Frequently Asked Questions (FAQs)

Understanding What BSA E-Filing Is and What It Offers

What is the purpose of BSA E-Filing?

BSA E-Filing allows organizations or individual to electronically and securely file discrete and batched Bank Secrecy Act (BSA) forms. It also allows a registered user to send secure messages to FinCEN (and receive responses where appropriate). Finally, FinCEN uses BSA E-Filing System to issue advisories and system updates to the BSA E-Filing user community.

What BSA forms may be submitted via BSA E-Filing?

See Using BSA E-Filing for a list of BSA forms that can be submitted via BSA E-Filing.

How much does participation in BSA E-Filing cost?

Nothing. No direct costs are involved for an organization to use BSA E-Filing. However, indirect costs may be incurred if an organization elects to make changes to its internal BSA filing processes in order to optimize its use of BSA E-Filing.

Can a law firm file BSA forms for a client?

No. A law firm may assist its clients in the preparation of electronic BSA forms for BSA E-Filing, but the client must submit filings on its own behalf.

Can a holding company file for an affiliate bank?

Yes, provided the information on the BSA form reflects the location where the transaction or suspicious activity occurred.

Can an individual file BSA forms on behalf of themselves rather than an organization?

Yes. If you only file FBAR data to FinCEN as an individual, the BSA E-filing enrollment process allows you to enroll as an FBAR Filer. See Become a BSA E-Filer for more information regarding this enrollment process.

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Understanding How BSA E-Filing Operates

What assistance is available for using the BSA E-Filing System?

Once enrolled in BSA E-Filing, an individual FBAR filer or your organization's Supervisory User will be able to access information on the secure portion of the BSA website.

How secure is BSA E-Filing?

BSA E-Filing was designed and developed in strict compliance with Government regulations applicable to Federal computer systems. Various management, operational, and technical security controls have been implemented to protect the confidentiality, integrity, and availability of the system and its resident data.

How do I get started using BSA E-Filing?

Click Become a BSA E-Filer and follow the step by step instructions in order to enroll yourself or your organization in BSA E-Filing.

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Connecting to BSA E-Filing

What are the technical requirements to use BSA E-Filing?

At least one computer that has access to your Internet connection and meets the following specifications:

- Intel Pentium III or greater processor.
- At least 128 MB RAM (256 MB recommended).
- 200 MB of free disk space.
- Microsoft Windows 2000 with Service Pack 4; Windows Server 2003; Windows XP Professional or Home Edition with Service Pack 2 or 3.
- Web browser:
  - 128-bit encryption level of Internet Explorer browsers may be checked by clicking Help>About Internet Explorer. Review "Cipher Strength" for bit encryption level.
  - Internet Explorer 6.0 or higher.
  - You cannot access BSA E-Filing using the Apple platform.
  - You cannot access BSA E-Filing using Firefox browser at this time.
  - The compatible version of Adobe Reader (link available from the BSA E-Filing public site)
- You will also need to have a FinCEN provided UserID and password to access the BSA E-Filing System. A PIN is also provided to digitally sign documents.

In addition, your organization's firewall must permit access through port 443 (for Secure Sockets Layer, which is used to encrypt transmission of data).

I have previously enrolled in BSA E-Filing,but now I can't access the system. Why?

Accessing BSA E-Filing requires that you use a computer and Internet browser and requires that you use the correct UserID and password.

If you are using a computer and Internet browser and you are entering the correct UserID and password but do not gain access to BSA E-Filing, contact the BSA E-Filing Help Desk at 1-866-346-9478 (option 1) or BSAEFilingHelp@fincen.gov for further assistance.

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Forms Reader

To use BSA E-Filing, what software do I need in order to submit forms?

Adobe Reader is required in order to submit BSA forms on the BSA E-Filing System. There is no cost to download, install or use the Adobe Reader software.

What is the BSA E-Filing compatible version of Adobe Reader software?

There are specific versions of Adobe Reader software that are compatible with BSA E-Filing. If not already installed, please download and install the version of Adobe Reader that is compatible with BSA E-Filing. To view the compatible versions of Adobe Reader visit: http://bsaefiling.fincen.treas.gov and click the link Downloading the Forms Reader on the right side under User Quick Links.

How do I determine if I already have Adobe Reader and what version it is?

To determine the version of Adobe Reader installed on your computer (if any), follow these instructions:

1. Go to your Start Menu.
2. Select Settings and then Control Panel.
3. In the Control Panel window, select Add or Remove Programs.
4. A list of your currently installed programs will be displayed.

How do I download the Adobe Reader?

To download the compatible version of the Adobe Reader software that will allow users to view and complete an Adobe BSA E-Filing discrete or batch form, go tohttp://bsaefiling.fincen.treas.gov/ and click the link Downloading the Forms Reader on the right side under User Quick Links.

Why am I getting a security error when I try to download Adobe Reader?

If you are not able to download or install the Adobe Reader, check with your system administrator to make sure that you have the security permissions to install new programs on your system.

On what platforms can I use the Adobe Reader to view and submit BSA E-Filing forms?

The platform for use of Adobe Reader with BSA E-Filing forms is Windows XP. While other versions of Windows may be supported by Adobe Reader, they have not been specifically tested with BSA E-Filing and therefore are not officially supported.

What web browsers can I use with Adobe Reader to view and submit forms?

Adobe Reader system requirements include Internet Explorer 6 or higher. While other web browsers may be supported by Adobe Reader, they have not been specifically tested with BSA E-Filing and therefore are not officially supported.

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Enrollment

How do I enroll?

To enroll, click Become a BSA E-Filer and follow the step by step instructions in order to enroll yourself as an individual FBAR filer or your organization as a Supervisory User in BSA E-Filing.

Note: If your organization has already enrolled in BSA E-Filing, contact your organization's Supervisory User to obtain instructions for enrolling yourself as a general user.

What is a Supervisory User?

A BSA E-Filing Supervisory User is a person who has primary responsibility for the filing organization's use of BSA E-Filing. A Supervisory User should be in a position to be cognizant of all BSA filing activities across the entire filing organization. This person should also be knowledgeable regarding the individuals responsible for preparing and submitting BSA filings and the processes by which filings are submitted. Within the secure portion of the BSA E-Filing website, Supervisory Users have access to functionality not available to regular users, including the ability to initiate the enrollment of new users, manage user access (i.e., assign privileges), update filing organization information, and track the status of filings submitted by all users from the organization.

What is the Filing Organization Enrollment Code, and how do I get one?

The Filing Organization Enrollment Code uniquely identifies your organization within BSA E-Filing. It is created when the designated Supervisory User enrolls your organization in BSA E-Filing and is required to enroll any subsequent users. If you are a regular BSA E-Filing user or the backup Supervisory User, you should contact your organization's Supervisory User to obtain your Filing Organization Enrollment Code. If you are a Supervisory User, this code may be obtained from the secure portion of the BSA E-Filing website.

What is a TCC (or Transmitter Control Code) ID?

A TCC ID is assigned to an organization after FinCEN has approved its application to become a batch filer. The first record of every batch file submitted by the organization must include the TCC ID. Discrete filers do not have a TCC ID and may disregard this field during the enrollment process.

What is a TIN (Taxpayer Identification Number)?

A TIN, also known as a Taxpayer Identification Number, is a nine-digit number assigned by the IRS to uniquely identify a business entity or an individual. An EIN (Employer Identification Number) is often used to identify a business entity, while a SNN (Social Security Number) or an ITIN (Individual Taxpayer Identification Number) is often used to identify an individual.

What is an MICR (or Magnetic Ink Character Recognition) number?

The MICR number, sometimes referred to as the routing number, is an eight- or nine-digit code that depository organizations enter in field 43 of the discrete CTR form. You may leave this field blank when enrolling your organization in BSA E-Filing if it is not a depository organization.

What is the DUNS number?

The Dun & Bradstreet DUNS number is a unique nine-digit identification sequence assigned by Dun & Bradstreet to single business entities that links corporate structures together. This number is requested, but not required, when you request a user ID and password because it helps the vetter complete the identity and employment verification process.

What is an individual FBAR filer?

A BSA E-Filing FBAR Filer is a person who is responsible for filing FBAR data only. This person may select to enroll as an individual and will have access to the BSA FBAR form. An FBAR Filer should be knowledgeable regarding the preparation and submission of BSA filings.

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General Filing (questions may apply to any type of filing)

Can my BSA E-Filing electronic filings satisfy my state filing requirements?

No. BSA E-Filings only allow users to satisfy selected Federal BSA filings requirements. See Using BSA E-Filing for a list of BSA forms that can be submitted via BSA E-Filing. Printed and/or electronically saved copies of the filings submitted via BSA E-Filing may be retained to meet Federal filing records retention requirements.

Can a partially completed BSA form be saved and completed at a later time?

Yes. You can save a BSA form at any stage of completion and then reopen it later to complete or submit it.

Must CTRs (Currency Transaction Reports) be filed within 15 days after the transaction date?

Yes. FinCEN announced a change in the CTR electronic filing specification for the CTR from the current 25-days to 15-days. FinCEN regulations have consistently maintained a regulatory requirement that CTRs be filed within 15 days. Notwithstanding this requirement, in connection with its receipt of magnetic media files initiated in late 1987, and ending in December 2008, FinCEN issued electronic specifications referencing a 25-day period to assist institutions seeking to take advantage of this filing method via a common business practice of submitting magnetic media files on a fixed schedule. The 25-day period was implemented to account for physically transporting (shipping) the magnetic media to the processing center in Detroit, Michigan. FinCEN understands that this business practice has continued with respect to batch e-filing. In light of the comments received and acknowledging that some financial institutions may need to change their business processes to become compliant with the rules, FinCEN has determined that it will temporarily maintain the 25-day compliance period referenced in its earlier 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. The FinCEN CTR filing specifications may be viewed at http://bsaefiling.fincen.treas.gov/news/FinCENCTRElectronicFilingRequirements.pdf.

What other BSA forms are available for filing via BSA E-Filing?

Check this site regularly for announcements regarding the availability of new forms. Currently, you can file:

- CTRs (Currency Transaction Reports)
- DEPs (Designations of Exempt Persons)
- SARs (Suspicious Activity Reports)
- SAR-MSBs (Suspicious Activity Reports - Money Service Businesses)
- SAR-SFs (Suspicious Activity Reports - Security and Futures Industries)
- CTRCs (Currency Transaction Reports by Casinos)
- SARCs (Suspicious Activity Reports by Casinos and Card Clubs)
- RMSBs (Registration of Money Services Business)
- FBARs (Report Foreign Bank and Financial Accounts)

Am I still required to keep filings for five years?

Yes. You are still required to keep filings for five years. You have the option of storing them as paper filings, saving them to your computer's hard drive or a network drive, or storing them on magnetic media. You will not be able to retrieve your filings from BSA E-Filing once you have submitted them. BSA E-Filing does not store filings; it only transmits them to FinCEN.

Can I submit a printed version of the electronic Bank Secrecy Act (BSA) E-Filing BSA Form to FinCEN?

No. FinCEN will not accept printed versions of the forms produced by BSA E-Filing. This type of submission does not meet the reporting requirements under Title 31, Part 103 of the Bank Secrecy Act.

How are Acknowledgements returned for filings submitted via BSA E-Filing?

Acknowledgements are returned from FinCEN for all BSA E-Filings to the user's secure inbox.

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How long does BSA E-Filing retain administrative data (i.e., Acknowledgment, Alert, and Track Status data) associated with electronic BSA filings?

BSA E-Filing retains administrative data as follows: (1) Acknowledgment data are retained for 30 days after being opened or 60 days after being posted, whichever comes first; (2) Alert data are retained for 30 days after posting; and (3) Track Status data are retained for 1825 days (i.e. 5 years) after achieving "Accepted" or "Rejected" status. It is highly recommended that you perform electronic and/or hard-copy archival of administrative data to support your organization's archival requirements.

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Discrete BSA Filing

What is a discrete BSA filing?

Discrete filings refer to BSA forms that are submitted one at a time rather than in aggregated batches.

How does discrete BSA E-Filing differ from paper-based BSA filing?

When filing discrete electronic forms via BSA E-Filing, you complete electronic forms on your computer (rather than creating hard copies by hand or using a typewriter or computer) and submit them electronically to BSA E-Filing (rather than mailing hard copies to the Enterprise Computing Center - Detroit). (Please see the related detailed instructions in the BSA E-Filing User Manual on the secure portion of the site.) Unlike with paper forms, you do not have the ability to enter information outside of a form's allotted space. The content of a BSA E-Filing discrete filing must meet the same specifications that existed for magnetic media filing of specific BSA forms. These specifications are available on the FinCEN website.

Can I group my discrete BSA filings and submit them all at once?

No. This functionality does not exist in BSA E-Filing. Each discrete BSA filing must be individually signed, saved, and submitted to BSA E-Filing. If you find that you are submitting a large quantity of discrete filings each week, you might consider the merits of submitting batch filings.

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Batch BSA Filing

What is a batch BSA filing?

A batch BSA filing is an electronic file created by a batch file creation software program (either developed in-house or bought from a third-party vendor). The file typically contains multiple BSA forms (although it is possible for a batch to contain just one filing).

How do I know what batch BSA filing format I should be using?

You should ensure that your batches comply with the BSA E-Filing electronic filing requirements. These specifications are available on the FinCEN website. For tips on how to ensure your batches remain in the proper format throughout the download process from your mainframe to a PC in preparation for uploading to BSA E-Filing, refer to section 6.3, Batch Filing of BSA Forms, in the BSA E-Filing User Manual on the secure portion of the BSA E-Filing website.

If we apply to use BSA E-Filing and do not currently file batch filings, do we need to separately apply for authorization to file batches before doing so?

Yes. You must apply for and receive authorization before you can file batches via BSA E-Filing. The application process for filing batches is handled through FinCEN or the BSA E-Filing Help Desk. The instructions for applying to file batches are available in the BSA E-Filing System Batch File Testing Procedures guide.

Where can we get help determining what modifications we need to make to our bank's procedures to use the system?

Detailed information is available on the secure portion of the website. In addition, Take a Tour, available on the BSA E-Filing public site, provides an overview of the BSA E-Filing System.

Are there any size limitations on a batch file?

The size limitation for a batch file is 60 MB.

How often can I transmit batch files through BSA E-Filing?

Transmitting batch files can be daily, or even multiple times a day.

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Secure Data Transfer Mode (SDTM)

What is SDTM?

SDTM is a secure mechanism for transferring batch submissions from your organization's internal server to the BSA E-Filing server.

What are the advantages of using the BSA E-Filing SDTM?

The batch submission process can be automated such that user intervention/involvement is minimized.

What is the difference in the file format previously used on tape and diskette submissions and the file format used for SDTM submissions?

None. They are identical. Files previously formatted for use on tape and diskette submissions are accepted by the SDTM process without any changes. However, at present, the BSA E-Filing System accepts only ASCII-formatted batch submission files using SDTM.

What are the differences between the BSA E-Filing electronic filing requirements and the specification for SDTM batch submission?

None. SDTM submissions must meet the same requirements.

Are there any restrictions or limits on the size or number of submissions in a batch in SDTM transfers?

The restrictions for SDTM batch submissions are the same as those for manual batch submissions. There are no additional restrictions, nor are there any fewer restrictions. Both types of batch submissions must meet the BSA E-Filing electronic filing requirements.

How will Currency Transaction Report (CTR) acknowledgment files be returned when SDTM is used for CTR submissions?

One file will be sent to the server that submitted the CTR batch file for each CTR batch file submitted. The name of the acknowledgment file will be composed of the name of the CTR batch file followed by ".ACKED". For example, if the CTR submission is named "CTRST.20061011062411.ANYBANK.002", the corresponding acknowledgment file will be named "CTRST.20061011062411.ANYBANK.002.ACKED".

How will Suspicious Activity Report acknowledgement files be returned when SDTM is used for SAR submissions?

One file will be sent to the server that submitted the SAR batch file for each SAR batch file submitted. The name of the acknowledgement file will be composed of the name of the SAR batch file followed by ".ACKED'. For example, if the SAR submission is named "SARST.20091011062411.ANYBANK.003", then the corresponding acknowledgement file will be named "SARST.20091011062411.ANYBANK.003.ACKED".

What are the costs associated with the use of SDTM?

The cost will depend upon what software is already in use by the financial institution and the availability of either a VPN appliance or the Connect:Direct Secure+ option. SDTM subscribers must use software that can exchange data with the Sterling Commerce Connect:Direct application with client authentication enabled. Client authentication requires the use of a third-party signed certificate for a trusted certificate authority. The cost of this software is dependent on the platform on which it is deployed, and the cost of the certificate is dependent upon the third-party certificate authority chosen. SDTM subscribers must have a VPN appliance that is compatible with the BSA E-Filing VPN appliance or use Connect:Direct with the Secure+ option. In addition, there may be costs associated with the setup, test, and maintenance of this capability.

What needs to be done to start using SDTM if we already file batch files using BSA E-Filing?

You will need to contact our Help Desk at 1-866-346-9478 (option 1) orBSAEFilingHelp@fincen.gov so that our SDTM systems engineering team can exchange control information with you and perform testing on the BSA E-Filing User Test system. Once testing has been completed successfully, additional control information will be exchanged and the production tables will be updated to enable communications tests. Tests will be conducted to ensure that files can be exchanged securely, submissions are acceptable to FinCEN, acknowledgment files can be sent from BSA E-Filing to the subscriber, and acknowledgment files can be processed successfully by the subscriber.

Is the Sterling Commerce Connect:Direct software (with Secure+, client authentication, and TLS_RSA_WITH_AES_256_CBC_SHA Encipherment Suite or a VPN appliance) the only software that can be used to exchange files with the BSA SDTM system?

No. Other software systems may be used as long as the subscriber is able to communicate with the Sterling Commerce Connect:Direct software (with Secure+ client authentication along with TLS_RSA_WITH_AES_256_CBC_SHA Encipherment Suite or a VPN appliance). Note: The Sterling Commerce Connect Select product is not usable with BSA E-Filing unless VPN is used because it does not provide client authentication and does not support TLS_RSA_WITH_AES_256_CBC_SHA encipherment.

If we convert to SDTM for batch filing, can we still file batches manually? Can we use both methods (manual and SDTM) at the same time?

Yes. Remember that the acknowledgment files from CTR/SAR batches filed manually are only available by logging into the BSA E-Filing System, opening the submitting user's BSA secure inbox, and detaching the acknowledgment file manually. Acknowledgment files for SDTM batch submissions will be sent back to the server from which they originated. Care must be taken when filing both ways to ensure that duplicate submissions are not sent to FinCEN.

If we submit using SDTM, how will we be notified that a submission has been accepted or rejected?

You will receive an unclassified email with the BSA tracking number and a status of either "Accepted" or "Rejected", as is currently the process for manual submissions.

How will we know that the acknowledgments are available to be processed?

The SDTM server can be programmed to launch an application on your SDTM server with the name of the acknowledgment file sent to the server. Alternatively, your server could be programmed to "watch" for new files and process them when they arrive.

Is there any additional tracking provided for SDTM batch submissions?

Yes, an additional role (SDTMBatchFiler) can be assigned to any BSA E-Filing user. However, requests for assignment of this role to users must be placed with our Help Desk at 1-866-346-9478 (option 1) or BSAEFilingHelp@fincen.gov, as this role cannot be assigned by Supervisory Users at this time. This role provides access to one additional report (SDTM Batch Submissions View SDTM Batch Submissions), which provides the following information for each SDTM batch submission: BSA E-Filing Tracking ID, Form Type, Date Received, Date Opened, Owner, Number Filings (in batch submission). This report is the only report that provides a count of the number of filings in SDTM batch submissions. This report is restricted to SDTM batch submissions and not available for manual batch submissions.