds to this account after you've received these in SBI NDMB. Only one account can be kept as 'another FCRA bank account'.

In most cases, details of the old designated account should be reported as 'another FCRA account'. Else the old designated account will become an 'orphan' causing confusion.

7. 'Another' Bank Account as per Records

The screen shows details of the account which is presently tagged as 'another FCRA bank account'. In some cases, the screen might not show any details though the FCRA letter already shows these. In such case, check with your advisers before making any changes here.

⁴ First proviso to sec. 17(1)



8. Intimate or Change Another FCRA Account?

If you do not have any account tagged as ‘another FCRA account’, and you want to set one up now, you should select ‘Yes’.

If you selected ‘Yes’, will be asked to provide details of the FCRA bank that you want to use as ‘another FCRA account’. Please **DO NOT** fill up details of your SBI NDMB account here.

9. Adding Details of Another Bank Account

The bank name and branch address are linked to the IFSC code that you provide, and are picked up automatically.

Just below this, you should fill up details of city, district, state and pin code where your NGO is located.

Below this, you must provide the bank account number, bank email ID, bank phone number and date of opening the account. The account number must be complete and correct. The Department checks this with the details provided by the bank in its letter.

10. Documents Needed

You should scan and upload the following documents:

1. Copy of FCRA Registration Certificate
2. Self-certified copy of letter from existing bank confirming the details of the FCRA account
3. Self-certified copy of a letter from SBI confirming the opening of FCRA designated bank account

You also have to upload scanned images of the organisation’s seal (jpg, 100 KB) and signatures of the chief functionary (jpg, 50 KB).

III. Filing the Form Online

1. Preview

Once you have filled up the form, and uploaded the documents, you are given a chance to preview the form. Please download the draft form and review it. If you are intimating the SBI NDMB account for the first time, the PDF form FC-6C will show four tables as depicted below. Tables are filled with dummy data:

a. Current details of designated FCRA Account

This should contain details of the bank account that you are using presently as designated FCRA account:



Name of the Bank	Branch Address	e-mail	IFSC Code	Account No.	Date of Account Opening
(1)	(2)	(3)	(4)	(5)	(6)
ABC Bank	10, XYX Street, Nowhere City, Some State	branch123@abc.co.in	ABC10001111	112133001024	10/03/1998

b. Changed details of designated FCRA account as SBI NDMB

This should show details of the new SBI NDMB account:

Name of the Bank	Branch Address	e-mail	IFSC Code	Account No.	Date of Account Opening
(1)	(2)	(3)	(4)	(5)	(6)
State Bank of India	11 Sansad Marg, New Delhi 110 001, New Delhi, Delhi, 110001	fcra.00691@sbi.co.in	SBIN0000691	4004982305	10/04/2021

c. Current details of ‘another FCRA account’

This table should be blank - unless you are filing FC-6C a second or third time:

Name of the Bank	Branch Address	e-mail	IFSC Code	Account No.	Date of Account Opening
(1)	(2)	(3)	(4)	(5)	(6)

d. Changed details of ‘another FCRA account’

This should again show details of the bank account that you are using presently as designated FCRA account. This account will now become ‘another FCRA account’:

Name of the Bank	Branch Address	e-mail	IFSC Code	Account No.	Date of Account Opening
(1)	(2)	(3)	(4)	(5)	(6)
ABC Bank	10, XYX Street, Nowhere City, Some State	branch123@abc.co.in	ABC10001111	112133001024	10/03/1998

If your preview copy shows something different, please approach your auditors or check with your advisers.

2. Common Errors

Most NGOs have found this form to be very confusing, leading to a lot of errors and re-submissions. In some cases, NGOs are not even aware that they have made a mistake in filing the form, because the Department has already approved the form.

**a. Yes or No?**

On the first screen, just below the designated bank account details, you are asked whether you have intimated designated account details for SBI NDMB. If you've already filed FC-6C earlier, AND the details of SBI NDMB account are showing correctly just above the question, then you should say 'Yes'. You can then move on to giving communication details etc.

However, if the details of a different bank (or an account with another SBI branch) are showing just above the question, then you must say 'No'. You should also say 'No', if there is any error in the details of SBI NDMB account, and you want it corrected. You will then be asked to fill up details of SBI NDMB account.

b. Old Designated as SBI Designated

Some NGOs fill up the details of their old designated account (after saying 'No') in the first screen, instead of giving details of SBI NDMB account that they have just opened.

If you do this, then your SBI NDMB account will not become the designated account. You can not start using it till you file FC-6C again and it is approved.

c. SBI NDMB as 'Another' Account

Some NGOs fill up details of SBI NDMB account as another FCRA account in the second screen.

This should not be done. SBI NDMB account details should only be given in the first screen. In the second screen, details of the old FCRA designated account should be filled up as 'another' FCRA Account.

d. SBI NDMB as Designated and as 'Another'

Some NGOs fill up details of their new SBI NDMB account in both the places: as designated account and as another FCRA account.

If you do this, then your old designated account will become orphaned. It will no longer be an FCRA account. You can not use the funds in this account, till you file FC-6C again to report this as another FCRA Account. Or file FC-6D to report this as a Utilisation Account.

e. City and State in SBI Designated Account Screen

When you are filling up SBI designated account details in the first screen, the SBI bank name and address is picked up automatically when you provide the correct IFSC code. Just below this, you are asked to provide City, State, District, Pin Code, etc. You should fill up the city, state, district, pin code where your NGO is located. Instead of this, many NGOs fill up the city, state where the SBI NDMB account is located. While this doesn't cause any damage, it skews the PFMS database. You should therefore avoid doing this.

3. Filing

No fee is payable for filing the form. Save a screenshot before clicking on 'final submit'.

Download and print a PDF copy after clicking 'final submit'. This will help you prove that you had filed the form if required.



4. Resubmission

If you find an error before your FC-6C has been approved, you can send an email to support-fcra@nic.in requesting them to allow you to resubmit the form before they approve it. This can save time and trouble for both the FCRA Department and for you.

If feasible, FCRA Department will send you a mail/sms and reopen the submission window online. Usually, there is a time lag between the message and reopening. You can then make the corrections and resubmit the form.

5. Correction after Approval

If your form has already been approved, but there has been a mix-up in the accounts or the details, you will have file form FC-6C again. Please consult your auditors or advisers for what needs to be done.

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