



Financial Crimes Enforcement Network  
U.S. Department of the Treasury

Washington, D.C. 20220

Subject: **Instructions for Backfiling and Amending Currency Transaction Reports**  
Issued: March 05, 2018

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Beginning June 1, 2018, financial institutions are required to file the updated Currency Transaction Report (FinCEN CTR), which adheres to the changes defined in the Federal Register notice posted on February 20, 2016.<sup>1</sup>

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 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.<sup>2</sup> Filers must ensure that the electronic file submission includes:

- For Backfiling CTRs, select Item 1 "FinCEN directed Backfiling"; or
- For Amending CTRs, 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 the 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 outlining the information that must be included in the letter.**

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

<sup>2</sup> [http://bsae filing.fincen.treas.gov/docs/XMLUserGuide\\_FinCENCTR.pdf](http://bsae filing.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.<sup>3</sup> The financial institution should ensure that the electronic file submission includes:

- For Backfiling Batch CTRs, record the element “FinCENDirectBackFileIndicator” with a “Y” value; or
- For Amending Batch CTRs, record the element “CorrectsAmendsPriorReportIndicator” with a “Y” value, and 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 the 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.**

## **III. BSA 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 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 must be completed in accordance with the BSA electronic filing requirements.<sup>4</sup>

After the bank has filed the FinCEN DOEP, it must send a letter to FinCEN, with copies sent to the federal and state agencies that examine the financial institution’s Bank Secrecy Act/Anti-Money Laundering Compliance Program. The letter must include the assigned 14-digit BSA ID number of the FinCEN DOEP that was filed.

## **IV. Notifying FinCEN of Backfiled and Amended FinCEN CTRs:**

All correspondence relating to a CTR backfiling/amending request or determination should be emailed to [fincenreports@fincen.gov](mailto:fincenreports@fincen.gov). You must encrypt your email and send the password in a separate email. When encrypting your email, the password must be at least eight characters long, include at least one lowercase, one uppercase, one numeric, and one special character. Please note, FinCEN will not access emails sent through third-party email encryption services that require the recipient to establish an account.

Financial institutions must send 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. The letter to FinCEN must be sent via an encrypted email as outlined above within **60 calendar days** of receipt of FinCEN’s

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<sup>3</sup> [http://bsae filing.fincen.treas.gov/docs/XMLUserGuide\\_FinCENCTR.pdf](http://bsae filing.fincen.treas.gov/docs/XMLUserGuide_FinCENCTR.pdf)

<sup>4</sup> <http://bsae filing.fincen.treas.gov/news/FinCENDOEPElectronicFilingRequirements.pdf>

determination, unless otherwise instructed. Do not include copies of completed FinCEN CTRs or DOEPs with the letter. 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 date of the transaction (the business day that the reportable transaction occurred)
6. The total cash-in/cash-out dollar amount of the report
7. The 14-digit BSA IDs of the original and amended CTRs.<sup>5</sup>
8. 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.

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 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.

### **Questions:**

If you have general questions regarding backfiling or amending FinCEN CTRs, please contact FinCEN's Resource Center at [FRC@fincen.gov](mailto:FRC@fincen.gov). 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 [BSAEFilingHelp@fincen.gov](mailto:BSAEFilingHelp@fincen.gov).

If you have questions about a specific DOEP and/or CTR backfiling or amending determination request that you submitted, please email your inquiry to [fincenreports@fincen.gov](mailto:fincenreports@fincen.gov).

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<sup>5</sup> 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 your BSA E-filing System account. If you are backfiling CTRs, you must supply the BSA ID number for each report that you have backfiled (e.g., 310000123456). If you are amending CTRs, you must supply both the BSA ID of the initial report (e.g., 310000123456) and the BSA ID of the amending CTR (e.g., 310000987654)