

Important Reminder for BSA E-Filers on Batch Validation Implementation

FinCEN will implement the second stage of its Bank Secrecy Act Electronic Filing System (BSA E-Filing) Batch Validation process at the end of July. FinCEN has assessed the first stage, which permits all submissions that do not correspond to formatting requirements to be accepted with warnings, and has determined that the initial six-month period will not be extended. FinCEN deployed new system enhancements to improve BSA data quality by providing detailed error notifications to filers upon submission. The Batch Validation process currently applies field and business rule validations to Currency Transaction Report (CTR), and Currency Transaction Report by Casinos (CTR-C) records. FinCEN will begin rejecting submissions with severe data issues on July 31, 2009.

The rejection criteria for CTRs are:

- Invalid or missing financial institution name (Error Code 001)
- Invalid or missing financial institution street address (Error Code 002)
- Invalid or missing financial institution EIN (Error Code 012)
- Invalid or missing owner name (Error Code 111)
- Invalid or missing owner ID number (Error Code 119)
- Invalid or missing transaction cash in/cash out amount(s) (Error Code 022)
- Invalid or missing transaction date (Error Code 024)

The rejection criteria for CTR-Cs are:

- Invalid or missing casino trade name and/or legal name (Error Code L03)
- Invalid or missing casino street address (Error Code L04)
- Invalid or missing casino EIN (Error Code L08)
- Invalid or missing customer name (Error Code C11)
- Invalid or missing customer ID EIN or SSN (Error Code C28)
- Invalid or missing transaction total amount(s) (Error Code C22)
- Invalid or missing transaction date (Error Code C24)

Please direct questions about the Batch Validation process to the Help Desk at 1-888-827-2778 (option 6) or via email at BSAEFilingHelp@notes.tcs.treas.gov. The Help Desk is available Monday through Friday 8 a.m. to 6 p.m. ET. The BSA E-Filing homepage is located at <http://bsaefiling.fincen.treas.gov>.

[UPDATE: As of July 31, 2010, the toll free number for the BSA E-Filing Service Desk is 1-866-346-9478 (Option 1). The email address is now BSAEFilingHelp@fincen.gov.]