



## **Sending Batch Files to FinCEN BSA E-Filing Secure Direct Transfer Mode (SDTM)**

**Background:** FinCEN provides connection and file transfer capabilities between the BSA E-Filing System and filing organizations using the Secure Direct Transfer Mode (SDTM). Filing organizations send batch files to the BSA E-Filing System and an acknowledgement file is sent back to the filing organization within two (2) business days containing the official BSA Identifiers for each filing within the batch along with any errors associated with the filings. The filing specifications for each report type can be downloaded at the BSA E-Filing Test System located at: <http://sdtmut.fincen.treas.gov/main.html> (under "Batch Filers"). Three methods exist for securely sending batch filings to FinCEN's BSA E-Filing System. A filing organization may select one of the three methods to send files. FinCEN provides FTP over a VPN Tunnel, Connect Direct over a VPN Tunnel, and Connect Direct with Secure Plus (+). These methods are described below.

**FTP over a VPN Tunnel:** For this type of transmission, the user and FinCEN setup a VPN tunnel between each other's servers using VPN appliances. Once a VPN tunnel is setup, an ftp account is created on FinCEN's SDTM server for the filing organization. The specifications for this account include an account name that is eight characters long and a password that is 32 characters randomly generated. In this type of configuration, the Filing Organization (FO) will push a batch file to FinCEN and pull their acknowledgement files from FinCEN.

**Connect Direct over a VPN Tunnel:** If the FO has Connect Direct installed, but does not have Secure+, then a VPN tunnel is setup between the FO and FinCEN's SDTM server. Once setup, the user can submit files securely to FinCEN where they are processed. In this configuration, the FO pushes a batch file to FinCEN and FinCEN will push an acknowledgement file to the FO.

**Connect:Direct with Secure+:** This mechanism is preferred for transferring files between the BSA E-Filing System and any FO. This type of transmission operates with the use of a server certificate on each server to ensure mutual secure authentication between the 2 servers. It is expected that each side performs a push of the file from their server to the other.

**Process:** Any FO seeking to use SDTM to transmit batched submissions will need to contact the FinCEN help desk at 1-866-346-9478 or via email at [BSAEFilingHelp@fincen.gov](mailto:BSAEFilingHelp@fincen.gov). Please inform the help desk if you prefer to use FTP over a VPN tunnel, Connect Direct over a VPN tunnel or Connect Direct with Secure+. The help desk will send a form for your IT department to complete that includes network and firewall configuration information. Please follow all instructions on the form and return to the help desk. Once you have returned the form to the help desk, you will be contacted by a representative of FinCEN to either setup the VPN tunnel and/or confirm firewall configurations.

After the networking is setup, an engineer from FinCEN will contact you to complete the SDTM configuration. The engineer will need to know:

- 1) A unique email address to send messages to. Most customers use [BSA@<DOMAIN>.<COM>](mailto:BSA@<DOMAIN>.<COM>).
- 2) The FO Enrollment code for your organization.

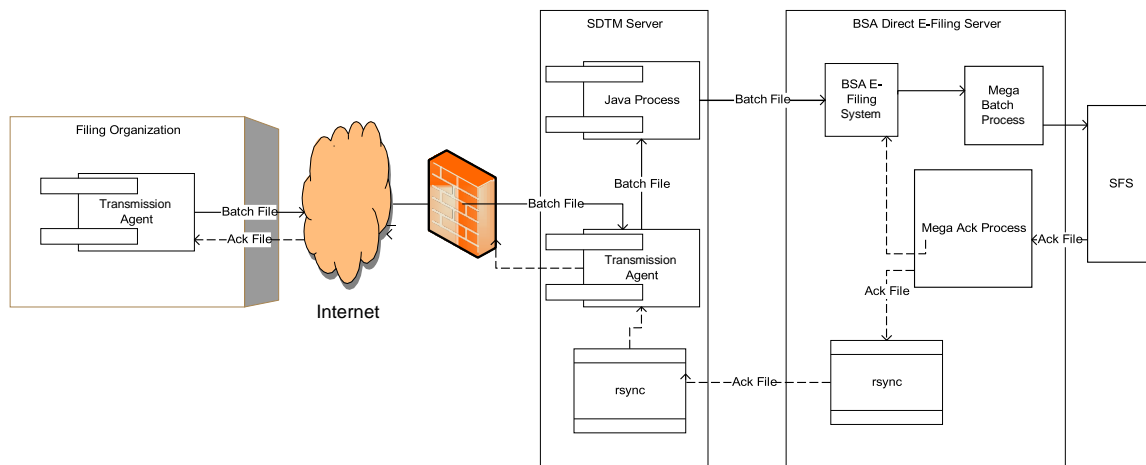
If your organization is not currently registered with the BSA E-Filing system, a UserID will need to be acquired. To request a User ID go to the BSA E-Filing System home page (<http://bsae filing.fincen.treas.gov/>) and follow the steps to Become a BSA E-Filer including filling out the Supervisory User Application Form. Once your application is received, a confirmation link will be sent to the email designated to in the application form to complete the User ID setup. Once your User ID has been issued, you will be assigned a FO code for your Organization.

Filing format for the batch files submitted to the BSA E-Filing System are as follows:

File Type	Naming Conventions
CTR XML batch	CTRXST.yyyyymmddhhss.<username>.xml
SAR XML batch	SARXST.yyyyymmddhhss.<username>.xml
DOEP ASCII* batch	DOEPST.yyyyymmddhhss.<username>.asc
DOEP XML batch	DOEPXST.yyyyymmddhhss.<username>.xml
FBAR XML batch	FFBARST.yyyyymmddhhss.<username>.xml

\*DOEP ASCII batch scheduled for retirement on January 1, 2020.

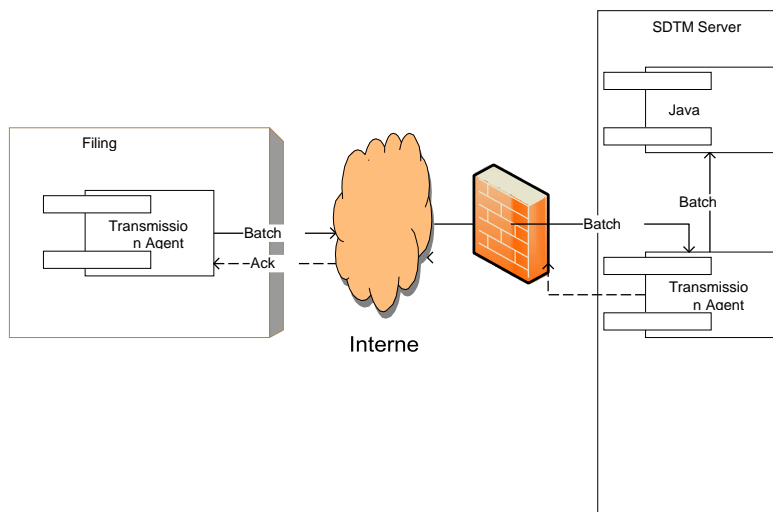
Acronym	Description
yyyy	Current Year
mm	Current Month
dd	Current Day
hh	Hour in 24-hour format
ss	Current Seconds
<username>	Username assigned by SDTM



**Figure 1: High-level Secure Direct Transfer Mode Architecture**

Batch files are transferred via secured connection either using VPN tunnel, Connect Direct over a VPN tunnel or Connect Direct Secure+. If the FO elects to use Connect Direct, a process is launched on the FO's server using a runtask procedure.

After a batch file is sent to FinCEN, a Java process performs validation on the file and sends an email to the FO at the email address, including the process id and the status of the submission. The status will be either Rejected or Accepted.





**Figure 2 High-level Internal Processing**

Each morning a batch process gathers all daily submissions for processing. Once submissions are batched up, the status of the submission changes from Accepted to Transmitted. Once processed, the batch processing will send back to the BSA E-Filing System an acknowledgement batch file. Another process separates out the acknowledgements to be sent to the FO and either transmits the acknowledgement file to the FO or places the acknowledgement files in the FO's home directory.

If the FO is using Connect Direct, the batch processing will transmit the files to the FO. If the FO is using ftp as the preferred choice, then an email is sent to a user indicating acknowledgement files are ready to be pulled and the FO can connect to the SDTM server and pull their acknowledgement files.

### **FAQ**

Q. What software should I use to transfer the files to you?

A. We can only give an overview of the whole process, we cannot give recommendations on what software/vendors to use. Filing Institutions have to decide that on their own and let us know how you want to proceed.

Q. What if the overall process to be setup with SDTM?

A. (see below)

### **Submitting via FTP over the VPN tunnel**

You must have a VPN tunnel setup with us and submit via FTP over the VPN. After that you can request SDTM accounts to be created for you. You will need to provide the help desk the following:

- The institutions name
- Their enrollment code
- An email address to which their email receipts will be sent \*must be a group email\*

Then a SDTM account would be setup for you.

Once the SDTM account is setup, the process continues with the following steps:

- The org submits the batch to us
- Your FTP software connects to our system and drops off the batch
- Our system here extracts the batch to your SDTM directory and processes the batch for your organization
- Assuming their submission was accepted, we receive an acknowledgement file for your submission in two business days and place the acknowledgement file back in your FTP directory
- You will log back into their FTP account and pull the acknowledgement file

That's the process at least for submitting via FTP over the VPN tunnel.

### **Submitting via Connect Direct**

The help desk will send a document to you requesting your Node Names and IP Addresses.

Our Hosting Provider will open a ticket for the firewall rules based on the returned document.



**Help**

Questions or issues regarding the SDTM process may be directed to the BSA E-Filing Help Desk at 1-866-346-9478 or via email at [BSAEFilingHelp@fincen.gov](mailto:BSAEFilingHelp@fincen.gov). The Help Desk is available Monday through Friday from 8 a.m. to 6 p.m. EST. Please note that the Help Desk is closed on Federal holidays.