

May 8, 2018

Important Notices to CTR Batch ASCII E-Filers

Reminder on Transition to CTR Batch XML from ASCII Cutoff is **June 1st**, 2018

Please note: Financial institutions that batch file must file using the new XML format not later than the above date. If a financial institution is unable, then they must revert to the discrete option to file their reports until they are able to file using the new XML format.

May 4th, 2018 – In August of 2017, the Currency Transaction Report (CTR) available on the BSA E-Filing System was updated to adhere to the changes defined in Federal Register notice posted on February 20th, 2016 (https://www.federalregister.gov/documents/2016/02/02/2016-01825/proposed-collection-comment-request-bank-secrecy-act-currency-transaction-report-bctr-revised-layout). New or updated data fields were added to the online discrete CTR as well as the CTR batch files. The new or updated data fields are:

Part I Person Involved in Transaction

Renamed Item 2d from "Courier Service (private)" to "Common carrier"

Part II Amount and Type of Transaction

Added a checkbox to Item 24 to reflect "Shared Branching"

Part III Transaction Location

Added an Unknown option to Item 29, Primary Federal Regulator

Added an Unknown checkbox to Item 32, EIN

Added an Item 37, Country

Added Item 41, Cash in amount for transaction location

Add Item 42, Cash out amount for transaction location

Part IV Filing Institution Contact Information

Added new Part IV "Filing Institution Contact Information" section to collect data about the institution that filed the CTR

Batch filers are required to submit the updated CTR data in an XML based file, rather than the current ASCII based fixed-length delimited file, **beginning June 1**st, **2018**. The XML User

Guide can be downloaded at <u>FinCEN Currency Transaction Report (CTR) Electronic Filing Requirements for XML</u>. Please review the Revision History for details of minor updates recently made to this document. The batch CTR XSD file can be downloaded at the following location: <u>FinCEN Currency Transaction Report (CTR) XSD.</u>

FinCEN has the following resources available to assist with the transition to XML:

- <u>FinCEN Technical Webinar on XML</u> this slide deck provides a high-level view of the XML schema and provides a walkthrough of the main elements of the XSD.
- <u>BSA E-Filing User Test Site</u> the test site can be used to test your XML files. A user account can be created by accessing the <u>home page</u> and selecting the Become a BSA E-Filer button.
- Sample Files the following sample files are available for download.
 - o CTRX_Batch Sample.XML this file contains four CTRs
 - <u>CTRX Batch Sample XML Acknowledgement</u> this file is the corresponding acknowledgement for the Batch Sample XML

SDTM/Connect; Direct Filers

FinCEN provides the ability for filers to submit the CTR XML batch file securely via the Internet using a VPN device or Connect: Direct software. This method of filing is referred to as Secure Data Transfer Mode (SDTM). 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.

For filers using this option for filing, SDTM filers can submit a single file containing the CTR XML batch data. Current SDTM/Connect: Direct filers do not need any new connections or paths setup to file XML batch files, existing connections can be used. The filename of the XML files as compared to the ASCII files is the only difference.

The file naming convention is as follows:

Submission type: CTRXST

Date/Time: This will be a date-time stamp to guarantee filename uniqueness

- Year = YYYY
- Month = MM
- Day = DD
- Hour = hh
- Minute = mm
- Second = ss

Organization name: Custom naming by the submitting organization, such as the bank's name (e.g. "FirstBankofUSA")

Extension: xml

Example CTR XML batch file name: CTRXST.20170609153015.FirstBankofUSA.xml

For any questions regarding XML please contact the BSA E-Filing Help Desk at 1-866-346-9478 or via email at BSAEFilingHelp@fincen.gov. 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.