

## Important Notice for Financial Institutions FinCEN Releases Test Site for the New CTR and SAR

February 17, 2012

The Financial Crimes Enforcement Network (FinCEN) has updated the BSA E-Filing System's <u>User</u> <u>Test System</u> Web site to allow for *testing* submissions of batch and computer-to-computer filings of FinCEN's new Currency Transaction Report (CTR) and Suspicious Activity Report (SAR). Additionally, the site offers a preview of the future PDF versions of these new reports, which enable institutions to file individual reports (discrete filing). The <u>BSA E-Filing System</u> itself will begin accepting these new reports at a later date.

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On September 8, 2011, FinCEN released <u>Electronic Filing Requirements For FinCEN's Currency</u> <u>Transaction Report (CTR)</u> and <u>Electronic Filing Requirements For FinCEN's Suspicious Activity</u> <u>Report (SAR)</u>. These technical specifications were released to allow the development of batch files of FinCEN's new <u>CTR</u> (FinCEN Report 112) and <u>SAR</u> (FinCEN Report 111) for upload or transmission to the BSA E-Filing System. FinCEN expects to publish slight updates to these technical specifications at a later date. These updates will not affect the specification field lengths, field order, or overall format of the batch file.

The updates to the User Test System made available today will enable information technology (IT) professionals, including both vendors and the in-house IT staff of financial institutions, to begin testing their programs that will eventually be used to file batch or computer-to-computer submissions of the new reports based on the above-referenced technical specifications. The BSA E-Filing System will begin to accept filings of these new reports in March 2012. The site will also make available and begin to accept the discrete filing of the PDF version of the reports on that same date. Institutions will not have the option to submit either of these new reports via paper.

In order to submit test files on the User Test System, a user account must be created which is specific to this site and separate from accounts used in the BSA E-Filing System. To set up an account on the User Test System, please click on "Become a BSA E-Filer" button within that site and follow the steps to enroll. Please be aware that the testing environment is separate and distinct from FinCEN's BSA E-Filing system.

FinCEN recommends that the person who will be uploading the test file be listed in the User Information section at the top of the application. Within two business days, FinCEN will send to the approved user identified in the application an email containing the user ID and specific instructions on how to create and upload a test file.

FinCEN further announced on December 20, 2011, that the mandatory use of these new reports will take effect on March 31, 2013. FinCEN will continue to accept submissions to its BSA E-Filing System that use the most current "legacy" forms (such as the CTR, CTR by Casinos, and industry-specific SARs) until the mandated use of the new reports in 2013. Accordingly, for approximately one year, financial institutions will be able to file either the legacy forms or the new reports.

Questions or issues regarding the BSA E-Filing System may be directed to the BSA E-Filing Help Desk at 1-866-346-9478 (option 1) or via email to <u>BSAEFilingHelp@fincen.gov</u>. 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.