



Subject: **Instructions for Backfiling and Amending Currency Transaction Reports**

Issued: March 05, 2018

Beginning June 1, 2018, financial institutions are required to file the updated Currency Transaction Report (FinCEN CTR) which adheres to the changes defined in Federal Register notice posted on February 20, 2016.¹

After May 31, 2018, Version 1.2 of the Currency Transaction Report will not be accepted and amendments to these reports must be submitted using the most recent updated FinCEN CTR (version 1.3 or later). Reports must be filed within **60 calendar days** of receipt of FinCEN's determination, unless otherwise instructed. When submitting the reports, the financial institution must follow the instructions that correspond with the appropriate filing method, as follows:

I. Discrete Bank Secrecy Act (BSA) E-Filing of FinCEN CTRs:

The financial institution is required to submit FinCEN CTRs through the BSA E-Filing System in accordance with BSA electronic filing requirements.² The financial institution should ensure that the electronic file submission includes:

- For Backfiling matters, select Item 1 "FinCEN directed Backfiling"; or
- For Amendment matters, select Item 1 "Correct/amend prior report" and complete the BSA Identifier ("BSA Identifier", or "BSA ID") field.

After the financial institution has filed the FinCEN CTRs, it must send a letter confirming that the reports have been backfiled and/or amended. The letter should be addressed to FinCEN with copies sent to those federal and state agencies that examine the financial institution's Bank Secrecy Act/Anti-Money Laundering Compliance Program. **Please see section IV of this document for instructions explaining the information that must be included in the letter.**

Do not include copies of completed FinCEN CTRs with the letter. The letter will serve as confirmation that the FinCEN CTR backfiling and/or amendment process has been completed; FinCEN suggests that the financial institution retain a copy of the letter for record keeping purposes.

¹ <https://www.federalregister.gov/documents/2016/02/02/2016-01825/proposed-collection-comment-request-bank-secrecy-act-currency-transaction-report-bctr-revised-layout>

² http://bsaefiling.fincen.treas.gov/docs/XMLUserGuide_FinCENCTR.pdf

II. Batch BSA E-Filing of FinCEN CTRs:

The financial institution is required to submit FinCEN CTRs through the BSA E-Filing System. The FinCEN CTRs must be filed in accordance with BSA electronic filing requirements.³ The financial institution should ensure that the electronic file submission includes:

ASCII Batch Submissions (Accepted until April 30th, 2018)	XML Batch Submissions (Required as of May 1st, 2018)
<ul style="list-style-type: none">• For Backfiling matters, enter “C” in field position 8 of the transaction summary (3A) record; or• For Amendment matters, enter “B” in field position 8 of the transaction summary (3A) record, and enter the previously assigned BSA Identifier in field positions 9-22 of the transaction summary (3A) record.	<ul style="list-style-type: none">• For Backfiling matters, record the element “FinCENDirectBackFileIndicator” with a “Y” value; or• For Amendment matters, record the element “CorrectsAmendsPriorReportIndicator” with a “Y” value, and also record the element “EFilingPriorDocumentNumberenter” with the previously assigned BSA Identifier as the value.

After the financial institution has filed the FinCEN CTRs, it must send a letter confirming that the reports have been backfiled and/or amended. The letter should be addressed to FinCEN with copies sent to those federal and state agencies that examine the financial institution’s Bank Secrecy Act/Anti-Money Laundering Compliance Program. **Please see section IV of this document for instructions explaining the information that must be included in the letter.**

Do not include copies of completed FinCEN CTRs with the letter. The letter will serve as confirmation that the FinCEN CTR backfiling and/or amendment process has been completed; FinCEN suggests that the financial institution retain a copy of the letter for record keeping purposes.

III. E-Filing of FinCEN Designation of Exempt Person (FinCEN DOEP):

In the event that FinCEN has granted regulatory relief for a bank to file a FinCEN DOEP in lieu of backfiling or amending the affected FinCEN CTRs and the bank chooses to exempt an eligible customer, the bank is required to file a FinCEN DOEP through the BSA E-Filing System. The FinCEN DOEP should be completed in accordance with BSA electronic filing requirements.⁴

³ http://bsaeiling.fincen.treas.gov/docs/XMLUserGuide_FinCENCTR.pdf

⁴ <http://bsaeiling.fincen.treas.gov/news/FinCENDOEPElectronicFilingRequirements.pdf>

After the bank has transmitted the FinCEN DOEP, it must send a letter to FinCEN and copies of the letter sent to those federal and state agencies that examine the financial institution's Bank Secrecy Act/Anti-Money Laundering Compliance Program including the following information:

- Assigned 14-character numerical BSA ID number from FinCEN DOEP electronic filing.

Do not include copies of completed FinCEN DOEPs with the letter. The letter will serve as confirmation that the FinCEN DOEP process has been completed. FinCEN suggests that the financial institution retain a copy of the letter for record keeping purposes. Please view section IV of this document for the methods of sending the letter via email, mail, or fax.

IV. Notifying FinCEN of Backfiled and Amended FinCEN CTRs:

Financial institutions must provide notification to FinCEN in the form of a letter, confirming that FinCEN CTRs have been backfiled and/or amended using the discrete or batch e-filing method indicated above or that a FinCEN DOEP was submitted. Do not include copies of completed FinCEN CTRs or DOEPs with the letter. The letter to FinCEN must be emailed, mailed, or faxed within **60 calendar days** of receipt of FinCEN's determination, unless otherwise instructed. The following information must be included in the letter to FinCEN:

1. Legal name of the financial institution that filed the report(s)
2. Address of the financial institution that filed the report(s)
3. Name of the institution's Primary Federal regulator (if none, Primary State regulator)
4. Name, phone number, and **email address** of the financial institution contact person
5. The 14-digit BSA IDs of the original and amended CTRs.

In 2-3 business days after filing CTRs, the BSA ID numbers are sent to the email address associated with your BSA E-filing System account and will be available in the "Track Status" option within the BSA E-filing System.

- If you are backfiling CTRs, you must supply the BSA ID number for each report that you have backfiled (e.g., 31000000123456).
 - If you are amending CTRs, you must supply both the BSA ID of the initial report (e.g., 31000000123456) and the BSA ID of the amending CTR (e.g., 31000000987654)
6. If not previously provided in writing, a brief statement explaining the errors or issues that prompted the requirement for CTRs to be backfiled or amended, and any actions taken to correct those issues going forward.

Filers are encouraged to submit their letter that includes all of the aforementioned information using an encrypted email, but it may also be sent via US Mail or fax. Upon receiving the financial institution's letter and confirming completion of the backfiling/amending process, FinCEN will send the financial institution an email which will serve as the financial institution's acknowledgement that the FinCEN CTR backfiling/amending process has been completed,

requiring no further action. This acknowledgement will only be sent by email, therefore the letter must include a valid email address in order to receive this final communication.

The letter to FinCEN must be emailed, mailed, or faxed within **60 calendar days** of receipt of FinCEN's determination, unless otherwise instructed, to:

Email: fincenreports@fincen.gov You must encrypt your email and send your password in a separate email. When encrypting a file, the password must be at least eight characters long, must include at least one lowercase, one uppercase, one numeric, and one special character. Note: FinCEN will not access email sent through third party email systems. Please submit all correspondence directly to fincenreports@fincen.gov and follow encryption instructions.

Mail: U.S. Department of Treasury
 Financial Crimes Enforcement Network
 Attention: CTR Backfile/Amendment Determinations Post Office Box 39
 Vienna, VA 22183

Fax: 202-354-6411

Questions:

If you have questions regarding backfiling or amending FinCEN CTRs, please contact FinCEN's Regulatory Help Line at 1-800-949-2732. If you have questions related to BSA E-Filing or would like assistance in enrolling in BSA E-Filing, please contact the BSA E-Filing Help Desk at 1-866-346-9478, or via email at BSAEFilingHelp@fincen.gov.

If you have questions about a specific DOEP and/or CTR backfiling or amendment determination request that you submitted, please email your inquiry to fincenreports@fincen.gov.