BSA E-Filing System

SAR Acknowledgements and Validations Questions and Answers Guide

Version 1.0

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Revision Number	Date	Section	Description
Version 1.0	28 August 2009	All	Initial version

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Introduction

The BSA E-Filing System currently accepts and processes seven forms:

1. Currency Transaction Report (CTR)
2. Currency Transaction Report by Casinos (CTR-C)
3. Designation of Exempt Person (DEP)
4. Suspicious Activity Report for Depository Institutions (SAR-DI)
5. Suspicious Activity Report by Casinos and Card Clubs (SAR-C)
6. Suspicious Activity Report by Money Services Business (SAR-MSB)
7. Suspicious Activity Report by the Securities and Futures Industries (SAR-SF)

Upon processing, these documents are transmitted to the IRS Enterprise Computing Center in Detroit (ECC-D) and assigned a unique identifier called a Document Control Number (DCN). For CTR, CTR-C, and DEP submissions, an acknowledgement record is returned to the originating filer for each submitted document. This record is used as a receipt of BSA report submission(s) to FinCEN. Various validations are performed on the CTR, CTR-C, and DEP submissions and error information (if any) is returned to the filer in the acknowledgement record. This information can be used to prevent errors in future BSA data submissions.

The SAR Acknowledgements and Validations Project provides similar functionality and benefits for Suspicious Activity Reports (SARs): SAR-DI, SAR-C, SAR-MSB, and SAR-SF

Phase I will:
- Provide BSA E-Filers with SAR Acknowledgement files that contain a DCN for each submitted document.
- Include a self-enrollment function to enable batch filers (Supervisory Users) to register their organization to receive acknowledgements by form type when they are ready to receive and process the acknowledgement files. Discrete filers do not need to register – they will automatically receive acknowledgements.
- Provide filers with updated electronic filing requirements and specifications to include SAR Acknowledgement Record Layouts and new error codes.

The files will be available to filers in both a flat ASCII, (American Standard Code for Information Interchange) file format and as an XML (Extensible Markup Language) file. When self-enrolling, the Supervisory User can select to receive one or both types of acknowledgement file formats.

Phase II will:
- Implement validations of submitted SAR batch files within BSA E-Filing and provide the resulting error codes within the SAR Acknowledgement file.

1. Questions and Answers about SAR Acknowledgements

When will users begin to receive SAR Acknowledgements?
- SAR Acknowledgements will be returned automatically to Discrete Filers when the process is initiated for the BSA E-Filing System on September 12, 2009.
- For SAR batch filers, the Supervisory User must enroll the organization in order to receive the batch file acknowledgements. Supervisory Users will be able to enroll their organization to receive batch file acknowledgements beginning September 12, 2009.

How do BSA E-Filers obtain SAR Acknowledgements?
- Discrete filers: Acknowledgements will be delivered automatically to the user's View Inbox.
- Batch filers: BSA E-Filing will include a new function to provide organizations the ability to enroll to receive SAR Acknowledgements. This mechanism allows batch filers time to make any process and/or system changes required to receive and process the acknowledgement files. The Supervisory User will enroll the organization by accessing the BSA E-Filing Manage Organization Information function to select the SAR Acknowledgement file type to be returned. The Supervisory User will select the file format of the SAR Acknowledgement batch file, either in a flat file or XML.

How do batch filers enroll to receive SAR Acknowledgements?
You must be a Supervisory User in order to self-enroll your organization to receive SAR Acknowledgements.

From the "**Welcome**" page, select "**Manage Organization Information**" on the left navigation menu under "**Organization Management,**" as shown in Figure 2-1.

Figure 2-1. Organization Management Menu

On the lower half of the page is a box titled "**SAR Batch Acknowledgement Enrollment,**" as shown in Figure 2-2. Check the SAR type(s) that you wish to receive acknowledgements for by checking the "**Enroll SAR,**" "**Enroll SAR-C,**" "**Enroll SAR-MSB,**" and/or "**Enroll SAR-SF**" checkboxes. (Note: you may add enrollments but once enrolled you cannot disenroll by unselecting one or all file types.)

Indicate the acknowledgement file type preference (ASCII flat file type (the default) and/or XML file type) that you wish to receive for that form type. (Note: you may change the file type preference at any time.) Flat file format is the default file format provided by ECC-D. You may select either ASCII flat file format, XML file format, or both.
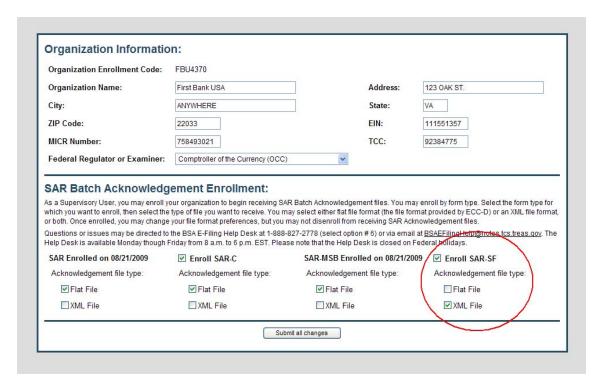

Figure 2-2. Select SAR Type and Acknowledgement File Format

Is there a deadline for enrolling to receive and process SAR Acknowledgements?
No. There is no enrollment deadline at this time; however, FinCEN strongly encourages filers to enroll to receive this critical feedback.

Where will users obtain the SAR Acknowledgements?
For SAR Discrete Filers, an acknowledgement with the DCN assigned to each SAR will be sent in a secure message to the filer's "**View Inbox.**" The status in "**Track Status**" will be updated with the "**Acknowledged**" or "**Acknowledge Failed**" status.

For SAR Batch Filers, an acknowledgement with the DCN assigned to each SAR within the batch will be sent in a secure message to the filer's "**View Inbox.**" The status in "**Track Status**" will be updated with the "**Acknowledged**" or "**Acknowledge Failed**" status.

How will SAR Batch Filers process SAR Acknowledgement files?
SAR Batch filers will have to upload the SAR Acknowledgement file to their SAR software system. The user's SAR software system should process the SAR Acknowledgement file based on the acknowledgement file layout specified by the

revised electronic requirements to be posted on FinCEN's Web site at
http://www.fincen.gov/forms/bsa_forms/.

Once a DCN is assigned to a SAR, will the DCN be required to correct or amend SARs, as is the case with the CTR, CTR-C and DEP files?
Yes. If a user needs to correct or amend a SAR, check box 1 for correcting or amending a report and enter the DCN in the narrative. Consult form instructions and FinCEN guidance for other requirements for submitting corrected or amended SARs.

How will Secure Data Transfer Mode (SDTM) (or System-to-System) filers be affected?
When the Supervisory User enrolls to receive SAR Acknowledgements, the enrollment is at the organizational level. For SDTM filers, the acknowledgement file will be made accessible to the filing organization and the BSA E-Filing SDTM Server and Financial Organization SDTM communications path will need to be established.

Will users be able to obtain acknowledgements for filings submitted prior to the date of enrollment?
No. Filers cannot request acknowledgements for submissions that were processed prior to the date they enrolled for acknowledgements.

How will the SAR Acknowledgement batch file be formatted?
The SAR batch acknowledgement flat file will be in ASCII format, or users can choose to obtain the XML file.

The flat file format is defined in the BSA Electronic Filing Requirements for each SAR form type as follows:

- *BSA Electronic Filing Requirements for Suspicious Activity Reports by Depository Institutions (SAR-DI)*
- *BSA Electronic Filing Requirements for Suspicious Activity Reports by Casinos and Card Clubs (SAR-C)*
- *BSA Electronic Filing Requirements for Suspicious Activity Reports by Money Services Business (SAR-MSB)*
- *BSA Electronic Filing Requirements for Suspicious Activity Reports by The Securities and Future Industries (SAR-SF)*

The XML schema for each form type is available at:

https://bsaefiling1.fincen.treas.gov/forms/ackSchemas/SARAcknowledgementData.xsd
https://bsaefiling1.fincen.treas.gov/forms/ackSchemas/SARCAcknowledgementData.xsd
https://bsaefiling1.fincen.treas.gov/forms/ackSchemas/SARSFAcknowledgementData.xsd
https://bsaefiling1.fincen.treas.gov/forms/ackSchemas/SARMSBAcknowledgementData.xsd
https://bsaefiling1.fincen.treas.gov/forms/ackSchemas/CommonAckTypes.xsd

Please note that a filer must be logged in to BSA E-Filing to access these schemas. The XML schemas will be updated when SAR Error Validations are enabled in December 2009.

What if I enroll in the wrong SAR Acknowledgement batch file type?
Filers can deselect unwanted file type and select the desired file type found on the BSA
E-Filing Manage Organization Information page.

Can I disenroll from receiving SAR Acknowledgements?
No. Once enrolled, disenrollment is not allowed. Filers may only change the file format
of the batch acknowledgement file.

**What if the organization needs to be consolidated with another organization, such
as in a bank merger?**
Notify the Help Desk for assistance.

2. SAR Validations

What are SAR Validations?
The BSA E-Filing system will implement data validations on submitted SAR batch files,
checking submitted data against the:

- General Specifications for Electronic Filing of Bank Secrecy Act (BSA) Reports
- BSA Electronic Filing Requirements for each SAR form type

SAR Validations will be similar to those currently performed on CTR and CTR-C forms.
The validations will provide feedback to filers about errors contained in filings, and give
them the opportunity to correct the filings, as well as address any systemic issues that
may cause report errors.

What is the timeframe for SAR Validations?
Validations will be implemented in BSA E-Filing in December 2009.

How will feedback on validation errors be provided to filers?
Error codes denoting identified errors will be provided in the SAR Acknowledgement
files, once the SAR Validations functionality is implemented. The error codes are
defined in the BSA Electronic Filing Requirements for each SAR form type. Any
revisions to defined errors will be communicated via a revision to the appropriate
requirements document(s).

Are corrected submissions required when errors are received on submissions?
Prior to implementation of SAR Validations, FinCEN will publish guidance on how to
correct SAR errors.

How can I test my SAR software updates?
The BSA E-Filing System has a User Test site used for uploading test files. 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 that the person uploading the test file be listed in the User Information section at the top of the application form. FinCEN will vet this application form and an email will be sent to the approved user identified in the application form with the user ID and specific instructions on how to create and upload your test file.

The Supervisory User must self-enroll your organization to receive SAR Acknowledgements as previously described in section 1 of this document.

2. Upload a test batch file on the BSA E-Filing User Test System. The test batch file should consist of a set of sample SARs that contain test, not real, subject data. The test file should contain 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 test Transmitter Control Code (TCC): "TBSATEST" in the Transmitter (1A) Record. 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 the upload 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 System has verified the format of your test batch file. The test batch file will be transmitted to ECC-D by the BSA E-Filing System for final validation and loaded into the ECC-D test database. ECC-D will generate a test acknowledgement file that will be loaded back into the BSA E-Filing User Test System for download.

This test procedure only validates the electronic format of the test file. It does not validate the format or accuracy of data items entered in the file.

Filers will be notified when the User Test system will be available to test SAR Acknowledgements.

3. Help

How will customer support be provided?
The BSA E-Filing System Help Desk will provide customer support for all users. The BSA E-Filing Help Desk can be contacted by calling 1-888-827-2778 (option 6) or by email at BSAEFilingHelp@notes.tcs.treas.gov. The Help Desk regular hours of operation are 8:00 a.m. – 6:00 p.m. East Coast Time, Monday – Friday. Please note that the Help Desk is closed on Federal holidays.