



## **Important Notices to E-Filers:**

### **FinCEN Announces Update to the Suspicious Activity Report (SAR) & Technical Webinar for Batch Filers**

**January 26th, 2018** – In June of 2018, the FinCEN Suspicious Activity Report (SAR) available on the BSA E-Filing System will be updated to adhere to the changes defined in Federal Register notice posted on February 2<sup>nd</sup>, 2017 (<https://www.federalregister.gov/documents/2017/02/02/2017-02235/proposed-collection-comment-request-update-and-revision-of-the-fincen-suspicious-activity-reports>).

Batch filers will be required to submit the updated FinCEN SAR data in an XML based file, rather than the current ASCII based fixed-length delimited file.

- The FinCEN SAR XML User Guide can be downloaded at [FinCEN Suspicious Activity Report \(SAR\) Electronic Filing Requirements for XML](#)
- The batch FinCEN SAR XSD file can be downloaded at [https://www.fincen.gov/base/EFL\\_SARXBatchSchema.xsd](https://www.fincen.gov/base/EFL_SARXBatchSchema.xsd)

The following list details the changes to the FinCEN SAR:

1. Filing institution note to FinCEN
  - New text field to alert FinCEN that the FinCEN SAR is being filed in response to a current specific geographic targeting order (GTO), advisory, or other activity.
2. New/Modified types (and subtypes) of suspicious activities
  - New “Cyber event” suspicious activity type category.
  - New/Modified subtype selections associated with the following categories of suspicious activities: Structuring, Fraud, Gaming activities (formally labeled “Casinos”), Money laundering, Identification/Documentation, Other suspicious activities, Securities/Futures/Options, and Mortgage fraud.
3. IP Address: Date and Timestamp
  - New text fields to accompany the IP Address field in order to record the date and/or timestamp of the first instance of the reported IP address.
4. New Cyber Event Indicators
  - New category of fields to record up to 99 cyber events associated with the suspicious activity. The following cyber event indicators are added along with the event value (and date and timestamp, if applicable): Command & Control IP address; Command & Control URL/Domain; Malware MD5, Malware SHA-1, or Malware SHA-256; Media Access Control (MAC) Address; Port; Suspicious e-mail address; Suspicious filename; Suspicious IP Address; Suspicious URL/Domain; Targeted system; and Other.

Below is a screenshot of how this data will be recorded on the FinCEN SAR discrete form:

The screenshot shows a form titled "44 Cyber Event Indicators. Select the appropriate indicator from the drop-down list and provide the associated supporting information." The form contains the following fields:

- Event type: A dropdown menu followed by a text input field.
- Event value: A text input field.
- Date: A text input field with a placeholder "MM/DD/YYYY".
- Time Stamp (UTC): A text input field with a placeholder "HH:MM:SS".

There are also "+" and "-" buttons next to the Event type field.

5. New Product Types

- New type selections associated with the product type(s) involved in the suspicious activity: Deposit accounts; Microcap securities.

6. New Types of Securities and Futures Institutions

- New subtype selections associated with the type of securities and futures institution in Part III (Financial institution where activity occurred) and Part IV (Filing institution).

**Discrete SAR Impact**

Discrete filers will be able to utilize the new online form with the new and updated fields in June 2018.

**Batch SAR Impact**

The BSA E-Filing System will continue to accept ASCII based batch files until January 1<sup>st</sup>, 2019. Batch filers will have six months from the go-live date in June to adhere to the new XML specification.

FinCEN will be hosting a technical webinar on February 1st, 2018 to provide an overview of the XML specifications and also address any questions regarding the XML User Guide. Application developers and programmers are urged to register and attend this webinar. **This is a technical webinar regarding XML, discrete filers should not register for this webinar.** Participants can register for the webinar below:

**BSA E-Filing SAR Update to XML**

Join us for a webinar on Feb 01, 2018 at 12:00 PM EST

[Register Now!](#)

After registering, you will receive a confirmation email containing information about joining the webinar.

[View System Requirements](#)

Please submit initial questions/comments via email at [BSAEFilingHelp@fincen.gov](mailto:BSAEFilingHelp@fincen.gov) prior to the webinar. Please indicate "FinCEN SAR Update Questions" in the subject heading of your email.