BSA E-Filing Technical Specifications

In Focus:
Currency Transaction Report
Suspicious Activity Report

Agenda

- ➢ Overview
- ➢ Schedule
- ➢ Highlights of Changes
- ➢ Walkthrough of Electronic Filing Specifications
    - ➢ Currency Transaction Report
    - ➢ Suspicious Activity Report
- ➢ Acknowledgements
- ➢Questions and Answers

Overview

➢ Consolidation of reporting specifications into one format for CTR and one format for SAR
- Accommodates every industry
- Streamlines processing, support, and assistance

➢ Increase in field lengths of critical fields and collection of new data fields
- Extensive outreach and working sessions with law enforcement, analysts and regulators

➢ Ability to submit an attachment to SAR filings
- Allows for acceptance of Excel/tabular based file formats up to 1MB per SAR.

Overview Continued

➢ New data collection tool for discrete (single) filers
- Tab based
- Ability to add multiples of certain fields
- Adobe based-ability to work offline
- No paper version available

➢ Designation of Exempt Person (DOEP) now in a separate specification
- New version of DOEP specs expected to be released in late October
- No paper version available

Schedule

- BSA E-Filing System Update December 1st 2011
  - New discrete data collection tool for CTR and SAR available
  - System updated to receive batch filings in new CTR and SAR format
- Testing of batch files available in November on User Test System
- Batch files in current format will continue to be accepted until June 30, 2012.
- Discrete filings in current format will continue to be accepted until June 30, 2012.

Highlights of Changes

➢Field Length Expansion

- • Name Fields Expanded to 150 Characters
- • TIN Fields Expanded to 25 to account for foreign TINs
- • Telephone Number Fields expanded to 16 to account for foreign telephone numbers

➢Only ASCII based batch files will be accepted

➢ISO Country Code List and ISO Canadian and Mexican State List

➢ Country Code List -

http://www.iso.org/iso/country_names_and_code_elements

➢ Canadian State List –

http://www.canadapost.ca/tools/pg/manual/PGaddress-e.asp#1380608

➢ Mexican State List -

http://www.commondatahub.com/live/geography/state_province_region/iso_3166_2_state_codes

Highlights of Changes Continued

➢ North American Industry Classification System (NAICS) Codes for Occupation

➢ Additional Suspicious Activity Categories

➢ Ability to file jointly with another financial institution

➢ Ability to provide multiple attributes to subjects
- Multiple Names
- Multiple Addresses
- Multiple Phone Numbers

Currency Transaction Report Specification File Layout

Record Type	Record Description					Next Possible Record	Required Record	Max Occurrence
1A	Transmitter (1A) Record					2A	X	
2A		Parent Financial Institution Information (2A) Record				2B	X	1
2B			Financial Institution Where Transaction(s) Take Place (2B) Record			2B, 3A	X	99
3A				Transaction Summary (3A) Record		3B, 3C, 4A	X	1
3B					Foreign Cash-In (3B) Record	3B, 3C, 4A		99
3C					Foreign Cash-Out (3C) Record	3C, 4A		99
4A					Person Involved in Transaction (4A) Record	4B, 4C, 4A	X	999
4B						Account Number (Cash-in) (4B) Record → 4B, 4C, 4A		99
4C						Account Number (Cash-out) (4C) Record → 4C, 4A, 3A, 9A		99
9A			Financial Institution Summary (9A) Record			2B, 9B	X	
9B		Parent Financial Institution Summary (9B) Record				2A, 9Z	X	
9Z	File Summary (9Z) Record - Required					(END)	X	

Currency Transaction Report Specification

➢ Transmitter (1A) Record – Required

- There can only be one of this record type and it must be the first record on the file.
- Contains the information identifying the batch file transmitter (person or organization handling the data accumulation and formatting)
- Modeled after current 1A Record format

Currency Transaction Report Specification

➤ Parent Financial Institution Information (2A) Record – Required

- There must be one of this record type for each Parent Financial Institution (FI) on the file.
- This record type immediately precedes all records related to the Parent FI.

Currency Transaction Report Specification

➢Financial Institution Where Transaction(s) Take Place (2B) Record – Required

• There must be at least one of this record type for each financial institution reporting under the Parent Financial Institution Information (2A) Record.

• This record type precedes all transaction records for the financial institution. Filers are permitted to associate up to 99 2B records for a single currency transaction report.

• Multiple 2B records must be grouped together prior to the associated Transaction Summary (3A) Record(s)

Currency Transaction Report Specification

➢Transaction Summary (3A) Record – Required

• There can only be one of this record type for each currency transaction or aggregated transactions being reported for the financial institution(s) identified in the associated 2B record(s).

• Filers are permitted to associate more than one currency transaction report with a single 2B record or a set of 2B records—assuming each financial institution where transaction(s) take place is the same for all associated currency transaction reports that follow.

• Foreign Cash-in (3B) Record and/or Foreign Cash-out (3C) Record will follow the 3A record if needed.

Currency Transaction Report Specification

➢Foreign Cash-in (3B) Record – Not Required

• One or more of this record type may follow a Transaction Summary (3A) Record when one or more types of foreign (cash-in) currency are involved in the currency transaction.

• A maximum of 99 3B records may be associated with a single currency transaction report.

Currency Transaction Report Specification

➤Foreign Cash-out (3C) Record – Not Required

• One or more of this record type may follow a Transaction Summary (3A) Record or Foreign Cash-in (3B) Record when one or more types of foreign (cash-out) currency are involved in the currency transaction.

• A maximum of 99 3C records may be associated with a single currency transaction report.

Currency Transaction Report Specification

➢ Person Involved in Transaction(s) (4A) Record – Required
- There must be one of this record type for each person involved in the currency transaction(s).
- An Account Number (Cash-in) (4B) Record and/or Account Number (Cash-out) (4C) Record will follow the associated 4A record if needed.

Currency Transaction Report Specification

➢Account Number (Cash-in) (4B) Record – Not Required
- • One or more of this record type may follow the Person Involved in Transaction(s) (4A) Record when one or more account numbers are included in the cash-in for the person involved in the currency transaction(s).
- • A maximum of 99 4B records may be associated with a Person Involved in Transaction(s) (4A) Record.

Currency Transaction Report Specification

➢Account Number (Cash-out) (4C) Record – Not Required
* One or more of this record type may follow the Person Involved in Transaction(s) (4A) Record or Account Number (Cash-in) (4B) Record when one or more account numbers are included in the cash-out for the person involved in the currency transaction(s).
* A maximum of 99 4C records may be associated with a Person Involved in Transaction(s) (4A) Record.

Currency Transaction Report Specification

➢Financial Institution Where Transaction(s) Take Place Summary (9A) Record – Required
   • There must be one 9A record for all Transaction Summary (3A) Records associated with one or more Financial Institution Where Transaction(s) Take Place (2B) Records.
   • This record contains counts of the number of 3A, 4A, 4B, and 4C record types associated with the Financial Institution Where Transaction(s) Takes Place (2B) Record.

Currency Transaction Report Specification

➢Parent Financial Institution Information Summary (9B) Record – Required

- •There must be one of this record type for each Parent Financial Institution 2A record reported on the file.
- •This record contains counts of the number of 2B, 3A, 4A, 4B, and 4C record types associated with the Parent Financial Institution Information (2A) Record.

Currency Transaction Report Specification

➢File Summary (9Z) Record – Required
- •There must be one of this record type on the file and it must be the last record.
- •The record contains counts of the number of the various record types which are on the file.

Suspicious Activity Report Specification File Layout

Record Type	Record Description			Next Possible Record	Required Record	Max Occurrence
1A	Transmitter (1A) Record			2A	X	
2A		Filing Institution Information (2A) Record		2B	X	
2B			Financial Institution Where Activity Occurred (2B) Record	2B, 2C, or 3A	X	99
2C			Branch Office Information Where Activity Occurred (2C) Record	2C, 2B, 3A		99
3A		Suspicious Activity (3A) Record		3B, 3C, 3D, 3E, 3F, 4A	X	1
3B			Suspicious Activity - Commodity Type (3B) Record	3B, 3C, 3D, 3E, 3F, 4A		99
3C			Suspicious Activity - Product/Instrument Description (3C) Record	3C, 3D, 3E, 3F, 4A		99
3D			Suspicious Activity - Market Where Traded (3D) Record	3D, 3E, 3F, 4A		99
3E			Suspicious Activity - IP Address (3E) Record	3E, 3F, 4A		99
3F			Suspicious Activity - CUSIP Number (3F) Record	3F, 4A		99
4A			Subject (4A) Record	4B, 4C, 4D, 4E, 4F, 4G, 4H, 4I, 4J, 4A, 5A		999
4B				Subject - Address (4B) Record	4B, 4C, 4D, 4E, 4F, 4G, 4H, 4I, 4J, 4A, 5A	X	99
4C				Subject - Identification (4C) Record	4C, 4D, 4E, 4F, 4G, 4H, 4I, 4J, 4A, 5A		99
4D				Subject - Alternative Name (4D) Record	4D, 4E, 4F, 4G, 4H, 4I, 4J, 4A, 5A		99
4E				Subject - Telephone (4E) Record	4E, 4F, 4G, 4H, 4I, 4J, 4A, 5A		99
4F				Subject - E-mail Address (4F) Record	4F, 4G, 4H, 4I, 4J, 4A, 5A		99
4G				Subject - Website (URL) Address (4G) Record	4G, 4H, 4I, 4J, 4A, 5A		99
4H				Subject - Relationship to Institution (4H) Record	4H, 4I, 4A, 5A	X	99
4I				Subject - Affected TIN & Account Number (4I) Record	4I, 4A, 5A		99
5A		Narrative Description (5A) Record		5A, 2B, 9A	X	20
9A		Financial Institution Where Activity Occurred Summary (9A) Record		2B, 9B	X	
9B		Filing Institution Contact Information Summary (9B) Record		2A, 9Z	X	
9Z	File Summary (9Z) Record			(END)	X	

Suspicious Activity Report Specification

➢Transmitter (1A) Record – Required

- There can only be one of this record type and it must be the first record on the file.
- Contains the information identifying the batch file transmitter (person or organization handling the data accumulation and formatting)
- Modeled after current 1A Record format

Suspicious Activity Report Specification

➢ Filing Institution Information (2A) Record – Required

- There must be one of this record type for each Filing Institution on the file.
- This record type immediately precedes all records related to the filing institution.
- The 2A record may be associated with multiple BSA SARs.

Suspicious Activity Report Specification

➢Financial Institution Where Activity Occurred (2B) Record – Required

  • There must be at least one of this record type for each financial institution reporting under the Filing Institution Information (2A) Record.

  • This record type precedes all records related to the financial institution(s) identified for a particular BSA SAR.

  • Filers are permitted to associate up to 99 2B records for a single suspicious activity report.

  • Multiple 2B records for a single BSA SAR must occur prior to the associated Suspicious Activity Information (3A) Record.

Suspicious Activity Report Specification

➢Branch or Office Institution Where Activity Occurred (2C) Record

- •There can be one or more of this record type when one or more branches or offices are involved in the suspicious activity.
- • Filers are permitted to associate up to 99 2C records for each Financial Institution Where Activity Occurred (2B) Record on the file.
- • All 2C records must be grouped under the associated 2B record.

Suspicious Activity Report Specification

➢Suspicious Activity Information (3A) Record – Required
- There can only be one of this record type for each suspicious activity or joint filing being reported for the financial institution(s) identified in the associated 2B record(s).
- Filers are <u>NOT</u> permitted to associate multiple Suspicious Activity Information (3A) Records under one or more shared 2B/2C records.

Suspicious Activity Report Specification

➢Commodity Type (3B) Record

  • There can be more than one of this record type depending on the number of different commodity types associated with a suspicious activity reported on the file.

  • Filers are permitted to associate up to 99 3B records for each Suspicious Activity Information (3A) Record on the file

Suspicious Activity Report Specification

➢Product/Instrument Description (3C) Record
- There can be more than one of this record type depending on the number of different product/instrument descriptions associated with a suspicious activity reported on the file.
- Filers are permitted to associate up to 99 3C records for each Suspicious Activity Information (3A) Record on the file.

Suspicious Activity Report Specification

➢Market Where Traded (3D) Record

  • There can be more than one of this record type depending on the number of different markets where traded associated with a suspicious activity reported on the file.

  • Filers are permitted to associate up to 99 3D records for each Suspicious Activity Information (3A) Record on the file.

Suspicious Activity Report Specification

➢ IP Address (3E) Record
- There can be more than one of this record type depending on the number of different IP addresses associated with a suspicious activity reported on the file.
- Filers are permitted to associate up to 99 3E records for each Suspicious Activity Information (3A) Record on the file.

Suspicious Activity Report Specification

➢CUSIP Number (3F) Record

• There can be more than one of this record type depending on the number of different CUSIP numbers associated with a suspicious activity reported on the file.

• Filers are permitted to associate up to 99 3F records for each Suspicious Activity Information (3A) Record on the file.

Suspicious Activity Report Specification

➢Subject (4A) Record – Required

- There must be one of this record type for each subject involved in the suspicious activity or joint filing.
- Filers are permitted to associate up to 999 4A records for each Suspicious Activity Information (3A) Record on the file.

Suspicious Activity Report Specification

➢Subject Address (4B) Record

• There can be more than one of this record type depending on the number of different addresses associated with a subject reported on the file.

• Filers are permitted to associate up to 99 4B records for each Subject (4A) Record on the file.

• All 4B records for a particular subject must be grouped under the associated Subject (4A) Record.

Suspicious Activity Report Specification

➢Subject Identification (4C) Record

• There can be more than one of this record type depending on the number of different forms of identification associated with a subject reported on the file.

• Filers are permitted to associate up to 99 4C records for each Subject (4A) Record on the file.

• All 4C records for a particular subject must be grouped under the associated Subject (4A) Record.

Suspicious Activity Report Specification

Subject Alternative Name (4D) Record

- There can be more than one of this record type depending on the number of different alternative names associated with a subject reported on the file.
- Filers are permitted to associate up to 99 4D records for each Subject (4A) Record on the file.
- All 4D records for a particular subject must be grouped under the associated Subject (4A) Record.

Suspicious Activity Report Specification

➢ Subject Telephone Number (4E) Record

• There can be more than one of this record type depending on the number of different telephone numbers associated with a subject reported on the file.

• Filers are permitted to associate up to 99 4E records for each Subject (4A) Record on the file.

• All 4E records for a particular subject must be grouped under the associated Subject (4A) Record.

Suspicious Activity Report Specification

➤Subject E-mail Address (4F) Record

• There can be more than one of this record type depending on the number of different e-mail addresses associated with a subject reported on the file.

• Filers are permitted to associate up to 99 4F records for each Subject (4A) Record on the file.

• All 4F records for a particular subject must be grouped under the associated Subject (4A) Record.

Suspicious Activity Report Specification

> Subject Website (URL) Address (4G) Record
>> • There can be more than one of this record type depending on the number of different website (URL) addresses associated with a subject reported on the file.
>> • Filers are permitted to associate up to 99 4G records for each Subject (4A) Record on the file.
>> • All 4G records for a particular subject must be grouped under the associated Subject (4A) Record.

Suspicious Activity Report Specification

➢Subject Relationship to Institution (4H) Record
- • There can be more than one of this record type depending on the number of different institution relationships associated with a subject reported on the file.
- • Filers are permitted to associate up to 99 4H records for each Subject (4A) Record on the file.
- • All 4H records for a particular subject must be grouped under the associated Subject (4A) Record.

Suspicious Activity Report Specification

➢Affected TIN & Account Number (4I) Record
- There can be more than one of this record type depending on the number of different affected institution TINs and/or account numbers associated with a subject reported on the file.
- Filers are permitted to associate up to 99 4I records for each Subject (4A) Record on the file.
- All 4I records for a particular subject must be grouped under the associated Subject (4A) Record.

Suspicious Activity Report Specification

➢Narrative Description (5A) Record – Required
- There can be more than one of this record type depending on the length of the narrative description given for the suspicious activity on the file.
- A maximum of 20 5A records may be associated with a Suspicious Activity Information (3A) Record.

Suspicious Activity Report Specification

➢Suspicious Activity Information Summary (9A) Record – Required

- There must be one 9A record for each Suspicious Activity Information (3A) Record reported and must follow the last Narrative Description (5A) Record for the associated BSA SAR.
- This record contains counts of the number of suspicious activity record types associated with each BSA SAR reported.

Suspicious Activity Report Specification

➢Filing Institution Summary (9B) Record – Required

- There must be one of this record type for each Filing Institution Information (2A) Record on the file and must be the last record associated with the filing institution.
- This record contains counts of the number of 2B, 2C, 3A, 4A, and 5A record types associated with the Filing Institution Information (2A) Record.

Suspicious Activity Report Specification

➤File Summary (9Z) Record – Required

  • There must be one of this record type on the file and it must be the last record.

  •The record contains counts of the number of the various record types which are on the file.

Suspicious Activity Report Specification

➢ Attachments – Reference Attachment E

  ➢ Identify which BSA SARs in the batch are associated with attachments
    ➢ Attachment Indicator = "X" in 3A Record
  ➢ Reference the BSA SAR Transaction Sequence Number in your attachment file name
  ➢ Include all attachments (associated with the BSA SAR batch file) in a single zip file
  ➢ Rename the attachment zip file
  ➢ Add the attachment zip file to the BSA SAR Batch Form prior to submission

Acknowledgements

➤ Each submitted record will have a corresponding acknowledgment record (i.e. 1A to 1A, 2A to 2A)

➤ Each acknowledgement record may contain errors

➤ Errors are identified as either primary or secondary

➤ Primary errors are identified with an asterisk (*)

- Primary errors make it difficult for regulators, analysts, and law enforcement investigators to locate the BSA CTRs or BSA SARs in the database or identify the nature and circumstances of the currency transactions.
- Examples of such errors include blank last names or legal names, missing financial institution Employer Identification Numbers, or an invalid entry in the transaction date field.

➤ Primary errors must be corrected

Acknowledgements – Correction Procedures

➢ When an accepted batch file contains reports with primary errors, those BSA reports must be re-filed as corrected reports with the primary errors corrected.

➢ If the accepted batch file contains reports with both primary and secondary errors, they must be re-filed as corrected reports with all errors corrected.

➢BSA reports that contain only secondary errors need not be re-filed.

➢ FinCEN requires that filers prevent all reported errors in their future filings.

Acknowledgements – Correction Procedures Currency Transaction Report

➢ Enter "B" at Field Position 8 "Type of Filing" in the Transaction Summary (3A) Record.

➢ Enter the prior report's BSA Identifier from the BSA CTR acknowledgement records at Field Position 9-22 "Prior Report Document Control Number" in the Transaction Summary (3A) Record.

➢ Ensure that Field Position 558-565 contains a new "Date Filed" in the Transaction Summary (3A) Record.

➢ Complete all other data in the BSA CTRs in their entirety.

➢ Retransmit the corrected BSA CTR in a new batch file. Do not re-transmit the original batch file because this will cause duplicate database entries on any BSA CTRs that were not corrected.

Acknowledgements – Correction Procedures Suspicious Activity Report

➤ Enter "B" at Field Position 9 "Type of Filing" in the Suspicious Activity Information (3A) Record for each corrected BSA SAR.

➤ Enter the prior report's BSA Identifier from the BSA SAR acknowledgement at Field Position 12-25 "Prior Report Document Control/File Number" in the Suspicious Activity Information (3A) Record for each corrected BSA SAR.

➤ Ensure that Field Position 1145-1152 contains a new "Date Filed" in the Suspicious Activity Information (3A) Record for each corrected BSA SAR.

➤ Complete all other data in the BSA SARs in their entirety.

➤ Record the nature of all corrections at the beginning of the initial Narrative Description (5A) Record for each corrected BSA SAR.
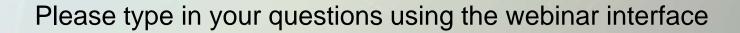
➤ Retransmit the corrected BSA SARs in a new batch file. Do not re-transmit the original batch file because this will cause duplicate database entries on any BSA SARs that were not corrected.

Additional Resources Upcoming

➢ Sample batch files of the new CTR and SAR posted on BSA E-Filing web site in October

➢ Addition webinar on overall BSA E-Filing usage in November targeting filers and BSA Compliance Officers

Questions and Answer Period

Please type in your questions using the webinar interface

Support

BSA E-Filing Home Page

http://bsaefiling.fincen.treas.gov

BSA E-Filing Help Desk at 1-866-346-9478
(select option # 1)
BSAEFilingHelp@fincen.gov.
The Help Desk is available Monday through
Friday from 8 a.m. to 6 p.m. ET