

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

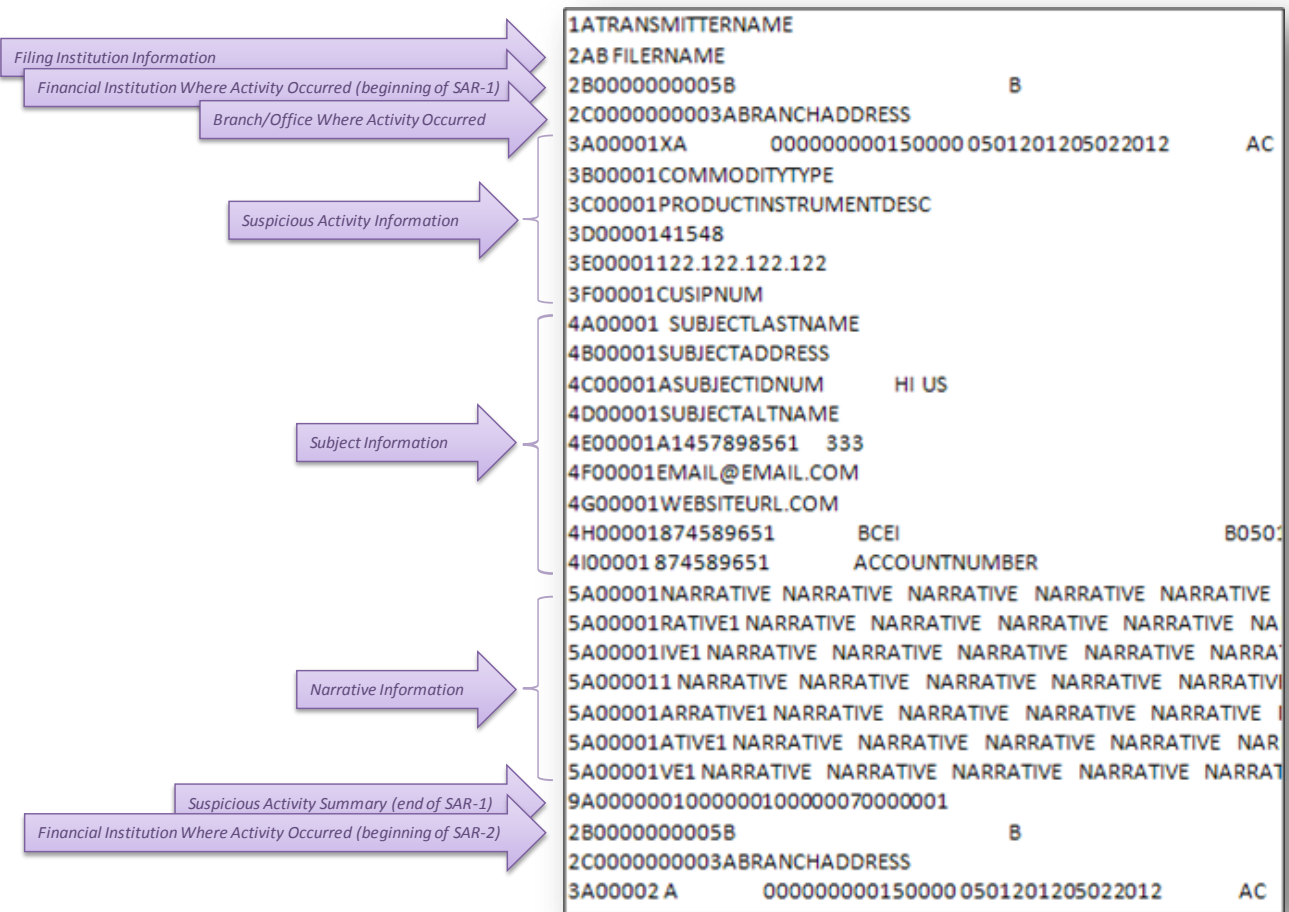
If you have additional questions about the testing procedures or need more information, please contact the BSA E-Filing Help Desk at 1-866-346-9478 (option 1) or BSAEFilingHelp@fincen.gov. The Help Desk regular hours of operation are 8:00 am - 6:00 pm East Coast Time, Monday - Friday. Please note that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

Financial Institution (1) Where Activity Occurred	2B0000000005B	B	
Branch/Office (1.1) Where Activity Occurred	2C0000000003ABRANCHADDRESS		BRANCHCITY
Branch/Office (1.2) Where Activity Occurred	2C0000000006ABRANCHADDRESS		BRANCHCITY
Financial Institution (2) Where Activity Occurred	2B0000000009B	B	
	3A00004XA	00000000150000 0501201205022012	AC
	3B00004COMMODITYTYPE		
	3C00004PRODUCTINSTRUMENTDESC		

Example 2

Only the second financial institution is associated with branch offices:

Financial Institution (1) Where Activity Occurred	2B0000000005B	B	
Financial Institution (2) Where Activity Occurred	2B0000000009B	B	
Branch/Office (2.1) Where Activity Occurred	2C0000000003ABRANCHADDRESS		BRANCHCITY
Branch/Office (2.2) Where Activity Occurred	2C0000000007ABRANCHADDRESS		BRANCHCITY
	3A00003 A	00000000150000 0501201205022012	AC
	3B00003COMMODITYTYPE		
	3C00003PRODUCTINSTRUMENTDESC		

Example 3

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

Financial Institution (1) Where Activity Occurred	2A8 FILENAME2		
Branch/Office (1.1) Where Activity Occurred	2B0000000010B	B	
Branch/Office (1.2) Where Activity Occurred	2C0000000003ABRANCHADDRESS		BRANCHCITY
Financial Institution (2) Where Activity Occurred	2C0000000009ABRANCHADDRESS		BRANCHCITY
Branch/Office (2.1) Where Activity Occurred	2B0000000014B	B	
	2C0000000017ABRANCHADDRESS		BRANCHCITY
	3A00005 A	00000000150000 0501201205022012	AC
	3B00005COMMODITYTYPE		
	3C00005PRODUCTINSTRUMENTDESC		

FinCEN SAR: Multiples Subjects / Multiple Addresses-

The diagram illustrates SAR data for two subjects. A purple arrow labeled "Subject (1) Information" points to the first subject's data block. Three purple arrows labeled "Subject (2) Information", "Subject (2); Address (1)", and "Subject (2); Address (2)" point to the second subject's data block, which includes two separate address entries.

```
2B0000000005B B
2C0000000003ABRANCHADDRESS BRA
3A00002 A 000000000150000 0501201205022012 AC
3B00002COMMODITYTYPE
3C00002PRODUCTINSTRUMENTDESC
3D0000241548
3E00002122.122.122.122
3F00002CUSIPNUM
4A00002 SUBJECTLASTNAME
4B00002SUBJECTADDRESS SUBJECTCITY
4C00002ASUBJECTIDNUM HI US
4D00002SUBJECTALTNAME
4E00002A1457898561 333
4F00002EMAIL@EMAIL.COM
4G00002WEBSITEURL.COM
4H00002874589651 BCEI B05012012
4I00002 874589651 ACCOUNTNUMBER
4A00002 SUBJECTLASTNAME
4B00002SUBJECTADDRESS SUBJECTCITY
4B00002SUBJECTADDRESS SUBJECTCITY
4C00002ASUBJECTIDNUM HI US
4D00002SUBJECTALTNAME
4D00002SUBJECTALTNAME
4E00002A1457898561 333
4F00002EMAIL@EMAIL.COM
4G00002WEBSITEURL.COM
4H00002874589651 BCEI B05012012
4I00002 874589651 ACCOUNTNUMBER
5A00002NARRATIVE NARRATIVE NARRATIVE NARRATIVE NARRATIVE NARRATIVE NA
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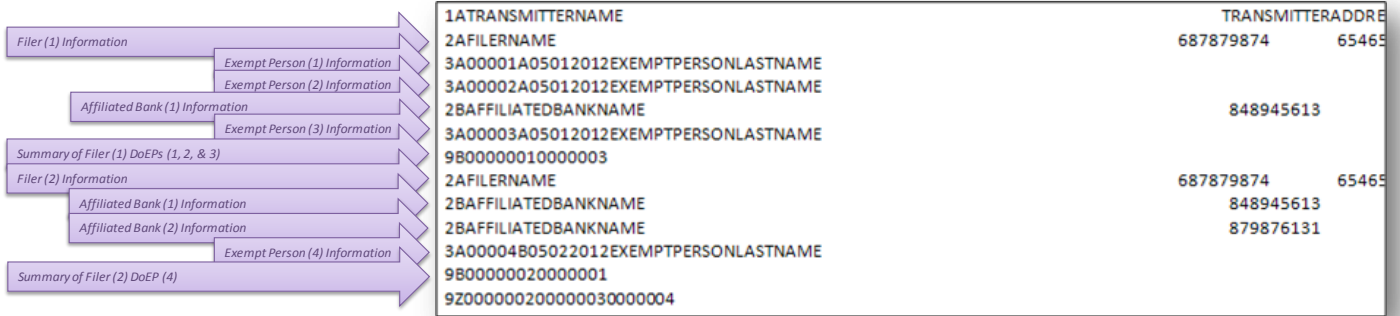
2. FinCEN CTR

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)

<input type="checkbox"/> Initial report	<input type="checkbox"/> Correct/Amend prior report
<input type="checkbox"/> Continuing activity report	<input type="checkbox"/> 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 [] *31 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="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.)

This document is intended to assist users of the BSA E-Filing System. It may not be used for any other purpose or re-disseminated to any other person or entity without the express permission of the Financial Crimes Enforcement Network of the U.S. Department of the Treasury.

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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 [Redacted]

*4 First name Unknown [Redacted]

5 Middle name/initial [Redacted]

Suffix [Redacted] Gender [Redacted]

*16 Date of birth Unknown [Redacted]

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

7 Occupation or type of business [Redacted]

7a NAICS Code [Redacted]

*13 TIN Unknown [Redacted] 14 TIN type [Redacted]

18 Phone number [Redacted] Ext. [Redacted] 17 Type [Redacted]

19 E-mail address [Redacted]

19a Website (URL) address [Redacted]

20 Corroborative statement to file? [Redacted] 25 Subject's role in suspicious activity [Redacted]

Subject Address Information

*8 Address Unknown [Redacted]

*9 City Unknown [Redacted]

*10 State Unknown [Redacted] *11 ZIP/Postal Code Unknown [Redacted]

*12 Country Unknown [Redacted]

*15 Form of identification for subject Unknown

Type [Redacted] [Redacted]

Number [Redacted] Issuing State [Redacted] Country [Redacted]

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

a Institution TIN [Redacted]

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 [Redacted]

22 Status of relationship [Redacted] 23 Action date [Redacted]

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

Institution TIN [Redacted] Non-US Financial Institution

account number [Redacted] 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 Alters transaction to avoid BSA recordkeeping requirement
- b Alters transaction to avoid CTR requirement
- c Customer cancels transaction to avoid BSA reporting and recordkeeping requirements
- d Multiple transactions below BSA recordkeeping threshold
- e Multiple transactions below CTR threshold
- f Suspicious inquiry by customer regarding BSA reporting or recordkeeping requirements
- z Other

30 Terrorist Financing

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

31 Fraud (Type)

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

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 Exchange small bills for large bills or vice versa
- b Suspicion concerning the physical condition of funds
- c Suspicion concerning the source of funds
- d Suspicious designation of beneficiaries, assignees or joint owners
- e Suspicious EFT/wire transfers
- f Suspicious exchange of currencies
- g Suspicious receipt of government payments/benefits
- h Suspicious use of multiple accounts
- i Suspicious use of noncash monetary instruments
- j Suspicious use of third-party transactors (straw-man)
- k Trade Based Money Laundering/Black Market Peso Exchange
- l Transaction out of pattern for customer(s)
- z 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 Account takeover
- b Bribery or gratuity
- c Counterfeit instruments
- d Elder financial exploitation
- e Embezzlement/theft/disappearance of funds
- f Forgeries
- g Identity theft
- h Little or no concern for product performance penalties, fees, or tax consequences
- i Misuse of "free look"/cooling-off/right of rescission
- j Misuse of position or self-dealing
- k Suspected public/private corruption (domestic)
- l Suspected public/private corruption (foreign)
- m Suspicious use of informal value transfer system
- n Suspicious use of multiple transaction locations
- o Transaction with no apparent economic, business, or lawful purpose
- p Two or more individuals working together
- q Unauthorized electronic intrusion
- r Unlicensed or unregistered MSB
- z Other

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36 Insurance

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

37 Securities/Futures/Options

- a Insider trading
- b Market manipulation/wash trading
- c Misappropriation
- d Unauthorized pooling
- z Other

38 Mortgage Fraud

- a Appraisal fraud
- b Foreclosure fraud
- c Loan Modification fraud
- d Reverse mortgage fraud
- z Other

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

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

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

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

41 Commodity type (if applicable)

42 Product/Instrument description (if needed)

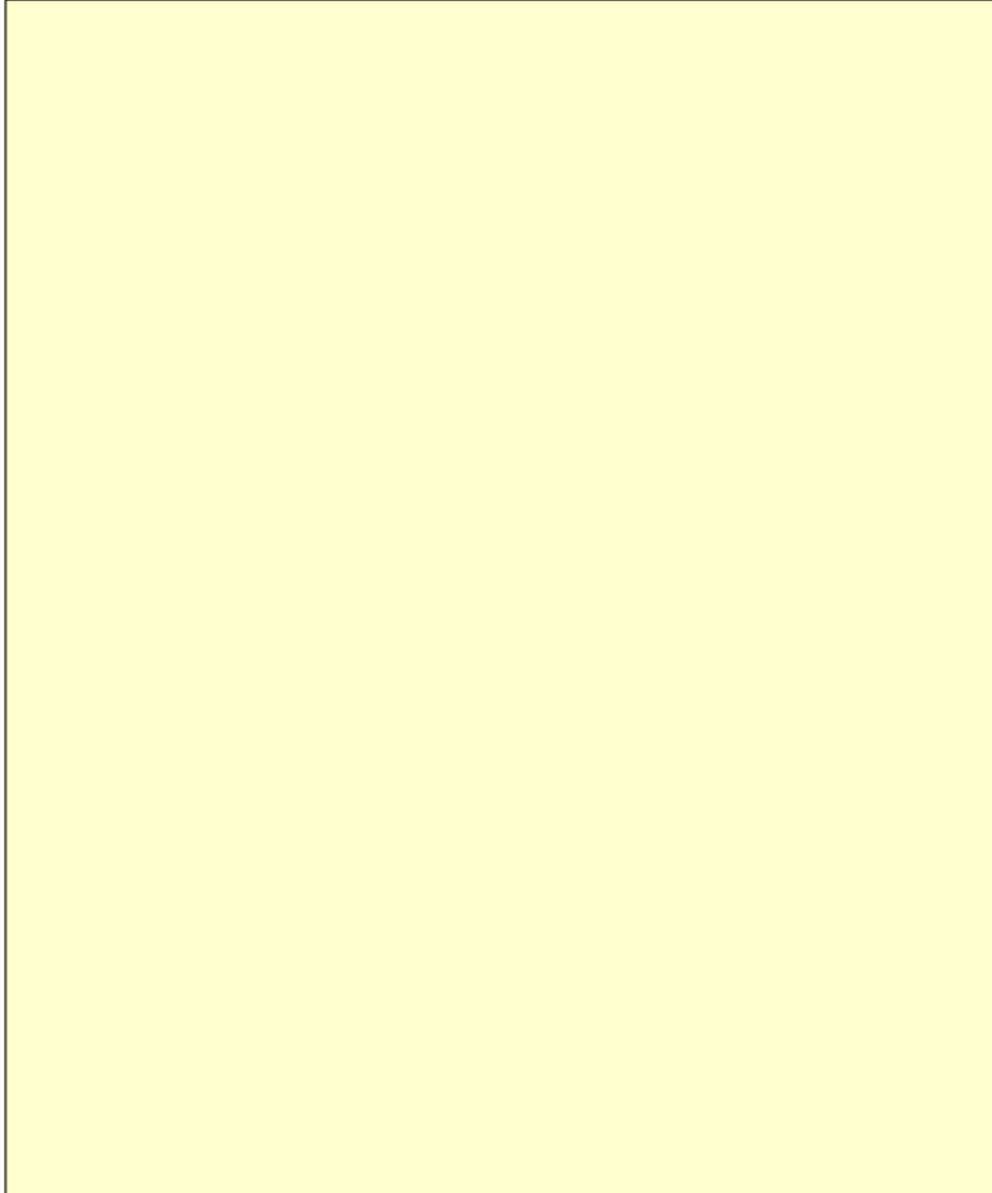
43 Market where traded

44 IP address (if available)

45 CUSIP# number

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Part V Suspicious Activity Information - Narrative*



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