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Description of document: Financial Crimes Enforcement Network (FinCEN) Bank Secrecy Act (BSA) Resource Center Procedures manual used for the FinCEN Regulatory Hotline, 2013

Requested date: 06-October-2017

Released date: 07-November-2017

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Source of document: Freedom of Information Act Request
Financial Crimes Enforcement Network (Disclosure Office)
P.O. Box 39
Vienna, VA 22183
[Treasury's FOIAonline web portal](#)

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November 7, 2017

Case Numbers: FinCEN 18-014-F
goFOIA 2017-10-064

This letter responds to your Freedom of Information Act request dated October 6, 2017, addressed to the Financial Crimes Enforcement Network (FinCEN) FOIA Office, seeking a copy of the manual used for the FinCEN Regulatory Hotline.

The processing of your request identified certain materials that will be released to you. Portions not released are being withheld pursuant to the Freedom of Information Act, 5 U.S.C. § 552. Please refer to the Applicable Exemptions list at the end of this letter that identifies the authority for withholding the exempt material, which is indicated by a mark appearing in the block next to the exemption. An additional enclosure with this letter explains these exemptions in more detail.

Fees

There are no fees associated with processing this request because the fees incurred do not exceed the minimum threshold necessary for charge.

Administrative Appeal

In the event that you wish to appeal this determination, an administrative appeal may be made in writing to FOIA Public Liaison, Mr. Ryan Law for assistance at: FOIA and Transparency, Department of the Treasury, Washington, DC 20220; Phone 202-622-8098; TreasFOIA@treasury.gov. Your appeal **must be submitted within 90 days** from the date of this determination. It should contain your FOIA request number and, to the extent possible, the reasons why you believe the initial determination should be reversed. In addition, the envelope in which the appeal is mailed should be prominently marked "FOIA Appeal." Please note that the determination of the appeal will be administratively final.

Additionally, you have the right to seek dispute resolution services from the Office of Government Information Services (OGIS) which mediates disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. If you are requesting access to your own records (which is considered a Privacy Act request), you should know that OGIS does not have the authority to handle requests made under the Privacy Act of 1974. You may contact OGIS as follows: Office of Government Information Services, National Archives and Records

Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001; e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5796.

If you have any questions pertaining to your request, please feel free to contact the FOIA Office at 703-905-5034 or email FinCENFOIA@fincen.gov.

Sincerely,



Rosemary Law
FOIA Officer

Summary:

Number of Pages Released in Part or in Full: 18

APPLICABLE EXEMPTIONS
FREEDOM OF INFORMATION ACT AND/OR PRIVACY ACT

Freedom of Information Act (5 U.S.C. 552)

☐ (b)(1) ☐ (b)(2) ☐ (b)(3) ☐ (b)(4) ☐ (b)(5) ☒ (b)(6)

☐ (b)(7)(A) ☐ (b)(7)(B) ☐ (b)(7)(C) ☐ (b)(7)(D) ☐ (b)(7)(E) ☐ (b)(7)(F)

Enclosures

FREEDOM OF INFORMATION ACT
SUBSECTIONS OF TITLE 5, UNITED STATES CODE, SECTION 552

Financial Crimes Enforcement Network (FinCEN) FOIA Branch applies FOIA exemptions to protect:

Exemptions

Exemption (b)(1): Records that contain information that is classified for national security purposes.

Exemption (b)(2): Records that are related solely to the internal personnel rules and practices of an agency.

Exemption (b)(3): Records specifically exempted from disclosure by code 31 U.S.C. § 5319, (Bank Security Act) which includes disclosure of reports pertaining to monetary instruments transactions filed under subchapter II of chapter 53 of title 31 and records of those reports.

Exemption (b)(4): Records that contain trade secrets and commercial or financial information obtained from a person that is privileged or confidential.

Exemption (b)(5): Inter- or intra-agency records that are normally privileged in the civil discovery context. The three most frequently invoked privileges are the deliberative process privilege, the attorney work-product privilege, and the attorney-client privilege:

- Deliberative process privilege – Under the deliberative process privilege, disclosure of these records would injure the quality of future agency decisions by discouraging the open and frank policy discussions between subordinates and superiors.
- Attorney work-product privilege – Records prepared by or at the direction of a TSA attorney.
- Attorney-client privilege – Records of communications between an attorney and his/her client relating to a matter for which the client has sought legal advice, as well as facts divulged by client to attorney and any opinions given by attorney based on these.

Exemption (b)(6): Records that contain identifying information that applies to a particular individual when the disclosure of such information "would constitute a clearly unwarranted invasion of personal privacy." This requires the balancing of the public's right to disclosure against the individual's right to privacy.

Exemption (b)(7)(A): Records or information compiled for law enforcement purposes, but only to the extent that production of such law enforcement records or information... could reasonably be expected to interfere with law enforcement proceedings.

Exemption (b)(7)(C): Records containing law enforcement information when disclosure "could reasonably be expected to constitute an unwarranted invasion of personal privacy" based upon the traditional recognition of strong privacy interests ordinarily appropriated in law enforcement records.

Exemption (b)(7)(E): Records compiled for law enforcement purposes, the release of which would disclose techniques and/or procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law.

Exemption (b)(7)(F): Records containing law enforcement information about a person, in that disclosure of information about him or her could reasonably be expected to endanger his or her life or physical safety.

BSA Resource Center Procedures

FinCEN BSA Resource
Center

Revised 5/13

Regulatory Helpline - (800) 949-2732

The Financial Crimes Enforcement Network's Regulatory Helpline provides assistance to callers from financial institutions, state and federal regulators, practitioners, law enforcement, and anyone who seeks information about FinCEN or the Bank Secrecy Act. When a person calls the Helpline, the caller will be greeted with a recording that asks them to select from seven options. Calls may be retrieved by checking the five mailboxes shown below:

- Money Services Businesses (b) (6) – Option 1
- Mandatory E-Filing (b) (6) – Option 2
- CTR/DOEP Questions (b) (6) – Option 3
- NBF/Casino/Card Clubs (b) (6) – Option 4
- Reserved line for future purposes (b) (6) – Option 5 - (we need to update the message)
- Other (3031) – to include requests for copies of paper forms/other materials – Option 6
- SAR Questions (b) (6) – Option 7
- Repeat options – Option 9

Retrieving Messages:

- 1) If not already completed, add the Helpline voicemail extensions to your Outlook (please refer to embedded instructions):



Adding Modular
Messaging Voice Mail

NOTE: The password for all extensions is the (b) (6) [REDACTED]. (For example, the password for Other Questions is (b) (6) [REDACTED]).

- 2) Once the Helpline voicemail extensions are added, navigate to the "Inbox" of your assigned line.
- 3) Hit "F9" to refresh the inbox to help ensure the most current contents.
- 4) To listen to a voicemail, double click on the message. A separate "Voice Mail Message – Modular Messaging" window will appear. Click on the ► button to play the message to your desktop phone.
- 5) Once you have listened to the call, delete the call to avoid duplicative efforts by BRC Staff.

Returning Calls:

- 1) Calls should generally be returned within one hour.
- 2) If the question is difficult and staff does not immediately know the answer, staff should return the call and indicate that the response is being researched. BRC Staff will notify the caller as soon as an answer is determined.
- 3) To research answers for calls, BRC Staff should consult the following: statute and regulations, previous Remedy logs, guidance issued on the FinCEN website, BRC Training Manual, Senior BRC Staff, or other senior FinCEN staff. *(For a list of current senior staff and their areas of expertise, see Appendix A)*

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(An electronic version of the BRC Training Manual can be found [here](#))

Forwarding Calls from Outlook:

- 1) In Outlook, select the phone call/message that needs to be forwarded.
- 2) On the top toolbar of Outlook under “Home”, click on “Forward” (same as forwarding an e-mail message).
- 3) A new message box appears, similar to an e-mail, with space to add intended recipients.
- 4) Once you have added the intended recipients, click “send”.
- 5) Delete the message once it has been forwarded.

Transferring a Call to Another Staff Member:

- 1) Press transfer.
- 2) Dial the extension of the staff member you wish to contact.
- 3) Press transfer again.
- 4) Ensure that the screen on the telephone indicates that the transfer is completed.
- 5) Complete your Remedy Log indicating both your response, as well as the response provided by the staff member the call was transferred to.

Documenting Helpline Calls:

- 1) Open the BRC Remedy User Tool on your desktop.
- 2) Enter your FinCEN username (same as your Windows user name) and password (same as your Windows password).
- 3) Once on the support page, click “Create Request” under the Helpline/Internal heading.
- 4) In the “Contact Information” field, enter all information that is known. You do not generally have to include the address information, but should complete this section with as much information as you are able to gather from the caller. If the last name is unknown, enter “Unknown” in the last name field. All **bolded** fields require an entry. Use of “Unknown” in the name fields should be limited to only those circumstances where you are unable to gather the required information.
- 5) Enter the question in the “Question” field; be as detailed as possible and include all questions posed by the caller. *See example below:*

Caller had a few questions about completing the FinCEN CTR. 1) What is the difference between "multiple transactions" and "aggregated transactions"? 2) If a bookkeeper performs a transaction on behalf of a business, what information would they put in Item 20 for the business?

- 6) In the Categorization, Request Summary and Info field, select the appropriate Issue, Category, Subcategory, Action, Source (defaults to telephone), Institution, and Contact type. Do not enter anything in the “Search for” or “Work Log” fields.
 - a. For Institution Type, follow the practices for making the selection:
 - i. Select “Individual” only when it is an individual member of the public calling.
 - ii. Select "Other" only if there is no other appropriate Institution choice. Please ensure that you choose the most descriptive “Contact” selection in these circumstances. If there is not an appropriate Contact choice then select “Other” but include a one or two word description of the contact type involved in the “Question” section of the log.

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- iii. Select “Unknown” only if you are unable to ascertain from the line, question, voicemail, inability to contact the caller, or other reasons the type of Institution or Contact type.
- b. The selection for “Source” is based upon how we received the inquiry.
- 7) In the “Answer” field, enter the answer provided. Ensure a clear and full description of the answer provided is entered in the “Answer” field. Do not enter anything in the summary field. *See answer below for the example question from above:*

Referred to FIN-2012-G002 (http://www.fincen.gov/statutes_regs/guidance/pdf/FIN-2012-G002.pdf). 1) Advised "multiple transactions" is when there were multiple transactions conducted by or on behalf of the person reported in that Part I. "Aggregated transactions" is if the financial institution did not identify any of the transactor(s) because the FinCEN CTR reports aggregated transactions, all of which were below the reporting requirement, and at least one of the transactions was a teller transaction. 2) Advised they would want to provide ID information on the business if known. Examples may include a state business license, business registration, or articles of incorporation. If the ID information is not known, check "Unknown".

- 8) Click [Save]. Hit “OK” on the pop up window(s).
- 9) Note, upon receipt of a call, create a log immediately. If the question requires further research, under the “Pending Status” field, select either “Awaiting Assistance” or “Awaiting Customer Callback” even before it is fully answered. Once the question(s) have been fully answered, update the status as normal. *NOTE: once a response is typed into the “Answer” field, and the log is “saved”, the “Status” will automatically update to “Resolved”.*
- 10) If requested, provide the DAD or designee with your personal logs at the end of the week (e-mail or copy of paper notes).

E-mail Inquiries - (BSA_Resource_Center@fincen.gov)

The BSA Resource Center can receive inquiries via e-mail in two ways. The first would be an e-mail sent directly to BSA_Resource_Center@fincen.gov. In addition, the Office of Public Affairs receives e-mails via webmaster@fincen.gov sent from visitors to the FinCEN website. The questions that pertain to RPPD are forwarded to the BSA_Resource_Center@fincen.gov. Once received, Senior Staff will then assign the inquiries to BRC Staff for resolution. The assigned staff will receive the e-mail inquiry in his or her personal e-mail account.

BRC Staff that are assigned the e-mail inquiry will treat it as if it were received via a voicemail message left on the Regulatory Helpline. If the question can be answered via published information, BRC Staff may draft an e-mail response including the link(s) to the published information (e.g. form, SAR Review, advisory, etc.). Once the BRC Staff have drafted the e-mail, they can then send it to a Senior BRC Staff member who will then send it to the requestor.

Alternatively, if the inquiry is more complex, BRC Staff will respond to the inquiry via phone (if phone number is not provided, Senior Staff will e-mail the requestor asking for a phone number). All responses will be logged into the BRC database by BRC Staff who either drafted the e-mail response or responded via telephone.

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Documenting E-mail Responses:

- 1) Open the BRC Remedy User Tool on your desktop.
- 2) Enter your FinCEN username (same as your Windows user name) and password (same as your Windows password).
- 3) Once on the support page, click “Create Request” under the Helpline/Internal heading.
- 4) In the “Contact Information” field, enter all information that is known including e-mail address. You do not generally have to include the address information. If the last name is unknown, enter “Unknown” in the last name field. All **bolded** fields require an entry.
- 5) Copy and paste the body of the requestor’s e-mail into the “Question” field. If the response is made via telephone and the requestor has additional questions, these must be included in the “Question” field.
- 6) In the Categorization, Request Summary and Info field, select the appropriate Issue, Category, Subcategory, Action, Source (change to Email), Institution, and Contact type. Do not enter anything in the “Search for” or “Work Log” fields.
- 7) In the “Answer” field, enter the answer provided. This may entail pasting the e-mail response. Ensure a clear and full description of the answer provided is entered in the “Answer” field. If BRC Staff called the requestor to provide a response, please indicate this at the beginning of the “Answer” field (e.g. Responded via telephone). Do not enter anything in the summary field. See above for example of a thorough answer.
- 8) Click [Save]. Hit “OK” on the pop up window(s).
- 9) Note, upon receipt of an e-mail, create a log immediately. If the question requires further research, under the “Pending Status” field, select either “Awaiting Assistance” or “Awaiting Customer Callback” even before it is fully answered. Once the question(s) have been fully answered, update the status as normal. *NOTE: once a response is typed into the “Answer” field, and the log is “saved”, the “Status” will automatically update to “Resolved”.*

If the BRC receives a question via the Office of Public Affairs (webmaster@fincen.gov) that is outside of the purview of RPPD, Senior Staff will return the Webmaster to the Public Affairs office and suggest the appropriate office.

Financial Institution Hotline - (866)556-3974

Please refer to the embedded document for further information related to FI Hotline Procedures.



2012 FI Hotline
Procedures (1.1.2013)

BRC Monthly Reports

At the end of each month, an assigned BRC Staff member will provide a monthly report to Senior Management with information about the inquiries handled by the BSA Resource Center, including calls received on the FI Hotline.

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For additional information, including the monthly report procedures and examples, please refer to the embedded document.



Monthly Report
Procedures (12.31.12)

Regulatory Helpline Greetings

Recording the Main Regulatory Helpline Greeting:

1. Dial the voicemail main number. Extension: (b) (6)
2. Press * to reach a different mailbox on the system
3. Press # and then enter the mailbox number (b) (6)
4. When your prompted for your password, enter (b) (6) then #
5. Press 5 for Personal Configuration
6. Press 2 for Caller Application Announcements
7. Press 1 to Record Announcement
8. Press 1# for Announcement 1
9. Begin recording, when finished press #
10. Press 0 to hear announcement, Press 1 to rerecord or Press 3 to delete. (You will taken back to step 11.)
11. Finished, press #

FEDERAL HOLIDAY GREETING

In anticipation of federal holidays, the main Regulatory Helpline greeting (ext 3975) should be changed to a holiday greeting. The holiday greeting should reflect the date and name of the particular holiday.

Thank you for calling FinCEN's Regulatory Helpline. The Helpline is now closed in observance of the _____ Day holiday. We will re-open for normal business hours on _____.

*If you are a financial institution and want to report suspicious transactions that **may relate to terrorist activity**, please contact the Financial Institutions Hotline at **1-866-556-3974** immediately.*

SEVERE WEATHER GREETING

In the event that the government must close due to severe weather, the main Regulatory Helpline greeting (x. 3975) should be changed to the severe weather greeting.

Due to severe weather conditions affecting the Washington DC metropolitan area, the Regulatory Helpline is presently closed. Please call back when the Helpline reopens.

GOVERNMENT SHUTDOWN

In the event that there is a federal government shutdown due to funding lapses, the main Regulatory Helpline greeting (b) (6) should be changed to the government shutdown greeting.

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The BSA Resource Center is currently closed during the government shutdown. If you choose to leave a message, we will get back to you as soon as we can after the BSA Resource Center reopens. Please check our website at www.fincen.gov for information on when the BSA Resource Center reopens.

Activating an Alternate Regulatory Helpline Message

The Telecommunications Team of TSSD, specifically Richard Morani, is responsible for switching the main Regulatory Helpline greeting as a result of one of the above scenarios.

calls from the Duty Agent to RPPD by 8 AM and for transferring calls from RPPD to the Duty Agent at 6 PM each business day; this process has been automated by the Telecommunications Team during normal business hours. In addition, the Telecommunications Team will ensure calls are routed to the Duty Agent for all federal holidays and will transfer calls to the Duty Agent during times of Agency-wide approved early departure. Note Diagram 1-1 for further instructions.

Should the Telecommunications Team need to redirect calls to the Duty Agent for reasons outside of the above, RPPD management should approve the transfer and the Telecommunications Team should be contacted to redirect the calls. Designated CLSD (Telecommunication Team) contacts are listed below:

CLSD CONTACTS: (b) (6)

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General Regulatory Helpline Main Greeting (b) (6) – Revised 2/15/2013—(Announcement #1):

“Thank you for calling FinCEN’s Regulatory Helpline.

*If you are a financial institution and want to report suspicious transactions that **may relate to terrorism**, contact the Financial Institutions Hotline at 1-866-556-3974 immediately.* For technical questions about FinCEN’s BSA E-Filing System, please call 1-866-346-9478. Financial institutions must file all required reports, with certain limited exceptions, using FinCEN’s BSA E-Filing system. After March 31, 2013, the “Legacy” versions of these reports will not be accepted and will no longer be available on the BSA E-filing System.

For questions about Money Services Businesses, related regulatory requirements, or accessing FinCEN’s public MSB registration list press 1.

For questions about FinCEN’s mandatory e-filing requirement that took effect on July 1, 2012, or a recently received letter from FinCEN about filing a report on paper, press 2.

For questions about currency transaction reporting or exemptions, including the FinCEN CTR, press 3.

For questions about suspicious activity reporting, including the FinCEN SAR, press 7.

For questions regarding the BSA requirements of all non-bank financial institutions, OTHER THAN money services businesses, press 4.

For any other questions, or if you are unsure which option to select, press 6.”

To hear these options again, please press 9.

Subject Matter Voicemail Greetings:

(listed in option order, not in order on primary voicemail message)

Option 1 (b) (6) : MSB—(Personal Greeting)

“Thank you for calling FinCEN’s Regulatory Helpline for Money Services Businesses. Please note that all MSB registrations must be filed electronically via the FinCEN BSA E-Filing System and that after March 31, 2013, only the new FinCEN RMSB will be available and accepted within the BSA E-Filing System. To obtain your MSB registration acknowledgement letter, you must visit the MSB Registrant Search Web page on FinCEN’s Web site at www.fincen.gov, which provides MSBs, their banks, and others the ability to access, search, verify, download and print MSB registration information 24 hours a day, seven days a week. Additionally, MSBs filing their registrations through the BSA E-Filing System will receive within two business days the System’s electronic acknowledgement that their registrations have been processed successfully. This acknowledgement includes the MSB Registration Number that will be available on the MSB Registrant Search Web page within two weeks of the filing date.

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If you have other MSB-related questions, please leave a clear and detailed message explaining your situation or question, your name, the name of your institution, and your telephone number. Providing a clear and detailed explanation improves our ability to respond to your call promptly.”

Option 2 (b) (6) : Mandatory E-filing—(Personal Greeting)

Thank you for calling FinCEN’s Regulatory Helpline for questions about FinCEN’s mandatory e-filing requirement that became effective July 1, 2012. The Federal Register notice explaining this new requirement is available on FinCEN’s website at www.fincen.gov.

Additionally, after March 31, 2013, financial institutions must file only the new FinCEN CTR, FinCEN SAR, and certain other Reports. The “Legacy” versions of these reports will not be accepted and will no longer be available on the BSA E-filing System. The electronic version of the [FBAR](#) is currently available within the BSA E-Filing System and must be electronically filed effective July 1, 2013. Businesses are also strongly encouraged to file Form 8300 using the BSA E-Filing System.

If you received a letter from FinCEN stating you filed a report on paper after the mandatory E-Filing deadline of July 1, 2012, you should immediately register and use the BSA E-Filing System to file all future FinCEN reports to avoid further notices and possible civil money penalties.

Should you still have questions about this new requirement, please leave a clear and detailed message including your name, your question, and the phone number where you can be reached.

Option 3 (b) (6) : CTR—(Personal Greeting)

“Thank you for calling FinCEN’s Regulatory Helpline for questions regarding currency transaction reporting and exemptions. Please note that financial institutions must file all CTRs and DOEPs via the FinCEN BSA E-Filing System. Additionally, after March 31, 2013, financial institutions must file only the new FinCEN CTR and DOEP. The “Legacy” versions of these reports will not be accepted and will no longer be available on the BSA E-filing System.

If you have a question about completing a CTR or CTR exemptions, please leave a clear and detailed message explaining your question, along with your name, the name of your institution, and your telephone number. Providing a clear and detailed explanation improves our ability to respond to your call promptly.”

Option 4 (b) (6) : NBF/Casinos—(Personal Greeting)

“Thank you for calling FinCEN’s Regulatory Helpline for all non-bank financial institutions not considered money services businesses, such as casinos and card clubs, insurance companies, and dealers in precious metals, stones, and jewels. Please note that non-bank financial institutions must file all required reports, with certain limited exceptions, using FinCEN’s BSA E-Filing

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system. Additionally, after March 31, 2013, financial institutions must file only the new FinCEN CTR, FinCEN SAR, and certain other Reports. The “Legacy” versions of these reports will not be accepted and will no longer be available on the BSA E-filing System. The electronic version of the [FBAR](#) is currently available within the BSA E-Filing System and must be electronically filed effective July 1, 2013. Businesses are also strongly encouraged to file Form 8300 using the BSA E-Filing System.

Please leave a clear and detailed message explaining your situation or question, your name, the name of your institution, and your telephone number. Providing a clear and detailed explanation improves our ability to respond to your call promptly. ”

Option 5 (b) (6) : FinCEN publications and other materials (not in current use-Personal Greeting)

“Thank you for calling FinCEN’s Regulatory Helpline. Please be aware that financial institutions must file all required reports, with certain limited exceptions, using FinCEN’s BSA E-Filing System. Additionally, after March 31, 2013, financial institutions must file only the new FinCEN CTR, FinCEN SAR, FinCEN RMSB, and FinCEN DOEP. The “Legacy” versions of these reports will not be accepted and will no longer be available on the BSA E-filing System. The electronic version of the [FBAR](#) is currently available within the BSA E-Filing System and must be electronically filed effective July 1, 2013. Businesses are also strongly encouraged to file Form 8300 using the BSA E-Filing System.

For copies of FinCEN publications, regulations, and other information please go to FinCEN’s Web site at www.fincen.gov. To order FinCEN’s MSB Poster and Take One cards, please provide your name, the name of your institution, your complete mailing address, your telephone number, and the name of the item you are requesting. Delivery may take up to 5 weeks.”

Option 6 (b) (6) : Other Inquiries—(Personal Greeting)

“Thank you for calling FinCEN’s Regulatory Helpline for all other Bank Secrecy Act questions. If you are calling regarding technical assistance with the 314 information sharing programs or a specific 314(a) information request, please contact FinCEN’s 314 Program Office at 1-866-326-8314. If you have questions regarding an OFAC hit or match, you must call the Office of Foreign Assets Control at 1-800-540-6322.

Please be aware that financial institutions must file all required reports, with certain limited exceptions, using FinCEN’s BSA E-Filing System. Additionally, after March 31, 2013, financial institutions must file only the new FinCEN CTR, FinCEN SAR, and certain other Reports. The “Legacy” versions of these reports will not be accepted and will no longer be available on the BSA E-filing System. The electronic version of the [FBAR](#) is currently available within the BSA E-Filing System and must be electronically filed effective July 1, 2013. Businesses are also strongly encouraged to file Form 8300 using the BSA E-Filing System.

For copies of FinCEN publications, regulations, and other information please go to FinCEN’s Web site at www.fincen.gov. To order FinCEN’s MSB Poster and Take One cards, please

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provide your name, the name of your institution, your complete mailing address, your telephone number, and the name of the item you are requesting. Delivery may take up to 5 weeks.

Option 7 (b) (6): SAR—(Personal Greeting)

“Thank you for calling FinCEN’s Regulatory Helpline for questions pertaining to suspicious activity reporting. Please note that all suspicious activity reports must be filed via the FinCEN BSA E-Filing System. Additionally, after March 31, 2013, financial institutions must file only the new FinCEN SAR. The “Legacy” versions of this report will not be accepted and will no longer be available on the BSA E-filing System.

For most general SAR-related questions, you can find relevant guidance pieces, frequently asked questions, and links to *SAR Activity Reviews* on FinCEN’s Web site at www.fincen.gov. If you have reviewed these relevant materials and still require assistance, please leave a clear and detailed message explaining your situation or question, your name, the name of your institution, and your telephone number. Providing a clear and detailed explanation improves our ability to respond to your call promptly.”

Option 8 (b) (6):

Main Helpline greeting.

Option 9:

To repeat options.

Training and Research

In an effort to provide complete and accurate information to individuals that contact FinCEN's Regulatory Helpline, it is imperative that Resource Center personnel be properly trained and provided resources to conduct necessary research. Personnel will have access to a variety of resources for answers, including FinCEN's website, telephone logs, the BRC Training Manual, and access to senior staff. When researching an answer, personnel should first consult the US Code and the Code of Federal Regulations. However, BRC Staff should be aware that much of the BSA cannot be discerned by a strict reading of the regulation. For this reason, personnel should rely on public and non-public resources that are available to staff. Principally, staff should consult the FinCEN website to check for guidance, frequently asked questions, rulings, and staff commentary. Staff may also need to consult other regulator websites as well as general open source information.

(An electronic version of the BRC Training Manual can be found [here](#))

When researching non-publicly available information, staff should initially consult the Remedy phone logs. In all cases, personnel should review all answers and look most closely at the most recent answer. Personnel are reminded that the BSA has experienced many changes. Therefore, an answer provided in the last six months may no longer be correct. If personnel find conflicting information, personnel should consult with Senior BRC staff, or the Office of Policy, as necessary. (See the Appendix A)

BMC Remedy User (Remedy)

In October of 2006, Remedy replaced the FRHS. Staff must now log all inquiries into the Remedy system. Both Helpline inquiries and Hotline calls must be logged into the Remedy system, as well as the inquiries received via the BSA_Resource_Center e-mail address. In addition to the Remedy user tool located on your desktop, the application is also available via the web at <http://hqbar-dev:8080/arsys/shared/login.jsp?arsys/home>.

APPENDIX A – Staff Expertise

Money Services Businesses

(b) (6)
(b) (6)
(b) (6) – MSB Website

CTRs

(b) (6)
(b) (6)
(b) (6)

New FinCEN Reports

(b) (6)
(b) (6)
(b) (6)

FI Hotline

(b) (6)
(b) (6)
(b) (6)

Banking

(b) (6)
(b) (6)

Securities/Futures

(b) (6)

IRD/ECC/DCC Issues

(b) (6)

Casinos

(b) (6)

Section 311

(b) (6)

Precious Metals

(b) (6)

Non-Bank Residential Mortgage Lenders & Originators (RMLO's)

(b) (6)

Analytics Support

(b) (6)
(b) (6)

Stored Value

(b) (6)

Enforcement Actions

(b) (6)

Section 314

(b) (6)
(b) (6)

Insurance

(b) (6)

Office of Public Affairs

(b) (6)

Congressional Affairs

(b) (6)

FATF Issues

(b) (6)

International Issues

FRHS Access

IT Help Desk

BRC Technical Support

(b) (6)

Telephone Technology Issues

(b) (6)

General Regulatory Helpline Main Greeting (b) (6) – Revised 2/15/2013—(Announcement #1):

“Thank you for calling FinCEN’s Regulatory Helpline.

*If you are a financial institution and want to report suspicious transactions that **may relate to terrorism**, contact the Financial Institutions Hotline at 1-866-556-3974 immediately.* For technical questions about FinCEN’s BSA E-Filing System, please call 1-866-346-9478. Financial institutions must file all required reports, with certain limited exceptions, using FinCEN’s BSA E-Filing system. After March 31, 2013, the “Legacy” versions of these reports will not be accepted and will no longer be available on the BSA E-filing System.

For questions about Money Services Businesses, related regulatory requirements, or accessing FinCEN’s public MSB registration list press 1.

For questions about FinCEN’s mandatory e-filing requirement that took effect on July 1, 2012, or a recently received letter from FinCEN about filing a report on paper, press 2.

For questions about currency transaction reporting or exemptions, including the FinCEN CTR, press 3.

For questions about suspicious activity reporting, including the FinCEN SAR, press 7.

For questions regarding the BSA requirements of all non-bank financial institutions, OTHER THAN money services businesses, press 4.

For any other questions, or if you are unsure which option to select, press 6.”

To hear these options again, please press 9.

Subject Matter Voicemail Greetings:

(listed in option order, not in order on primary voicemail message)

Option 1 (b) (6) : MSB—(Personal Greeting)

“Thank you for calling FinCEN’s Regulatory Helpline for Money Services Businesses. Please note that all MSB registrations must be filed electronically via the FinCEN BSA E-Filing System and that after March 31, 2013, only the new FinCEN RMSB will be available and accepted within the BSA E-Filing System. To obtain your MSB registration acknowledgement letter, you must visit the MSB Registrant Search Web page on FinCEN’s Web site at www.fincen.gov, which provides MSBs, their banks, and others the ability to access, search, verify, download and print MSB registration information 24 hours a day, seven days a week. Additionally, MSBs filing their registrations through the BSA E-Filing System will receive within two business days the System’s electronic acknowledgement that their registrations have been processed successfully. This acknowledgement includes the MSB Registration Number that will be available on the MSB Registrant Search Web page within two weeks of the filing date.

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If you have other MSB-related questions, please leave a clear and detailed message explaining your situation or question, your name, the name of your institution, and your telephone number. Providing a clear and detailed explanation improves our ability to respond to your call promptly.”

Option 2 (b) (6) : Mandatory E-filing—(Personal Greeting)

Thank you for calling FinCEN’s Regulatory Helpline for questions about FinCEN’s mandatory e-filing requirement that became effective July 1, 2012. The Federal Register notice explaining this new requirement is available on FinCEN’s website at www.fincen.gov.

Additionally, after March 31, 2013, financial institutions must file only the new FinCEN CTR, FinCEN SAR, and certain other Reports. The “Legacy” versions of these reports will not be accepted and will no longer be available on the BSA E-filing System. The electronic version of the [FBAR](#) is currently available within the BSA E-Filing System and must be electronically filed effective July 1, 2013. Businesses are also strongly encouraged to file Form 8300 using the BSA E-Filing System.

If you received a letter from FinCEN stating you filed a report on paper after the mandatory E-Filing deadline of July 1, 2012, you should immediately register and use the BSA E-Filing System to file all future FinCEN reports to avoid further notices and possible civil money penalties.

Should you still have questions about this new requirement, please leave a clear and detailed message including your name, your question, and the phone number where you can be reached.

Option 3 (b) (6) : CTR—(Personal Greeting)

“Thank you for calling FinCEN’s Regulatory Helpline for questions regarding currency transaction reporting and exemptions. Please note that financial institutions must file all CTRs and DOEPs via the FinCEN BSA E-Filing System. Additionally, after March 31, 2013, financial institutions must file only the new FinCEN CTR and DOEP. The “Legacy” versions of these reports will not be accepted and will no longer be available on the BSA E-filing System.

If you have a question about completing a CTR or CTR exemptions, please leave a clear and detailed message explaining your question, along with your name, the name of your institution, and your telephone number. Providing a clear and detailed explanation improves our ability to respond to your call promptly.”

Option 4 (b) (6) : NBF/Casinos—(Personal Greeting)

“Thank you for calling FinCEN’s Regulatory Helpline for all non-bank financial institutions not considered money services businesses, such as casinos and card clubs, insurance companies, and dealers in precious metals, stones, and jewels. Please note that non-bank financial institutions must file all required reports, with certain limited exceptions, using FinCEN’s BSA E-Filing

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system. Additionally, after March 31, 2013, financial institutions must file only the new FinCEN CTR, FinCEN SAR, and certain other Reports. The “Legacy” versions of these reports will not be accepted and will no longer be available on the BSA E-filing System. The electronic version of the [FBAR](#) is currently available within the BSA E-Filing System and must be electronically filed effective July 1, 2013. Businesses are also strongly encouraged to file Form 8300 using the BSA E-Filing System.

Please leave a clear and detailed message explaining your situation or question, your name, the name of your institution, and your telephone number. Providing a clear and detailed explanation improves our ability to respond to your call promptly. ”

Option 5 (b) (6) : FinCEN publications and other materials (not in current use-Personal Greeting)

“Thank you for calling FinCEN’s Regulatory Helpline. Please be aware that financial institutions must file all required reports, with certain limited exceptions, using FinCEN’s BSA E-Filing System. Additionally, after March 31, 2013, financial institutions must file only the new FinCEN CTR, FinCEN SAR, FinCEN RMSB, and FinCEN DOEP. The “Legacy” versions of these reports will not be accepted and will no longer be available on the BSA E-filing System. The electronic version of the [FBAR](#) is currently available within the BSA E-Filing System and must be electronically filed effective July 1, 2013. Businesses are also strongly encouraged to file Form 8300 using the BSA E-Filing System.

For copies of FinCEN publications, regulations, and other information please go to FinCEN’s Web site at www.fincen.gov. To order FinCEN’s MSB Poster and Take One cards, please provide your name, the name of your institution, your complete mailing address, your telephone number, and the name of the item you are requesting. Delivery may take up to 5 weeks.”

Option 6 (b) (6) : Other Inquiries—(Personal Greeting)

“Thank you for calling FinCEN’s Regulatory Helpline for all other Bank Secrecy Act questions. If you are calling regarding technical assistance with the 314 information sharing programs or a specific 314(a) information request, please contact FinCEN’s 314 Program Office at 1-866-326-8314. If you have questions regarding an OFAC hit or match, you must call the Office of Foreign Assets Control at 1-800-540-6322.

Please be aware that financial institutions must file all required reports, with certain limited exceptions, using FinCEN’s BSA E-Filing System. Additionally, after March 31, 2013, financial institutions must file only the new FinCEN CTR, FinCEN SAR, and certain other Reports. The “Legacy” versions of these reports will not be accepted and will no longer be available on the BSA E-filing System. The electronic version of the [FBAR](#) is currently available within the BSA E-Filing System and must be electronically filed effective July 1, 2013. Businesses are also strongly encouraged to file Form 8300 using the BSA E-Filing System.

For copies of FinCEN publications, regulations, and other information please go to FinCEN’s Web site at www.fincen.gov. To order FinCEN’s MSB Poster and Take One cards, please

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provide your name, the name of your institution, your complete mailing address, your telephone number, and the name of the item you are requesting. Delivery may take up to 5 weeks.

Option 7 (b) (6): SAR—(Personal Greeting)

“Thank you for calling FinCEN’s Regulatory Helpline for questions pertaining to suspicious activity reporting. Please note that all suspicious activity reports must be filed via the FinCEN BSA E-Filing System. Additionally, after March 31, 2013, financial institutions must file only the new FinCEN SAR. The “Legacy” versions of this report will not be accepted and will no longer be available on the BSA E-filing System.

For most general SAR-related questions, you can find relevant guidance pieces, frequently asked questions, and links to *SAR Activity Reviews* on FinCEN’s Web site at www.fincen.gov. If you have reviewed these relevant materials and still require assistance, please leave a clear and detailed message explaining your situation or question, your name, the name of your institution, and your telephone number. Providing a clear and detailed explanation improves our ability to respond to your call promptly.”

Option 8 (b) (6):

Main Helpline greeting.

Option 9:

To repeat options.