THE Berlin GROUP

A EUROPEAN STANDARDS INITIATIVE

Berlin Group openFinance API Framework

Workplan 2026

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Contents

1 Introduction 1
1.1 From Core XS2A Interface to openFinance API 1
1.2 Workplan 2026 3
2 Short-term extensions: Finalisation of 2025 work 5
2.1 Integrated ID Services 5
2.2 Payment Initiation Functionality Extensions 5
2.3 Direct Access API account and user management 5
2.4 Wallet integration 6
2.5 Combinations of document and payment services functionality 6
2.6 Alignment MobileP2P Framework 6
2.7 Trade Finance Phase 1: Bank guarantee 7
3 Mid-term extensions 8
3.1 Administration Functions: Commercial Onboarding Services 8
3.2 Digital Euro impact 8
3.3 Support of Card Processing via Payment APIs 8
3.4 Audit Confirmation Services for Corporates 9
3.5 Support of Agentic AI 9
3.6 FX business (Direct Access Use Case) 10
3.7 DLT Smart Contract Triggered Payments 10
3.8 Mortgage/Loan Management API 11
3.9 Trade Finance Phase 2: Letter of credit 12
4 Watch List 13
4.1 API Access Schemes 13
4.2 eIDAS review (eID in general) 13
4.3 Tokenized commercial bank money 13
5 Back Log 14
5.1 Securities order business 14
5.2 Savings contracting 14
5.3 Account Opening Service 14
5.4 Account Switching Service 15
5.5 Open Insurance Use Case: Product offerings 15

5.6 Instant credit card issuing initiation 15
5.7 Factoring Services 15

1 Introduction

1.1 From Core XS2A Interface to openFinance API

With the revised Payment Services Directive (PSD2) the European Union has published a directive on payment services in the internal market. Among others, PSD2 contains regulations on services to be operated by Third Party Providers (TPPs) on behalf of a Payment Service User (PSU). These services are

- Payment Initiation Service (PIS) to be operated by a Payment Initiation Service Provider (PISP) TPP as defined by article 66 of PSD2,
- Account Information Service (AIS) to be operated by an Account Information Service Provider (AISP) TPP as defined by article 67 of PSD2, and
- Confirmation on the Availability of Funds Service (FCS) to be used by a Payment Instrument Issuing Service Provider (PIISP) TPP as defined by article 65 of PSD2.

To support the TPP in accessing the accounts managed by an Account Servicing Payment Service Provider (ASPSP), each ASPSP has to provide an "access to account interface" (XS2A interface). Such an interface has been defined in the Berlin Group NextGenPSD2 XS2A Framework.

The XS2A Framework is now extended to premium value added services. This interface is addressed in the following as **openFinance API Framework** (ref. www.berlin-group.org/open-finance for more detailed information). The openFinance API interface differs from the XS2A interface in several dimensions:

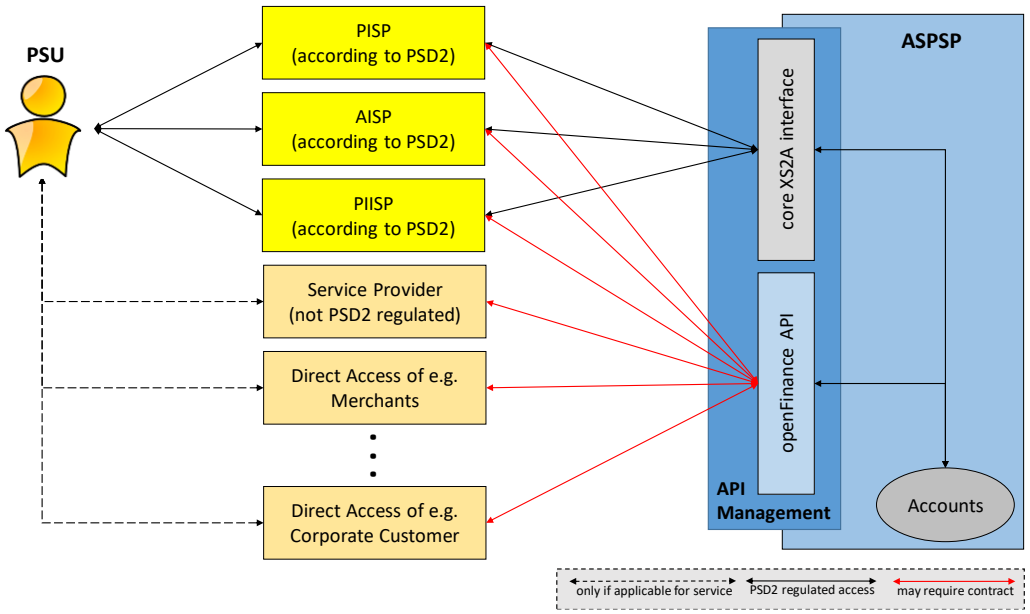
- The extended services might not rely anymore solely on PSD2 but e.g. also on GDPR;
- The openFinance API can address different types of **API Clients**, e.g. TPPs regulated by an NCA according to PSD2, or corporates not regulated by an NCA;
- The extended services might require commercial contracts between the API Client and the ASPSP;

The following openFinance API Services have already been standardised in 2022-2025:

- Basic API Framework Version 2.x with a.o. several new security functions and extended consent model as well as adding features for corporate direct access;
- Compliance Services based on API Framework Version 2.2;
- Extended Payment Services: reservation of funds, deferred execution of payments, recurring payments (both with/without dynamic amounts) and multiple recurring payments (also known in the market as variable or dynamic recurring payments);
- Standing Order Services: an dedicated service to submit, change and view standing orders systematically;
- Request-to-Pay with document integration and consent process to support onboarding routines for the API Clients;
- Push AIS Services (pushing account entries/statements/balances as well as incoming Request-to-Pay entries to third parties, following criteria consented by the PSU);
- AIS for Savings, Loans, Securities, Cards;
- Mandate Services for Direct Debits;
- Document Services, e.g. for secure postal services to online banking inboxes;
- Verification of Party Services, to support specifically verification of payee functions;
- Discovery Services to enhance documentation and scheme implementation (ASPSP directories);
- Admin Services for commercial onboarding of API Clients;

Already in 2023, the openFinance Taskforce had assessed that more or less all services required from API Access Schemes (EPC SPAA, EPC SRTP and giroAPI) were already covered by the offered openFinance services.

The following access models are followed by the openFinance API Framework:



1.2 Workplan 2026

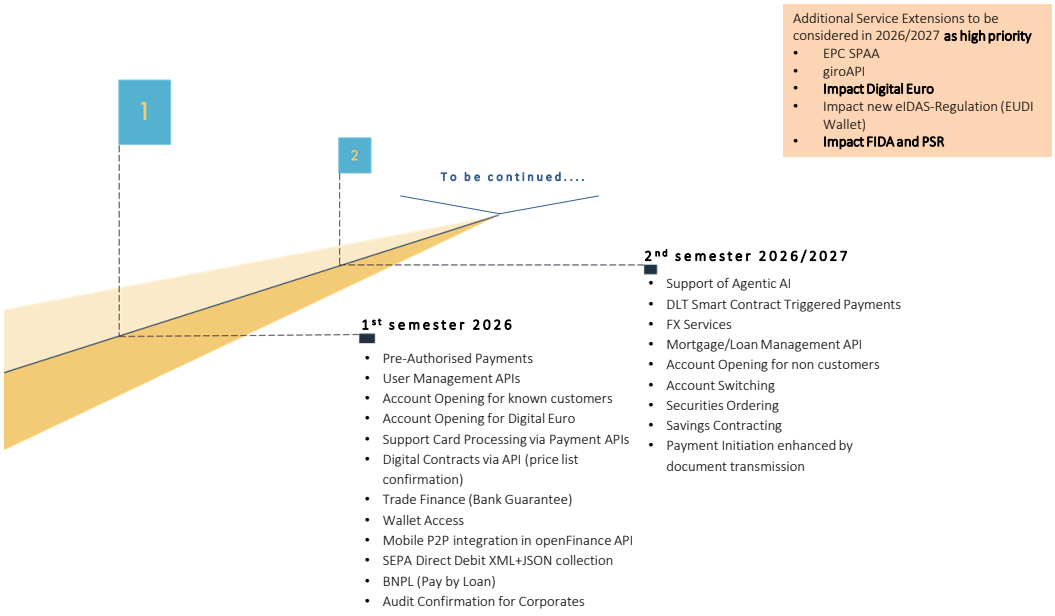
The Workplan 2026 distinguishes between short-term and mid-term extensions. In 2025 a list of services was prioritised for a two-years program, where some of them have been completed in 2025 (see above). All other services have been included again for 2026.

The earlier prioritisation was based on a.o. the following quantifiable criteria (based on weighted averages):

- Interest measured as a commitment to implement
- Commercial value
- Expected usage rate

In addition, priorities from the openFinance Advisory Group & Board were taken into account as well as non-quantifiable criteria, e.g. urgency of already available Change Requests, easy-to-achieve targets, resources offered as support during standardisation, and connection to the ongoing publication of regulatory texts and plans as e.g. by the European Commission in the draft FIDA, PSR, PSD3 and digital euro regulations.

The following picture summarises the resulting Workplan 2026:



Please note that the 2nd semester topics could also extend into 2027.

2 Short-term extensions: Finalisation of 2025 work

These items are all items from the Workplan 2025, where the work had been started already but not all items completely finished yet.

2.1 Integrated ID Services

This service allows to extend the payment initiation request with confirmation of certain PSU-related data (e.g. age, address data, TaxID etc.). A potential PSU consent could be part of the payments SCA process.

Todo:

- Extend the related extended payment service documentation as defined above.

2.2 Payment Initiation Functionality Extensions

The following extensions to the payment functionalities shall be finalised in detailed technical Implementation Guidelines:

- the initiation of a consumer loan into the payment initiation (Pay by Loan or now named Buy Now Pay Later - BNPL, ref. CR0006);
  such a service would allow the PSU to agree first with the ASPSP on a consumer loan to be used for the related payment. Additional functions like cancellation of remotely agreed loans and 'ex ante' information about all relevant rates (e.g. interest, installment details) shall be added as well.
- a new payment service type to support SEPA Direct Debit (SDD) collections via XML and JSON (ref. CR0007+CR0055);
  such a service would allow to initiate EPC-formatted SDDs or the JSON version as published in the payment data model version 2, together with relevant PSU-authorisations, by re-using the payment endpoint functionality of the core XS2A interface in introducing a new payment product. Potentially, this solution should also cover the lifecycle management of R-Transactions for frontends.

Todo:

- finalise Operational Rules and Implementation Guidelines as well as Open API files after a public market consultation on the Implementation Guidelines

2.3 Direct Access API account and user management

Direct access offers a re-use of the openFinance APIs as defined already for TPPs to the own customers of an ASPSP. For corporate customers the requirements on identification and authentication are similar to the requirements of the TPP-ASPSP interfaces, specifically in the more and more usual case where corporate systems are hosted in cloud platforms.

A first assessment of the related connectivity requirements showed that a direct access API should offer functions to administer users, accounts and certificates for existing corporate customers, which is part of the direct access definitions besides definitions for a.o. signing transactions via corporate seals or personalised digital certificates.

This specifically addressed the possibility to open Digital Euro accounts within corporates (e.g. merchants), where a pan-European solution is needed.

Implementation Guidelines for how to use existing AIS and PIS APIs for direct corporate usage, as well as draft Operational Rules for certificate-, user- and account management have been delivered already in 2025.

Todo:

- Provide Implementation Guidelines and OpenAPI files for the following Direct Access administration functions.
    - User and User Certificate Management
    - New Account Opening for known corporate customers
    - Account opening for Digital Euro for known customers

2.4 Wallet integration

The European regulatory roadmap comes with providing a new type of payment apps, e.g. the EUDI wallet program or the expected digital euro wallet provided by ECB. These external apps will need access to ASPSP systems via standardised APIs.

A white paper is planned to explore the potential impact of these regulatory roadmaps to the openFInance payment APIs first. In a second phase, detailed best practices or implementation guidelines should be provided.

Todo:

- Work out a white paper and potentially best practices

2.5 Combinations of document and payment services functionality

Payment services shall be extended to support document transmission. These documents can be documents like e.g. e-invoices to be transported with the related payment data to the ASPSP or it can be digital contracts or e-receipts only to be transported to the PSU via the ASPSP after a successful payment.

Todo:

- Extend the related Operational Rules and Implementation Guidelines and OpenAPI files.

2.6 Alignment MobileP2P Framework

The existing Berlin Group MobileP2P Framework is supporting amongst others a proxy-lookup service and reach functionality in a version 1.2 of the related MobileP2P Interoperability

Framework. Technically this Framework is not directly compatible with the openFinance architecture. The openFinance Request-to-Pay (RTP) service is now offering an RTP functionality not only for payment accounts but implicitly also for MobileP2P schemes. For this reason it is proposed to work on a version 2 of the MobileP2P Framework in order to have proxy lookup and RTP functionality with a common technical architecture and data model, aligned with the openFinance architecture. This will enable ASPSPs to more easily

- offer MobileP2P services directly to the market and
- achieve interoperability between existing MobileP2P services.

Todo:

- Review of the Mobile P2P Interoperability Implementation Guidelines and prepare OpenAPI files.

2.7 Trade Finance Phase 1: Bank guarantee

This is a service to be provided in a first phase:

- This service allows the Creditor to get a Bank Guarantee
- The definition of the possible types of guarantees for private and business clients is part of the business analysis phase by the Business Evaluation Working Group.
- As part of the business analysis, the Berlin Group will take into consideration the newest developments in the ISO 20022 API SEG where a Business Justification on Trade Finance Bank Guarantees has been submitted.

3 Mid-term extensions

The mid-term extensions are aimed to start in Q2 2026 and may extend into 2027. Please note that depending on market input and feedback or new market developments, the Workplan 2026 and related timelines may be subject to further adjustments and finetuning.

3.1 Administration Functions: Commercial Onboarding Services

Ref. CR0025

The version 2 of Onboarding Services will provide service pricing and service details information to the market. The Service Registering service will provide means to subscribe to a service, where applicable. Signature Processes will be more globally defined to transmit signature processes results of PSUs to the ASPSP, particularly in the case of corporates.

Todo:

- Extend the related Operational Rules and provide Implementation Guidelines and Open API files.

3.2 Digital Euro impact

The ECB has started the realization phase for a digital Euro in 2024, resulting in a first version of the intended Rulebook covering technical details in specification appendices. Berlin Group editors are involved in several of the related Rules Development Technical Workstreams. The final requirements to the Digital Euro are currently being studied and a pilot may start in a few years.

The Berlin Group has offered the use of the Berlin Group openFinance API Framework for the digital euro to the ECB and has started an informal contact group with the ECB for more in-depth analysis of the fit-for-purpose of the openFinance API Framework use in the digital euro architecture

Todo:

- Work out potential impacts of the Digital Euro program on the openFinance API Framework and its services, including the specific subject of card processing functions, see Section 3.3

3.3 Support of Card Processing via Payment APIs

It is intended to support the clearing and settlement of card transactions via the openFinance Payment Initiation APIs. This processing model is described in an overview in the Berlin Group document “Reconciliation and Settlement of Card Payments via Instant Payments and Premium Payment APIs, A White Paper as an Introduction to the Topic, Version 1.1, 09/01/2024”. To achieve this, a new SCA channel “EMV” needs to be addressed at least for

the Payment APIs, where the result of the authentication of the PSU towards the card is securely transported via the EMV cryptogram.

In addition to the EMV cryptogram also card transaction related data like the Terminal ID needs to be transported. This data is covered by the ISO20022 card data container used in Berlin Group's SCC Specifications, where this data is encapsulated in direct debit messages to support a SEPA mechanism for clearing and settlement of card transaction in the SEPA payment infrastructure.

Todo:

- Review the ISO card data container to adapt it to the newest ISO 20022 data model
- Add the EMV SCA channel to the openFinance Framework at least for Payment APIs.

3.4 Audit Confirmation Services for Corporates

Auditors need access to corporate financial information provided by the corporate bank as part of the yearly corporate auditing process. Today, this information is provided via dedicated portals in pdf formats or even as letters. A structured data set would be much easier processed (automatically) by auditors. The financial information needed by the auditors go beyond the broad account information services already available in the openFinance API Framework.

It is intended to extend the openFinance API Framework respectively the extended account information services by auditor confirmation services, including a related adjustment of the existing consent services.

Todo:

- Set-up a dedicated working group
- Provide Operational Rules and Implementation Guidelines and Open API files.

3.5 Support of Agentic AI

While Agentic AI and Agentic Commerce are still in their infancy, and each of the individual developments may not have such a significant impact in the short term, together they might profoundly influence how the external world prefers to connect with banks. Agentic AI, Agentic Commerce, AP2, MCP, etc., are all about connectivity to automated channels.

As agents are expected to increasingly reduce friction in financial transactions, loyalty may shift from banks to whichever agent best optimises a customer's financial well-being. In distribution, agents may start to intermediate many customer journeys: shopping bots comparing financing at checkout, CFO copilots optimising treasury, or household assistants managing bills.

A positioning of Berlin Group as a major API standardisation initiative for banks is needed.

Todo:

- Explore and analyse the potential impact of agentic AI on the openFinance API Framework
- Define the potential standardisation scope for agentic AI within the openFinance API Framework

3.6 FX business (Direct Access Use Case)

This service shall support FX business once the Direct Access conditions have been set for payment initiation services. The service will offer:

- Exchange information;
- Initiate the exchange order for a future payment at the time of authorisation of a submitted payment;
- Buy/Sell options for FX;
- Bank check services integrated into this;

Todo:

- Provide Operational Rules and Implementation Guidelines and Open API files.

3.7 DLT Smart Contract Triggered Payments

Smart contracts in a customers / Market DLT Blockchain structure should be able to work with existing SEPA Payments. So the smart contract should address an API at the Payer site to do a PIS. Operational rules should define how attributes in a SEPA Credit Transfer should be filled (e.g. by settings for purpose codes, remittance information and end-to-end identification). These settings shall enable a matching of the payment to a smart contract on sender and receiver side, e.g by using the Push AIS service which is currently built. In addition adaption to the current authorisation and extended payment initiation framework on elements like pre-authorisation terms needs to be reviewed.

Todo:

- write the related Operational Rules and extend the existing Implementation Guidelines and OpenAPI files for extended payment initiation services if applicable.

3.8 Mortgage/Loan Management API

Ref. CR0058
This service should allow (from the customer's perspective):

- with current bank involved
  - show existing mortgages/loans with all product details,
  - show current offers for expiring mortgages/loans,
  - manage a mortgage/loan (e.g. add documents, get status),
  - to prolong an expiring mortgage/loan,
  - increase an existing mortgage/loan while keeping the conditions,
  - change the conditions of an existing mortgage/loan (e.g. fixed-interest duration),
  - get offers and apply for new mortgage/loan,
  - calculate the costs of an early mortgage/loan repayment,
  - terminate an existing mortgage/loan.
- with other bank involved
  - apply for new financing of an existing mortgage/loan by another bank,
  - transfer current mortgage/loan to another provider.
- with multiple banks involved
  - get a list of available mortgage/loan products including conditions (e.g. as a link list).
  - generate a liquidity planning, based on the currently available financial information regarding any current mortgage.

Todo:

- Overlaps with the Buy Now Pay Later (BNPL) Service (cp. section 2.2) shall be checked
- Provide Operational Rules and Implementation Guidelines and OpenAPI files.

Please note that the priority of this work item will be re-assessed in Q3 2026.

3.9 Trade Finance Phase 2: Letter of credit

This is an undertaking/promise given by a Financial Institute on behalf of the Buyer to the Seller, that, if the Seller presents the complying documents to the Buyer's designated Financial Institute as specified by the Buyer in the Purchase Agreement then the Buyer's Financial Institute will make payment to the Seller.

- Creation of an L/C Agreement
- Support of qualified signatures (creation / validation) for the Agreement and the documents
- Document upload

Event-driven payment initiation (evidences: scanned documents, signed documents, smart contracts, etc.)

Todo:

- Provide Operational Rules and Implementation Guidelines and OpenAPI files for phase 1.

4 Watch List

openFinance will on a regular basis re-asses potential impacts of the related topics on the openFinance APIs. Priorities of the topics in the Watch List could be re-assessed after e.g. further regulatory clarifications.

4.1 API Access Schemes

In the European market, API Access Schemes (e.g. EPC SPAA and giroAPI) are evolving. Berlin Group is committed to support the functional requirements of all prevailing API Access Schemes within its standards. In order to achieve this, Berlin Group will continuously monitor the upcoming scheme rulebooks and MVP definitions and potentially adjust the Workplan.

4.2 eIDAS review (eID in general)

The European Commission has issued the eIDAS2.0 Regulation, which integrates a European Digital Identity Framework, commonly understood as the "EUDI Wallet Framework".

Berlin Group openFinance will assess the impact on the API Framework, starting with a White Paper study first. This work is expected to be provided in cooperation with some of the Large Scale Pilots of the European Commission.

4.3 Tokenized commercial bank money

In addition to a CDBC for retail banking (e.g. Digital Euro), also commercial bank money could be tokenized and issued by ASPSPs. Money processed in such a token could be converted either into commercial bank money or into CDBC directly where needed. The related token issued by an ASPSP would be fungible with a related token issued by any other ASPSP within the system. Berlin Group openFinance could start to assess the interbank interfaces and potential impacts on the API Framework.

5 Back Log

The openFinance Taskforce and Advisory Board had discussed and evaluated other potential services in addition to the mid-term services. The evaluation showed that these services were either considered as not urgent, too early for standardisation or missing stakeholder involvement. Nevertheless these services are listed here to guarantee a full market transparency on the prioritisation process. The fact that the services are listed here **does not necessarily imply** that the services will be standardised in the near future: standardisation in the openFinance community will always be driven by current market needs.

5.1 Securities order business

This service will support three sub-services:

- Information about available stock exchange platforms, rates for a chosen security, other additional information (optional, maybe at a later step).
- Order submission with additional data like limits or order places and order authorisation.
- Status reports on order submissions restricted to submitted orders.

Todo:

- Check with existing market standards.
- Provide Operational Rules and Implementation Guidelines and OpenAPI files.

5.2 Savings contracting

This service will support two sub-services:

- show product details like interests, lifetime, etc.
- account opening authorisation (SCA, signatures etc.)

Todo:

- Provide Operational Rules and Implementation Guidelines and OpenAPI files.

5.3 Account Opening Service

(later in the process, due to potential impact from the new eIDAS regulation)

This service supports a fully digital account opening. The following use cases are possible:

- The opening of an additional account for an existing customer.
- The account opening for a new customer including the KYC process, optionally with eID and eSignature involved.

Todo:

- Provide Operational Rules and Implementation Guidelines and OpenAPI files.

5.4 Account Switching Service

This service supports fully digital account switching. The PSU initiates this via its new ASPSP.

- Interface to initiate the transfer (Subscription)
- Interface to transfer the date to the new ASPSP.
- Optional: Transfer of all Assets to the new ASPSP

Todo:

- Provide Operational Rules and Implementation Guidelines and OpenAPI files.

5.5 Open Insurance Use Case: Product offerings

SMEs need insurances - e.g. against fire or natural catastrophes. Either during a (e.g. annual) check of the costs of the insurances or change of situation (e.g. new building) SMEs have a look on the costs. Besides the "current costs" also information about "adequate market prices" are important - combined with the possibility to change the insurance if it is too expensive / another insurance fits better to SME's needs.

In Germany there are portals providing this information in web frontends. However, they are not integrated in existing systems like ERP systems. APIs would be useful to retrieve this information about quotes for insurances, display it in the user's workflow directly and having the possibility to change to another insurance.

5.6 Instant credit card issuing initiation

Allow third parties / companies to ask for new / virtual credit card issuing on demand. E.g. for one-time (pre-approved) payments for employees; dedicated subscription payments that can be managed by employees (using virtual cards that expire after its usage, limits can be realised and fraud reduced), or to facilitate expense management.

5.7 Factoring Services

Factoring - a company that wants to optimise their cash availability and/or reduce the risk of not being payed wants to sell its receivables to a factoring provider.