

BSA E-Filing Updated Technical Specifications

***In Focus:
FinCEN's New SAR, CTR and DOEP***



Agenda



- Overview
- Schedule Update
- Highlights of Changes
- Electronic Filing Specifications
 - Currency Transaction Report
 - Suspicious Activity Report
 - Designation of Exempt Person
- Acknowledgements
- Common Questions/Inquiries Using the New Specifications
- Obtaining Help
- Question and Answer Period

Overview of New Reports



- 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 tabular based transactions in CSV (Comma Separated Value) format up to 1MB per SAR.



Overview Continued

- Designation of Exempt Person (DOEP) now in a separate specification
 - DOEP and CTRs were previously submitted in the same specification
 - No paper version available

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

Currency Transaction Report - Discrete Version

Currency Transaction Report

Home

Step 1. Person Information

Step 2. Amount and Type of Transaction

Step 3. Financial Institution Information

Part I Person Involved in Transaction 1 of 1



*2 a Person conducting transaction on own behalf b Person conducting transaction for another c Person on whose behalf transaction was conducted d Courier Service (private)

3 Multiple transactions

Check If entity

*4 Individual's last name or entity's legal name Unknown

*5 First name Unknown Gender

6 Middle name Suffix

8 Alternative names entity

9a NAICS Code 9 Occupation or type of business

*10 Address Unknown

*11 City Unknown

*12 State Unknown *13 ZIP/Postal Code Unknown

Item 5 - First name. Enter the individual's first name. Select "Unknown" if the first name is unknown. Do not record also known as (AKA) or doing business as (DBA) names in Item 5.

Suspicious Activity Report - Discrete Version

Suspicious Activity Report

Home

Step 1. Filing Institution
Contact Information

Step 2. Filing Institution
Where Activity Occurred

Step 3. Subject
Information

Step 4. Suspicious
Activity Information

Step 5. Narrative

Part I Subject Information 1 of 1



2 Check: if entity, if all critical* subject information is unavailable (Does not include item 24)

*3 Individual's last name
or entity's legal name

Unknown

*4 First name

Unknown

5 Middle name/initial

Suffix

Gender

*16 Date of birth

Unknown

Item 5 - Suffix. If the subject is an individual, enter the subject's suffix such as JR, SR, III, etc. Leave this item blank if the suffix is unknown or the individual's legal name does not include a suffix.

6 Alternate name, e.g., AKA - individual or trade name, DBA - entity



7a NAICS Code

7 Occupation or type of business

*13 TIN

Unknown

14 TIN type

18 Phone number



Ext.

17 Type

19 E-mail address



19a Website (URL) address



20 Corroborative statement to filer?

25 Subject's role in suspicious activity

Designation of Exempt Person Report - Discrete Version

Designation of Exempt Person

Home

Filing/Exempt Person
Information

Filer
Information

Part I Filing Information

*1 Indicate the type of Filing by checking a,b or c

a Initial designation

b Exemption amended

c Exemption revoked

Document Control Number / BSA Identifier

*2 Effective date of the exemption

Item 1 - Type of filing. Select the appropriate box (only one) to identify this DoEP as an initial registration, amendment to a prior filing, or a revocation of an existing exemption. Check box 1a if filing an initial designation, which the bank will file one time only. If amending a prior report, check box 1b and complete the amended report in its entirety. If revoking an existing exemption, check box 1c. If 1b or 1c is checked, enter the Document Control Number (DCN) or BSA Identifier (BSAI).

Part II Exempt Person Information

Check here If entity

*3 Individual's last name or entity's
legal name of the exempt person

4 First name

5 Middle name

Suffix

6 Alternate Name

7 Occupation or type of business



Schedule Update

- BSA E-Filing System Updated March 2012
 - New FinCEN CTR, SAR, DOEP Available on Production System and User Test System
 - Production System and User Test System updated to receive batch filings in new CTR, SAR and DOEP format
- Updated Technical Specifications Released March 2012
- Mandatory use of new CTR, SAR, and DOEP by March 31, 2013
 - Batch files and discrete filings in legacy format will continue to be accepted until March 31, 2013.
- Mandatory e-filing of most FinCEN reports takes effect July 1, 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 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
 - <http://bsaefiling.fincen.treas.gov/docs/2007NAICS.pdf>
- Additional Suspicious Activity Categories
- Ability to file jointly with another financial institution
- Ability to provide multiple attributes for subjects
 - Multiple Names
 - Multiple Addresses
 - Multiple Phone Numbers



Updated Electronic Filing Specifications Released March 2012

- No Changes to File Layout/Record Types
- FinCEN CTR Updates Examples include
 - Update of Field Instructions
 - Updates Total cash-in (Item 25) instructions to include the following statement: 'The total cash in will be automatically computed in BSA E-Filing discrete FinCEN CTR from the entries in 25a through 25i and 25z.'
 - Correction of Error Code Descriptions
 - Removes the phrase 'or person state unknown' from error code C430 in Attachment A – Error Code List and replaces the reference to Field Position '732a' with '786-787'.
 - Update of valid values for certain fields
 - Removes 'alphanumeric' as an invalid form of entry for the Transmitter TIN in the 1A record, position 483-507



Updated Electronic Filing Specifications Released March 2012

- FinCEN SAR Updates Examples include
 - Update of Field Instructions
 - Updates Item *79 Filer name instruction to include the following statement: 'Enter the full name of the filer if the filer is an individual, such as a sole proprietorship acting as a financial institution. If an individual's name is recorded, enter the name in (first name) (middle name) (last name) or equivalent format, e.g. John Jacob Doe or Richard R. Roe II, etc.'
 - Correction of Error Code Descriptions
 - Added the following clarifying language to the Error Codes Description and Remarks (Acknowledgement Transmitter (1A) Record, pos. 30-119): 'Error codes associated with this record begin with a 'T', are 3 alphanumeric characters in length, and are left-justified'
 - Update of valid values for certain fields
 - Removes 'alphanumeric' as an invalid form of entry for the Transmitter TIN in the 1A record, position 483-507

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 File Layout Example

Record: 4A, Position: 10-159

Record: 4A, Position: 162-196

Record: 4A, Position: 198-232

4A record data...

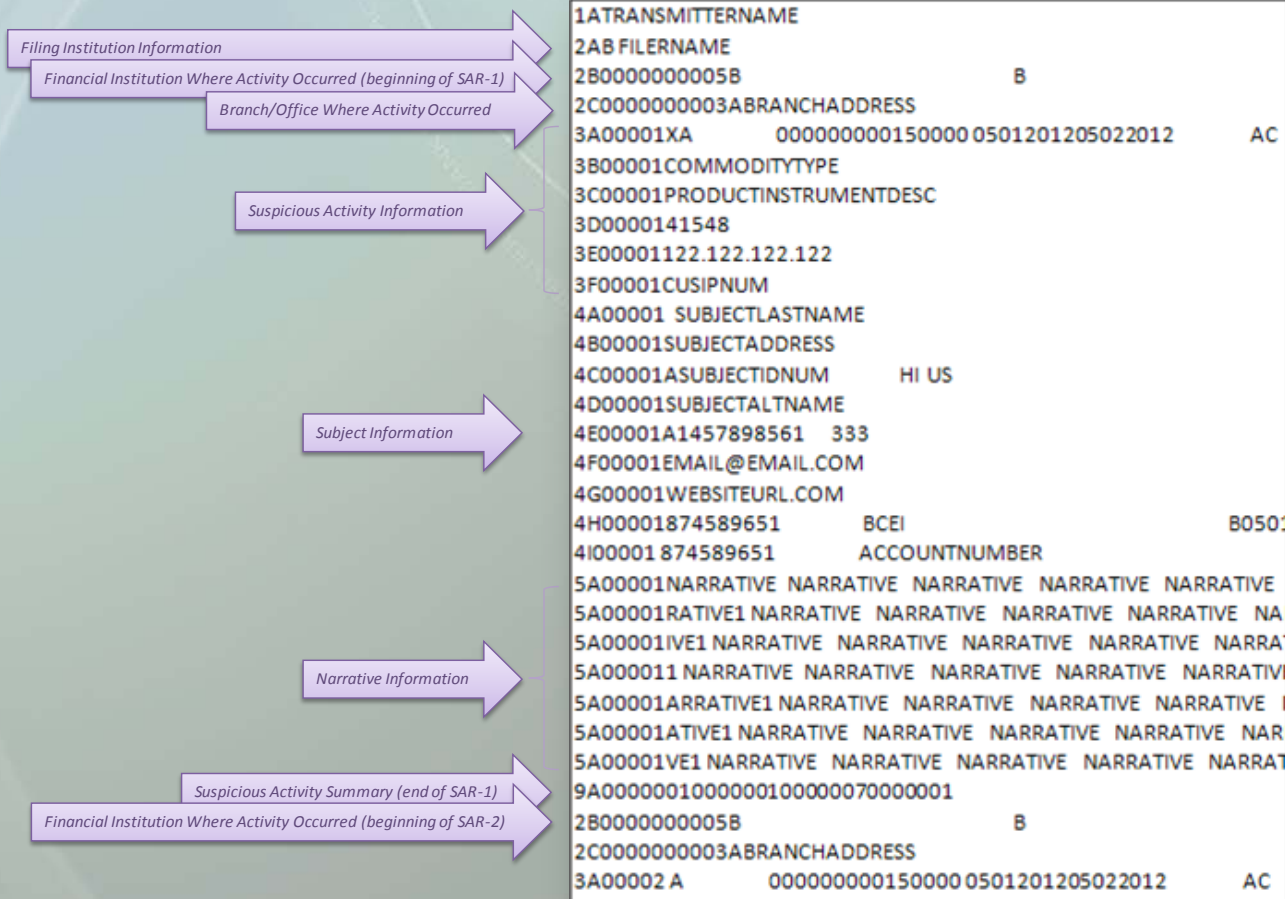
```

1A TRANSMITTERNAME
2AD DEPOSITORYINSTITUTIONLEGALNAME
2B00000000001D DEPOSITORYINSTITUTIONLEGALNAME
3A00001A 05012012 0000000002500000000000010000
3B00001000000000015000UK
3C00001000000000030000MX
3C00001000000000020000CA
4A00001B PERSONLASTNAME
4A00001C ENTITYLEGALNAME
4B00001ENTITYACCOUNTCASHIN
4C00001ENTITYACCOUNTCASHOUT
9A0000001000000200000010000001
9B00000010000001000000200000010000001
9Z0000000100000010000001000000200000010000001
    
```

Suspicious Activity Report Specification File Layout

Record Type	Record Description	Next Possible Record	Required Record	Max Occurrence Per Discrete U-SAR
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 or Office Information Where Activity Occurred (2C) Record	2C, 2B, 3A		99
3A	Suspicious Activity Information (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	4A, 4B, 4C, 4D, 4E, 4F, 4G, 4H, 4I, 4J, 4A, 5A	X	999
4B	Subject - Address (4B) Record	4B, 4C, 4D, 4E, 4F, 4G, 4H, 4I, 4J, 4A, 5A		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		99
4I	Subject - Affected TIN & Account Number (4I) Record	4I, 4A, 5A		99
5A	Narrative Description (5A) Record	5A, 2B, 9A	X	20
9A	Suspicious Activity Information Summary (9A) Record	2B, 9B	X	
9B	Filing Institution Summary (9B) Record	2A, 9Z	X	
9Z	File Summary (9Z) Record	(END)	X	

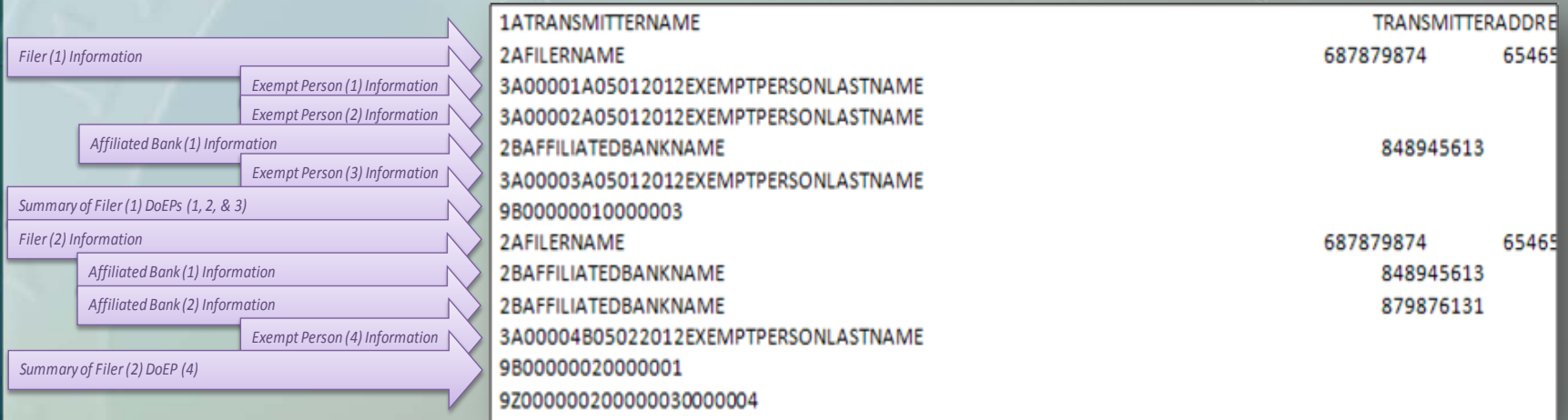
Suspicious Activity Report Specification File Layout Example



Designation of Exempt Person Report Specification File Layout

Record Type	Record Description	DEP Form Content	Next Possible Record	Required Record	Max Occurrence Per DEP
1A	Transmitter (1A) Record	Transmitter Information	2A	X	
2A	Filer Information (2A) Record - Required	Part III - Filer Information	2B, 3A	X	
2B	Affiliated Bank (2B) Record - Optional	Part III - Affiliated Bank(s)	2B, 3A		99
3A	Designation of Exempt Person Information (3A) Record - Required	Part I, II, IV	3A, 2B, 9B	X	
9B	Filer Information Summary (9B) Record - Required	Summary of 2A	2A, 9Z	X	
9Z	File Summary (9Z) Record - Required	Summary of Batch	(END)	X	

Designation of Exempt Person Report File Layout Example



Suspicious Activity Report Specification - Attachments



➤ Attachments – Reference Attachment D

- Identify which FinCEN SARs in the batch are associated with attachments
- Reference the FinCEN SAR Transaction Sequence Number in your attachment file name
- Include all attachments (associated with the FinCEN SAR batch file) in a single zip file
- Add the attachment zip file to the FinCEN 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 FinCEN CTRs or FinCEN 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

- Identify the correction indicator in the technical specification
 - CTR - Enter “B” at Field Position 8 “Type of Filing” in the Transaction Summary (3A) Record.
 - SAR - Enter “B” at Field Position 9 “Type of Filing” in the Suspicious Activity Information (3A) Record for each corrected FinCEN SAR.
 - DOEP - Enter “B” at Field Position 8 “Filing type” in the Exempt Person Information (3A) Record for each corrected DOEP.
- Enter the prior report’s BSA Identifier returned in the acknowledgement file into the correct field position identified in the technical specification
 - CTR - Field Position 9-22 “Prior Report Number” in the Transaction Summary (3A) Record
 - SAR - Field Position 12-25 “Prior Report Number” in the Suspicious Activity Information (3A) Record for each corrected FinCEN SAR
 - DOEP - Field Positions 985 – 998 “Prior Report Number” in the Exempt Person Information (3A) Record for each corrected DOEP
- Complete all other data in the reports in their entirety
- Ensure that each correction contains a new “Date Filed”
- For FinCEN SAR, record the nature of all corrections at the beginning of the initial Narrative Description (5A) Record for each corrected FinCEN SAR.
- Retransmit the corrected FinCEN CTR, SAR, or DOEP reports in a new batch file. Do not re-transmit the original batch file because this will cause duplicate database entries.



Acknowledgements Updates

- User Field Inclusion
 - Specifications allow for User Field data to be entered into incoming batch file
 - Currently testing User Field data return in Acknowledgement File
 - Update of Acknowledgment to include User Field by July, 2012
- XML Based Acknowledgment
 - Currently testing acknowledgment formatted in XML
 - Update of BSA E-Filing System to include ability to download XML based acknowledgement by July, 2012.

Batch File Testing Procedures



- Go To User Test Site (<http://sdtmut.fincen.treas.gov/>) and Request an Account (Become a BSA E-Filer link)
- Utilize Transmitter Control Code (TCC) of TBSATEST for testing purposes
- Code to specifications and test upload of batch file
- Review batch validation errors and correct any errors
- Validate file is uploaded, accepted, and acknowledged
- E-mail will be sent once file is acknowledged with the production TCC to utilize for production
- Ready to file on the production system!
- Updated Batch Test Procedures Document (<http://bsaefiling.fincen.treas.gov/docs/TestingProcedures.pdf>) contains samples of discrete form and file layout

Common Questions/Inquiries



Question: Where can I find copies of the BSA E-Filing Specifications for batch filing FinCEN's new SAR, CTR, and DOEP

- **Answer:** These specifications are available from the BSA E-Filing Web site at <http://bsaefiling.fincen.treas.gov/main.html>

Question: Will there be a recording of this webinar available? Will the presentation be available?

- **Answer:** Yes. A recording of the webinar and a copy of the presentation will be shortly available on FinCEN's Web site.

Question: What is the deadline for using FinCEN's new SAR and CTR?

- **Answer:** March 31, 2013. For more information see <http://www.fincen.gov/whatsnew/html/20111220.html>

Common Questions/Inquiries



Question: When does FinCEN's mandatory e-filing requirement begin?

- **Answer:** As of July 1, 2012, all CTRs, SARs, DOEPs, and RMSBs must be filed using FinCEN's BSA E-Filing system. For more information on this requirement, see http://www.fincen.gov/news_room/nr/html/20120223.html

Question: My institution does not e-file now, where can I find more information about the BSA E-Filing system?

- **Answer:** The BSA E-Filing Web site (<http://bsaefiling.fincen.treas.gov/>) allows you to take a tour of the system. Additionally, FinCEN released a recorded webinar walking through the basics of the BSA E-Filing system, see <http://treas.yorkcast.com/webcast/viewer/?peid=a93e7d2b1a07427a93b0cf2e764a57421d>



Common Questions/Inquiries

Question: Can I review the discrete filing version of FinCEN's new SAR, CTR, and DOEP for testing purposes before establishing an account with BSA E-Filing?

- **Answer:** The discrete filing version is available on the BSA E-Filing system's User Test site at <http://sdtmut.fincen.treas.gov/main.html>

Question: What is the Transmitter Control Code (TCC) and how do I get one so others in my institution can file FinCEN's new reports?

- **Answer:** The Transmitter Control Code is an 8-digit code that is utilized in the batch file technical specifications. The TCC of TBSATEST should be utilized when testing batch files on the User Test System. Once your files have been accepted and acknowledged on the User Test System, and e-mail will be sent with the production TCC to utilize when submitting batch files on the production system.



Common Questions/Inquiries

Question: When will the XML formats for SAR filing acknowledgements be made available. At this time, filing acknowledgements are only available using the ASCII format

➤ **Answer:** FinCEN plans to provide the capability for XML formatted filing acknowledgements as part of a future BSA E-Filing system update. FinCEN currently expects to make this capability available by July 2012.

Question: I am a supervisory user and my general users are not able to view the links within the BSA E-Filing System for FinCEN's new reports. How can this be corrected?

➤ **Answer:** For general users to view the links within the BSA E-Filing System for FinCEN's new reports, the supervisory user must update the general user's system roles to include those reports.

Common Questions/Inquiries



Question: How can financial institutions create a discrete filing version of FinCEN's new SAR for a report completed within a batch filing?

➤ **Answer:** FinCEN is aware that a financial institution, in response to an ad hoc request from an appropriate law enforcement agency or regulator, may have previously used the static format of the legacy Suspicious Activity Reports (SARs), such as the SAR-DI, SAR-C, SAR-MSB, or SAR-SF, as a template for creating a duplicate of a batch filed SAR. Because of the interactive nature of the discrete filing version of FinCEN's new SAR, some financial institutions may have difficulty creating a copy in that exact format. In such instances, FinCEN expects the institution to provide a copy as close to the format of the discrete filing version of FinCEN's new SAR as practical, while ensuring all information provided within the original SAR is included in the version provided to the requesting law enforcement agency or regulator. Financial institutions may require a sample layout of the data fields available on the discrete filing version of FinCEN's new SAR to create such an ad hoc copy. A sample layout of the data fields available on the discrete filing version of FinCEN's new SAR is available in the Testing Procedures document (<http://bsaefiling.fincen.treas.gov/docs/TestingProcedures.pdf>)

Common Questions/Inquiries



Question: What guidance has FinCEN published regarding compliance requirements associated with the new FinCEN reports?

- **Answer:** The specifications documents include general and line item instructions for completing the new reports; the discrete filing versions have embedded instructions. FinCEN also has published guidance (FIN-2012-G002) to assist institutions in filing out the new reports at

http://www.fincen.gov/statutes_regs/guidance/html/FIN-2012-G002.html)



Common Questions/Inquiries

Question: What topics does the FinCEN guidance cover?

- **Answer:** The guidance covers the following key topics:
 - Use of suspicious activity characterizations
 - Use of NAICS codes
 - Critical fields
 - SAR narrative and spreadsheet attachments
 - Gender fields
 - Fields related to Internet presence
 - Ordering of discrete filing reports and auto-filing capabilities
 - Timeframe for filing CTRs

Common Questions/Inquiries



Question: Must CTRs be filed within 15 days after the transaction date using the BSA E-Filing system?

- **Answer:** Yes, but FinCEN will temporarily maintain the 25-day compliance period referenced in earlier BSA E-Filing specifications until March 31, 2013, for those filers that need to update their systems in order to be in compliance with the established regulatory requirements.



Obtaining Help

BSA E-Filing Home Page

<http://bsaefiling.fincen.treas.gov>

BSA E-Filing Help Desk at 1-866-346-9478

BSA E-Filing E-Mail Address

BSAEFilingHelp@fincen.gov

The Help Desk is available Monday through Friday
from 8 a.m. to 6 p.m. ET

Conclusion



- Future Webinars: FinCEN will be offering a separate Webinar on the new FinCEN reports at a later date for financial institution employees and compliance professionals with BSA-related responsibilities
- Webinar materials/recording will be available on www.fincen.gov
- Questions will be documented and responded to within two weeks.

Questions and Answer Period



Please type in your questions using the webinar interface