

***General Specifications
for Electronic Filing of
Bank Secrecy Act (BSA) Reports***



Revised Date July 2008

DEPARTMENT OF THE TREASURY

These Specifications for Electronic Filing of BSA Reports were developed under the sponsorship of the following:

**Financial Crimes Enforcement Network
Internal Revenue Service**

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Revision History

Version Number	Date	Reason for Change
1.0	8/24/07	Initial Issue
1.1	4/7/08	Removed State and Country list. Removed ZIP Code validation list. Both lists may be accessed at http://www.fincen.gov/forms/files/country_and_state_codes.pdf .
1.2	7/8/08	Replaces references to magnetic media with references to electronic filing using the BSA E-Filing System. References updated testing procedures, including information on TCCs. Added FAQs and Definitions. General information has been moved from individual form specifications to the General Specifications.

Purpose

The purpose of these specifications is to provide general requirements and conditions for filing Bank Secrecy Act (BSA) reports submitted electronically using the BSA E-Filing System. For more information on the BSA E-Filing System and to register please go to <http://bsaefiling.fincen.treas.gov>.

These specifications only apply to BSA reports that have been revised as of March 2007 and later. Additional requirements and conditions for each BSA report will be found in separate report specifications. Go to http://www.fincen.gov/reg_bsaforms.html under 'Electronic Filing Specifications.' Report any inconsistencies between the General Specifications and separate report specifications.

BSA report versions prior to March 2007 must refer to the specific electronic filing guidelines for that BSA report.

The electronic file forwarded to the Enterprise Computing Center - Detroit (ECC-D) will be considered as a substitute for the paper report, provided the transaction is accepted by the ECC-D system. Receipt and acknowledgment of electronic files is further discussed in a later section.

Approval to participate in the electronic file reporting program is contingent upon the filer following these steps:

- Review specifications
- File application to participate
- Satisfy acceptance testing procedures
- Receive formal FinCEN approval
- Monitor quality

Continued participation in the BSA E-Filing Program is contingent upon maintenance of quality standards and timely reporting.

It is recommended that you refer to the General Specifications first, and then the separate report specifications.

Electronic Filing

For purposes of these specifications, the filer is the organization responsible for filing the BSA form. The filer and transmitter may be the same or different entities.

For information on receiving an account on the BSA E-Filing System test site or on submitting batch files using the BSA E-Filing System, please see the BSA E-Filing website at <http://bsaefiling.fincen.treas.gov> or contact the BSA E-Filing Help Desk at 1-888-827-2778 (option 6) or BSAEFilingHelp@notes.tcs.treas.gov.

Approval to file BSA reports via electronic files will be contingent upon the applicant satisfactorily passing an acceptance test. (See Test Files and Acceptance Procedures for further guidance.)

After you have received approval to file electronically you need not reapply each year; however you must notify the BSA-E-Filing Help Desk if you change software or software provider or had hardware or software changes that would affect the characteristics of your electronic submission. The BSA E-Filing Help Desk can be contacted at 1-888-827-2778 (option 6) or BSAEFilingHelp@notes.tcs.treas.gov. Please notify the RPPD Help Desk at 800-949-2732 if you discontinue filing electronically.

FinCEN will advise electronic filers when they may begin to file using the BSA E-Filing System. Until this notification has been issued, electronic files will not be accepted.

If entire files are unreadable due to formatting or file structural errors, the BSA E-Filing System will reject the file and will notify the filer via e-mail and through the Tracking Status page. The errors on the file will be reported to the filer and the filer must correct these errors and send a replacement for the file. A filer whose error rates are at a high level on a continuing basis may risk being discontinued as an electronic filer.

Filers are required to retain a copy of each filed BSA report and all original supporting documentation or business record equivalent for five years from the date of the BSA report (BSA General Instructions, How to Make a Report). Additionally, the filer must retain any acknowledgement files received to facilitate inquiries for the same period as well as any 'working' papers which may be necessary for centralized keying of transactions. All supporting documentation must be made available to appropriate authorities upon request.

Electronic files are submitted to ECC-D through the BSA E-Filing System. The BSA E-Filing System receives the reports and transmits the reports to ECC-D on a daily basis.

The BSA E-Filing System provides a track status view to relay status information to the submitting filer.

Filing Requirements

Suspicious Activity Reports (SAR)

The filing of SARs using electronic files will be on a continuous basis. Electronic files must be prepared and submitted via the BSA E-Filing System to ECC-D for processing no later than 30 calendar days after the date of initial detection of facts that may constitute a basis for filing a SAR. If no subject was identified on the date of detection of the incident requiring the filing, a Financial Institution may delay filing a SAR for an additional 30 calendar days to identify a Subject. In no case shall reporting be delayed more than 60 calendar days after the date of initial detection of a reportable transaction.

All Other BSA (Non-SAR) Reports

All other BSA reports filed using electronic files may be filed on a daily basis, and should be filed no less than on a biweekly basis (e.g., January 1, 2007 – January 14, 2007). Electronic files must be prepared and submitted via the BSA E-Filing System to ECC-D for processing as soon as possible after the reporting period ends. Non-SAR reports filed using electronic files are considered timely when filed no later than 25 calendar days after the date of the transaction.

Test Files and Acceptance Procedures

See the BSA E-Filing System Batch File Testing Procedures posted on <http://bsaefiling.fincen.treas.gov> for information on required testing of submissions for new users. This document is located under Quick Links.

Receipt and Acknowledgment of Electronic Files

Electronic File Acknowledgments

Each electronically filed non-SAR will be acknowledged to the transmitter within two business days after receipt. Transmitters should immediately match the acknowledgements to the original files transmitted. If the filer does not receive the acknowledgement file within five business days, please contact the BSA E-Filing Help Desk at 1-888-827-2778 (option 6) to determine if you will need to resubmit your filing. This could be a result of an improperly formatted electronic file, which cannot be processed and is rejected by the system. The BSA E-Filing System will notify the filer electronically of any errors in the submitted electronic file which caused the file to be rejected. The filer must correct these errors and resubmit the file in order for the file to be acknowledged.

Any non-SAR BSA report that is processed but contains transaction errors will be flagged and error codes indicating the reason for the error(s) will be returned via an acknowledgement record. Acknowledgements will be routed to the filer via BSA E-Filing Secure Message Replies. The content of the acknowledgement (including the assigned Document Control Number and any error codes) will be contained in a file attached to the Secure Message Reply. These error situations should be corrected and the records sent back via the BSA E-Filing System to ECC-D as correction records and not as amendments. A correction record corrects errors on already filed reports; an amendment to any BSA report adds further information. Further information regarding acknowledgements can be found in the individual report electronic filing specifications. ECC-D acknowledges receipt by inserting a document control number in the DCN field. The DCN number must be included when resubmitting corrections for those records flagged because of errors. SAR reports **currently are not acknowledged** to the transmitter.

Filing Corrected Reports

If a BSA report that was prepared and submitted via an electronic file must be corrected, you must file a complete corrected BSA report as soon as possible. All fields must be completed with the correct information, NOT JUST THE DATA FIELDS REQUIRING CORRECTION. Corrected BSA reports will be accepted via electronic files. The date filed must be the date of the corrected BSA report. For SARs, an explanation of the changes must be included in the narrative. Amendments to electronically filed CTRs, DEPs, and CTR-Cs must include the DCN from the acknowledgment record, along with the amendment code indicator.

Contacts for Assistance

Compliance-Related and Forms Questions

Direct all Bank Secrecy Act (BSA) compliance-related inquiries and BSA Forms completion questions to the FinCEN BSA Resource Center's Regulatory Helpline at 1-800-949-2877.

Technical Filing Questions

Electronic submissions for BSA forms are processed via the BSA E-Filing System. See the BSA E-Filing web site <http://bsaefiling.fincen.treas.gov> for information, including user documentation such as Frequently Asked Questions (FAQs) and user manuals and guides, or contact the BSA E-Filing Help Desk at 1-888-827-2778 (option 6) or BSAEFilingHelp@notes.tcs.treas.gov. The Help Desk regular hours of operation are 8:00 am - 6:00 pm East Coast Time, Monday - Friday. Please note that the Help Desk is closed on Federal holidays.

Overview of File

An electronic file is an alternative to filing BSA reports on paper. If you file a transaction using electronic files, do not file a paper BSA report for the same activity.

All initial, corrected, amended, supplemental (recurring), and late report filings can be submitted via electronic files.

BSA reports that have missing or incomplete information are considered original (initial) filings. When information becomes available they should be replaced via a new electronic file and include the corrected or supplemental indicator code. (Unless technical difficulties prevent the filing institution from doing so, use the same method for filing a corrected and/or supplemental BSA report as the initial BSA report).

All dates are to be in the format of **century, year**, month, day with month and day both being right justified and zero filled (CCYYMMDD), unless specified otherwise in the separate report specifications..

Money amounts **should be right justified and zero filled**. Enter dollar amounts only; all cents should be rounded up to the next higher dollar amount (e.g., \$10,000.01 should be reported as \$10,001).

All name, address, and city fields are to be **left justified and space filled**, unless specified otherwise in the separate report specifications.

All alphabetic characters must be in upper case.

All name and address fields must follow the Name Editing Conventions specified in the attachments.

Account numbers must NOT contain leading zeroes unless they are part of the actual account number.

Do not use dashes in the entry for an EIN or SSN.

If the suspicious activity violation amount on a SAR is unknown, leave the amount field blank and check the box for Unknown.

Do not use default values, such as all zeroes, all nines, N/A, or Unknown, for any fields.

Do not use carriage returns, tabs, low values, special characters, or charts/tables when entering data into the fields or in the narrative.

All required fields (fields with an asterisk *) must be completed with the requested information. If the information is unknown, enter 'XX' in the field, left justified and space filled, unless otherwise specified. Non-required fields should be left blank if information is unknown or not applicable.

Unless specified differently, the following must apply for all entries:

- Entries must be left justified and space filled.
- Entries should not contain lower case characters in the file.
- All 'Filler' fields must be space filled.
- Blank fields must be space filled.
- Do not use low values as a substitute for spaces.

Attachment A – Definitions

Term	Description
Account	The customer's account number as related to the transaction being reported, if any.
Corrected Report	A report which is used to correct one that was previously filed but rejected by ECC-D because of validity or consistency errors.
Currency	Currency is the coin and paper money of the United States or any country, which is circulated and customarily used and accepted as money.
DBA	Doing Business As
ECC-D	Enterprise Computing Center - Detroit
EIN	Employer Identification Number
FI	Financial Institution
File	A file consists of records submitted by a transmitter electronically.
Identifying Numbers	For individuals, it is the Social Security Number (SSN). For customers that are not individuals, it is the Employer Identification Number (EIN). If an individual is a non-resident alien, it is an Individual Taxpayer Identification Number (ITIN).
ITIN	Individual Taxpayer Identification Number
SSN	Social Security Number
TIN	Taxpayer Identification Number
Transactor	A person(s) who conducts a transaction.
Transmitter	Person(s) or organization(s) submitting electronic file(s).
Transmitter Control Code (TCC)	An eight position alphanumeric character identifier assigned to the transmitter prior to submitting electronic files to the BSA E-Filing System. See the BSA E-Filing Test Procedures for information on obtaining a TCC.

Attachment B – Error Code List

Error Code	Error Source
F01	Non-numeric record counts reported on 1A summary record.
F02	Number of records reported does not match the computer count for the 2A record or 2A record is not the second record on the file.
F03	Number of records reported does not match the computer count for the 2B record or 2B record is not the third record on the file.
F04	Number of records reported does not match the computer count for the 3A record, or 3A is not the fourth record on the file or the 3A record has no corresponding 5A record.
F08	Number of records reported does not match the computer count 3E records.
F09	Number of records reported does not match computer count for 4A records.
F10	Number of records reported does not match computer count for 5A records.
F11	Explanation/Description (7A) record in error.
F16	No Transmitter (1A) Record on file.
F17	No Branch Summary (9A) Record on file or a 9A record is found with no prior 3A record.
F18	No File Summary (9Z) Record on file.
F22	Parent MSB (9B) summary totals do not equal total of MSBs reported.

Attachment C – FAQs

Q1.	During the acceptance test, are you planning to return an acknowledgment file for non-SARs?
A1.	Yes, we will acknowledge your test file but do not require that it be corrected and resubmitted if it contains errors. We do recommend that you use it to test your internal error programs.
Q2.	Are the Standard Country and State Abbreviations mandatory?
A2.	Yes.
Q3.	Is the record format fixed or variable length?
A3.	The record format is a fixed length.

Attachment D – Name Editing Instructions

- A. Delete any titles, prefixes, suffixes or other descriptive information such as Mr., Mrs., Dr., Reverend, Partner, or Trustee. Do not delete suffixes that distinguish family members such as Jr., Sr., III or IV. Suffixes should be edited to follow the last name in the last name field. For example, John M Doe Jr., last name = Doe Jr, MI = M and first name = John. Do not separate names with slashes ("/").
- B. Delete all punctuation (e.g., 'JR.' would be submitted as 'JR').
- C. Do not use the following words in fields:
 - a. THE
 - b. SEE ABOVE
 - c. SAME AS ABOVE
 - d. SAME
 - e. COMPUTER GENERATED
 - f. SIGNATURE CARD
 - g. NONE
 - h. NON CUSTOMER
 - i. CUSTOMER
 - j. T/A
 - k. VARIOUS
 - l. OTHER
 - m. N/A
 - n. UNKNOWN
 - o. NOT APPLICABLE
 - p. DBA
 - q. SUPPORTING DOCUMENTS ATTACHED
 - r. SEE NARRATIVE
 - s. Any variations of the above examples
- D. Spanish surnames. Care must be taken in formatting Spanish surnames as the names are usually written in the order of first name, father's last name, and then mother's last name, i.e., Juan Vega Santiago. In this example, Vega Santiago

would be used as the last name; and Juan as the first name. Enter the data into the corresponding fields, without slashes ('/').

- E. If only the surname of an individual is present, place the name in the last name field. Do not use a slash ('/') at the end of the name.
- F. If a non-individual is listed, enter the entity name in the last name field. Do not enter slashes between names.
- G. Delete the word, 'The' whenever it appears.