Bank Secrecy Act Electronic Filing System (BSA E-Filing) Batch Validation Implementation

On November 15, 2008, FinCEN will deploy new system enhancements to the Batch Validation process of the Bank Secrecy Act Electronic Filing System (BSA E-Filing). The goal of these enhancements is to improve BSA data quality by providing detailed error notifications to filers upon submission, which ultimately will facilitate more timely correction of data issues.

The new Batch Validation process will apply field and business rule validations to Currency Transaction Report (CTR), Designation of Exempt Persons (DEP), and Currency Transaction Report by Casinos (CTR-C) records and will ensure that submitted files meet the formatting requirements defined by FinCEN in the appropriate BSA E-Filing Requirements documents: <u>BSA Electronic Filing Requirements for the Currency</u> <u>Transaction Report (CTR) (FinCEN Form 104) and Designation of Exempt Person</u> (DEP) (FinCEN Form 110) and <u>BSA Electronic Filing Requirements for the Currency</u> <u>Transaction Report by Casinos (CTR-C) (FinCEN Form 103)</u>

FinCEN will implement the new Batch Validation approach in two stages. The first stage, which will last a minimum of six months, will permit *all* submissions that do not correspond to formatting requirements to be accepted with warnings. Accompanying the warning messages will be a corresponding entry in the BSA E-Filing Track Status with additional information for any file that does not adhere to the field and business rule validations. After the first three months, FinCEN will assess the process to determine if the initial six-month period should be extended. Once FinCEN initiates the second stage of the approach, the BSA E-Filing system will either accept submissions with warnings or completely reject the submission, depending on the severity of the data issue(s).

To allow a preview of the new functionality, FinCEN has updated the BSA E-Filing User Test system, (<u>http://sdtmut.fincen.treas.gov/</u>), with the new Batch Validation enhancement, as well as provided a detailed Questions and Answers document available on the BSA E-Filing Web Site.

Questions about this new BSA E-Filing feature may be directed to the BSA E-Filing System Help Desk at 1-888-827-2778 (option 6) or via email at <u>BSAEFilingHelp@notes.tcs.treas.gov</u>. The Help Desk is available Monday through Friday 8:00 a.m. – 6:00 p.m. EST. The BSA E-Filing Home Page is located at <u>http://bsaefiling.fincen.treas.gov</u>.