

BSA E-Filing System

Batch File Testing Procedures

Version 1.3

Version Released: May 2012

Purpose

The purpose of this document is to provide BSA E-Filing users with instructions to test batch file submissions. FinCEN requires testing with the BSA E-Filing User Test system of new/revised submission procedures, processes, and software used to submit batch files prior to submitting batch files to the production system. A batch BSA filing is an electronic file generated by a software program (either developed in-house or using a third party vendor's solution). The file typically contains multiple BSA forms (although it is possible for a batch to contain just one filing). Testing your batch file is a two step process:

Step 1: Upload your file until it passes the validation tests performed by the BSA E-Filing system. Validation rules include verifying record lengths, sequencing of the records in the file, and summary totals in the file.

Step 2: The BSA E-Filing system will transfer and load the validated file into the test database. A test acknowledgment file will be generated for each submission. A test Transmitter Control Code (TCC) is required to submit your test file. A TCC of TBSATEST must be used and inserted into the test batch file. Please work with your software vendor or service provider to ensure the test TCC is placed in the proper location within the file. The file specifications for each form type provide the exact location where the TCC should be entered. Once the file has passed validation, a production TCC for the BSA E-Filing system will be provided to the submitter via e-mail.

Submission Methods

There are currently three submission methods available to transmit your BSA Files to FinCEN. The file format for each submission type is exactly the same and is based on the requirements documented on the FinCEN web site under BSA E-Filing Electronic Filing Specifications

(http://www.fincen.gov/forms/bsa_forms/).

1. BSA E-Filing Web Site Users

For this method of submission, filers connect and login to the BSA E-Filing system web site and then securely upload their batch file from their local computer to the web site.

2. Secure Direct Transfer Mode (SDTM) Filers

SDTM allows for a secure, system to system mechanism for transferring batch submissions from your organization's internal server to the BSA E-Filing server. The batch submission process can be automated such that user intervention/involvement is minimized. There is no interaction with the BSA E-Filing system web site for the upload of the batch file but the BSA E-Filing system web site is used to track the status of the submissions.

Testing Steps

The BSA E-Filing system has a User Test site used for uploading test files. For each one of these submission methods, the following testing steps are required.

1. Apply for a user account on the BSA E-Filing User Test system.

In order to receive an account on the User Test system, please click on the Become a BSA E-Filer button and follow the steps to enroll at the following link:

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

It is recommended the person who will be uploading the test file be listed in the User Information section at the top of the application. FinCEN will vet this application within two business days and an e-mail will be sent to the approved user identified in the application with the user ID and specific instructions on how to create and upload your test file.

2. Upload a test batch file on the BSA E-Filing User Test system.

The test data should consist of a set of sample returns, containing test data. The test file should contain between 50 and 100 documents for CTR filings and between 25 and 50 documents for SAR filings. The data in the file should be test data and not contain any valid Social Security numbers or customer data. **The test batch file must contain the following test Transmitter Control Code (TCC): TBSATEST.** The electronic filing specifications provide the exact location where this code should be placed in the test batch file. The exact process and screen shots to upload your test file will be provided to you in the e-mail you receive with your BSA E-Filing User Test system account. If there are any formatting issues discovered during processing of your test batch file, the BSA E-Filing User Test system will provide the error codes and descriptions of the error to you in the Track Status portion of the web site.

Once your file has a status of Accepted in the Track Status portion of the application, the BSA E-Filing User Test system has verified the format of your test batch file. The test batch file will be transmitted to the BSA E-Filing User Test system for final validation and loaded into the test database. A test acknowledgement file will be generated and loaded back into the BSA E-Filing User Test system for download for CTR, CTR-C, and DEP filings, as well as FinCEN SAR, FinCEN CTR, and FinCEN DOEP filings. The final validation on the submitted test batch file should be completed within 10 days. FinCEN will notify the test filer of the status of their filings via e-mail within 10 business days and provide the production TCC to be used for filing on the production system.

Once your file has passed validation and you have received the production BSA E-Filing system TCC, you are ready to start batch filing on the production BSA E-Filing system. If you have not already applied for a production BSA E-Filing system account, please select the 'Become a BSA E-Filer' button using the following link: <http://bsaefiling.fincen.treas.gov>, and the system will take you through the enrollment process. FinCEN will get your application and provide you with a production BSA E-Filing system user ID within five business days.

Please check your URL address to ensure that you are not sending test data to the production BSA E-Filing system. During testing, the URL address must start with <https://sdtmut1.fincen.treas.gov> as that is the address for the User Test system. During testing, the URL address must not start with <https://bsaefiling1.fincen.treas.gov> as that is the address for the production system.

Help Desk Support

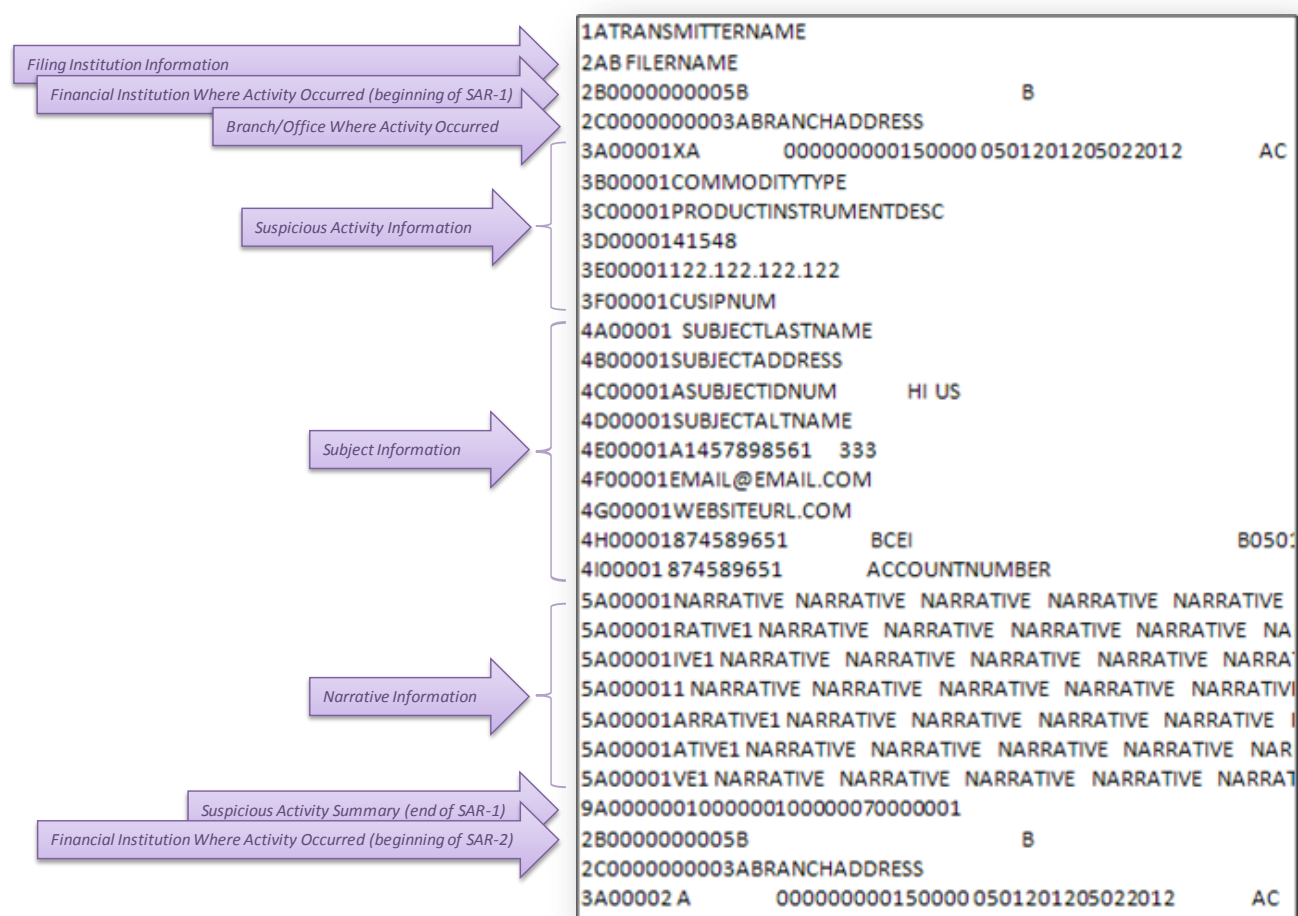
If you have additional questions about the testing procedures or need more information, please contact the BSA E-Filing Help Desk at 1-866-346-9478 (option 1) or BSAEFilingHelp@fincen.gov. The Help Desk regular hours of operation are 8:00 am - 6:00 pm East Coast Time, Monday - Friday. Please note that the Help Desk is closed on Federal holidays.

Batch Examples

The examples below provide a visual representation of the batch file layout for the new FinCEN SAR, FinCEN CTR, and FinCEN DOEP reports. Please take note of the record relationships for each file type, illustrated by the arrows in each example.

1. FinCEN SAR

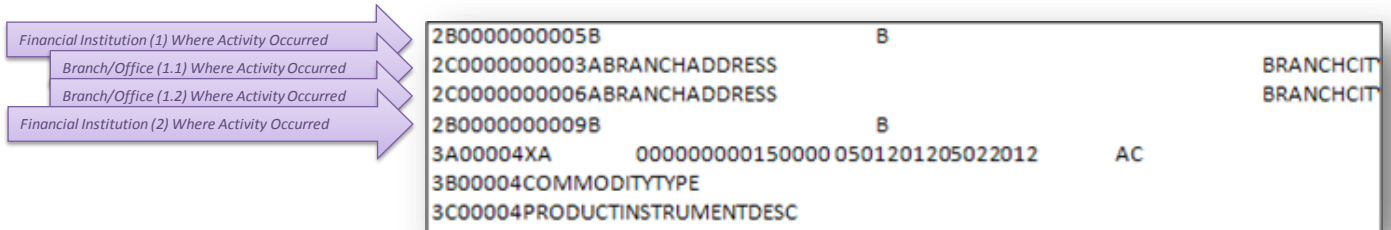
FinCEN SAR: Basic Batch Layout-



FinCEN SAR: 2B/2C Record Relationship-

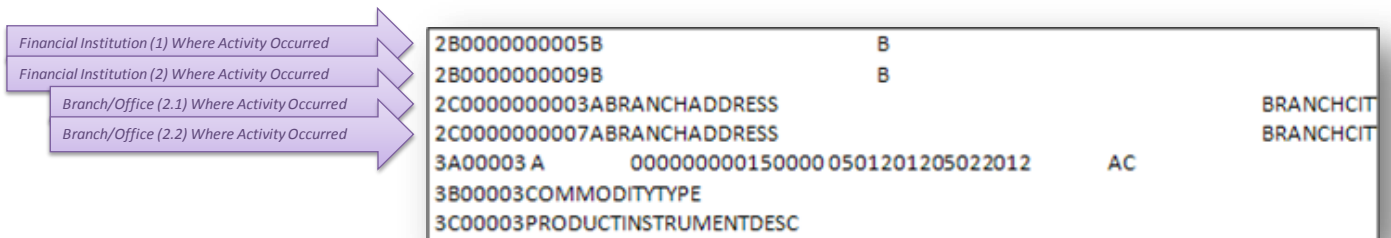
Example 1

Only the first financial Institution is associated with branch offices:



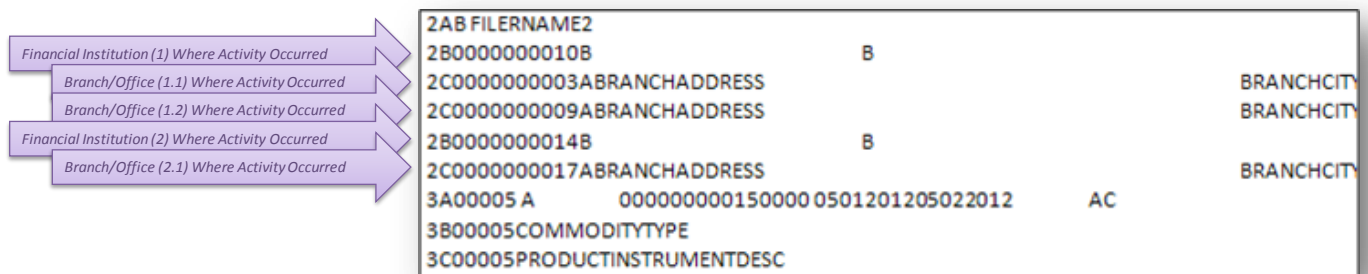
Example 2

Only the second financial institution is associated with branch offices:

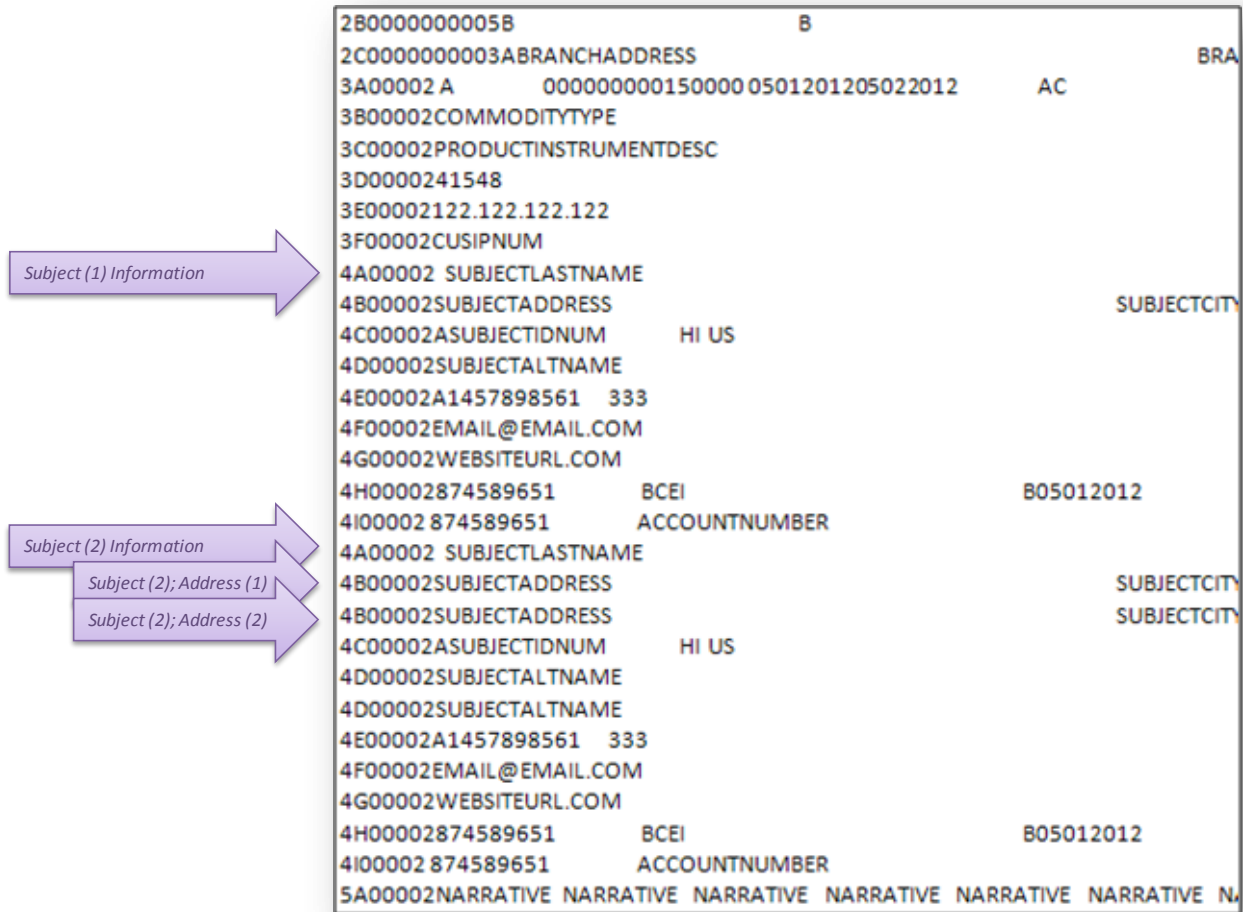


Example 3

The first financial institution is associated with two branch offices while the second financial institution is associated with one branch office:



FinCEN SAR: Multiples Subjects / Multiple Addresses-



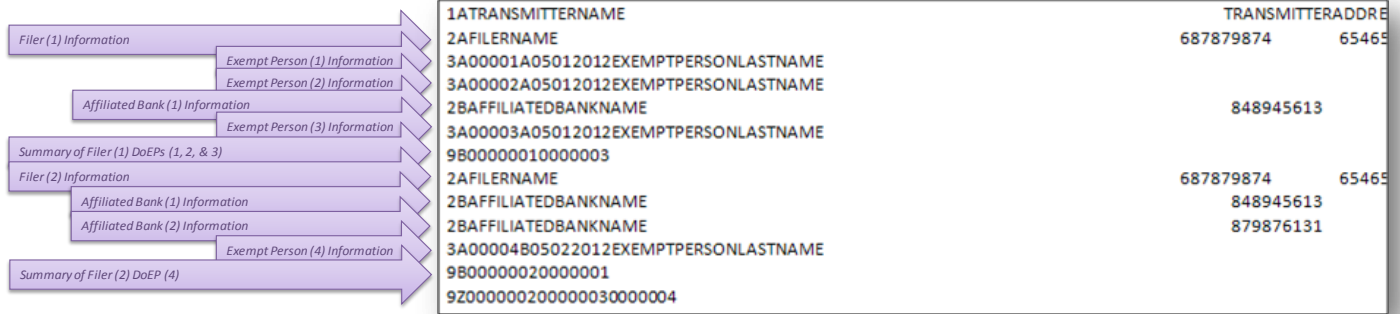
2. FinCEN CTR

FinCEN CTR: Batch Layout Example-




3. FinCEN DOEP

FinCEN DOEP: Batch Layout Example-



Sample Field Layout of FinCEN SAR

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Suspicious Activity Report

Version Number: 1.0

Filing name

*1 Type of filing
(Check all that apply)

☐ Initial report

☐ Correct/Amend prior report

☐ Continuing activity report

☐ Joint report

Prior report Document Control
Number/BSA Identifier

Attachment

Under penalties of perjury, I declare that I have examined this transmittal, including accompanying documents, and to the best of my knowledge and belief it is correct and complete. In the case of documents without recipient's identifying numbers, I have complied with the requirements of the law in attempting to secure such numbers from the receipts. I declare that this filing represents all Documents filed during this reporting period except for those transactions reported on paper.

Sign with PIN

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Part IV Filing Institution Contact Information

*82 Type of financial institution

*78 Primary federal regulator

*79 Filer name (Holding company, lead financial institution, or agency, if applicable)

*80 TIN *81 TIN type

83 Type of Securities and Futures institution or individual filing this report - check box(es) for functions that apply to this report

<input type="checkbox"/> Clearing broker-securities	<input type="checkbox"/> Introducing broker-securities	<input type="checkbox"/> SRO Securities
<input type="checkbox"/> CPO/CTA	<input type="checkbox"/> Investment Adviser	<input type="checkbox"/> Subsidiary of financial/bank holding company
<input type="checkbox"/> Futures Commission Merchant	<input type="checkbox"/> Investment company	<input type="checkbox"/> Other <input type="text"/>
<input type="checkbox"/> Holding company	<input type="checkbox"/> Retail foreign exchange dealer	
<input type="checkbox"/> Introducing broker-commodities	<input type="checkbox"/> SRO Futures	

84 Financial institution identification Type

Number

*85 Address

*86 City

*87 State *88 ZIP/Postal Code *89 Country

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

91 Internal control/file number

92 LE contact agency

93 LE contact name

94 LE contact phone number (Include Area Code) Ext.

95 LE contact date

*96 Filing institution contact office

97 Filing institution contact phone number (Include Area Code) Ext.

98 Date filed (Date filed will be auto-populated when the form is signed.)

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Part III Information about Financial Institution Where Activity Occurred 1 of 1

*47 Type of financial institution

*48 Primary federal regulator

49 Type of gaming institution

☐ State licensed casino ☐ Tribal authorized casino ☐ Card club ☐ Other (specify)

50 Type of Securities and Futures institution or individual where activity occurred - check box(es) that apply to this report

☐ Clearing broker-securities ☐ Introducing broker-securities ☐ Subsidiary of financial/bank holding company

☐ Futures Commission Merchant ☐ Investment Adviser ☐ Other

☐ Holding company ☐ Investment company

☐ Introducing broker-commodities ☐ Retail foreign exchange dealer

51 Financial institution identification

Type

Number

52 Financial institution's role in transaction ☐ Selling location ☐ Paying location ☐ Both

*53 Legal name of financial institution ☐ Unknown

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

*55 TIN ☐ Unknown 56 TIN type

*57 Address ☐ Unknown

*58 City ☐ Unknown

59 State

*60 ZIP/Postal Code ☐ Unknown

*61 Country ☐ Unknown

62 Internal control/file number

63 Loss to financial institution \$.00

Branch where activity occurred information

If no branch activity involved, check this box: ☐

Branch Information

64 Branch's role in transaction ☐ Selling location ☐ Paying location ☐ Both

65 Address of branch or office where activity occurred

67 City 66 RSSD Number

68 State 69 ZIP/Postal Code *70 Country

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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

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

7 Occupation or type of business

7a NAICS Code

*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

Subject Address Information

*8 Address ☐ Unknown

*9 City ☐ Unknown

*10 State ☐ Unknown *11 ZIP/Postal Code ☐ Unknown

*12 Country ☐ Unknown

*15 Form of identification for subject ☐ Unknown ☐

Type

Number Issuing State Country

21 Relationship of the subject to an institution listed in Part III or IV (check all that apply)

a Institution TIN

b ☐ Accountant e ☐ Attorney h ☐ Director k ☐ Officer

c ☐ Agent f ☐ Borrower i ☐ Employee l ☐ Owner or Controlling Shareholder

d ☐ Appraiser g ☐ Customer j ☐ No relationship to institution z ☐ Other

22 Status of relationship 23 Action date

*24 Financial institution TIN and account number(s) affected that are related to subject No known accounts involved ☐

Institution TIN ☐ Non-US Financial Institution

account number Closed? Yes ☐

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Part II Suspicious Activity Information

*26 Amount involved in this report ☐ Amount Unknown ☐ No amount involved \$.00

*27 Date or date range of suspicious activity for this report From To

28 Cumulative amount (only applicable when "Continuing activity report" is checked in Item 1) \$.00

When completing item 29 through 38, check all that apply

29 Structuring

- | | | | |
|---|---|---|---|
| a | <input type="checkbox"/> Alters transaction to avoid BSA recordkeeping requirement | e | <input type="checkbox"/> Multiple transactions below CTR threshold |
| b | <input type="checkbox"/> Alters transaction to avoid CTR requirement | f | <input type="checkbox"/> Suspicious inquiry by customer regarding BSA reporting or recordkeeping requirements |
| c | <input type="checkbox"/> Customer cancels transaction to avoid BSA reporting and recordkeeping requirements | z | <input type="checkbox"/> Other <input type="text"/> |
| d | <input type="checkbox"/> Multiple transactions below BSA recordkeeping threshold | | |

30 Terrorist Financing

- a ☐ Known or suspected terrorist/terrorist organization z ☐ Other

31 Fraud (Type)

- a ☐ ACH d ☐ Consumer loan g ☐ Mail j ☐ Wire
b ☐ Business loan e ☐ Credit/Debit card h ☐ Mass-marketing z ☐ Other
c ☐ Check f ☐ Healthcare i ☐ Pyramid scheme

32 Casinos

- a ☐ Inquiry about end of business day
- b ☐ Minimal gaming with large transactions
- c ☐ Suspicious intra-casino funds transfers
- d ☐ Suspicious use of counter checks or markers
- z ☐ Other

33 Money Laundering

- | | | | |
|---|---|---|--|
| a | <input type="checkbox"/> Exchange small bills for large bills or vice versa | g | <input type="checkbox"/> Suspicious receipt of government payments/benefits |
| b | <input type="checkbox"/> Suspicion concerning the physical condition of funds | h | <input type="checkbox"/> Suspicious use of multiple accounts |
| c | <input type="checkbox"/> Suspicion concerning the source of funds | i | <input type="checkbox"/> Suspicious use of noncash monetary instruments |
| d | <input type="checkbox"/> Suspicious designation of beneficiaries, assignees or joint owners | j | <input type="checkbox"/> Suspicious use of third-party transactors (straw-man) |
| e | <input type="checkbox"/> Suspicious EFT/wire transfers | k | <input type="checkbox"/> Trade Based Money Laundering/Black Market Peso Exchange |
| f | <input type="checkbox"/> Suspicious exchange of currencies | l | <input type="checkbox"/> Transaction out of pattern for customer(s) |
| | | z | <input type="checkbox"/> Other |

34 Identification/Documentation

- a ☐ Changes spelling or arrangement of name
- b ☐ Multiple individuals with same or similar identities
- c ☐ Provided questionable or false documentation
- d ☐ Refused or avoided request for documentation
- e ☐ Single individual with multiple identities
- z ☐ Other

35 Other Suspicious Activities

- | | | | |
|---|--|---|---|
| a | <input type="checkbox"/> Account takeover | k | <input type="checkbox"/> Suspected public/private corruption (domestic) |
| b | <input type="checkbox"/> Bribery or gratuity | l | <input type="checkbox"/> Suspected public/private corruption (foreign) |
| c | <input type="checkbox"/> Counterfeit instruments | m | <input type="checkbox"/> Suspicious use of informal value transfer system |
| d | <input type="checkbox"/> Elder financial exploitation | n | <input type="checkbox"/> Suspicious use of multiple transaction locations |
| e | <input type="checkbox"/> Embezzlement/theft/disappearance of funds | o | <input type="checkbox"/> Transaction with no apparent economic, business, or lawful purpose |
| f | <input type="checkbox"/> Forgeries | p | <input type="checkbox"/> Two or more individuals working together |
| g | <input type="checkbox"/> Identity theft | q | <input type="checkbox"/> Unauthorized electronic intrusion |
| h | <input type="checkbox"/> Little or no concern for product performance penalties, fees, or tax consequences | r | <input type="checkbox"/> Unlicensed or unregistered MSB |
| i | <input type="checkbox"/> Misuse of "free look"/cooling-off/right of rescission | z | <input type="checkbox"/> Other <input type="text"/> |
| j | <input type="checkbox"/> Misuse of position or self-dealing | | |

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36 Insurance

- | | |
|---|---|
| a <input type="checkbox"/> Excessive insurance | e <input type="checkbox"/> Suspicious termination of policy or contract |
| b <input type="checkbox"/> Excessive or unusual cash borrowing against policy/annuity | f <input type="checkbox"/> Unclear or no insurable interest |
| c <input type="checkbox"/> Proceeds sent to or received from unrelated third party | z <input type="checkbox"/> Other <input type="text"/> |
| d <input type="checkbox"/> Suspicious life settlement sales insurance (e.g., STOLI's, Viatical's) | |

37 Securities/Futures/Options

- | | |
|---|---|
| a <input type="checkbox"/> Insider trading | d <input type="checkbox"/> Unauthorized pooling |
| b <input type="checkbox"/> Market manipulation/wash trading | z <input type="checkbox"/> Other <input type="text"/> |
| c <input type="checkbox"/> Misappropriation | |

38 Mortgage Fraud

- | | |
|--|---|
| a <input type="checkbox"/> Appraisal fraud | d <input type="checkbox"/> Reverse mortgage fraud |
| b <input type="checkbox"/> Foreclosure fraud | z <input type="checkbox"/> Other <input type="text"/> |
| c <input type="checkbox"/> Loan Modification fraud | |

39 Were any of the following product type(s) involved in the suspicious activity? (Check all that apply)

- | | | | |
|--|---|---|---|
| a <input type="checkbox"/> Bonds/Notes | g <input type="checkbox"/> Futures/Options on futures | m <input type="checkbox"/> Options on securities | s <input type="checkbox"/> Swap, hybrid, or other derivatives |
| b <input type="checkbox"/> Commercial mortgage | h <input type="checkbox"/> Hedge fund | n <input type="checkbox"/> Penny stocks/Microcap securities | z <input type="checkbox"/> Other (List below) |
| c <input type="checkbox"/> Commercial paper | i <input type="checkbox"/> Home equity loan | o <input type="checkbox"/> Prepaid access | <input type="text"/> |
| d <input type="checkbox"/> Credit card | j <input type="checkbox"/> Home equity line of credit | p <input type="checkbox"/> Residential mortgage | |
| e <input type="checkbox"/> Debit card | k <input type="checkbox"/> Insurance/Annuity products | q <input type="checkbox"/> Security futures products | |
| f <input type="checkbox"/> Forex transactions | l <input type="checkbox"/> Mutual fund | r <input type="checkbox"/> Stocks | |

40 Were any of the following instrument type(s)/payment mechanism(s) involved in the suspicious activity? (Check all that apply)

- | | | | |
|---|---|--|---|
| a <input type="checkbox"/> Bank/Cashier's check | d <input type="checkbox"/> Gaming instruments | g <input type="checkbox"/> Personal/Business check | z <input type="checkbox"/> Other (List below) |
| b <input type="checkbox"/> Foreign currency | e <input type="checkbox"/> Government payment | h <input type="checkbox"/> Travelers checks | <input type="text"/> |
| c <input type="checkbox"/> Funds transfer | f <input type="checkbox"/> Money orders | i <input type="checkbox"/> U.S. Currency | |

41 Commodity type (if applicable)

42 Product/Instrument description (if needed)

43 Market where traded

44 IP address (if available)

45 CUSIP® number

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Part V Suspicious Activity Information - Narrative*

A large, empty yellow rectangular box with a thin black border, occupying the majority of the page below the section header. It is intended for the user to provide a narrative description of suspicious activity.

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