



KPMG AEOI Updates & Tracking Service CRS Alert



Date:	18 August 2025	Alert Type:	Document
Country:	Costa Rica	Regime:	CRS
Document Type:	Other Guidance		

Costa Rica: Issued Resolution on CRS Due Diligence and Compliance Amendments

On 23 July 2025, the Imprenta Nacional published Scope No. 92 of the Official Gazette No. 136, which includes Resolution MH-DGT-RES-0012-2025 issued by the General Directorate of Taxation of Costa Rica on July 1, 2025. This resolution consolidates the due diligence procedures, general reporting obligations, definitions, and timeframes that Reporting Financial Institutions (RFIs) must follow under the Common Reporting Standard (CRS), which were previously outlined in Resolutions No. DGT-R-16-2020, DGT-R-27-2021, and DGT-R-23-2022, all of which have now been repealed.

The key updates introduced by the new resolution are as follows:

- **Mandatory Self Review Tool for CRS Reports:** RFIs must complete the “*Self-Review Tool for CRS Reporting Compliance*” with the most current data when submitting the CRS report through the Tax Information Exchange System (SIIF).
- **Simplified Process for Filing Nil Reports:** For RFIs that have no reportable accounts, the prior requirement to submit a sworn declaration has been eliminated. Instead, RFIs must indicate on the SIIF system that they have no reportable accounts and complete the Self-Review Tool. The system will generate an Acknowledgment of Receipt.
- **New Supervision and Compliance Framework:** The Tax Administration is granted authority to supervise, verify, and monitor RFIs annually to ensure compliance with due diligence requirements and CRS reporting obligations. To achieve this, the Tax Administration may request relevant information on due

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diligence processes and the acquisition of self-certifications related to the annual CRS report.

Each year, the Tax Administration will issue a general resolution outlining the objective selection criteria. These criteria are designed to evaluate and diagnose, through technical processes, the risk of irregular behavior or non-compliance by RFIs. The Tax Administration will also annually disclose the risk criteria used for compliance evaluations (see [here](#) for a detailed KPMG Alert on the Objective Selection Criteria and the Risk Criteria for Supervision, Verification, and Monitoring of Entities Subject to CRS Reporting).

Where an RFI is subject to compliance evaluation and receives a compliance report with recommendations from the tax administration, the RFI should implement the recommendations within three months from the date the report becomes final.

- **Extended Reporting Deadline for Tax Year 2024:** Due to regulatory and technological updates aimed to enhance reporting efficiency and ensure compliance with international tax transparency commitments, the deadline for submitting CRS reports for the 2024 tax year has been extended. The CRS reports must now be submitted between 01 August and 01 September 2025, inclusive (see [here](#) for a detailed KPMG Alert on the Extended Reporting Deadline).

Reference (Spanish): [Official Gazette No. 136](#) [PDF 76,443 KB]

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For more information on KPMG AEOI Updates & Tracking Service, please see [here](#).

For additional summaries of the latest AEOI developments, please visit KPMG's TaxNewsFlash-FATCA/IGA/CRS Insights page, [here](#).

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