The Benefits of BSA E-Filing

In Focus: Money Services Businesses

To Access Audio: 1.) Dial 1-773-945-1011

2.) Enter Access Code: 600-337-158

3.) Enter Audio Pin shown on screen







- ➤ New for BSA E-Filing: RMSB (Form 107)
 - MSB Requirements and BSA E-Filing
- ➤ BSA E-Filing Overview
- ➤ Benefits of BSA E-Filing
- Brief Tutorial
 - Enrolling and Using the BSA E-Filing System
 - Electronically Filing an RMSB
- Questions and Answers

MSB Requirements & BSA E-Filing



NEW! RMSB (Registration of Money Services Business)

On July 18, 2011, FinCEN announced that MSBs can now E-File their registration forms

What other reports can MSBs file using BSA E-Filing?

- ➤ SAR-MSB (Suspicious Activity Report by Money Services Businesses)
- CTR (Currency Transaction Report)





NEW! RMSB (Registration of Money Services Business)

- MSBs can E-File initial registrations, renewals, reregistrations, and corrections
 - ➤To E-file a correction, you will need the Document Control Number (DCN) included in the acknowledgement letter.

 MSBs can also obtain the DCN by calling (866) 270-0733.
- Faster receipt of acknowledgement letter due to reduced processing times
- Same BSA reporting obligations

MSB Requirements & BSA E-Filing



BSA E-Filing System Acknowledgements

- Immediate: Submission Conformation
- Two Business days: Acknowledgement from BSA E-Filing System
 - ➤ Includes Document Control Number

Acknowledgement Letter

Faster receipt of acknowledgement letter compared to paper filing





Who needs to register as an MSB?

- With few exceptions, each money services business (MSB) must register with FinCEN. A person that is an MSB solely because that person serves as an agent of another MSB is not required to register.
 - Example: A business acts as an agent of a money transmitter and does not conduct any other MSB activities
 - > Registration not required
 - Example: A business acts as an agent of a money transmitter and also does its own check cashing
 - > Registration required



RMSB and Data Quality: Agent Request Initiative

- Letter dated April 27, 2011, sent to all MSBs whose RMSBs listed in Item 29 that they have agents. MSBs that receive this letter should respond in one of two ways:
 - ➤ if an MSB actually has agents, it must send FinCEN its agent list
 - its RMSB does not actually have agents, it must correct
 - ➤ MSBs should now use E-Filing to file the correction!

MSB Requirements & BSA E-Filing



What is an agent?

An "agent" is a separate business entity from the issuer (also sometimes referred to as the "principal") that the issuer authorizes, through a written agreement or otherwise, to sell its instruments or, in the case of funds transmission, to sell its send and receive transfer services.

An agent is not: an employee, a second location

Note: many businesses *are* agents of another MSB, but this does not mean they themselves *have* agents.

MSB Requirements & BSA E-Filing

When is the RMSB due?

Requirements remain the same:

- ➤ Initial Registration The deadline for initial registration is the end of the 180-day period beginning on the day following the date the business is established.
- ➤ Renewal After an MSB completes its initial registration, the form to renew its registration must be filed by December 31 of the second calendar year preceding the 24-month renewal period. Thereafter, a registration renewal must be filed every 24 months by December 31.
- ➤ Re-registration must be filed not later than 180 days after the date the *triggering event* occurs (re-registration under state law, >10% transfer of equity interest, >50% increase in agents.)





Am I an MSB?

Do I have agents?

How do I fill out a SAR?

- Visit FinCEN's Website
 http://www.fincen.gov/financial_institutions/msb/
- Call FinCEN's Regulatory Helpline at (800) 949-2732

What if I have questions on the status of my acknowledgement letter?

Call the IRS at (866) 270-0733

BSA E-Filing Overview

* EL ORCEMENT NELLES

What is BSA E-Filing?

- ➤ A secure, web-based electronic filing system that provides the capability for financial institutions to submit Bank Secrecy Act reports
- ➤ A flexible solution for your institution, whether you file one BSA report or thousands
- ➤ An accessible service that filers can use their existing Internet connections to access
- > A proven system available since October 2002



Who uses BSA E-Filing?

- ➤ More than 31,000 active users representing approximately 10,000 financial institutions of all sizes and from a variety of industries
- ➤ Average of approximately 1.1 million reports submitted per month
- > 84% of all BSA data is now filed electronically



BSA E-Filing Overview

What other reports can be filed using BSA E-Filing?

- ➤ CTR-C (Currency Transaction Report by Casinos)
- ➤ DEP (Designation of Exempt Person)
- > SAR (Suspicious Activity Report by Depository Institutions)
- SAR-C (Suspicious Activity Report by Casinos and Card Clubs)
- ➤ SAR-SF (Suspicious Activity Report by the Securities and Futures Industries)
- ➤ NEW! FBAR (Report of Foreign Bank and Financial Accounts)

Benefits of BSA E-Filing



Why should financial institutions choose BSA E-Filing?

- Provided free to all filing institutions
- Streamlined BSA form submission process
- Faster routing of information to better protect the financial system from illicit actors and activities
- Greater data security and privacy compared with paper forms and traditional mail delivery
- ➤ Long-term cost savings to both financial organizations and the government
- > Features not available to paper filers....

Benefits of BSA E-Filing

What features are only available through BSA E-Filing?

- Ability to obtain electronic notification of transmissions, receipt of submission, and errors, warnings, and alerts to improve filing quality
 - Batch validation—a vital quality check for your filings
 - CTR and SAR acknowledgements—a valuable auditing tool
 - Filer feedback reports—a helpful analytical report
- > Faster receipt of acknowledgement letter for MSBs
- ➤ Ability to send and receive Secure Messages
- ➤ Use of Adobe Forms
 - Uses pre-populated Form Templates to reduce data entry
 - Ability to print paper copies can minimize change to existing internal review and approval processes
- ➤ Ability for your institution's Supervisory User to assign system roles
- Provision of helpful training materials to ease the transition

BSA E-Filing: The Right Choice for You



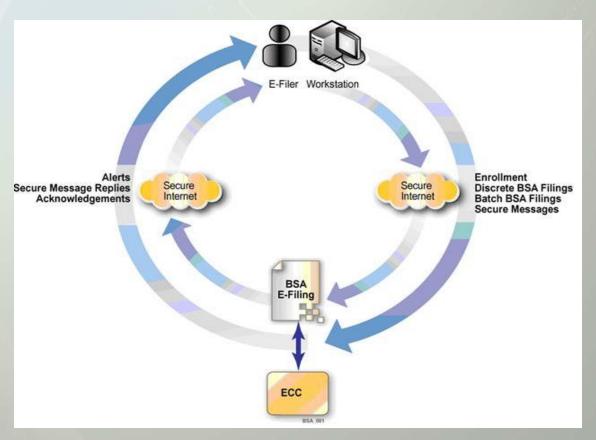
- For more information on regulatory requirements for MSBs, visit:
 - http://www.fincen.gov/financial_institutions/msb/
- Signing up is as easy as visiting FinCEN's BSA E-Filing Web site at http://bsaefiling.fincen.treas.gov/
 - Explore BSA E-Filing more by using FinCEN's "Take a Tour" feature on the Web site
 - See what else E-Filing can do for your institution at http://www.fincen.gov/whatsnew/pdf/E-File_Brochure.pdf

BRIEF TUTORIAL

ENROLLING AND USING THE BSA E-FILING SYSTEM



System Architecture







Become a Filer



BSA E-FILING SYSTEM

FINANCIAL CRIMES ENFORCEMENT NETWORK



Become a BSA E-Filer

Complete the following four steps to enroll your organization in BSA E-Filing: (Printable Version)



Identify Your Organization's Point of Contact

This person will serve as a liason between BSA E-Filing and the filing organization and will complete the process to enroll him/herself as well as the filing organization.



Fill Out and Submit the Supervisory User Application Form

To obtain a user ID, the Supervisory User must fill out and submit the Supervisory User Application Form.



Obtain Authorization as Supervisory User

Once FinCEN verifies the identity/designation of the Supervisory User, he/she will receive a user ID to access the E-Filing system.



Download the Forms Reader

The Forms Reader allows preparation of CTR/SAR electronic forms, viewing of BSA E-Filing alerts, and transmittal of secure messages to FinCEN.



This enrollment process is for use by individuals who have been designated as the initial BSA E-Filing Supervisory User for their filing organizations. All other users from the filing organization, including any backup Supervisory Users, will enroll via a distinctly different process only after the Supervisory User has successfully enrolled him/herself and the filing organization.

Easy Four Step **Process To** Enroll!

How To Enable Filing Security

vov 4, 2010 - Content of Todays E-Filing Informational Webinar

User Quick Links

FBAR Filers

▶ File an Individual FBAR

Supervisory Users

- Getting Started with BSA E-Filing
- Submitting the Supervisory User Application Form
- Obtaining Authorization as Supervisory User

General Users

Downloading the Adobe Acrobat Reader

Batch Filers

▶ BSA E-Filing System Batch File Testing Procedures

Website Comments?

Let us know what you think



Become a Filer



Using BSA E-Filing

Become a BSA E-Filer

Frequently Asked Questions

E-Filing System Login

BSA Home

Take a Tour

Help

Site Map

BSA E-FILING SYSTEM

FINANCIAL CRIMES ENFORCEMENT NETWORK

Become a BSA E-Filer Complete the following four steps to enroll your organization in BSA E-

Easy Four Step **Process To** Enroll!

How To Enable Filing Security

vov 4, 2010 - Content of Todays E-



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Become a Filer





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2

Fill Out and Submit the Supervisory User Application Form

To obtain a user ID, the Supervisory User must fill out and submit the Supervisory User Application Form.

3

Obtain Authorization as Supervisory User

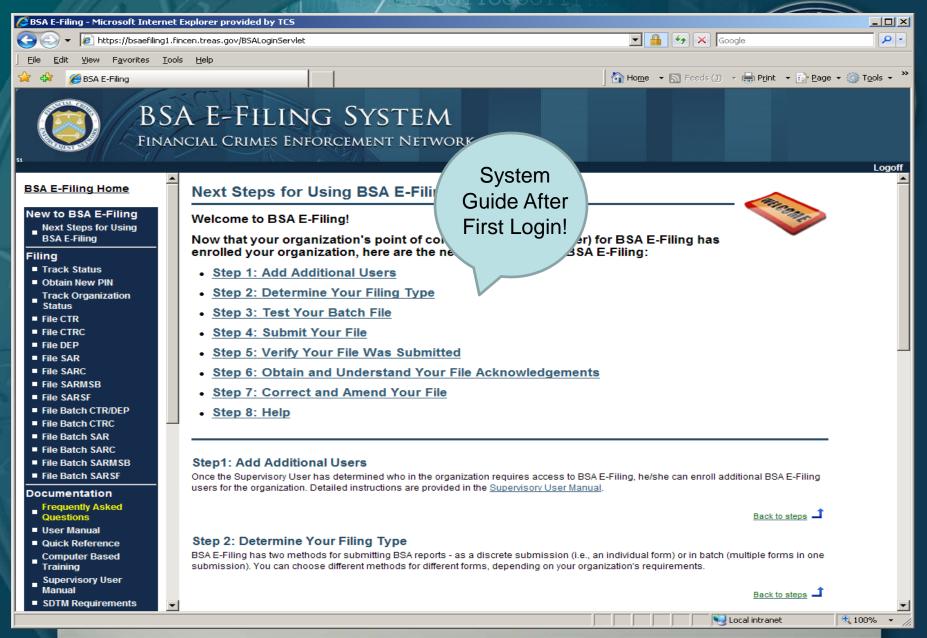
5 – 7 Business Days

Once FinCEN verifies the identity/designation of the Supervisory User, he/she will receive a user ID to access the E-Filing system.

4

<u>Download the Forms Viewer</u>

The Forms Viewer allows preparation of CTR/SAR electronic forms, viewing of BSA E-Filing alerts, and transmittal of secure messages to FinCEN.



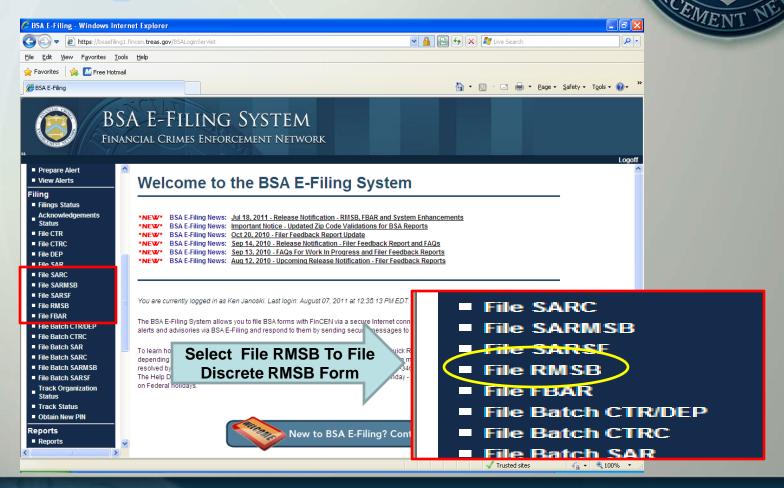
Three Ways to E-File:

What is the right BSA E-Filing solution for you?

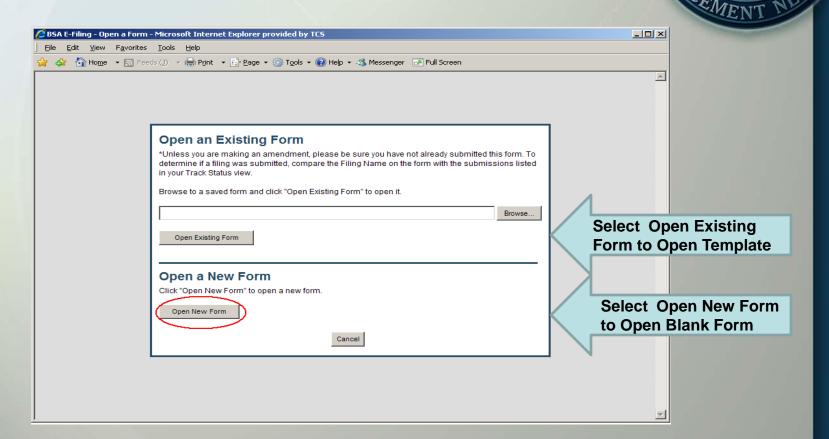
- Discrete BSA Filing (single report)
 - A solution for smaller institutions or those that only file small numbers of BSA reports
 - RMSB must be filed as a discrete report
- > Batch BSA Filing
 - A solution for medium-size or larger institutions or those that consistently file larger numbers of BSA reports
- > System-to-System Filing (Secure Data Transfer Mode)
 - A batch filing solution for the largest filers



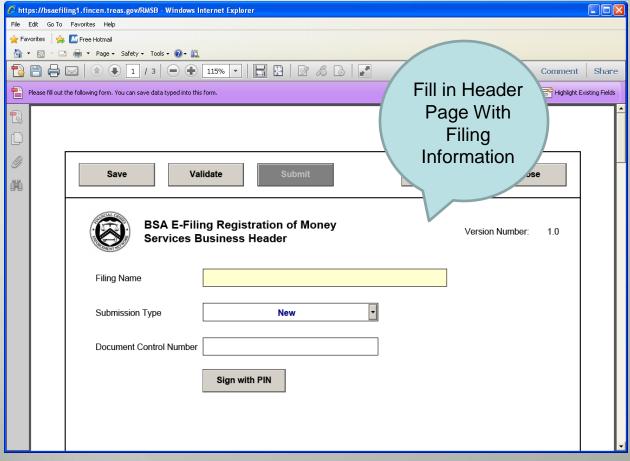
Filing an RMSB



Opening a New RMSB Form

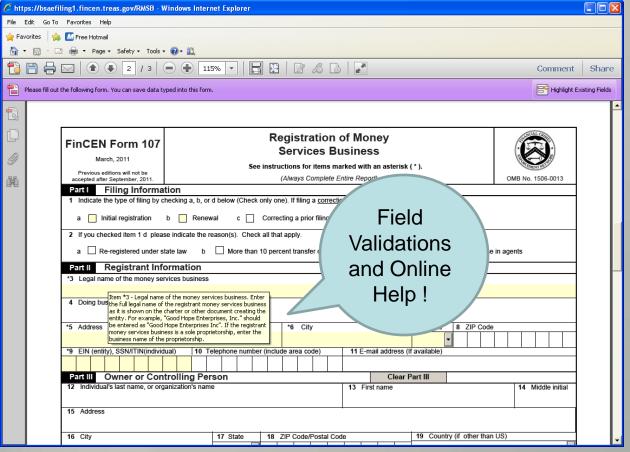


RMSB Form - Header Page



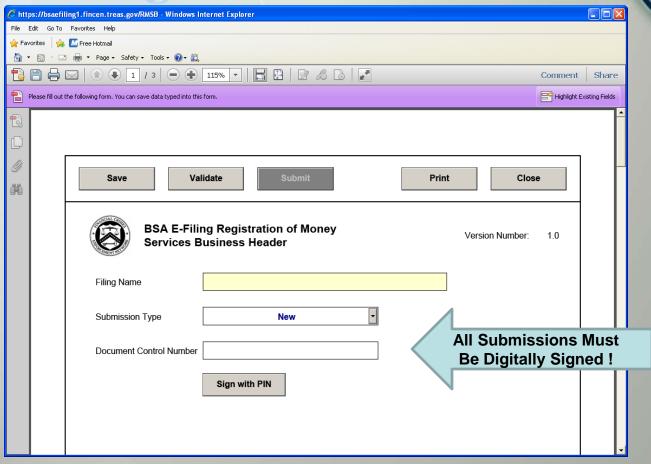


RMSB

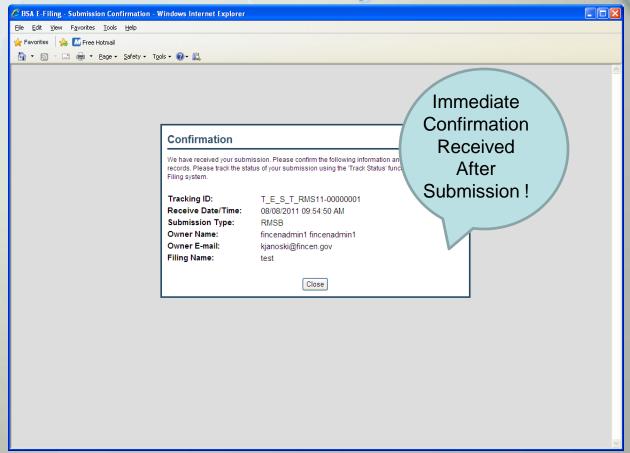




PIN Signature

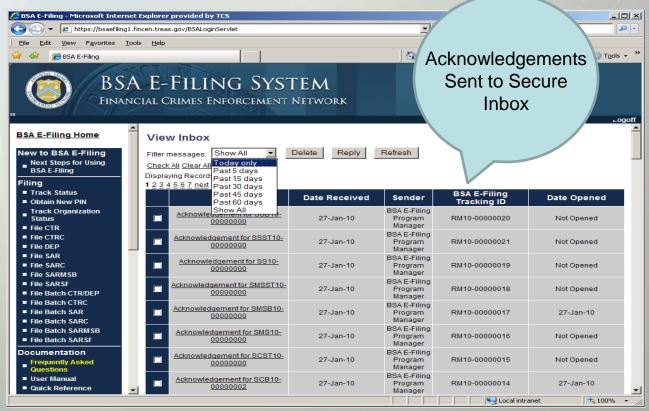


Submission Confirmation

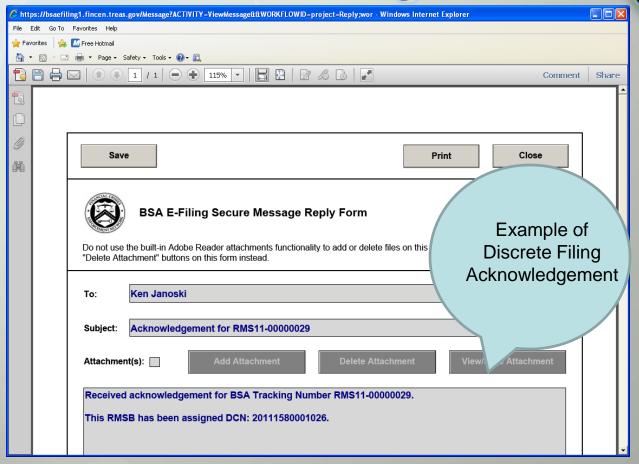


0700100110001111

Acknowledgements



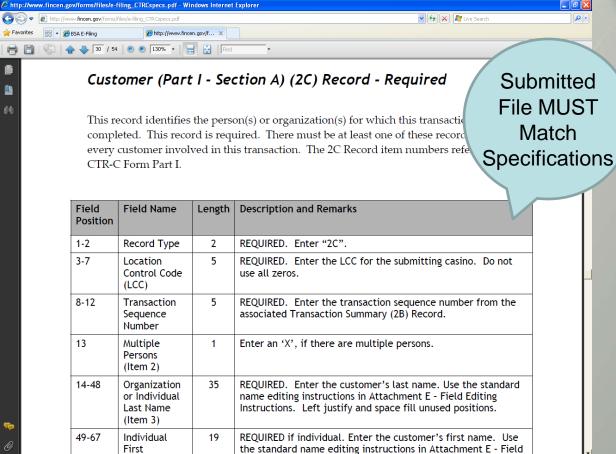
RMSB Acknowledgement



Batch Filing

- One file contains multiple submissions
- File must match published E-Filing Specifications (posted on www.fincen.gov)
- Batches are validated against specifications
- ➤ AML Vendors provide software to create files or files created by internal IT staff
- ➤ The BSA E-Filing Test site is available to test file format before moving to production

Specification Snapshot





Sample Batch File

File Formatted to Specifications

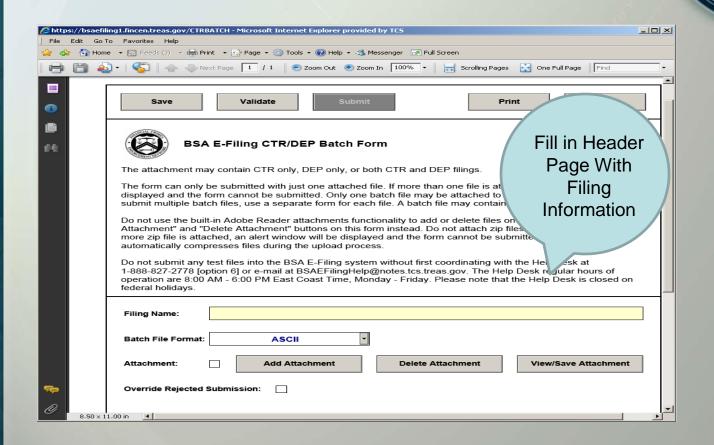


CTRTEST.txt - Notepad

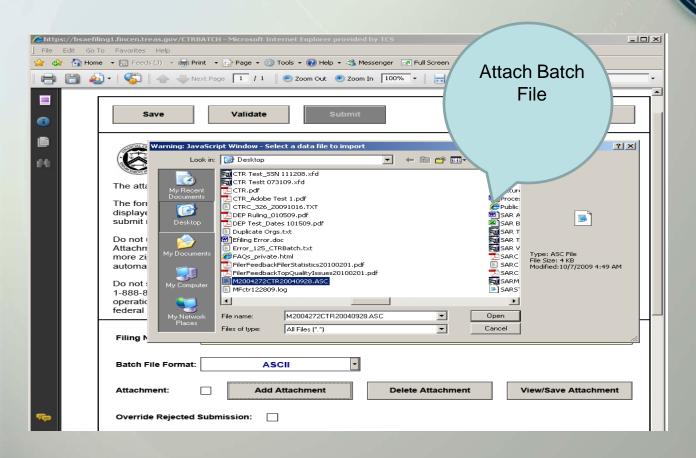
<u>File Edit Format View H</u>elp

File Edit Format View Help		
		_
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A000001100004 CHERRY/TEST/J 123456 PIEDMONT ATLANTA	GA30355 US222333444RESTAURANT OWNE	R CTP123456 19310
A0000011000051 5 A000000000000999999920070829001000001 B EVER	RETT/PERRY COLLIER/VICTOR 40	499560980000000000000 C000005552
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A00000110000000002000000000200000000000		
B00000122SCHWARTZ 3280 PEACHTREE ROAD, NW ATLANTA	GA30305 205249432061002948VP/COMP OFFI	
A000001200006 6 000015945700000000020070829001000001 E EVERET F0000012000060	T/PERRY COLLIER/VICTOR 40499 0703400003	256098000000000000000 C000000000000
A0000012000060 A000001200006 CHERRY/TEST/J 123 PIEDMONT ATLANTA	GA 30355 US222333444BIOMEDICAL ENGINEE	RS BUS123456 193108
A000001200000 CHERATTESTY 125 TEEDWORT ATEARTA A000001200007 2 0000123456000000000020070829001000001 E EVERET		2560980000000000000 C000000000000
E0000012000070	0703400008	200700000000000000000000000000000000000
A000001200007 WASHINGTON/TEST/G 123456 PIEDMONT ATLAN		WORKERS CNH123456
A000001200008 5 0001234569000123456920070829001000001 C EVERET	T/PERRY COLLIER/VICTOR 40499	95609800000000000000 C000000000000
E0000012000080	0703400017	
A000001200008 SMITH/TEST/J 123456 TEST ATLANTA	GA30355 US333444555PERSONAL AND HOME CA	
A000001200009 2 000056124500000000020070829001000001 D EVERET		95609800000000000000 C000000000000
E0000012000090	0703400018	10010001
5A000001200009 CHERRY/TEST/J 123456 PIEDMONT ATLANTA 5A000001200010 3 000098765400000000020070829001000001 BCD EVERI	GA30355 US222333444JANITOR ETT/PERRY COLLIER/VICTOR 404	AGA123456 19310804 07
E000001200010 3 000098763400000000020070825001000001 BCD EVERT	0703400019	4993609800000000000000 C0000000000
A000001200010 ONE/CLAUDES/T 5335 TRIANGLE PKW NORCROS		CTIVES AVAILII 19
A000001200011 2 000078945600000000020070829001000001 E EVERET		25609800000000000000000000000000000000000
E0000012000110	0703400020	
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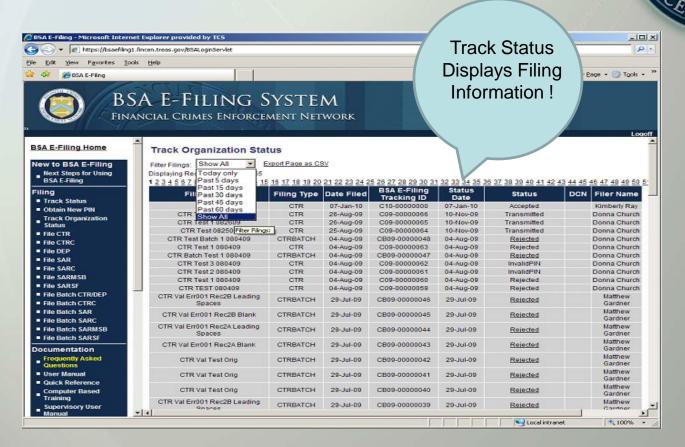
Batch CTR Submission



Attaching A Batch File

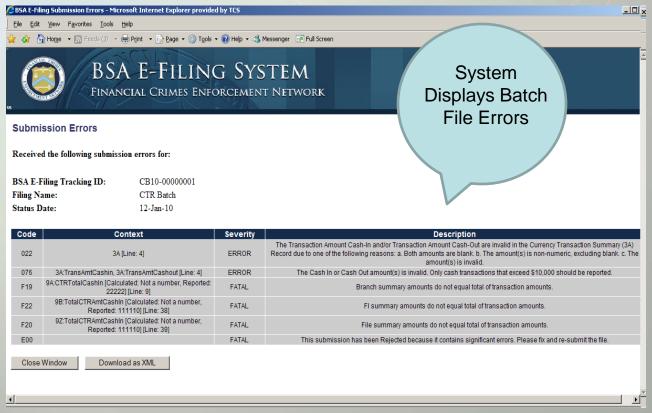




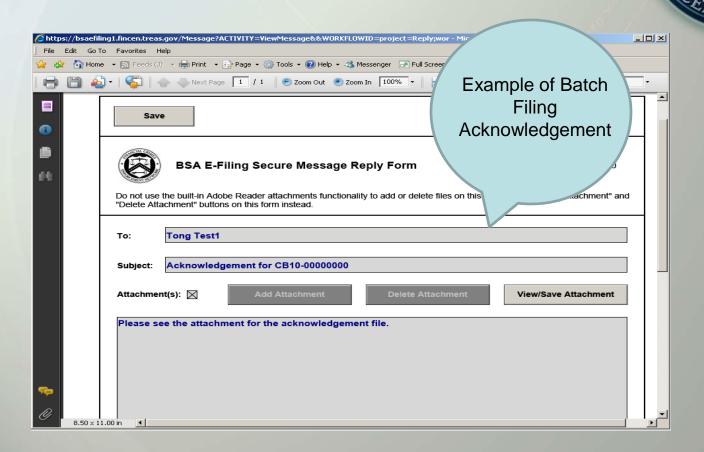


Batch Validation Errors





Batch Acknowledgement



Filer Feedback Reports





BSA Filing Top Data Quality Issues by Form

Organization Name: Unit Test Organization

Month: February Year: 2010

Filing Institution Name: Bank of WIP - Eastern Division

Form Type: CTR

Error Code	Error Description	Error Count	Rank
111	Owner Name is invalid. a. Blank, b. not in proper format, c. contains no slashes for individual.	21	1
112	Owner Number and street is blank.	20	2
113	Owner City is blank.	16	3
114	Owner State is blank.	12	4
115	Owner Country is US, CA, or MX but state is not a standard abbreviation.	8	5
116	Owner Country is not a valid country abbreviation.	6	6
117	Owner Zip-Code is blank, zeroes, or invalid and Country Code is US.	4	7
119	Owner Identifying Number Record is invalid. Identifying number is zeros, all 9s, invalid or non-numeric.	3	8
120	Owner Business occupation or profession is missing.	2	9
122	Owner Address contains punctuation.	1	10

Filer Feedback Reports





BSA Filing Counts Year-To-Date By Month

Organization Name: Unit Test Organization

Filing Institution Name: Bank of WIP - Eastern Division Year: 2009

Month	CTR	DEP	CTR-C	SAR-DI	SAR-C	SAR-MSB	SAR-SF
January	12354	2345	0	235	0	576	214
February	27	3457	0	257	0	457	214
March	755	457	0	79	0	345	234
April	852	479	0	56	0	286	92
May	123	12	0	97	0	368	134
June	1346	3568	0	34	0	34	345
July	81	7531	0	13	0	13	137
August	85	582	0	581	0	18	92
September	2458	85	0	1	0	9	51
October	81	5134	0	4	0	1347	75
November	80	536	0	754	0	17	75
December	93	289	0	24	0	8	78

For More Information

BSA E-Filing Home Page



http://bsaefiling.fincen.treas.gov

BSA E-Filing Help Desk at 1-866-346-9478 (select option # 1)

BSAEFilingHelp@fincen.gov.

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