



Strategic Plan

Financial Crimes Enforcement Network
Fiscal Years 2008 - 2012



Strategic Plan

Fiscal Years 2008 – 2012
Financial Crimes Enforcement Network

Table of Contents

Message from the Director	1
Introduction	3
The Bank Secrecy Act	4
The Nation’s Financial Intelligence Unit	5
Mission Statement and Vision	6
Core Values	7
Cross-Cutting Principles	8
Outcome Goals, Objectives, and Strategies	10
Outcome Goal 1: <i>Financial systems resistant to abuse by money launderers, terrorists and their financial supporters, and other perpetrators of financial crime</i>	10
Outcome Goal 2: <i>Detection and deterrence of money laundering, terrorism financing, and other illicit activity</i>	14
Outcome Goal 3: <i>Efficient management, safeguarding, and use of BSA information</i>	18
Management Goal: <i>FinCEN’s mission is accomplished by high-performing employees and managers operating in a stimulating and responsible work environment</i>	22
Appendix 1: FinCEN’s Strategic Framework	26
Appendix 2: Key Factors Affecting the Achievement of FinCEN’s Strategic Goals	28
Appendix 3: Mission, Cross-Cutting Principles, and Goals	32

Message from the Director



I am pleased to submit this Financial Crimes Enforcement Network Strategic Plan for Fiscal Years 2008-2012.

The Financial Crimes Enforcement Network, known as FinCEN, is a bureau of the U.S. Department of the Treasury, within the Office of Terrorism and Financial Intelligence. FinCEN's mission is to enhance U.S. national security, deter and detect criminal

activity, and safeguard financial systems from abuse by promoting transparency in the U.S. and international financial systems. FinCEN's work advances the Treasury Department's strategic goal of preventing terrorism and promoting the nation's security through strengthened international financial systems.

As the administrator of the Bank Secrecy Act (BSA), FinCEN regulates the financial industry for anti-money laundering / counter terrorism financing (AML/CFT) purposes across a broad range of sectors, including banking, securities, insurance, money services businesses, casinos, and precious metals and jewelry dealers. The resulting public-private sector partnership helps protect against those who would exploit the nation's financial system for improper purposes.

These financial institutions also provide a stream of reported information that is reviewed by FinCEN's expert analysts to detect trends and patterns of potential illicit activity, and used to support regulatory policy and efforts to inform the financial industry of risks and vulnerabilities. FinCEN also makes the BSA information available to many government partners and further supports their law enforcement, regulatory and intelligence missions. Finally, as the nation's financial intelligence unit, FinCEN shares its expertise and certain information with its counterparts in over 100 countries around the world.

This broad range of activities is accomplished by a small group of 300 dedicated professionals, who are constantly called upon to learn, adapt, and innovate. In line with a thorough review that I launched after joining FinCEN as Director in April 2007, staff members are also seeking ways to make everything we do more efficient and effective.

To integrate all FinCEN activities, this plan focuses on three mission-critical outcome goals for the next 5 years: financial systems resistant to criminal abuse; detection and deterrence of money laundering, terrorism financing, and other illicit activity; and efficient management, safeguarding, and use of BSA information.

The plan also outlines five cross-cutting principles that will serve as the foundation for all our work:

- A quest for maximum efficiency and effectiveness in both our internal operations and our external impact;
- A commitment to create value for the wide range of government customers that rely on the BSA data and analyses of that data;
- Partnerships and collaboration with a host of external entities as well as among FinCEN employees with different areas of expertise;
- A global perspective; and
- Use of secure, advanced technology to facilitate all our operations.

In the coming years, the financial services industry and the methods used by those who would seek to exploit it are certain to evolve. This strategic plan offers us at FinCEN a framework for keeping a steady focus on our obligations to the American people while enhancing our ability to achieve our mission in a changing world.

James H. Freis, Jr.
Director
Financial Crimes Enforcement Network
April 2008

Introduction

The Financial Crimes Enforcement Network (FinCEN) is a bureau of the U.S. Department of the Treasury, within the Office of Terrorism and Financial Intelligence (TFI). TFI supports the Department's strategic goal of preventing terrorism and promoting the nation's security through strengthened international financial systems. TFI applies analytical expertise and a broad range of Departmental authorities to preempt and neutralize the flow of money to terrorist groups, state sponsors of terrorism, proliferators of weapons of mass destruction, regimes that constitute a threat to the United States, drug traffickers, and other criminals. These actions promote financial stability as well as national security.

FinCEN plays two important roles in the Treasury Department's multi-faceted efforts to keep the world's financial systems accessible to legitimate users while excluding those who wish to exploit these systems for illegal purposes. FinCEN is the administrator of the Bank Secrecy Act, the oldest and most comprehensive federal anti-money laundering law. FinCEN also serves as the nation's financial intelligence unit (FIU). In both roles, FinCEN pursues the Treasury Department's strategic outcome of safer and more transparent U.S. and international financial systems by promoting appropriate transparency of financial transactions.

The Bank Secrecy Act

The Bank Secrecy Act (BSA) was passed in 1970 to fight money laundering and other financial crimes by eliminating the secrecy formerly cloaking many financial transactions. Amended numerous times, notably by the USA PATRIOT Act, the BSA now applies to a wide range of financial institutions and includes a focus on terrorism financing. The BSA is one of the nation's most powerful tools for preventing criminals from exploiting the U.S. financial system.

To administer the BSA, FinCEN:

- Issues, interprets, and supports and enforces compliance with regulations implementing the law;
- Supports and coordinates compliance examination functions delegated to other federal regulators;
- Manages the collection, processing, storage, and dissemination of BSA information;
- Maintains a government-wide access service to the BSA information, and networks users with overlapping interests; and
- Conducts analyses to support policy makers; law enforcement, regulatory, and intelligence agencies; and the financial industry.

The Nation's Financial Intelligence Unit

FinCEN serves as the nation's financial intelligence unit (FIU). An FIU is a central, national agency responsible for receiving (and as permitted, requesting), analyzing, and disseminating to the competent authorities disclosures of financial information:

- (i) concerning suspected proceeds of crime and potential financing of terrorism, or
- (ii) required by national legislation or regulation,

in order to combat money laundering and terrorism financing.

FinCEN plays a major role in promoting the multilateral work of the Egmont Group, an association of more than 100 FIUs from around the world. FinCEN assists other countries in developing their FIUs, helps established FIUs strengthen their counter-terrorism and anti-money laundering policies and programs, provides a secure web system through which Egmont members can exchange information, and participates in the Egmont Group's coordinating and working groups.

Mission Statement

FinCEN's mission is to enhance U.S. national security, deter and detect criminal activity, and safeguard financial systems from abuse by promoting transparency in the U.S. and international financial systems.

Vision:

Safer,
TRANSPARENT
U.S. and international financial systems

Core Values

FinCEN is committed to maintaining the highest standards of excellence, integrity, and mutual respect, consistent with the Treasury Department's core values. FinCEN accepts the public trust that underlies its role in strengthening national security, and strives to provide outstanding public service. FinCEN is committed to developing and maintaining a diverse, innovative, and expert work force and an organization well equipped to serve the public and achieve its mission.

Service

Work for the benefit of the American people.

Integrity

Aspire to the highest ethical standards of honesty, trustworthiness, and dependability.

Excellence

Strive to be the best, continuously improve, innovate, and adapt.

Objectivity

Encourage independent views.

Accountability

Responsible for our conduct and work.

Community

Dedicated to excellent customer service, collaboration, and teamwork while promoting diversity.

Cross-Cutting Principles

The following principles serve as the foundation for all FinCEN operations. Adherence to these principles enables FinCEN employees to work across organizational lines to weave strategic activities into a coherent whole.

Principle 1: Efficiency and Effectiveness

FinCEN seeks to ensure maximum efficiency and effectiveness in both internal operations and external impact. Everyone in the organization is responsible for identifying ways to improve the efficiency of the BSA regulatory structure, ensure the best possible service for our customers, and make wise use of time, budget, and other resources. Externally, FinCEN strives to ensure that its regulatory framework enables the financial industry, law enforcement agencies, and regulators to focus resources efficiently on areas of greatest risk. At times, pursuing efficiency and effectiveness may require re-prioritizing or eliminating activities that are no longer of value or that other entities are already performing well.

Principle 2: Creating Value

FinCEN aims to create value in all its activities. For example, after learning how a specific money laundering scheme operates, how a given law enforcement agency uniquely analyzes financial data during investigations, or how different types of cross-border money exchanges occur, FinCEN creates value by analyzing and synthesizing that information. The resulting intelligence is then used to assist other entities in both the public and private sectors.

Principle 3: Partnerships and Collaboration

All FinCEN activities rely on collaborative relationships. For instance, FinCEN’s analytical efforts are strongest when analysts specializing in one area—supporting domestic law enforcement or developing regulatory analysis, for example—draw ideas and information from analysts with other specialties, such as knowledge of online payment systems or international money flows. FinCEN’s external partnerships with domestic law enforcement agencies, federal and state regulators, other FIUs, and the private sector enrich joint efforts to deter and detect threats to U.S. national security and safety and to the well-being of the U.S. financial sector.

Principle 4: A Global Perspective

As the nation’s FIU, FinCEN maintains a global perspective throughout its activities. FinCEN recognizes that the transnational nature of financial markets makes the world’s leading economy a major target for financial crimes. Because financial transactions are not bound by national borders, partnerships with other nations and international bodies are essential to detect and deter illicit activities both in this country and abroad and to strengthen financial system transparency throughout the world.

Principle 5: Advanced Technology

FinCEN is an information-driven organization. Fully integrated, secure, and high-performing systems based on proven technology are critical to both FinCEN’s internal operations and its ability to securely exchange information with financial institutions, law enforcement agencies, regulators, FIUs, and other authorities. FinCEN continually strives to incorporate technological advances to serve and communicate with stakeholders and to maximize operating efficiency.

Outcome Goals, Objectives, and Strategies

OUTCOME GOAL 1: Financial systems resistant to abuse by money launderers, terrorists and their financial supporters, and other perpetrators of financial crime

The BSA requires a wide variety of financial institutions to establish anti-money laundering programs, customer identification programs, and processes and systems for data reporting and recordkeeping related to certain kinds of financial transactions. These requirements increase transparency as a way to prevent criminals from abusing the nation's legitimate financial systems. Criminal access to financial services and products, whether to fund terrorist operations or to hide the proceeds of drug trafficking or other crimes, directly threatens U.S. national security, public safety, and the integrity of financial institutions.

FinCEN's goal is to reduce the vulnerability of U.S. depository institutions, money services businesses, broker/dealers in securities, insurance companies, casinos, and other financial services providers to such abuse. Because numerous national financial systems are so closely entwined in today's global economy, FinCEN also seeks to protect U.S. interests by supporting and encouraging stronger counter-terrorism financing and anti-money laundering policies and programs worldwide.

Strategic Objective 1.1:

Effective, efficient, and consistent application of, examination for, and enforcement of the BSA

Strategies:

- 1.1.1 Issue, revise and implement regulations, interpretations and guidance, and conduct outreach to ensure effective, efficient, and consistent application of the BSA.
- 1.1.2 Conduct assessments to determine the level of compliance with implemented regulations and make referrals to regulatory partners to ensure consistent, risk-based examination for compliance with the BSA.
- 1.1.3 Identify and report trends and patterns in BSA data to identify vulnerabilities in the financial system, and conduct analyses to determine systemic deficiencies in data provided by reporting financial institutions.
- 1.1.4 Impose, in coordination with regulatory partners, appropriate civil enforcement remedies that promote compliance with and understanding of BSA requirements.

Strategic Objective 1.2:

Domestic financial systems more resistant to abuse

Strategies:

- 1.2.1 Provide consistent and forward-looking leadership of the BSA Advisory Group to elicit data and perspectives needed to ensure that the BSA framework balances regulatory, law enforcement, and industry needs.
- 1.2.2 Promote ongoing information sharing through formal agreements with partners about deficiencies and violations of the BSA as well as examination and enforcement programs and activities.

- 1.2.3 Support partners by responding to broad requests for research and providing analytical products that demonstrate the utility of BSA data.
- 1.2.4 Expand outreach to and feedback from all sectors of the regulated industry to increase the effectiveness of the BSA regulatory framework.
- 1.2.5 Expand collaboration with and assistance to federal, state and local authorities, self-regulatory organizations, and the private sector.
- 1.2.6 Inform the financial industry of risks and indicators of illicit activity.

Strategic Objective 1.3:

International financial systems more resistant to abuse

Strategies:

- 1.3.1 Participate in interagency fora to foster the development of anti-money laundering and counter-terrorism financing regimes and financial intelligence units.
- 1.3.2 Enhance collaboration with and assistance to foreign financial intelligence units and other foreign counterparts.
- 1.3.3 Participate with international bodies, such as the Financial Action Task Force (FATF) and FATF-style regional bodies, to strengthen anti-money laundering and counter-terrorism financing regimes.

Goal 1 Key Indicators and Measures

Regulatory Efficiency and Effectiveness

FinCEN will monitor the percentage of federal and state regulatory agencies supported by FinCEN to improve examination consistency and effectiveness, the percentage of bank examinations conducted by the federal banking agencies indicating a systemic failure of the anti-money laundering program rule, and the time required for its enforcement actions.

To assess the impact of regulatory activity on consistent BSA application and level of compliance, FinCEN will develop a survey measure of its information exchange and assistance provided under formal agreements with regulatory partners. FinCEN will also measure the percentage of callers judging the advice they receive from FinCEN's Regulatory Resource Center as understandable.

OUTCOME GOAL 2: Detection and deterrence of money laundering, terrorism financing, and other illicit activity

Since its establishment in 1990, FinCEN has supported domestic law enforcement agencies and other authorities seeking to detect and deter crime by providing research, analytical reports, and assistance with investigations and law enforcement initiatives. Going forward, FinCEN plans to continue this thrust through new analytical products and investigative support based on its expertise in financial crimes and financial systems, analysis of BSA information and other financial transaction data, and networking of law enforcement, regulatory, and financial industry partners.

For example, FinCEN will produce periodicals, reports, and reference manuals on emerging and existing financial systems, flows, and mechanisms. These products will be designed to improve detection and deterrence of both domestic and international illicit activity. In addition, FinCEN will continue to support the detection and deterrence of international crime, including financing of terrorism, by providing products and services to law enforcement agencies, the intelligence community, foreign FIUs, and other authorities. Analytical findings that allow regulated institutions to better target risks and vulnerabilities will be provided to the financial industry.

Strategic Objective 2.1:

Products and services that enable enhanced detection and deterrence of domestic illicit activity

Strategies:

- 2.1.1 Strengthen FinCEN's analysis of BSA information to better identify possible indicators of financial crime.
- 2.1.2 Expand communications with domestic partners to ensure that FinCEN's financial intelligence products and services support and enhance their operations.
- 2.1.3 Develop unique, authoritative financial intelligence and investigative products to assist domestic authorities detecting, deterring, and prosecuting financial crime.
- 2.1.4 Develop analytical studies that help law enforcement agencies, regulators, and the financial industry better direct their resources toward risks and vulnerabilities.
- 2.1.5 Develop authoritative reference guides on value transfer mechanisms to facilitate law enforcement investigations.
- 2.1.6 Maximize appropriate dissemination and use of FinCEN's analytical products.

Strategic Objective 2.2:

Products and services that enable enhanced detection and deterrence of international illicit activity

Strategies:

- 2.2.1 Protect the nation's economic and security interests by producing analyses that identify risks, vulnerabilities, and patterns related to cross-border crime.
- 2.2.2 Increase support for Egmont Group FIUs that request research for financial crimes investigations.

- 2.2.3 Increase support for U.S. law enforcement agencies requesting information from Egmont Group FIUs.
- 2.2.4 Strengthen processes for priority analysis and international dissemination of financial lead information relating to suspected terrorism financing.
- 2.2.5 Collaborate with the intelligence community in the conduct of intelligence or counterintelligence activities, including analysis to protect against international terrorism.

Strategic Objective 2.3:

Strengthened capacity of foreign FIUs to detect and deter crime

Strategies:

- 2.3.1 Provide training and technical assistance to enhance the capabilities of foreign FIUs, and conduct assessments to determine the effectiveness of these activities.
- 2.3.2 Strengthen information exchanges among members of the Egmont Group of FIUs by:
 - Conducting analytical exchanges and strategic studies with Egmont partners,
 - Participating in Egmont working groups, and
 - Enhancing the Egmont Secure Web.

Goal 2 Key Indicators and Measures

Value of Products and Services

FinCEN will determine the percentage of customers who find its analytical reports highly valuable. To help improve the responsiveness, quality, and value of products for law enforcement, FinCEN will implement tools, techniques, and procedures for better identifying and meeting law enforcement needs. The Bureau will also survey international partners to measure the value of technical assistance and training they receive from FinCEN.

OUTCOME GOAL 3: Efficient management, safeguarding, and use of BSA information

As administrator of the BSA, FinCEN is entrusted with receiving the valuable information reported and collected under BSA requirements. FinCEN is committed to an efficient enterprise-wide approach for managing and safeguarding this unique body of financial data.

BSA information is used to support policy decisions, strengthen law enforcement investigations and initiatives, expand knowledge of emerging financial crime patterns and methodologies, map international money flows, and identify criminal assets. Because of the importance of the information collected under the BSA, FinCEN recognizes the critical need to maximize the appropriate use of BSA data and simplify processes for filing, information retrieval, and analysis.

FinCEN has significantly increased the number of authorized law enforcement and regulatory authorities with electronic access to BSA reports so that they can more efficiently use the information to develop policy and to detect and deter crime. Expanded access has strengthened FinCEN's commitment to ensure that technology for storing and exchanging the information is secure and that users safeguard the information in the public trust. In the years ahead, FinCEN will aim to expand the use of BSA information by authorized domestic partners, encourage and support innovative uses of the information, and increase efforts to ensure data security.

Strategic Objective 3.1:

Enhanced quality, integrity, and value of BSA information

Strategies:

- 3.1.1 Establish an enterprise-wide BSA data management framework to allow:
- Better management decision-making and control of BSA data collection and processing issues affecting data quality and integrity; and
 - Enhanced assessment to ensure that the scope of BSA information being collected meets the needs of FinCEN and its external partners.
- 3.1.2 Promote and support electronic filing of BSA reports and facilitate other financial industry efforts to comply with reporting and recordkeeping requirements in an efficient manner.
- 3.1.3 Employ technology to improve the quality and speed of feedback to financial institutions on their reporting obligations and to support the regulatory compliance process.
- 3.1.4 Enrich and standardize BSA data to facilitate access and analysis by users.
- 3.1.5 Deploy advanced and/or innovative technologies and services to:
- Protect BSA data confidentiality and integrity,
 - Support proactive identification of trends and patterns in the BSA data,
 - Integrate BSA data with other federal and state data,
 - Capture data use and access patterns, and
 - Exchange feedback with users.

Strategic Objective 3.2:

Broader and more innovative use of BSA information by appropriate domestic partners

Strategies:

- 3.2.1 Establish and implement guidelines for providing exceptional access to BSA information within legal requirements.
- 3.2.2 Strengthen processes for negotiating, tracking, and implementing interagency Memoranda of Understanding for access to BSA information for appropriate domestic partners.
- 3.2.3 Promote new and innovative use of BSA information.
- 3.2.4 Establish and implement ongoing processes and procedures for exploring advances in technology that may permit innovative exploitation of BSA information.

Strategic Objective 3.3:

Legal and secure dissemination of BSA information

Strategies:

- 3.3.1 Strengthen efforts to ensure BSA data security through clear guidelines concerning the legal requirements associated with using, storing, and disseminating BSA information and actions to reinforce these guidelines.
- 3.3.2 Enhance FinCEN's internal programs for safeguarding BSA information.

Goal 3 Key Indicators and Measures

User Satisfaction

FinCEN will assess its progress toward enhanced management, use, and accessibility of BSA information by measuring the percentage of customers satisfied with components for electronic filing of BSA reports and systems for accessing BSA information electronically.

Use of E-Filing

FinCEN will also track the percentage of BSA filings submitted electronically.

MANAGEMENT GOAL: *FinCEN's mission is accomplished by high-performing employees and managers operating in a stimulating and responsible work environment*

FinCEN's management goal facilitates mission accomplishment and reflects FinCEN's organizational vision: A well-managed environment where expert staff act swiftly, creatively, and collaboratively to address the threats posed to the domestic and international financial systems by money launderers, terrorists and their financial supporters, other threats to national security, and perpetrators of financial crime.

Created in 1990 as a unit within the Treasury Department, FinCEN gained bureau status with passage of the USA PATRIOT Act in October 2001. Since then, FinCEN has steadily grown and assumed many management and administrative functions formerly performed for the Bureau by larger organizations.

From 2002 through 2007, FinCEN developed its management systems and processes for human resources, financial management, information technology, security, acquisitions, and project management. FinCEN now plans to refine these processes, strengthen operations, and become a public service employer of choice in the fields of financial supervision and financial intelligence. A high-performing workforce and results-oriented management of mature organizational capabilities will allow FinCEN to provide public service of the highest caliber in the years ahead.

Management Objective M 1:

An innovative, high-performing, and diverse workforce

Strategies:

- M 1.1 Promote innovative thinking at all staff levels to address evolution within the financial industry and in methods for potential abuse.
- M 1.2 Identify and address barriers to recruiting and retaining a diverse and high performing workforce.
- M 1.3 Provide training and development to ensure that employees have the skills needed to achieve FinCEN's mission and goals and to advance within the Bureau.
- M 1.4 Improve the reliability, performance, and security of the technology infrastructure supporting FinCEN's workforce.
- M 1.5 Strengthen internal communications and collaboration across and within organizational functions and programs.
- M 1.6 Consistently and equitably apply employment flexibilities that support a balance between work and personal life.

Management Objective M 2:

Accountable and results-oriented management

Strategies:

- M 2.1 Strengthen project and portfolio management.
- M 2.2 More efficiently utilize available resources, including staff, management data and reports, and Treasury Department and external resources.

- M 2.3 Implement a comprehensive leadership development and recruitment strategy for managers and employees with high potential.
- M 2.4 Clearly define and communicate performance expectations and formally evaluate employee performance regularly and on time.
- M 2.5 Explore and implement constructive ways for employees and peers to provide feedback on managers' performance.

Management Objective M 3:

A safe, secure, healthy, and environmentally responsible work place

Strategies:

- M 3.1 Ensure that FinCEN's physical work environment is free from health and safety hazards.
- M 3.2 Enhance measures to promote personnel, physical, and operations security.
- M 3.3 Promote and support sound environmental practices.

Key Management Goal Indicators and Measures

Stakeholder Indicators

FinCEN will assess progress toward organizational excellence through internal assessments, external audits and reports, and employee satisfaction surveys.

Process Indicators

FinCEN will track internal efficiency measures, including time taken to perform specific tasks, costs of key activities, and achievement of operational milestones.

Appendix 1: FinCEN's Strategic Framework

FinCEN's Strategic Plan is aligned with the U.S. Department of the Treasury Strategic Plan for Fiscal Years 2007 – 2012, and with a Treasury Office of Terrorism and Financial Intelligence (TFI) strategic goal. Treasury Department and TFI goals are shown below.

Department of the Treasury	
Strategic Goal	Prevented terrorism and promoted the Nation's security through strengthened international financial systems
Strategic Objective	Pre-empted and neutralized threats to the international financial system and enhanced U.S. national security
Outcome	Safer and more transparent U.S. and international financial systems
Office of Terrorism and Financial Intelligence Strategic Goal	
Enhance the transparency and integrity of the financial system, and support law enforcement and financial regulators	
FinCEN Outcome Goals	
Goal 1: Financial systems resistant to abuse by money launderers, terrorists and their financial supporters, and other perpetrators of financial crime	
Goal 2: Detection and deterrence of money laundering, terrorism financing, and other illicit activity	
Goal 3: Efficient management, safeguarding, and use of BSA data	

Overview of FinCEN's Strategic Planning Process

FinCEN's executive team collaboratively developed the mission statement, vision, values, cross-cutting principles, goals, and objectives in this strategic plan. A team of employees from across the Bureau then developed strategies to achieve the objectives. The executive team subsequently refined the plan based on employee input and comments received during consultations with members of the Bank Secrecy Act Advisory Group, representatives of law enforcement agencies, and officials at the Treasury Department and the Office of Management and Budget.

Support for the FinCEN Strategic Plan

Processes and products that support implementation of FinCEN's Strategic Plan include the following:

- FinCEN's Performance-based Budget
- FinCEN's Employee Performance Appraisal System
- Internal strategic-planning activities related to human capital, information technology, and equal employment opportunity
- Processes for identifying operational priorities in support of strategic goals to facilitate appropriate and forward-looking resource allocation
- Internal communications reporting on Strategic Plan implementation
- Performance assessments and reports, including internal reviews, the Office of Management and Budget's Performance Assessment Rating Tool, and the Treasury Department's Performance and Accountability Report

Appendix 2: Key Factors Affecting the Achievement of FinCEN's Strategic Goals

In the years covered by this strategic plan, FinCEN's ability to achieve its mission and goals will be influenced by a variety of forces not under its direct control. The following are critical internal and external factors with the potential to affect FinCEN's operational success.

Budget Environment

FinCEN's workload and scope of responsibilities have been increasing and are projected to continue to grow significantly. To make maximum use of available resources, FinCEN is committed to efficiency and effectiveness in all operations and collaboration with other Treasury Department units to leverage department-wide resources. Where appropriate, FinCEN will also participate in interagency efforts to pursue mutual goals.

Technology

The rapid pace of technological change will challenge FinCEN's efforts to ensure that all systems and databases that support the collection, analysis, processing, protection, and dissemination of BSA information are as modern, reliable, well-integrated, and efficient as possible. Continued modernization of systems supporting FinCEN's mission-related activities and communications with partner organizations is also essential. These are the goals of FinCEN's comprehensive, multi-year information technology modernization effort, which began in Fiscal Year 2007.

National Security Threats

FinCEN plays a key role in the Department of the Treasury's efforts to protect U.S. national security. In cooperation with other Departmental offices, FinCEN is committed to using its authorities and expertise in coordinated actions to detect and deter threats from terrorism and its financing, proliferation of weapons of mass destruction, drug trafficking, international crime, and the underground economy. FinCEN plans to be as prepared as possible to address shifting national security threats by continuously refining its knowledge base, analytical expertise, and dissemination of financial intelligence that supports national security goals.

Data Security

FinCEN holds a unique position of public trust related to the sensitive data included in BSA reports. The Bureau must ensure the secure collection and dissemination of the data as well as safeguard handling by the growing number of users. Consequently, FinCEN considers data security to be a major priority underpinning all of its activities. The Bureau is committed to maintaining systematic and reliable processes for protecting the integrity of the data and for ensuring that all users properly safeguard the data and use it only for authorized purposes. FinCEN's ongoing technology modernization efforts will include upgrading security devices to address any new threats. FinCEN staff will also provide and reinforce guidelines for strong security measures by data users.

Workforce

To achieve its goals, FinCEN must recruit and retain talented personnel with specialized knowledge and skills in financial services, regulatory activity, analytical techniques, liaison activities, and other areas essential to FinCEN's operations. However, FinCEN will compete with other employers who may offer higher salaries, superior benefits, or more attractive work environments. FinCEN will respond to this challenge by identifying and addressing barriers to recruiting and retaining a diverse and high-performing workforce. FinCEN will also aim to provide satisfying employment and ample opportunities for employees to continuously develop their skills and to move into leadership roles.

Financial Services

Changes in the financial services industry, including the consolidation of institutions and the development of new products and services, are expected to present regulatory and law enforcement challenges. New payment methods are making it easier to rapidly transfer large sums of money and more difficult to track transactions related to money laundering and other financial crimes. Moreover, financial crime trends and patterns change quickly. FinCEN will need to stay ahead of financial criminals through cutting-edge analysis, international information exchanges, and strong partnerships with domestic law enforcement agencies, regulatory agencies, and private sector entities.

Cooperation

Cooperation is critical to FinCEN's ability to effectively fulfill its roles as administrator of the BSA and the nation's financial intelligence unit. Efforts to increase transparency in the U.S. and global financial sectors will require continuing cooperation from the financial sector, law enforcement and intelligence agencies, regulators, other government agencies, and global partners. FinCEN's emphasis on collaboration is designed to nurture and strengthen relationships with the broad array of domestic and foreign partners that help to safeguard financial systems around the world.

Globalization

Continuing globalization will have a direct impact on FinCEN's efforts to promote transparency in financial transactions. FinCEN will need to build new relationships with emerging economies and to nurture ongoing relationships with foreign counterparts. FinCEN's main forum for international exchanges, including collaborative strategic analysis, will continue to be the Egmont Group of financial intelligence units. FinCEN will also continue to support U.S. law enforcement agencies that request information from Egmont Group financial intelligence units.

Legislation

Like other federal organizations, FinCEN may be subject to new legislative requirements. To meet changing mandates, FinCEN staff will stay abreast of legislative proposals that could affect the BSA regulatory framework as well as internal operations. Such diligence will help FinCEN respond quickly and responsibly to new legislative direction.

Appendix 3: Mission, Cross-Cutting Principles, and Goals

Enhance U.S. national security, deter and detect criminal activity, and safeguard financial systems from abuse by promoting transparency in the U.S. and international financial systems.

Cross-Cutting Principles



OUTCOME GOAL 1: Financial systems resistant to abuse by money launderers, terrorists and their financial supporters, and other perpetrators of financial crime

OUTCOME GOAL 2: Detection and deterrence of money laundering, terrorism financing, and other illicit activity

OUTCOME GOAL 3: Efficient management, safeguarding, and use of BSA information

MANAGEMENT GOAL: FinCEN's mission is accomplished by high-performing employees and managers operating in a stimulating and responsible work environment



www.FinCEN.gov