# BDB LAW Advisory



## Advisory on the Registration of CAS, CBA and/or its Components

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Simplified Policies on the Application for Registration of Computerized Accounting System (CAS), Computerized Books of Accounts (CBA) and/or its Components, including Electronic Storage System (ESS), Middleware and Other Similar Systems

MEMBER FIRM OF

### BUREAU OF INTERNAL REVENUE REVENUE MEMORANDUM CIRCULAR NO. 5-2021

### **ADVISORY**

#### SIMPLIFIED POLICIES ON THE APPLICATION FOR REGISTRATION OF COMPUTERIZED ACCOUNTING SYSTEM (CAS), COMPUTERIED BOOKS OF ACCOUNTS (CBA) AND/OR ITS COMPONENTS, INCLUDING THEE ELECTRONIC STORAGE SYSTEM (ESS), MIDDLEWARE AND OTHER SIMILAR SYSTEMS

#### Registration of CAS, CBA and/or its components

Taxpayers are not required to secure PTU, instead they shall be subject to the following process:

Registeration of the "System"	<ul> <li>Submit the requirements stated in Annex "A" of RMC No. 5-2021.</li> <li>BIR Form No. 1900 is no longer required to be submitted</li> </ul>
	<ul> <li>The "System" must comply with the standards set forth under Annex "B" of RMC No. 5-2021.</li> </ul>
Issuance of Acknowledgment Certificate	<ul> <li>Upon submission of the complete requirements, an Acknowledgment Certificate shall be issued by the RDO within three (3) working days.</li> <li>Permit to Use the System shall no longer be required.</li> </ul>
Post-evaluation by the RDO	<ul> <li>System demonstration or pre-evaluation is not required prior the use of the "System"</li> <li>The RDO shall conduct post-evaluation to determine compliance with the standards under Annex "B" of RMC No. 5-2021.</li> </ul>

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#### Taxpayers with existing Permit to Use (PTU)

All taxpayers with existing PTUs shall **NOT** be required to apply for registration. Existing PTUs shall be valid, except:

- 1. PTU was revoked due to non-compliance with existing revenue issuances
- 2. Existence of major system enhancement or upgrade, which will require the filing of new application for registration of the "System"

#### What constitutes major system enhancement?

- 1. Change in the functionalities of the system particularly on enhancements that will have a direct effect on the financial aspect of the system that includes modified computations and other financial-related issues that were considered;
- 2. Addition or removal of modules or submodules within the system that will have a direct impact on the financial aspect of the system;
- 3. Change in the system/software Version or Release Number that will have enhancements on the financial aspect of the system; and
- 4. All other enhancements that will be deemed as major system enhancement based on the recommendation of the technical evaluators after the comparative functionalities of the old and upgraded "system" 'were presented by the taxpayer.

The use of an enhanced or upgraded system, software, or application without prior registration with the BIR will result to:

- automatic revocation of the PTU originally issued; or
- the non-effectivity of the registration from the time the enhanced or upgraded system was adopted

The taxpayer may still be subjected to penalties under existing revenue issuances.

In case of minor system enhancement, the taxpayer must submit a written notification to their registered RDO/ LT Office stating the minor enhancements on the system.

Source: Revenue Memorandum Circular No. 5-2021 **ADVISOR**