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# Bank Secrecy Act Monitoring Tools

## Using CU\*BASE Tools to Comply with BSA Requirements

*also includes*

## Printing Currency Transaction Report (CTR) Forms via CU\*BASE

### INTRODUCTION

This book describes the CU\*BASE tools that are available to assist your credit union with its required due diligence regarding compliance to the rules and guidelines of the Bank Secrecy Act (BSA), activation of the SARs/Fraud Alert warning, and information about printing CTR forms using CU\*BASE tools.

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For an updated copy of this booklet, check out the Reference Materials page of our website:  
<http://www.cuanswers.com/resources/doc/cubase-reference/>  
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# CONFIGURING BSA MONITORING PARAMETERS

The first step in monitoring for BSA is to configure the parameters that control what transaction activity will be shown on the daily report, in the online inquiry, and on the summary report.

Because every credit union is different, this configuration lets you tell CU\*BASE how you interpret the BSA rules and how you want to track your member activity.

## “Bank Secrecy Act Monitoring Cfg” on the General Configuration 1 (MNCNFC) menu

The screenshot shows the 'Bank Secrecy Selection Criteria' configuration window. It has a title bar 'Session 0 CU\*BASE GOLD Edition - ABC TESTING CREDIT UNION' and a menu bar 'File Edit Tools Help'. The main area is titled 'Bank Secrecy Selection Criteria' with an 'UPDATE' button in the top right. There are two tables for selecting transaction types to track.

Transaction Types to Track- Money In	Individual (MI)	Organizational (MO)
Cash in	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Inhouse drafts	<input type="checkbox"/>	<input type="checkbox"/>
Outside checks	<input type="checkbox"/>	<input type="checkbox"/>
Deposits/payments	<input type="checkbox"/>	<input type="checkbox"/>
Miscellaneous receipts	<input type="checkbox"/>	<input type="checkbox"/>
Funds carried forward	<input type="checkbox"/>	<input type="checkbox"/>

Transaction Types to Track- Money Out	Individual (MI)	Organizational (MO)
Cash out	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Withdrawals/disbursements	<input type="checkbox"/>	<input type="checkbox"/>
Money orders	<input type="checkbox"/>	<input type="checkbox"/>
Miscellaneous advances	<input type="checkbox"/>	<input type="checkbox"/>
Corporate checks	<input type="checkbox"/>	<input type="checkbox"/>
Funds forwarded	<input type="checkbox"/>	<input type="checkbox"/>

Report separate transaction amounts equal to or over  (whole dollars)  
 CTR flag for separate amounts over  (whole dollars)  
 Teller alert if single transaction exceeds this amount  Alert  No alert  CTR form  
 CTR default memo type codes for AT Trackers CTR form  CF CTR submit/lock  CL CTR skipped/deleted  CD  
 Calculation method  Combine \$\$ in and \$\$ out  Separate \$\$ in from \$\$ out

Contact Information

Navigation icons: back, forward, up, down, search, help, refresh, print, home, exit.

FR (1694) 9/16/14

Use this screen to specify which types of transactions should be included when analyzing for BSA activity. You can also choose the threshold amount that determines when a member should be included on the summary report, and decide whether you want to count money in and money out separately, or combined.

When BSA monitoring is done, the system will first gather together all of the individual transactions (according to audit key) that you have marked for inclusion. Then for each SSN/TIN, the amounts are added together (according to your chosen calculation method) and the total(s) compared to your threshold dollar amount.

If a total is greater than your threshold, then all of those transactions for that SSN/TIN will be included in the online inquiry and shown on the daily report. (This is a straight “greater than” evaluation; if you enter \$10,000, a transaction that totals exactly \$10,000.00 will be ignored for the purpose of BSA or CTR monitoring.)

Notice that your rules can be different for individuals than for organizations.

- The Bank Secrecy Monitoring configuration includes a *Contact Information* button. This allows you to prefill default contact information into each CTR. Refer to Page 8 for more information.

After completing all fields (see below for field descriptions and Page 6 for some special tips), press Enter to save changes and return to the menu.

**Field Descriptions**

<i>Field Name</i>	<i>Description</i>
<b>Transaction Types to Track - \$\$ In</b>	
Cash in	Check this box if BSA monitoring should include cash in transactions ( <b>audit key 9</b> ). <ul style="list-style-type: none"> <li>• NOTE: For machines/networks with Smart ATMs, cash deposits will be included when evaluating activity against your BSA monitoring.</li> </ul>
Inhouse drafts	Check this box if BSA monitoring should include inhouse draft transactions ( <b>audit key 7</b> ).
Outside checks	Check this box if BSA monitoring should include outside check transactions ( <b>audit key 6</b> ).
Deposits/Payments	Check this box if BSA monitoring should include deposit and loan payment transactions ( <b>audit key 2</b> ).
Miscellaneous receipts	Check this box if BSA monitoring should include miscellaneous receipt transactions ( <b>audit key 4</b> ).
Funds carried forward	Check this box if BSA monitoring should include funds carried forward transactions ( <b>audit key F</b> ). This means funds came <i>in</i> to an account after being carried over from another, separate member transaction. This is the counterpart to a “funds forwarded” record.
<b>Transaction Types to Track - \$\$ Out</b>	
Cash out	Check this box if BSA monitoring should include cash back transactions ( <b>audit key B</b> ). <ul style="list-style-type: none"> <li>• NOTE: ATM cash withdrawals are also included when evaluating your activity against BSA monitoring</li> </ul>
Withdrawals/Disbursements	Check this box if BSA monitoring should include loan disbursements, including these that result in cash out ( <b>audit key 8</b> ).
Money orders	Check this box if BSA monitoring should include money order transactions ( <b>audit key 3</b> ).
Miscellaneous advances	Check this box if BSA monitoring should include miscellaneous cash advance transactions ( <b>audit key 5</b> ).
Corporate checks	Check this box if BSA monitoring should include corporate check transactions ( <b>audit key C</b> ).
Funds forwarded	Check this box if BSA monitoring to should include funds forwarded transactions ( <b>audit key O</b> ). This means the funds were forwarded to <i>another</i> member account. This is the counterpart to a

Field Name	Description
	"funds carried forward" record.
<b>Miscellaneous Settings</b>	
Report separate transaction amounts equal to or over	Enter the threshold amount you wish to use to determine whether a particular member appears on the BSA inquiry and reports. The most common setting is \$3,000, which means amounts <i>greater than</i> \$3,000.00 (not equal to) will be included.
CTR flag for separate amounts over	<p>Enter the threshold amount you wish to use to flag for special attention and CTR forms automation. The most common setting is \$10,000, which means amounts <i>greater than</i> \$10,000.00 (not equal to) will be included. The summary record will be marked with an asterisk (*) in the online inquiry tool and marked on the report.</p> <p>This is the threshold that is used for the optional teller alert or CTR forms prompt (see below).</p>
Teller alert if single transaction exceeds this amount	<p>This check box controls what happens when a transaction exceeds your CTR threshold when posting transactions from the following screens:</p> <ul style="list-style-type: none"> <li>▪ Main Teller Posting</li> <li>▪ Teller Misc. Receipts</li> <li>▪ Teller Misc. Advances</li> <li>▪ Teller Money Orders</li> <li>▪ Teller CU Checks</li> </ul> <p>Choose one of the following:</p> <p><b>Alert (A)</b> – On transactions where the total* exceeds your configured threshold, this choice will display the following warning message to tellers:</p> <p style="background-color: #e0f0ff; padding: 2px;"><b>1423-Warning: Verify against bank secrecy act rules</b></p> <p>Choose this if you want tellers to at least be aware that a CTR may be needed but do not want them to have to pause to fill out a form, even partially, while working the teller line. Make sure your tellers know what to do when they see this message.</p> <p><b>CTR form (F)</b> – On transactions where the total* exceeds your configured threshold, this choice will cause the new CTR Forms screens (see Page 27) to appear for the teller to complete, once the teller transaction has been posted. Choose this if you want tellers to complete all or at least part of the CTR form while in the presence of the member. If pressed for time or more research is needed, a teller can save a partially-completed form and return to it later if needed, or the form can be finalized by another employee via the BSA Inquiry tool.</p> <p><b>No alert (N)</b> – Tellers will receive no warning nor will a CTR be prompted. You can still choose to create a CTR form manually via the Work with CTRs screen. Choose this if you do not want tellers to be concerned with CTRs in any way.</p> <p>*In all cases, this Total is determined according to your chosen calculation method, either combined or separate money in and money out.</p> <p>For example, say your BSA config. monitors only cash in and cash out transactions, using the combined calculation</p>

Field Name	Description
	<p>method, with a threshold of \$10,000. If a teller takes in \$6,000 in cash and gives \$7,000 in cash back <i>in the same transaction posting</i>, the warning (or CTR fill-in screens) will appear.</p> <p>Remember that the calculation can combine only those transactions that were posted at that same time. If a member returns and posts another transaction, even five minutes later, that will be evaluated separately. (If the aggregate of both exceeds your thresholds, the member will appear on your daily report and in the online BSA Inquiry, though, for later follow-up.)</p>
CTR default memo type codes for AT Trackers	<p>Use these fields to define which of your configured Memo Type codes should be used when the system generates CTR-related Audit Tracker notes. All three fields are required when you choose the “CTR form” setting in the field above.</p> <p>You should also complete these even if you intend to use CU*BASE to create your CTR forms manually without using the teller prompt.</p> <p><b>CTR Form</b> – Enter a Memo Type code for the Tracker note when a new form is created or a saved form is modified.</p> <p><b>CTR Submit/Lock</b> – Enter a Memo Type code for the Tracker note when a form is locked via the option on the Work with CTR Forms screen (see Page 23).</p> <p><b>CTR Skipped/Deleted</b> – Enter a Memo Type code for the Tracker note created when a form is deleted (via the option on the Work with CTRs screen or the command key on a CTR fill-in screen) or skipped (when creating a form via the teller posting prompt).</p>
Calculation method	<p>Choose one of the following methods for determining what will appear on the BSA inquiry and reports:</p> <p><b>Method 1: Combine \$\$ in and \$\$ out</b> - With this method, the system will add up all amounts (for all transactions flagged above), regardless of whether they represent money coming in or going out.</p> <p>For example, if a member brings in cash of \$6,000 and takes out cash of \$7,000, the aggregate would be \$13,000, and would therefore warrant both BSA records <i>and</i> the CTR warning.</p> <p><b>Method 2: Separate \$\$ in from \$\$ out</b> - With this method, the system will use two separate totals: one for all money in transactions, the other for all money out transactions (only the transaction types flagged above will be included).</p> <p>For example, if a member brings in cash of \$6,000 and takes out cash of \$7,000, the aggregate would be \$6,000 in and \$7,000 out. This would warrant two separate BSA records but not the CTR warning.</p>

### Other Tips to Keep In Mind

- BSA monitoring is done just once a day as part of daily processing. **Changes to this configuration will take affect the next time BSA monitoring is done.** Data from previous days that appears on the report and online inquiry will not be refreshed; that data will still be according to your previous configuration settings.

- If you choose to track multiple transaction types under \$\$ in (or \$\$ out), it is possible that there will be some duplication of activity on your BSA inquiry and reports.

For example, say you have flagged both cash in and deposits/payments to be tracked for BSA. A member brings in \$2,000 cash and deposits it to her savings account. This member would appear on your BSA list because the combined amount of the two transaction types would be \$4,000. (Because these both represent \$\$ in, it would not matter which calculation method you use.)

- For members that have multiple memberships under the same SSN/TIN, the inquiry and reports will show the name from the first membership record found. This is because the files that store BSA data do not contain a name, just a SSN/TIN. CU\*BASE then looks for the first matching MASTER record with that SSN/TIN to display the name.
- Although it happens only rarely, if two accounts happen have the same SSN/TIN but one is an individual and the other is an organization, the system is smart enough to look at the configuration and, if the organization does not require monitoring on a particular transaction, that record will not be included.
- Shared branch transactions that your tellers perform for members of other credit unions will be tracked by your BSA system. In place of a name, these items will show the CUID for the member's home credit union. (Exception: If that same member has a membership at your credit union also, the member name will be pulled from your files; look at actual transaction history to determine where the transaction was posted.)
- All BSA monitoring tools (the daily report, the online inquiry/verification system, and the on-demand report) pull data from the same files, which are populated every day during end-of-day processing:

**BSAMAST** - Summary records

**BSADET** - Detail transaction records

- If you have reversed a teller transaction that included cash (such as cash in with one or more deposits), note that although the deposit audit keys will be marked as reversed (and therefore not included in BSA monitoring), the special cash audit key is not reversed and therefore will still be included in the BSA reports and inquiry.
- The warning message or CTR forms prompt occurs at the time *Post* (F5) is used, which means the calculation can combine only those transactions that were posted at that same time. If a member returns and posts another transaction, even five minutes later, that will be evaluated separately. (If the aggregate of both exceeds your thresholds, the member will appear on your daily report and in the online BSA inquiry for later follow-up.)
- An optional SARs warning message can also be activated to warn tellers of transactions that may need additional research. Refer to page 9 for more details.

## PREFILL OF CONTACT INFORMATION INTO CTRs

On the Bank Secrecy Monitoring configuration screen (shown below), there is a *Contact Information* button. This allows you to enter contact information that is then automatically prefilled into the last screen of the CTR fill-in screens, each time a Currency Transaction Reports (CTR) is created. (See Page 29 for the exact location of these fields on the screen.) CTRs are covered in the next section of this booklet.

The screenshot shows the 'Bank Secrecy Selection Criteria' configuration window. It features a table for selecting transaction types to track for Money In and Money Out, with checkboxes for Individual (MI) and Organizational (MO) categories. Below the table are input fields for report amounts and alert settings. At the bottom, there is a 'Contact Information' button and a navigation bar with icons for back, forward, up, down, and search.

Transaction Types to Track- Money In	Individual (MI)	Organizational (MO)
Cash in	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Inhouse drafts	<input type="checkbox"/>	<input type="checkbox"/>
Outside checks	<input type="checkbox"/>	<input type="checkbox"/>
Deposits/payments	<input type="checkbox"/>	<input type="checkbox"/>
Miscellaneous receipts	<input type="checkbox"/>	<input type="checkbox"/>
Funds carried forward	<input type="checkbox"/>	<input type="checkbox"/>

Transaction Types to Track- Money Out	Individual (MI)	Organizational (MO)
Cash out	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Withdrawals/disbursements	<input type="checkbox"/>	<input type="checkbox"/>
Money orders	<input type="checkbox"/>	<input type="checkbox"/>
Miscellaneous advances	<input type="checkbox"/>	<input type="checkbox"/>
Corporate checks	<input type="checkbox"/>	<input type="checkbox"/>
Funds forwarded	<input type="checkbox"/>	<input type="checkbox"/>

Report separate transaction amounts equal to or over  (whole dollars)  
CTR flag for separate amounts over  (whole dollars)  
Teller alert if single transaction exceeds this amount  Alert  No alert  CTR form  
CTR default memo type codes for AT Trackers CTR form  CTR submit/lock  CTR skipped/deleted   
Calculation method  Combine \$\$ in and \$\$ out  Separate \$\$ in from \$\$ out

Contact Information

Click the *Contact Information* button to advance to the screen where you enter the default Contact office, contact phone #, and Contact extension.

The screenshot shows the 'CTR/BSA Contact Information' configuration window. It contains three input fields: 'Contact office', 'Contact phone #' (with a masked value '0000000000'), and 'Contact extension'. There is an 'UPDATE' button in the top right corner. At the bottom, there is a navigation bar with icons for back, forward, up, down, and search.

Contact office   
Contact phone #   
Contact extension

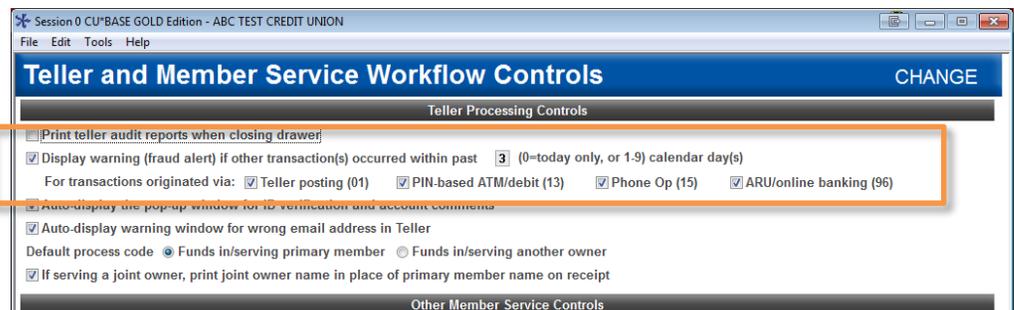
- NOTE: For a single CTR, you can override this information by entering the new information directly on the CTR screen. This will be for a one-time use only and will not override the information saved in this location.

# SARs/FRAUD ALERT AND RESEARCH TOOL

The teller system also has an optional SARs/Fraud Alert warning (shown on the next screen). You can activate this to help prevent situations like when a member who just did an ATM deposit with an empty envelope immediately tries to withdraw the money at the teller line.

## ACTIVATION OF THE SARs/FRAUD ALERT WARNING

Activate this feature in the Teller and Member Service Controls, which can be accessed via **Workflow Ctrls: Teller Mbr Svc** on the General Configuration 1 (MNCNFC ) menu.



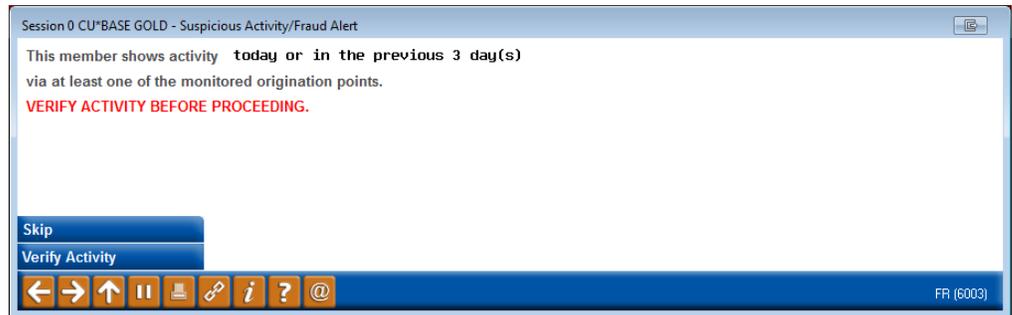
You can elect to trigger the SARs warning based on activity from one day ago up to 9 days ago. This is helpful for warning tellers about transactions that occurred on the account over a weekend or on a holiday. If you only want to review transactions for the current day, enter a zero in the *Display warning (fraud alert) if other transactions occurred within the past x calendar days* field. Otherwise enter a number from one to nine days.

Additionally, your credit union has control over which activity will be used to activate the warning window (teller, ARU/online banking, PIN-based ATM/debit, and Phone Operator). (These are origin codes 01, 13, 15, and 96.) This allows you to narrow the scope of the warning to ensure tellers pay proper attention to it.

To activate the feature check the box in front of *Display...*, enter a number of days (or leave at zero) and deselect any origin codes you do not want to monitor.

## WARNING WINDOW ALERTS TELLERS OF PREVIOUS ACTIVITY

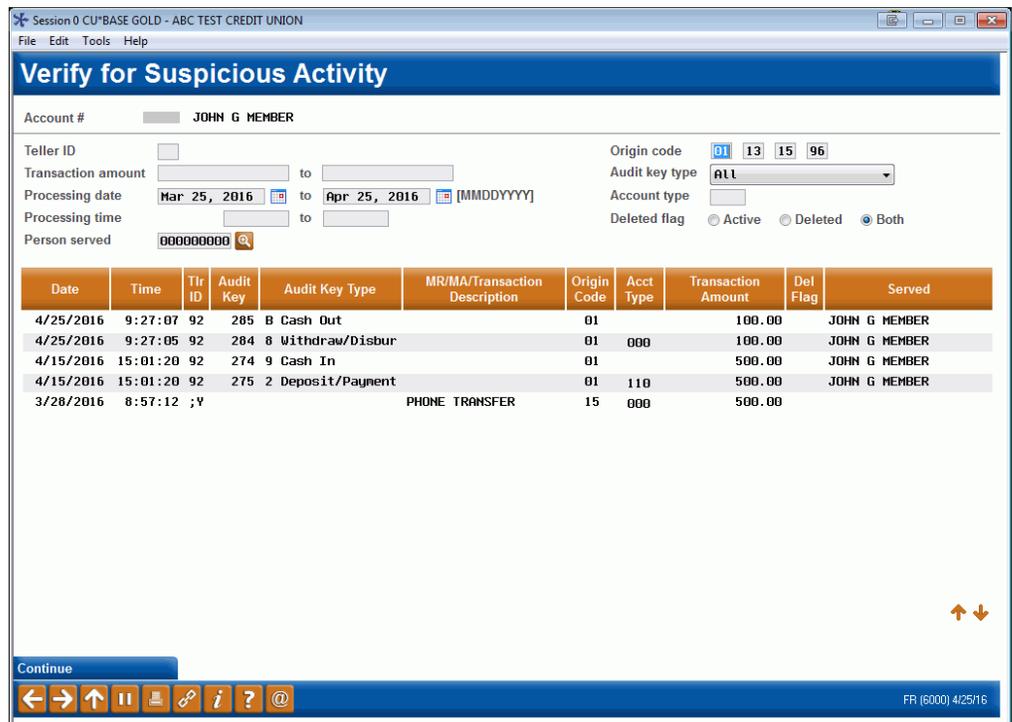
Once activated, the *Suspicious Activity/Fraud Alert* warning window will alert your tellers when transactions have been made that fit your configuration settings. (See previous page.) This warning will appear after the teller has entered the account and used Enter on the Teller Processing screen.



The teller must take an action from this screen. **Skip** (8) is available to advance; however, **Verify Activity** (F14) takes the teller to the screen shown below.

## VERIFY FOR SUSPICIOUS ACTIVITY SCREEN ALLOWS RESEARCH

Your tellers can use the **Verify Activity** (F14) button on the SARs alert window to access the *Verify for Suspicious Activity* screen. This screen defaults to show the transactions that caused the warning to appear, including cashed checks.



The origin codes used for the alert (selected in the configuration) are shown the upper left corner of the screen. Similar to the Teller Audit screen, this screen has several filter features. You can even move backward to see transactions from dates outside of the configured SARs warning range.

# RESEARCH TRANSACTIONS (INCLUDING CASHED CHECKS)

If your credit union is looking for help detecting attempts by members to commit fraud across the teller line by cashing checks look no further than the *All Member Activity* screen, as well as the *Suspicious Fraud Alert* screen shown on page 10. Both show cashed checks in their listing.

The *All Activity for this Member* screen gives a complete picture of a member's daily teller interactions for a membership *across all branches*, which can be an important indicator for fraud detection.

Accessed via the **Teller Cash Activity** (F2) button at the top of the Transaction History screen, this screen shows not only transactions that hit the member's account, but also teller drawer-only activity.

- NOTE: This feature should not be used as a balancing tool.

## Transaction History Screen

Session 0 CU\*BASE GOLD Edition - ABC TEST CREDIT UNION

File Edit Tools Help

### Transaction Inquiry

 CHECKING

Account #  CHECKING Current balance 13,358.12  
 Name ED MEMBER Available 13,358.12

Search by: Date  [MMDDYYYY] Draft#  Transaction amount  Desc  ID

Business Date	Activity Date	Activity Time	Amount	Draft#	Balance	Description	Transfer Acct	ID	Print Receipt
4/08/16	4/08/16	16:34:41	0.00		1,601.12	STOP PAY CHANGED		92	
4/08/16	4/08/16	16:34:29	35.00-		1,566.12	STOP PAYMENT CHARGE		92	
4/08/16	4/08/16	16:35:29	35.00-		1,531.12	STOP PAYMENT CHARGE		92	

From the Transaction History screen, accessed via Inquiry or Phone Operator, use the *Teller Cash Activity* (F2) button

## All Member for this Activity Screen

Session 0 CU\*BASE GOLD - ABC TEST CREDIT UNION

File Edit Tools Help

### Activity for This Member

Account #  ED MEMBER

Teller ID

Transaction amount  to

Processing date  to  [MMDDYYYY]

Processing time  to

Person served

Origin code  selected

Audit key type

Account type

Deleted flag  Active  Deleted  Both

Date	Time	Tlr ID	Audit Key	Audit Key Type	MR/MA/Transaction Description	Origin Code	Acct Type	Transaction Amount	Del Flag	Served
3/30/2016	11:30:29	92	181	9	Cash In	01		15.00		BELINDA A MEMBER
3/30/2016	11:30:29	92	182	2	Deposit/Payment	01	000	15.00		BELINDA A MEMBER
3/29/2016	11:27:21	92	171	W	TransferWithdrw	01	000	1,000.25		ED MEMBER
3/29/2016	11:27:21	92	172	1	TransferDeposit	01	110	1,000.25		ED MEMBER
3/29/2016	10:12:54	92	168	B	Cash Out	01		18.95		ED MEMBER
3/29/2016	10:12:53	92	167	6	Outside Check	01		18.95		ED MEMBER
3/29/2016	9:18:39	92	166	4	Misc Receipt	01		5.25		ED MEMBER
3/29/2016	9:18:35	92	165	9	Cash In	01		5.25		ED MEMBER
3/28/2016	13:46:17	92	164	B	Cash Out	01		5,000.00		ED MEMBER
3/28/2016	13:45:03	92	162	B	Withdraw/Disbur	01	110	5,000.00		ED MEMBER
3/28/2016	13:45:03	92	163	N	NSF/ANR Fee	01	110	35.00		ED MEMBER
3/28/2016	8:57:11	;Y			PHONE TRANSFER FEE	15	000	2.00		
3/28/2016	8:57:11	;Y			PHONE TRANSFER	15	000	500.00		
3/23/2016	15:47:27	92	146	2	Deposit/Payment	01	045	86.01		BELINDA A MEMBER

Continue

(6000) 418116

Use the filter features to narrow down the transactions that appear on this screen. This screen includes cash-only and cashed check transactions, making it an excellent place to research these types of transactions. Much of these filters are similar to the Teller Audit screen. All columns are sortable by clicking on the header row. Use the Page Up arrow to view all transaction history retained (varies according to account type and your credit union retention schedule).

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# CURRENCY TRANSACTION REPORTS (CTRs): OVERVIEW AND SETUP

CU\*BASE offers tools to help your credit union complete Currency Transaction Report (CTR) forms per regulatory requirements. If you wish, you can even choose to prompt tellers to complete the forms as soon as they post an eligible teller transaction. Here's how the feature works:

During a teller transaction, CU\*BASE checks the teller audit file to determine if the member has certain types of transactions that total more than \$10,000 (or other amount) according to your credit union's Bank Secrecy Act (BSA) configuration. If the total transaction meets the configured minimum, you can choose to have one of three things happen upon posting:

- 1) The system can automatically display a series of CTR form fill-in screens so the teller can complete the form, pre-populating data from transaction and membership files.

OR

- 2) A warning message can be delivered to the teller stating that a CTR may need to be filed, allowing the teller or another employee to work on the form later:

**1423-Warning: Verify against bank secrecy act rules**

OR

- 3) No message is displayed to the teller, but the transaction is flagged in the BSA Inquiry tool and a CTR can then be completed the next day by your internal BSA auditor.

The choice you make depends on whether you want tellers to work on CTR forms while still in the presence of the member, or centralize all CTR work to a single BSA auditor, or a combination of both.

All data used to compile the form will be stored so that the CTR can be printed immediately by the teller or later (3-month retention) by another employee, and it can be reviewed, edited, reprinted, and ultimately locked via the BSA Inquiry tool. Audit Tracker notes will also be generated as an additional tracking mechanism.

Depending on whether the "Automated Filing of CTRs to FinCEN" feature is activated (see Page 15), the CTRs will either be uploaded to FinCEN during end-of-day processing, or the CTR will need to be manually entered in the FinCEN website.

A copy of the form that is produced can be found on Page 30.

## ACTIVATING CTRs: STEP BY STEP

1. Configure the threshold dollar amount for CTRs (BSA Configuration)
2. Configure the Tracker Memo Type codes for CTRs (BSA Configuration)

Remember you'll need these even if you elect not to use the automated prompt for tellers to complete the forms.

3. Choose the desired Alert style to be used for your tellers (BSA Configuration)
4. Enter the default contact information to be pre-filled into the first CTR fill-in screen (BSA Configuration, then *Contact Information*)
5. Educate tellers on what actions they should take if the warning or form prompt screens appear
6. Grant access to **Work with CTR Forms** on the Member Service (MNSERV) menu to any tellers or other staff that will need to be able to credit or edit forms without having access to the full BSA Inquiry tool

## THE CTR PROCESS

Typically, once the CTR is filled out by the teller it then goes to a second individual, many times the BSA auditor, who then reviews the form for accuracy, in some cases updates the form, and then submits the form to the government.

When CU\*BASE Teller Processing sees that a CTR form needs to be filled out, the teller will have the choice of completing it immediately as part of posting the transaction, or saving a partial form to be completed later at a more convenient time. In either case an **Audit Tracker** conversation note will be generated.

At the end of each day, when BSA monitoring is done, the system will gather the day's BSA data, aggregating totals from multiple transactions performed during the same day.

The next day, the credit union's BSA auditor would use the CU\*BASE BSA Inquiry tool to review forms already printed, edit forms as needed, and print or reprint forms that were saved. He or she would also be able to create new CTRs for records as needed, such as when individual transaction amounts did not warrant a CTR but the combined total of multiple transactions causes the CTR flag to be triggered at the end of the day.

Also remember that the system will only allow you to generate one form per day, per SSN/TIN. So if a member performs transactions subject to CTR in the morning, then returns later in the day to perform additional transactions (whether they reach CTR threshold or not), you will simply need to adjust the transaction amount and other details on the single CTR form for that day.

Finally, the BSA auditor or other designated employee would finish printing all required CTRs and the final step on CU\*BASE would be to flag each record as "submitted/locked or "ready to submit," depending on whether you have the automated upload feature turned on. At that point no further changes are allowed, although the form can be viewed/printed again if needed.

**IMPORTANT:** Unless the “Automated Upload of CTRs to FinCEN” feature is activated, the system does not actually submit the form to anyone. Your credit union is still responsible for filing paperwork with appropriate governmental authorities as usual. If the automated upload is turned on, the CTR will be uploaded to FinCEN during end-of-day processing. (See below for more information.)

CTR forms are generated using a separate database so that the data entered can be retained for additional review, edits, and reprints. Printing is done to a CU\*BASE device similar to loan forms and other CU\*BASE forms.

## **AUTOMATED UPLOAD OF CTRs TO FINCEN**

Credit unions can select to have their completed CTR forms sent directly to FinCEN. This eliminates the time consuming step of re-entering the information into the FinCEN website.

- Activation of this feature is required. A signed authorization form will need to be faxed to a Client Services Representative. A small monthly fee is charged for this service.
- Sign and fax Page 2 of the CTR Automated Upload to FinCEN brochure:  
[http://www.cuanswers.com/pdf/cb\\_ref/ctr\\_automated\\_upload.pdf](http://www.cuanswers.com/pdf/cb_ref/ctr_automated_upload.pdf)
- *The configuration to activate is in the CU Parameter Configuration. **Self Processors, you must contact a CSR before activating this feature.***

To transmit your records, your employee must complete the CTR forms and lock them (to prepare them for transmission).

- Learn more about handling CTRs in the section on the Work with CTRs screen, which starts on Page 23. How to work CTRs with the “Automated Upload of CTRs to FinCEN” feature turned on (as well as turned off) is included in this section.

Then during end-of-day processing, the locked CTRs will be transmitted to FinCEN.

- **IMPORTANT:** Once the feature is activated, it will only affect CTRs going forward. CTRs locked prior to activation will not be sent to FinCEN, but will instead need to be manually entered in the FinCEN website. To make it easier to keep track of what you’ve sent and not sent, make sure you are all caught up on outstanding reports before asking us to activate the feature for you.

## **CTRs AND THE AUDIT TRACKER**

At various points during the CTR generation and completion process, the system will write notes to the member’s Audit Tracker (AT) record, using the memo type codes you define in your BSA configuration (see Page 3).

In addition, there is also an employee ID and date on the CTR record itself, and a “Last action taken” status notation on the BSA Inquiry, to help you keep track of where the CTR forms are in your process.

Refer to Page 37 for details on the content used for these Tracker notes.

## A WORD ABOUT DATA RETENTION AND FORMS ARCHIVAL

At this point CTR forms will *not* be archived via CU\*Spy (CU\*Answers private ASP) nor burned to CD. However, the CTR database files will have a **3-month retention period\*** so that there is a period of time where the form can be reviewed and reprinted before it is purged from the CU\*BASE database.

*\*BSA data is also currently retained for a rolling 3 months, purged once a month.*

The retention of CTR forms is currently set by regulation at 5 years. **Your credit union is responsible for retaining the final paperwork for the required period. CU\*BASE should not be considered your long-term repository for CTRs.** It is recommended that you print your CTRs. See Page (I will send them to where they can print it) for information on how to print your CTRs. See Page 24 for information on how to do this.

If your CU has an in-house e-documents server (eDOC or other), you can treat this like any other custom form you produce, and archive it as appropriate (i.e., send the output to your designated eDOC printer after setting up custom indexes, just as you would with any other custom form).

## CTRs AND SHARED BRANCHING

In a teller shared branch situation, the prompt for CTRs is controlled by the *teller* credit union's BSA configuration. So if your credit union does not prompt for forms but your member visits another credit union's shared branch, that CU's teller may be prompted to complete a form as part of their normal operations.

If a member is **exempt** from CTRs (see Page 17), the system will not prompt a shared branch teller to complete a CTR form. There will be no message as to why (i.e., warn that the member is exempt); the system simply will not interrupt the teller with any type of warning. In the BSA inquiry, the teller CU will see that shared branch transaction with no CTR, but currently there is no indicator as to whether the form is missing because the teller skipped it, or if the member was exempt. Remember that it's the *member* credit union that decided they were exempt, not the teller credit union; the teller CU might still want to file one.

Also, no Tracker notes will be created when a teller CU creates CTRs for a shared branch member.

## MAKING MEMBERS EXEMPT FROM CTR REQUIREMENTS

On occasion there may be memberships that are exceptions to the usual requirements to fill out regular CTR forms. Once you have filed the proper paperwork to request the exemption, you can flag the member account in CU\*BASE so that the teller system will not prompt for the form again.

### “Update Membership Info” on the Update Functions (MNUPDT) menu

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File Edit Tools Help

### Update Membership Individual

Name **MARY MEMBER** Account #   
Opened **Nov 23, 1982** SSN   
Branch # **01 ABC TESTING CU - MAIN OFFICE**  Photo ID on file

**Other Information**

Reason code	<input type="text" value="00"/>	Electronic deposit hold group	<input type="text" value="02"/>
User defined fields	<input type="text" value="0"/>	Tran source ID	<input type="text"/>
Statement group	<input type="text" value="0"/>	Due diligence monitoring level	<input type="text" value="0 (0 - 9)"/>
Account exec	<input type="text"/>	<input checked="" type="checkbox"/> Allow shared branch transactions	
Employee type	<input type="text" value="0"/>	<input type="checkbox"/> Proxy ballots	
Employee #	<input type="text"/>	<input type="checkbox"/> Dividend withholding	
Department/sponsor #	<input type="text"/>	<input type="checkbox"/> Exclude from dormancy	
Check hold status	<input type="text" value="1"/>	<input type="checkbox"/> Force monthly statement (Reg E override)	
Certification of SSN	<input type="text" value="C"/>	<input type="checkbox"/> 3rd-party opt out	
Reference	<input type="text"/>	<input type="checkbox"/> CU contact opt out	
Preferred contact method	<input type="text" value="NP"/> No Preference Selected	<input checked="" type="checkbox"/> Exempt from CTR	

Mother's maiden name  Code word  Marital status

Email address   Email address is wrong

**Overdraft Service for ATM & Everyday Debit Card Transactions**

Opt in/out:  IN = Member wants the CU to authorize & pay overdrafts on ATM & everyday debit card transactions  
 QUT = Member does NOT want the CU to authorize & pay overdrafts on ATM & everyday debit card transactions

Verified **Jul 19, 2013** By ;v

Skip Alternate Address Greeting Reg E Settings

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By default all of your memberships will be subject to CTR forms according to the parameters in your BSA configuration. If you check *Exempt from CTR* on this screen, this member would not be prompted to complete a CTR by the teller system (even if they visit a shared branch).

When a CTR is created manually via the BSA Inquiry (see page 18), the system will warn the employee that this person has the *Exempt from CTR* box checked. The SSN of the membership will appear highlighted in the listing.

- **Important:** Since multiple memberships may be tied to a BSA record, all memberships with activity on that SSN must be marked as exempt for that SSN to appear highlighted on this screen.

No warning is currently available on the Work with CTR screen. (See Page 23).

# VERIFYING BANK SECRECY ACT ACTIVITY

For busy credit unions, tracking the activity necessary to adhere to the BSA requirements can be tricky. To make this process a little easier, a Bank Secrecy Act Activity inquiry is available to verify transactions against the various reports your credit union is required to submit. Similar to the Collections inquiry systems, this inquiry will allow you to mark the items as “verified” as you check them against the Currency Transaction Report and/or Suspicious Activity Reports your credit union is required to file.

**“Audit Daily BSA/CTR Activity” on the Auditing Functions (MNAUDT) menu or “Work Daily BSA/CTR Activity” on the ERM: Compliance Management Tools (MNRSK6) menu**  
**Screen 1: Summary**

If **Exempt from CTR** is checked in Membership Update (see page 17), the SSN will appear highlighted. **Important:** Since multiple memberships may be tied to a BSA record, all memberships on that SSN must be exempt for that SSN to appear highlighted on this screen.

Use **CTR** to access the CTR fill-in screens for this particular SSN/TIN.

Use **Show Details** to see individual transactions that made up this total.

Use **Work All CTRs** to jump to the Work with CTR Forms screen to view all of your CTR forms in one place, add new forms from scratch, delete forms, etc.

Verified	By	SSN/TIN	Name	Amount	Processed	Last Action Taken on CTR
0/00/0000		1		9,151.00	Feb 20, 2014	
0/00/0000		2		5,253.53	Feb 20, 2014	
0/00/0000		3		4,500.00	Feb 20, 2014	
3/03/2014	*1	3!		11,025.75 *	Feb 20, 2014	Locked Only
0/00/0000		3!		5,551.81	Feb 20, 2014	
0/00/0000		3!		3,500.00	Feb 20, 2014	
0/00/0000		3!		3,000.00	Feb 20, 2014	
0/00/0000		3!		5,000.00	Feb 20, 2014	
0/00/0000		3!		4,210.00	Feb 20, 2014	
0/00/0000		3!		11,505.00 *	Feb 20, 2014	
0/00/0000		3!		10,600.00 *	Feb 20, 2014	
0/00/0000		3!		3,000.00	Feb 20, 2014	
0/00/0000		3!		6,301.00	Feb 20, 2014	
0/00/0000		3		3,000.00	Feb 20, 2014	
0/00/0000		3		3,823.00	Feb 20, 2014	
0/00/0000		3		3,187.41	Feb 20, 2014	
0/00/0000		3		3,400.00	Feb 20, 2014	
0/00/0000		3		4,000.00	Feb 20, 2014	

This first screen is a summary, showing one record per day for each SSN/TIN where total transactions reached your threshold on that day. In addition to your own teller activity you will also see the activity of your members at shared branching locations or national shared branch locations (Xtend or National switches). This screen includes ATM cash withdrawal transactions and if your credit unions machines/networks support Smart ATMs, this screen will also include cash deposits as well. Records are sorted by date, with the most recent date at the top of the list.

*Remember that these records are created during nightly processing, so no records will appear for today.*

Transactions are monitored and grouped by SSN/TIN. Remember that you will have members from multiple credit unions shown on the report. If a

company has the same Tax ID as another member's Social Security number, or if the same person belongs to two different shared branch credit unions and performs transactions at both of them, or if a member has used their own Social Security number on a child's account, the combination of these otherwise unrelated accounts may exceed BSA requirements and cause accounts to appear on the report that otherwise would not. Careful analysis of both the inquiry and report detail will help to determine appropriate action under BSA rules.

See Page 6 for some additional tips about how data will be displayed on this screen, such as shared branch transactions.

If *Exempt from CTR* is checked in Membership Update (see page 17), the SSN will appear highlighted in this listing (shown previously).

- Important: Since multiple memberships may be tied to a BSA record, all memberships on that SSN must be exempt for that SSN to appear highlighted on this screen

If your configuration specifies calculation method 1 (combine \$\$ in and \$\$ out), only members whose combined money in and money out total exceeds your configured level will be included in the list.

If using calculation method 2, (separate \$\$ in from \$\$ out), the screen will show up to two records per SSN: one for the total money in (if it exceeds your threshold), and another for total money out (if it exceeds your threshold).

## Searching for Data

Enter a date in the *Go to date* field and use Enter to scroll the list quickly to the first entry with that date. Data is stored on line for at least 3 months (a purge occurs once a month at the end of the month).

To display all records for a specific person, regardless of date, enter a SSN/TIN in the other search field and use Enter. This is helpful if you are trying to research a pattern of suspicious cash activity for a particular membership. To return to the full list, clear both search fields and use Enter to refresh.

## Reviewing CTRs

An asterisk (\*) will appear in the column just to the right of the total transaction amount for any totals that exceed the CTR threshold in your configuration (such as \$10,000).

If a CTR form exists that matches a SSN/TIN listed here, the *Last Action Taken on CTR* column will show the most recent task completed related to that CTR. This status is updated when the form is printed, even if no changes were made to the data. (An explanation of the Descriptions is included in the Work with CTR section starting on Page 23.)

To create or modify a CTR form, select the record and use *CTR* to proceed to the fill-in screens (see Page 27). If no form has been created yet for the current date, the system will create a new one, filling in as much general member and transaction data as possible from the selected BSA record. If a CTR already exists (assuming it hasn't been marked as locked/submitted yet) the fill-in screens will appear and you can make changes as needed.

If you need to create a form for a SSN/TIN which does not appear in your BSA list, use *Work All CTRs* (F15) to proceed to the screen shown on Page 23, then use *Add New CTR* (F5).

*Keep in mind that the system will only allow you to generate one form per day, per SSN/TIN. So if a member performs transactions subject to CTR in the morning, then returns later in the day to perform additional transactions (whether they reach CTR threshold or not), you will simply need to adjust the transaction amount and other details on the single CTR form for that day.*

## Verifying Bank Secrecy Act Activity

To work with the records, select an item in the list and use one of the following options:

<i>Option</i>	<i>Description</i>
Show Details	Use this to see the individual transactions that make up the total displayed on this screen. The detail screen shown on the following page will appear.
Verified	<p>Use this to mark a record as verified. This might mean that you have completed all necessary reports, or have researched to ensure that no additional action is required. The current date will appear in the <i>Date Verified</i> column, and your Employee ID will appear in the <i>By</i> column.</p> <p><b>BE CAREFUL:</b> This cannot be undone if a record is marked by mistake.</p> <p>An Audit Tracker entry will be made at this time. Select <i>Save/Continue</i> (F5) to complete the Tracker entry. See Page 37 for more information about Audit Tracker.</p> <p><b>CU*TIP:</b> This feature is separate from the CTR features, including the separate Submit/Lock feature that locks the CTR from further editing. If you wish, your credit union can even choose to separate the responsibilities – one person checks and submits CTRs while another verifies all BSA items against other policies/procedures (SARs, etc.).</p>
Delete	<p>Use this to delete a record from this inquiry file. This should be used only in rare cases where you want to remove a record completely (such as if the transactions were subsequently reversed or the amounts adjusted and they are no longer subject to BSA rules).</p> <p><b>IMPORTANT:</b> Remember that this file is also used for the summary report (see Page 34), so removing it here will remove it from the report as well. Also remember that your BSA database and your CTR database are completely separate from one another. If you delete something displayed here, related CTRs will NOT be affected, nor vice versa.</p> <p>An Audit Tracker entry will be made at this time. Select <i>Save/Continue</i> (F5) to complete the Tracker entry. See Page 37 for more information about Audit Tracker.</p>
CTR	Use this to create or modify a CTR form for the selected SSN/TIN. The CTR fill-in screens will appear (see Page 27).

## Screen 2: Detail

The "From Shared Branch CU ID" column indicates if the transactions took place at a shared branching location (this includes Xtend and national shared branch locations, if applicable to your credit union). This way you will be able to review member transactions at other locations just as you would work transactions posted at your own branches.

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File Edit Tools Help

**Bank Secrecy Act File - Detail** Money Out

Member [REDACTED] LINDA P  
SSN/TIN [REDACTED]

Account #	Transaction Amount	Time	Transaction Type	Teller	From Shared Branch CU ID	Total Amount	CTR
[REDACTED]	6,707.76	11:22:05	Cash Out	PP		6,707.76	
[REDACTED]	6,707.75	11:23:04	Corporate Check	PP		0.00	
[REDACTED]	6,707.76	11:27:18	Corporate Check	PP		13,415.51	
						Transaction total for this SSN/TIN	20,123.27

Member Inquiry

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This screen displays all of the individual transaction types that make up the total shown on the previous summary screen. Remember that only the transaction types flagged in your BSA configuration will be included here; the actual transaction posted might have included additional elements (such as outside checks or money orders) that you do not track for BSA.

To view more transaction history, select any transaction in the list and click **Member Inquiry**. Since transactions could have been performed on multiple accounts, you will be brought to the main inquiry screen showing all of this member's sub-accounts for further research.

An asterisk (\*) will appear in the CTR column if any individual transaction item exceeds your CTR threshold. (Remember that if each individual item is under that threshold, there will be no asterisk, even if the total exceeds the threshold and is therefore marked on the summary screen.)

When done, use the backup arrow to return to the summary screen.

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# WORKING WITH CTR FORMS

## GENERATING CTR FORMS: STEP BY STEP

### From Teller Processing

If your BSA configuration is set up to prompt for a CTR form:

1. Post the teller transaction as usual via *Post* (F5) on the main Teller screen
2. The first CTR Form screen will appear  
⇒ *Posting is already done, so you won't be able to back up to your teller transaction.*
3. Complete the fields, using *Enter* to proceed until the final screen (there will either be 2 or 3 screens total) appears
4. Use *Save Only* (F10) or *Save/Print* (F14)
5. The initial Teller posting screen will reappear.

### From the BSA Inquiry

1. Highlight a record marked with an asterisk (\*) in the BSA Inquiry
2. Select *CTR*.
3. The first CTR Form screen will appear
4. Complete the fields, using *Enter* to proceed until the final screen (there will either be 2 or 3 screens total) appears
5. Use *Save Only* (F10) or *Save/Print* (F14)
6. The BSA Inquiry will reappear.

### From the Work with CTRs Screen

1. Access the Work with CTRs screen (via *Work All CTRs* (F15) on the BSA Inquiry or via **Work with CTR Forms** on the Member Service (MNSERV) menu.
2. Use *Add New CTR* (F6).
3. The first CTR Form screen will appear.
4. Complete all fields, **including the SSN/TIN**, using *Enter* to proceed until the final screen (there will either be 2 or 3 screens total) appears.
5. Use *Save Only* (F10) or *Save/Print* (F14).
6. The Work with CTRs screen will reappear.

## WORKING WITH ALL CTR FORMS

This screen presents all of the CTR forms generated by your credit union over the past three months, displayed in order by date (most current at the top), then by SSN/TIN. From here you can modify, print, or lock existing forms, or use **Add New CTR** (F6) to create a brand-new form from scratch, either for a member or a non-member, or even for a member of another credit union based on shared branch activity.

- NOTE: The **Status** on this screen indicates the most recent action made to this CTR. (This field can be blank.) These descriptions change depending on whether the “Automated Upload of CTRs to FinCEN” feature is activated, and the following two images are provided for comparison. (See Page 15 for information on activation of “Automated Upload of CTRs to FinCEN.”)

### “Work with CTR Forms” on the Member Service (MNSERV) menu (or via “Work All CTRs” (F15) on the BSA Inquiry Screen)

This is an example of what the screen will look like if the “Automated Upload of CTRs to FinCEN” feature is **not activated**. In this example, the Status of a locked CTR is “Locked only,” indicating that this CTR will need to be manually entered in the FinCEN website.

With the “Automated Upload of CTR forms to FinCEN” featured not activated, these locked CTRs are listed as “Locked Only” and will not be transmitted in the end-of-day processing to FinCEN. They will instead need to be entered manually into the FinCEN website.

Use **Add New CTR** (F6) to create a form from scratch (can be for any SSN, even for a prior date or even for activity not shown in your BSA inquiry). A window will appear requesting a SSN/TIN and transaction date.

Emp ID	SSN/TIN	Member Name	Date CTR Created	Transaction Date	Status / Date
*1	2		Mar 03, 2014	Feb 20, 2014	Locked Only
43	2		Feb 20, 2014	Feb 19, 2014	Saved But not Printed
*1	3		Feb 18, 2014	Feb 18, 2014	Locked Only
;V	6		Feb 18, 2014	Feb 18, 2014	Printed
EV	8		Feb 18, 2014	Feb 15, 2014	Saved But not Printed
JR	6		Feb 14, 2014	Feb 14, 2014	Saved But not Printed
18	3		Feb 12, 2014	Feb 11, 2014	Saved But not Printed
35	9		Feb 11, 2014	Feb 11, 2014	Saved But not Printed
21	4		Feb 10, 2014	Feb 07, 2014	Locked Only
21	8		Feb 10, 2014	Feb 08, 2014	Locked Only
21	0		Feb 07, 2014	Feb 06, 2014	Locked Only
21	0		Feb 07, 2014	Feb 07, 2014	Locked Only
21	3		Feb 06, 2014	Feb 05, 2014	Locked Only
21	6		Feb 06, 2014	Feb 05, 2014	Locked Only
21	0		Feb 05, 2014	Feb 04, 2014	Locked Only
21	3		Feb 03, 2014	Feb 03, 2014	Locked Only
21	0		Feb 03, 2014	Jan 31, 2014	Locked Only

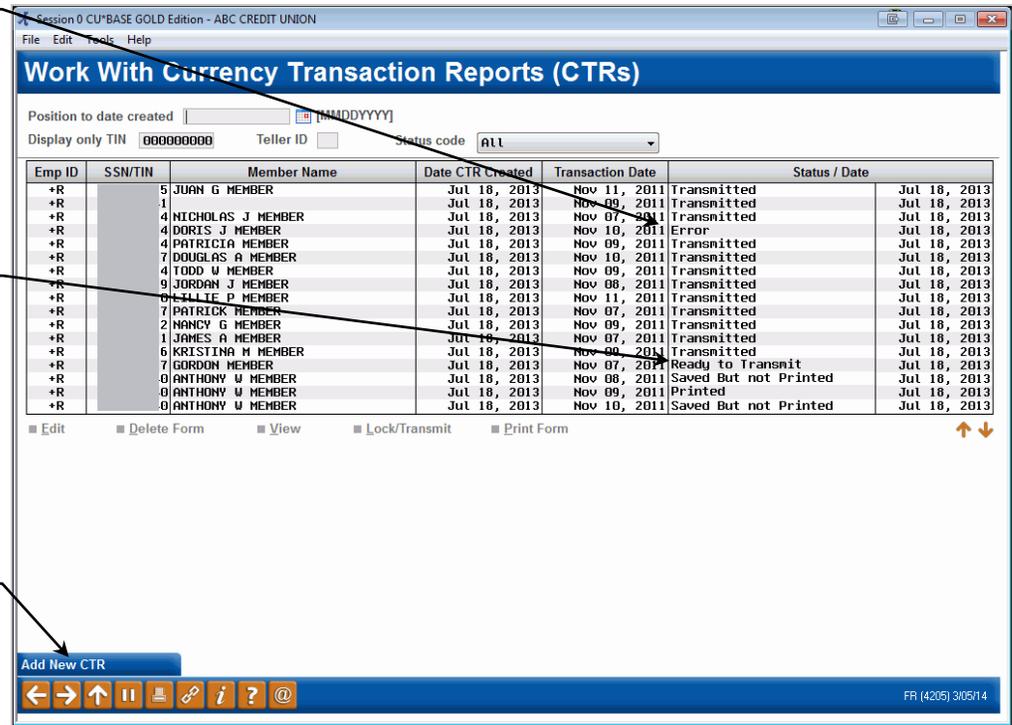
**“Work with CTR Forms” on the Member Service (MNSERV) menu  
(or via “Work All CTRs” (F15) on the BSA Inquiry Screen)**

This screen is configured to have the “Automated Upload of CTRs to FinCEN” feature **activated**. (See Page 15 for more information.) In this example, the Status of a locked CTR is “Ready to Transmit,” indicating that this CTR will be uploaded to FinCEN during end-of-day processing.

With the “Automated Upload of CTR forms to FinCEN” feature activated, FinCEN is sent these CTRs (since this feature is activated, it also sends a return file with errors. This will be noted with an “Error” description.

With the “Automated Upload of CTR forms to FinCEN” feature activated records that are locked, are listed as “Ready to Transmit” and will be transmitted in the end-of-day processing to FinCEN. Once they are transmitted, the Status will change to “Transmitted.”

Use *Add New CTR* (F6) to create a form from scratch (can be for any SSN, even for a prior date or even for activity not shown in your BSA inquiry). A window will appear requesting a SSN/TIN and transaction date.



View the options below to see how to handle editing, viewing and locking a CTR. **Specific directions are included in the table.**

- **About your required retention:** The CTR database files will have a **3-month retention period** so that there is a period of time where the form can be reviewed and reprinted before it is purged from the CU\*BASE database. The retention of CTR forms is currently set by regulation at 5 years. **Your credit union is responsible for retaining the final paperwork for the required period. CU\*BASE should not be considered your long-term repository for CTRs.** It is recommended that you print your CTRs using *Print Form*. (See below.)

Unlike the BSA Inquiry, this screen might show records dated today, especially if you use the feature to prompt tellers to complete forms while posting transactions.

**Options**

Option	Description
Edit	Use this to return to the CTR fill-in screens (see Page 27) to modify the data on the form. When you save: <ol style="list-style-type: none"> <li>1. An Audit Tracker note will be generated.</li> <li>2. Your employee ID and the current date will be stored on the CTR form record.</li> </ol> If the form has already been locked, this option will not work; use View or Print instead.

<i>Option</i>	<i>Description</i>
Delete Form	<p>When this option is used:</p> <ol style="list-style-type: none"> <li>1. A confirmation window will be displayed.</li> <li>2. An Audit Tracker note will be generated (you will be able to add your own explanatory text in addition to the generic system-defined text).</li> <li>3. Your employee ID and the current date will be stored on the CTR form record.</li> <li>4. The system will prevent the form from being changed or deleted (can still be viewed and printed).</li> </ol> <p>If you subsequently receive notification from the government that you need to correct the form and resubmit it, you will need to create a new one manually (use <i>Add New CTR</i> (F6)).</p> <p><b>IMPORTANT:</b> Deleting a record here will have no affect on your BSA records, except that there will no longer be a status notation in the “Last action taken” column on the BSA Inquiry screen.</p>
View	Use this to display the CTR fill-in screens (see Page 27) to view the data on the form.
Lock/Transmit	<p><b><i>If Automated Upload to FinCEN is activated (see Page 15),</i></b> this will prepare the CTR for transmission to FinCEN during end-of-day processing.</p> <ul style="list-style-type: none"> <li>• <b>BE CAREFUL:</b> You cannot unlock a form once it is locked, nor can a locked form be deleted.</li> </ul> <p><b><i>If Automated Upload to FinCEN is not activated,</i></b> this feature is optional, and is intended only to allow you to prevent inadvertent changes to a form you already completed and submitted to the government.</p> <ul style="list-style-type: none"> <li>• <b>BE CAREFUL:</b> You cannot unlock a form once it is locked, nor can a locked form be deleted. But since there is no requirement to use the Lock feature if you do not use the “Automated Upload of CTRs to FinCEN” feature, you may choose to skip this step. Remember that in any case there will still be a Tracker note showing when the form was originally created.</li> </ul> <p>With either option when <i>Lock/Transmit</i> is used:</p> <ol style="list-style-type: none"> <li>1. A confirmation window will be displayed.</li> <li>2. An Audit Tracker note will be generated.</li> <li>3. Your employee ID and the current date will be stored on the CTR form record.</li> <li>4. The system will prevent the form from being changed or deleted (can still be viewed and printed).</li> <li>5. How you handle the CTR from here depends on whether you have the Automated Upload of CTRs to FinCEN feature activated.</li> </ol> <ul style="list-style-type: none"> <li>• <b><i>If you have the “Automated Upload of CTRs to FinCEN” feature activated the CTR will be sent to FinCEN during the end-of-day processing.</i></b></li> <li>• <b><i>If you have not activated the “Automated Upload of CTRs to FinCEN” activated, you will need to manually enter this information in the FinCEN website.</i></b></li> </ul> <p>See Page 31 for information on what to do if the CTR has errors.</p>

Option	Description
	<p><b>Locking a form can also be done from the final CTR form fill-in screen shown on Page 28.</b> (This <i>Lock</i> button is not available if the CTR is accessed via Teller).</p> <p><b>About your required retention:</b></p> <p>The CTR database files will have a <b>3-month retention period</b> so that there is a period of time where the form can be reviewed and reprinted before it is purged from the CU*BASE database. The retention of CTR forms is currently set by regulation at 5 years. <b>Your credit union is responsible for retaining the final paperwork for the required period. CU*BASE should not be considered your long-term repository for CTRs.</b> It is recommended that you print your CTRs using <i>Print Form</i>. (See below)</p>
Print Form	<p>Use this to print the form; a window will appear allowing you to select a printer ID.</p> <p>NOTE: Using this option <i>will</i> update the employee ID and date in the CTR forms database, and the “last action taken” status on the BSA Inquiry screen will show Printed. But no Tracker note will be created.</p> <p><b>About your required retention:</b></p> <p>The CTR database files will have a <b>3-month retention period*</b> so that there is a period of time where the form can be reviewed and reprinted before it is purged from the CU*BASE database. The retention of CTR forms is currently set by regulation at 5 years. <b>Your credit union is responsible for retaining the final paperwork for the required period. CU*BASE should not be considered your long-term repository for CTRs.</b> It is recommended that you print your CTRs. It is recommended that you print your CTRs using this option.</p>

*Remember that Audit Tracker records are only posted for your members, not for non-members, nor for members of other credit unions for which your teller posted a shared branch transaction.*

## FILLING IN A CTR FORM

Whether filling in a form from the Teller system or from options on the Work with CTR Forms screen, the following screens will appear to fill in the fields for the printed form. Wherever possible the system will fill in data from transaction or membership files.

After completing the applicable fields on each screen, use Enter to proceed to the next screen in sequence.

Screen 2 of 3 will appear only if this box is checked

**Screen 1 of 3**

1. Type of filing **Correct/amend prior report** Transaction date **Feb 01, 2013**

**Part I Person Involved in Transaction**

2. **Person on whose behalf transaction was conducted**  Check if entity 3.  Multiple transactions

4. Individuals last name or entity's legal name **MEMBER**

5. First name **JANET** 6. Middle name **M** 7. Gender **Female**

8. Alt name

9. Occupation or type of business

10. Address **1111 STREET CONDO 17A** 9a. NAICS code

11. City

12. State **MI** 13. ZIP/postal code **55555 0000** 14. Country code

15. TIN 16. TIN type **SSN/ITIN** 17. Date of birth **Jun 06, 1937** [MMDDYYYY]

18. Phone # Ext

19. Email

20. Form of ID used to verify identity: **Unknown** Issuing state

21. Cash in amount for individual or entity listed in Item 4

Account # Account # Account #

22. Cash out amount for individual or entity listed in Item 4

Account # Account # Account #

View Errors Continue

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If passed to this screen after posting a Teller transaction, instead of "Delete Form" you'll see **Skip Form** (on all three screens). This cancels the CTR process and does not save the form, but does generate a Tracker note for the member.

If you want to add a joint owner performing a transaction for this member, use **Add Person (F6)**. A screen to enter that person's SSN/EITN will appear followed by the CSR screens to enter CRT information for that person.

### Choices at top of Screen 1

**Part I Person Involved in Transaction**

last **Person conducting transaction on own behalf**  Check if entity

**Courier service (private)**

**Person conducting transaction for another**

**Person conducting transaction on own behalf**

**Person on whose behalf transaction was conducted**

6. Middle name

### #2 Choices:

- Courier service – transaction handled by a courier
- Person conducting transaction for another – this will be the default for any joint owner when posting a transaction using Funds In/Serving Another Owner

- Person conducting transaction on own behalf – this will be the default for the primary member if the Funds In/Serving Primary member option is used
- Person on whose behalf transaction was conducted – this will be the default for the primary member when posting a transaction using Funds In/Serving Another Owner

**Additional check box:**

- Check if entity: Check this if the person conducting the transaction is a corporation, not an individual

**Screen 2 of 3 (Multiple Persons only)**

*This screen will only appear if “Multiple transactions” was checked on screen 1 of 3.*

Use one of the following buttons:

<i>Delete Form (F4)</i>	<i>Does not appear if coming from the Teller system. Use this to delete an additional person from the CTR form. A confirmation window will appear. Remember that even if the form is deleted, a Tracker note will still exist from when the CTR was first created.</i>
<i>Add Person (F6)</i>	Select this to add a transaction for an additional joint owner to this CSR record. A window will appear allowing you to enter the SSN/TIN of that person.  A transaction of one joint owner will be added to the CTR for the member. Additional joint owners will need to be manually added using the F6-Add feature. You can also manually add a joint owner at any time use F6-Add Person.
Continue	To save all and move to the final CTR screen.

Screen 3 of 3

They system will save your entries to this section with this specific CTR and redisplay them the next time that you enter this screen. If you change the entries, CU\*BASE will display the newly entered information.

- The *Contact Office*, *Phone #* and *Ext* information at the bottom of the screen can be prefilled each time. Use the “CTR BSA Contact Information” screen (shown on Page 8) to enter the information to be prefilled. If at any time you wish to enter alternate contact information, enter it on this screen and it will be saved with that CTR only.

Use one of the following buttons:

<p><i>Save Only</i> (F10)</p>	<p>To only save all changes and return to the Work with CTRs screen (or, if coming from the Teller system, to return to the initial Teller Posting screen).</p>
<p><i>Save/Print</i> (F14)</p>	<p>To save all changes, print a hard copy of the form, and return to the Work with CTRs screen (or, if coming from the Teller system, to return to the initial Teller Posting screen). A window will appear to allow you to choose a printer ID, drawer, and # of copies to print.</p>
<p><i>Lock</i> (F17)</p>	<p>To save all changes, lock the form to prevent further edits, and return to the Work with CTRs screen (this option does not appear if coming from the Teller system). <b>BE CAREFUL: This action cannot be undone. A confirmation message will appear.</b> If your credit union has activated the “Automated Upload of CTRs to FinCEN” feature (See Page 15), this record will be sent to FinCEN with the end-of-day processing. If you have not activated this feature, you will need to manually enter this information in the FinCEN website.</p>
<p><i>Skip Form</i> (F20)</p>	<p>Appears only when coming from the Teller system. This cancels the CTR process and does not save the form, but does generate a Tracker note for the member. A confirmation message will appear.</p>

## CTR Report Sample

2/07/13 9:11:25 RUN ON 2/07/13	CURRENCY TRANSACTION REPORT	UCTRA	PAGE 1
FILING NAME 2/04/2013 CTR 1 Type of filing: Initial Report	DOCUMENT CONTROL NUMBER/BSA IDENTIFIER		
PART 1 PERSON INVOLVED IN TRANSACTION			
2A Person conducting transaction on own behalf			
3 Multiple transactions: No Entity: No			
4 Individual's last name or entity's legal name: MEMBER			
5 First name: JOHN		6 Middle name: G	
7 Gender: Male		8 Alternate name:	
9 Occupation or type of business:		9a NAICS code:	
10 Address: 123 East Street			
11 City: Anycity		12 State: MI	13 ZIP: 049
15 Country: Unknown			
15 TIN: 999999999		16 TIN type: SSN/ITIN	17 Date of birth: 3/29/1949
18 Contact phone number:		Ext:	
19 E-mail address:			
20 Form of identification used to verify identity: Unknown			
Number: Unknown		Country: Unknown	
Issuing state: Unknown			
Other:			
21 Cash in amount for individual or entity listed in item 4:		0	
Acct number(s):			
22 Cash out amount for individual or entity listed in item 4:		0	
Acct number(s):			
PART II AMOUNT AND TYPES OF TRANSACTION(S)			
23 Date of transaction: 2/04/2013 24: Type of transaction delivery or payment method is unknown			
25 CASH IN		27 CASH OUT	
Deposit(s):		0 Withdrawal(s):	
Payment(s):		0 Advance(s) on credit:	
Currency received for funds transfer out:		0 Currency paid from funds transfers in:	
Purchase of negotiable instrument(s):		0 Negotiable instrument(s) cashed:	
Currency exchange(s):		0 Currency exchange(s):	
Currency to prepaid access:		0 Currency to prepaid access:	
Total cash in:		20,000	
26 Foreign cash in:		0 Foreign country:	
28 Foreign cash out:		0 Foreign country:	
PART III FINANCIAL INSTITUTION WHERE TRANSACTION(S) TAKES PLACE			
30 Legal name of financial institution: ABC Credit Union			
32 EIN: 381796409		31 Alternate name:	
33 Address: PO Box 209			
34 City: Frankenmuth			
35 State: MI		36 ZIP: 48734	
40 Contact office: test		41 Phone number: 123-546-789	
EXT:			
42 Financial Institution ID			
43 Financial Institution ID #			
2/07/13 9:11:25 RUN ON 2/07/13	CURRENCY TRANSACTION REPORT	UCTRA	PAGE 2 USER
FILING NAME 2/04/2013 CTR 1 Type of filing: Initial Report	DOCUMENT CONTROL NUMBER/BSA IDENTIFIER		
PART 1 PERSON INVOLVED IN TRANSACTION			
2A Person conducting transaction for another			
3 Multiple transactions: No Entity: No			
4 Individual's last name or entity's legal name: Jones			
5 First name: Mary		6 Middle name	
7 Gender: Female		8 Alternate name:	
9 Occupation or type of business:		9a NAICS code:	
10 Address: 123 West Street			
11 City: Othercity		12 State: MI	13 ZIP: 490009999
15 Country: Unknown			
15 TIN: 999999999		16 TIN type: SSN/ITIN	17 Date of birth: 7/25/1983
18 Contact phone number:		EXT:	
19 E-mail address:			
20 Form of identification used to verify identity: Unknown			
Number: Unknown		Country: Unknown	
Issuing state: Unknown			
Other:			
21 Cash in amount for individual or entity listed in item 4:		0	
Acct number(s):			
22 Cash out amount for individual or entity listed in item 4:		0	
Acct number(s):			

An example of what you see when you print the CTR is shown above.

- NOTE: It is not a requirement by Treasury that CTRs follow the same format as what you a typical CTR form looks like when filing on the e-filing system.

## WHAT IF THE CTRs HAVE ERRORS?

The process of returning the corrections of a CTR to FinCEN depends on whether you have the “Automated Upload of CTRs to FinCEN” feature activated. (See Page 15 for more details on automated filing to FinCEN.)

### ***If Automated Upload of CTRs to FinCEN is NOT activated***

If automated upload to FinCEN is not activated, you will need to create a new CTR manually. Correct the form and resubmit it using *Add New CTR* (F6) on the screen shown on Page 23).

### ***If Automated Upload of CTRs to FinCEN is activated***

If you have the automated upload feature activated, FinCEN will return an acknowledgement file including CTRs that need correction (see page 33 for an example). You will just need to rework them and resubmit them to FinCEN.

The CTRs with errors will have a Status of “Error” on the Work with CTR screen (shown below).

### **Work with CTR Screen**

Emp ID	SSN/TIN	Member Name	Date CTR Created	Transaction Date	Status / Date
+R		5 JUAN G MEMBER	Jul 18, 2013	Nov 11, 2011	Transmitted Jul 18, 2013
+R		1	Jul 18, 2013	Nov 09, 2011	Transmitted Jul 18, 2013
+R		4 NICHOLAS J MEMBER	Jul 18, 2013	Nov 07, 2011	Transmitted Jul 18, 2013
+R		4 DORIS J MEMBER	Jul 18, 2013	Nov 10, 2011	Error Jul 18, 2013
+R		4 PATRICIA MEMBER	Jul 18, 2013	Nov 09, 2011	Transmitted Jul 18, 2013
+R		7 DOUGLAS A MEMBER	Jul 18, 2013	Nov 10, 2011	Transmitted Jul 18, 2013
+R		4 TODD W MEMBER	Jul 18, 2013	Nov 09, 2011	Transmitted Jul 18, 2013
+R		9 JORDAN J MEMBER	Jul 18, 2013	Nov 08, 2011	Transmitted Jul 18, 2013
+R		0 LILLIE P MEMBER	Jul 18, 2013	Nov 11, 2011	Transmitted Jul 18, 2013
+R		7 PATRICK MEMBER	Jul 18, 2013	Nov 07, 2011	Transmitted Jul 18, 2013
+R		2 NANCY G MEMBER	Jul 18, 2013	Nov 09, 2011	Transmitted Jul 18, 2013
+R		1 JAMES A MEMBER	Jul 18, 2013	Nov 07, 2011	Transmitted Jul 18, 2013
+R		6 KRISTINA M MEMBER	Jul 18, 2013	Nov 09, 2011	Transmitted Jul 18, 2013
+R		7 GORDON MEMBER	Jul 18, 2013	Nov 07, 2011	Ready to Transmit Jul 18, 2013
+R		0 ANTHONY U MEMBER	Jul 18, 2013	Nov 08, 2011	Saved But not Printed Jul 18, 2013
+R		0 ANTHONY U MEMBER	Jul 18, 2013	Nov 09, 2011	Printed Jul 18, 2013
+R		0 ANTHONY U MEMBER	Jul 18, 2013	Nov 10, 2011	Saved But not Printed Jul 18, 2013

If the “Automated Upload of CTRs to FinCEN” feature is activated, FinCEN will return a file with errors. Any CTR with an error will be shown with the Status of “Error.”

**Important! You may need to scroll down the list to see these error messages, as the FinCEN response may take over 7-10 days.**

To update the CTR, select it and then *Edit* to advance to the first CTR screen.

## Entry CTR Fill-in Screen

Session 0 CU\*BASE GOLD Edition - ABC CREDIT UNION  
File Edit Tools Help

**CTR Form - DORIS J MEMBER** CHANGE

1. Type of filing **Correct/amend prior report** Transaction date **Nov 10, 2011**

Part I Person Involved in Transaction

2. **Person conducting transaction on own behalf**  Check if entity 3.  Multiple transactions

4. Individuals last name or entity's legal name **MEMBER**

5. First name **DORIS** 6. Middle name **J** 7. Gender **Female**

8. Alt name

9. Occupation or type of business

9a. NAICS code

10. Address **123 East Street** 11. City **Anycity**

12. State **MI** 13. ZIP/postal code **49000 0000** 14. Country code

15. TIN 16. TIN type **SSN/ITIN** 17. Date of birth **Sep 27, 1934** [MMDDYYYY]

18. Phone # Ext

19. Email

20. Form of ID used to verify identify: **Unknown**

Number Country Issuing state

Other desc

21. Cash in amount for individual or entity listed in Item 4

Account # Account # Account #

22. Cash out amount for individual or entity listed in Item 4

Account # Account # Account #

Add Person **View Errors** Continue

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On this first CTR fill-in screen (shown above), click the conditional *View Errors* (F22) button to view the “Message Received from FinCEN” screen (shown below) to view the errors sent back in the FinCEN file.

## CTR Error Message Screen

Session 0 CU\*BASE GOLD - Messages Received From FINCEN  
File Edit Tools Help

**Messages Received From FinCEN**

Record Type	Error Code	Error Description
4A	C416	Person TIN type contains an invalid code.

FR (5183)

Correct the CTR and then use the *Lock/Transmit* feature to lock the CTR. It will then be uploaded to FinCEN during end-of-day processing.

## WHAT CONFIRMATION IS THERE FROM FINCEN?

- NOTE: FinCEN may take seven to ten days or longer to send the confirmation and error files used to create these reports.

Credit unions using the Automated Upload of CTRs to FinCEN feature will receive two reports that will appear in the DAILY OUTQ. These are then routed to CU\*SPY for auditing purposes.

The first, the “FinCEN CTR Acknowledgement Report” (PRECVCTR1A) lists CTRs received by FinCEN through the batch upload.

This includes the date that the CTR was filed. It also includes the FinCEN’s BSA ID number which auditors of credit unions use to confirm that FinCEN received the CTR.

9/15/14	9:00.07	CREDIT UNION			PRECVCTR1A	PAGE
RUN ON	9/15/14	FINCEN CTR ACKNOWLEDGEMENT REPORT			USER	
		FILE DATE: 09/12/14				
SSN/TIN	DATE	CASH IN	CASH OUT	BSA ID NUMBER		
	9/02/2014	30,000		31		
	9/03/2014	24,952		31		
*** END OF REPORT ***						

Additionally, the “FinCEN CTR Acknowledgement Error Report” (also PRECVCTR1A) records the errors FinCEN sends back for correction. This is a comprehensive listing of all errors in the CTRs sent in that batch.

9/11/14	9:00.06	CREDIT UNION			PRECVCTR1A	PAGE
RUN ON	9/11/14	FINCEN CTR ACKNOWLEDGEMENT ERROR REPORT			USER	
		FILE DATE: 09/09/14				
TRANSACTION ERROR						
SSN/TIN	DATE	CODE	ERROR MESSAGE			
	8/22/2014	C420	Person telephone number contains non-numeric values or is in an invalid format.			
*** END OF REPORT ***						

# BANK SECRECY ACT SUMMARY REPORT

## DAILY REPORT

A Bank Secrecy Act Cash report (**LBKSC3**) is printed automatically on a daily basis, showing all transactions that match your configured BSA monitoring settings.

## RUNNING THE BSA REPORT ON DEMAND

You can also produce this same report format (**LBSAFIL**) at any time to review BSA records from a range of dates, for all members or for a single SSN/TIN. This can be helpful if you want to look for a pattern of suspicious activity over time for a particular member, or review a month's worth of activity at the same time.

**“Print BSA/SAR Activity Report” on the Auditing Functions (MNAUDT) menu or on the ERM: Compliance Management Tools (MNRSK6) menu**

The screenshot shows a software window titled "Session 0 CU\*BASE GOLD Edition - ABC TESTING CREDIT UNION". The window contains a "Bank Secrecy Act Report Selection" dialog box. The dialog has a "Report Options" section and a "Response" section. The "Report Options" section includes fields for "Month/year to process" (Sep 2012), "Date range - from" (Sep 01, 2012), "Date range - to" (Sep 15, 2012), and "SSN/TIN". There is also a checkbox for "Export report to file". The "Response" section includes a "Job queue" checkbox, "Copies" (1), and "Printer" (P1). The window also has a menu bar (File, Edit, Tools, Help) and a status bar at the bottom with navigation icons and the text "FR (666) 9/04/13".

Use this screen to define which records should be included on the report. Remember that data is stored for 3 months. This report pulls data from the same summary and detail files (BSAMAST and BSADET) that were generated for each individual date.

*The main difference between this report and the automatic daily report is that here you can include multiple days worth of data, and you can limit the report to a single SSN/TIN. Otherwise the data shown will match what was on the daily report for the date when each transaction was posted.*

Use this screen to define which records should be included on the report. Remember that data is stored for 3 months. The report will be sorted and grouped by SSN. If a single member has multiple membership accounts, the system adds all activity for all of the member's accounts to determine inclusion on the report.

**Field Descriptions**

<i>Field Name</i>	<i>Description</i>
Month/year to process	Enter the month and year for which data should be shown. (For prior months, it may be necessary to contact a CU*BASE representative to load a tape so that you can print data as of a previous month-end. There is a nominal charge if this service is required.)
Date range - from Date range - to	If you wish to view data only for a certain period of time within the past 3 months, enter a starting and ending date for the desired range.  If you wish to include a range beyond 3 months ago, you will need to enter a different month-end reporting period and have a tape loaded as appropriate.
SSN/TIN	If you wish to view activity for only a specific member, enter the SSN/TIN here. (All memberships under this SSN/TIN will be included.) Leave the field blank to include all members.
Export report to file	Check this to create a file containing the records generated by the report. You can choose either to create a file that ready for Member Connect (contains account base only), so you can communicate instantly with these members via email and online banking messages, set up a marketing outreach via mailing labels and selective statement inserts, and track the responses via a telemarketing Tracker. Or you can choose to export all report data into a file that can be used for further analysis with CU*BASE Report Builder.

See the report sample on the next page, followed by some tips for reading the data on the report.

## Report Sample

7/13/12 8:28.22	CU*BASE CREDIT UNION	LBSAFIL	PAGE						
BANK SECRECY ACT CASH REPORTING AS OF 06/30/2012		USER							
DATE RANGE: 6/15/2012 TO 6/15/2012									
SOC. SEC. # MEMBER NAME	ACCOUNT BASE	TRANS AMOUNT	TRANS DATE	TRANS TYPE	TELLER ID	SB ID	BR ID	TOTAL AMT	*****CTR****
12-222222	ACCOUNT FEE	MONTHLY						12226.95	*
	8200	8.00	6/15/2012	CASH IN			RW		
		1771.00	6/15/2012	CASH IN			18		
		7340.00	6/15/2012	CASH IN			18		
		1030.00	6/15/2012	CASH IN			18		
		104.00	6/15/2012	CASH IN			18		
		3.00	6/15/2012	CASH IN			77		
		8.00	6/15/2012	CASH IN			77		
		4.00	6/15/2012	CASH IN			77		
		4.00	6/15/2012	CASH IN			RA		
		95.00	6/15/2012	CASH IN			RA		
		5.00	6/15/2012	CASH IN			77		
		2.00	6/15/2012	CASH IN			74		
		1334.00	6/15/2012	CASH IN			67		
		511.00	6/15/2012	CASH IN			KN	12226.95	
20-222222	ABC MANAGEMENT CORP							7340.12	*
	42314	7340.12	6/15/2012	CASH BACK			28	7340.12	
27-222222	ABC GAS INC							14750.00	*

The “SB ID” column in this report indicates that the transactions took place at a shared branching location (this includes Xtend branches as well as national shared branch locations, if applicable to your credit union). This way you will be able to review member transactions at other locations just as you would work transactions posted at your own branches.

If your configuration specifies calculation method 1 (combine \$\$ in and \$\$ out), the report will simply list all records for the SSN. Only members whose combined money in and money out total exceeds your configured level will be included on the report.

If using calculation method 2, (separate \$\$ in from \$\$ out), the report will show up to two totals per SSN: one for the total money in (if it exceeds your threshold), and another for total money out (if it exceeds your threshold).

Remember that only the transaction types flagged in your BSA configuration will be included in the total calculation and shown on the report. The report will list all of the individual transactions that added up to the total which was compared to your configured threshold.

The “CASH TRANS RPT” columns on the right edge of the report will be marked as follows:

- ALRT An asterisk (\*) will appear if the total transaction exceeds your configured CTR tolerance.
- FORM An asterisk (\*) will appear if a CTR form exists for this SSN for this date.
- SUBM An asterisk (\*) will appear if a CTR form exists and has been marked as submitted/locked.

# AUDIT TRACKER AND BSA MONITORING

Audit Tracker is an automated tool that allows you to verify that activities related to compliance have occurred. Audit Tracker provides an ongoing trail of verification for later use when your auditors monitor your member accounts. Each time the tracked operation or process is run, a conversation will be appended to the AT Tracker with the appropriate Memo Code to indicate if the member passed, failed or was otherwise affected by the process.

The AT Tracker provides an record of all BSA, OFAC, FIDM and Dormancy monitoring and changes. If, at any time, you would like to review the status of a member’s account, simply review the Audit Tracker to see if conversations were appended to it. The Memo Codes of the conversations indicate what kind of monitoring or activity happened to the account while the messages (or conversations) themselves tell you exactly what was recorded.

In the case of BSA Monitoring, an AT Tracker conversation note could in theory be created daily since the accounts are scanned daily for activity related to the Bank Secrecy Act. Members who fall within your reported configuration guidelines as a match, receive a conversation with a **BS** Memo Type appended to his or her AT Tracker saying “**Member had transactions on the BSA Monitoring Report Inquiry for the date mm/dd/yyyy.**”

Likewise, certain employee activity on the BSA Inquiry (MNAUDT #1 **Audit Daily BSA Activity** on the Auditing Functions (MNAUDT) menu) creates a conversation note, which is appended to the member’s AT Tracker.

- If the employee manually marks the member as Verified, a message with a **BV** Memo Type reading, “**BSA Record was verified on mm/dd/yyyy**” with the member’s name will appear on the conversation. After the employee is marked as Verified, a screen will appear, allowing the employee to change or add to the text to the conversation at this point.
- Likewise, if the employee marks the member as Deleted, a conversation with the Memo Type **BD** will be appended to the member’s AT Tracker with the text “**The BSA Record was deleted on mm/dd/yyyy.**” Again, the employee will need to accept the deletion to move into the Audit Tracker conversation creation.
- Actions taken on CTR forms will also result in a Tracker note being added, as shown below (using the Memo Type codes you specified in the BSA configuration):

<i>CTR Event</i>	<i>Text in the Audit Tracker Note</i>
When a CTR is saved at any point (every time it gets edited, whether the first time through or later on)	CTR form Created / Modified
When a CTR is locked on the Work with CTRs screen, or via the button on the CTR form screens	CTR form Submitted / Locked
When a CTR is deleted on the Work With CTRs	CTR form Skipped / Deleted

CTR Event	Text in the Audit Tracker Note
screen, or via either the <i>Skip Form</i> or <i>Delete Form</i> buttons on the CTR form screens	

In addition to the text above, the Tracker note will also contain the **Employee ID**, the **date** and **time**, and any text the user enters manually on the Tracker screen (applies only when skipping or deleting a form).

*Audit Tracker notes are not created for non-members, although the system can still generate a CTR form for a non-member teller transaction. Also, the system will not create Tracker notes for members of other credit unions when posting shared branch transactions (see CTRs and Shared Branching on Page 16).*

## REVIEWING A TRACKER ENTRY AT A LATER DATE

Let’s look at how this works when an account is marked as Verified. Once the account is marked as Verified the Tracker conversation process will begin.

1. First mark the entry as Verified by selecting the item and *Verified*.

**“Audit Daily BSA/CTR Activity” on the Auditing Functions (MNAUDT) menu or “Work Daily BSA/CTR Activity” on the ERM: Compliance Management Tools (MNRSK6) menu**

Session 0 CU\*BASE GOLD Edition - ABC TESTING CREDIT UNION

File Edit Tools Help

**Verify Bank Secrecy Act File** All Records

Go to date [MMDDYYYY] Go to SSN/TIN \* Exceeds 10,000

Verified	By	SSN/TIN	Name	Amount	Processed	Last Action Taken on CTR
5/03/2013	/E	625 S		20,123.27 *	Feb 14, 2013	
0/00/0000		023 S		1,707.76	Feb 14, 2013	
0/00/0000		985 R		3,500.00	Feb 14, 2013	
0/00/0000		713 G	C	8,030.00	Feb 14, 2013	
0/00/0000		020 L	IC	9,739.41	Feb 14, 2013	
0/00/0000		148 R		3,253.85	Feb 14, 2013	
0/00/0000		184 S	L	3,000.00	Feb 14, 2013	
0/00/0000		645 E		950,000.00 *	Feb 14, 2013	
0/00/0000		245 S		7,100.00	Feb 14, 2013	
0/00/0000		517 S		3,200.00	Feb 14, 2013	
0/00/0000		531 C		4,469.00	Feb 14, 2013	
0/00/0000		216 E		3,105.63	Feb 14, 2013	
0/00/0000		638 C		4,000.00	Feb 14, 2013	
0/00/0000		445 R		4,140.00	Feb 14, 2013	
0/00/0000		165 B		9,318.00	Feb 14, 2013	
0/00/0000		682 L		8,000.00	Feb 14, 2013	
0/00/0000		124 G		5,060.74	Feb 14, 2013	
0/00/0000		076 G		4,180.00	Feb 14, 2013	

Show Details
  Verified
  Delete
  CTR

Change View

Work All CTRs

FR (4194) 9/04/13

- Then a screen will appear allowing you to add any additional notes. Use *Save/Continue* (F5) to save the tracker.

### Member Tracker Entry (1)

Session 0 CU\*BASE GOLD Edition - ABC TESTING CREDIT UNION

File Edit Tools Help

## Member Tracker Entry

Account #

Memo type

Speaking to  Conversations 414

Enter text here to explain what you did to verify the activity...

Save/Continue Page Up/Down ↑ ↓

- Phone Inquiry
- Save/Continue
- Contact
- Previous
- Filter
- First
- Last
- Next
- Household
- Additional Signers
- Conversations
- Print Notice

Date	May 20, 2013
Time	13:48:35
Memo type	OFAC/PLC Pass
Created by	-3
Need group	
Task	
Assigned	
Contact	
Follow up	
Complete	

OFAC scan run on 05/28/2013. No suspected match.

Shift + Page Up/Down ↑ ↓

*i* Conversations are ordered newest (First) to oldest (Last).

FR (4580) 9/04/13

- On the next screen determine whether to set a follow up date, and press Enter to save the record.

### Member Tracker Entry (2)

Session 0 CU\*BASE GOLD Edition - ABC TESTING CREDIT UNION

File Edit Tools Help

## Member Tracker Entry

Member account #

Speaking with  on Sep 04, 2013 at 10:57:07

Update last contact date for this account

Entry just made requires a follow up

FR (3014) 9/04/13

- Later if you want to review a member's account you simply review his or her Audit Tracker. You can access member trackers through Inquiry or Phone Inquiry. Select the member's base account and use *Tracker Review* (F21) to view the Member Tracker Review.

### Member Account Inquiry

Session 0 CU\*BASE GOLD Edition - ABC TESTING CREDIT UNION

File Edit Tools Help

## Member Account Inquiry

MSR 23 Account # [REDACTED] LINDA [REDACTED] Date opened Jan 15, 2013

ATM ID [REDACTED] Joint Owners [REDACTED] Beneficiaries [REDACTED] G/L account 901.00-03

# ATM W/D [REDACTED] Account type 000 REGULAR SAVINGS

# ATM overdrafts [REDACTED] Div appl SH REGULAR SAVINGS

# Withdrawals 1 Outstanding accrued club benefits 0.00

# Transfers 0

Frozen 0 NO Current balance 5.00 Annual b/u withholding 0.00

Passbook NO - par value 5.00 Period average balance 4.05

AFT NO - secured 0.00 Period minimum balance 5.00

Payroll NO - uncollected 0.00

= Net available 0.00 YTD club benefits 0.00

1st date negative 00000000

### Dividend Information

Quarter	Amount	Total
1	0.00	0.00
2	0.00	Accrued 0.00
3	0.00	
4	0.00	

Transaction inquiry date Feb 14, 2013 [MMDDYY]

FR (3758) 9/04/13

### Member Tracker Review (1)

Session 0 CU\*BASE GOLD Edition - ABC TESTING CREDIT UNION

File Edit Tools Help

## Member Tracker Review

Member [REDACTED] LINDA [REDACTED]

Date [REDACTED] [MMDDYYYY] Time [REDACTED]

Account type 000 Tracker type [REDACTED]

Reference [REDACTED]

Date	Time	Account Type	Reference	Speaking With	Type	ID
1/15/2013	13:38:01	000	SALES TRACKER	LINDA [REDACTED]	SALE	23
5/28/2013	13:48:35	000	Audit Tracker	LINDA [REDACTED]	AUDT	-3

View Update

Consolidate

Work Follow Ups

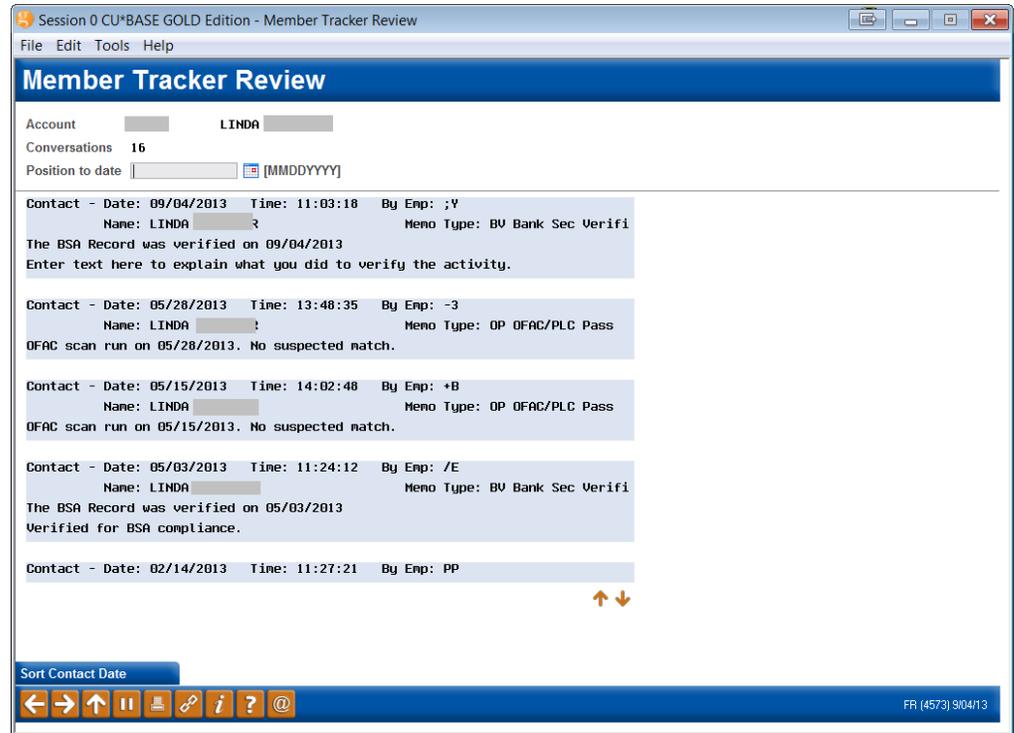
Tracker Entry

Cross Sales Tasks

FR (463) 9/04/13

5. Here you will view a list of the member's trackers (they might have a Collections (XX) or Sales (ST) Trackers as well) and you will see the Audit Tracker in the list.
6. Select to view this tracker to view the Audit Tracker Conversations.

### Member Tracker Review (2)



7. Once you select to view the Audit Tracker, you will see a conversation about the activity on the account. In the sample above we see a record of the activity in the BSA Inquiry.