



Financial Crimes Enforcement Network (FinCEN)

BSA E-Filing: XML Batch Testing Procedures

DEPARTMENT OF THE TREASURY
FINANCIAL CRIMES ENFORCEMENT NETWORK (FINCEN)

0. Revision History

Version Number	Date	Change Description
1.0	11/18/2019	Initial version

Contents

0. Revision History..... iii

Contents iv

1. Introduction 1

2. Testing Overview 1

 2.1. Batch Submission & Validation..... 1

 2.2. Batch Acknowledgement Processing..... 1

3. Submission Methods 1

 3.1. Manual Submission via the BSA E-Filing System Website..... 1

 3.2. Server-to-Server Submission via Secure Direct Transfer Mode (SDTM)..... 1

4. Testing Steps 1

 4.1. User Enrollment on the BSA E-Filing *User Test* System 1

 4.1.1. Initial Supervisory User Enrollment (New Filing Organization)..... 2

 4.1.2. Additional User Enrollment (Existing/Enrolled Filing Organization)..... 2

 4.2. Submit Batch Test Data to the BSA E-Filing *User Test* System 2

 4.2.1. Batch Test Data Composition..... 2

 4.2.2. Batch Test Data Validation 2

 4.3. Process Corresponding Acknowledgement File 3

5. Sample Test Data..... 3

6. Test Completion..... 3

7. Help Desk Support..... 4

1. Introduction

This document provides BSA electronic filers with instructions regarding how to submit batch test data via the BSA E-Filing [*User Test*](#) System. FinCEN strongly encourages filers to first test in the *User Test* system in order to ensure that the batch generation program/software (either developed by the filing organization or via third party vendor on behalf of the filing organization) is formatted in accordance with FinCEN approved reporting requirements.

2. Testing Overview

Testing your batch file is a two step process:

2.1. Batch Submission & Validation

The objective of this process is to submit various test scenarios without receiving fatal errors and/or validation warnings. This step involves submitted the batch test file and addressing batch validation errors. If the batch file is rejected, then the filer must resolve the errors that contributed to the submission rejection until the batch file is accepted. If the batch file is accepted with warnings, then the filer should assess why the file received the warning(s) and take appropriate corrective action to address.

2.2. Batch Acknowledgement Processing.

The objective of this process is to ingest/process the corresponding batch acknowledgement file generated by FinCEN. This step involves the processing of the corresponding acknowledgement file returned to the filer as a result of an accepted batch test submission. The batch acknowledgement file contains the BSA ID assigned to each activity/form in the batch test file, as well any validation errors received at the time of batch submission.

3. Submission Methods

There are currently two (2) methods of electronic batch file submission available to filers:

3.1. Manual Submission via the BSA E-Filing System Website

For this method of submission, the filer navigates to the BSA E-Filing System to login and manually attach/submit the batch file. Submission status and validation errors are available for review on the site (via "Track Status") immediately after submission. A corresponding acknowledgement file is returned to the filer on the site (via "View Inbox") within two (2) business days of submission acceptance.

3.2. Server-to-Server Submission via Secure Direct Transfer Mode (SDTM)

For this method of submission, the filer must work with FinCEN to setup a secure server connection prior to testing this method. SDTM establishes a secure, direct to server mechanism for transferring batch files from your organization's internal server to the BSA E-Filing server. This method of batch submission can be automated such that user intervention/involvement is minimized. Submission status and validation errors are pushed back to the filer (via "Messages.xml" file) immediately after submission. A corresponding acknowledgement file is returned to the filer using the same direct to server method within two (2) business days of submission acceptance.

If you are interested in this method of batch submission, click [here](#) to request more information.

4. Testing Steps

The following steps outline the process of submitted a test batch file manually via the web application (NOTE: For server-to-server batch submission test steps, click on the link in section 3.2 above):

4.1. User Enrollment on the BSA E-Filing *User Test* System

User enrollment on the *User Test* system is categorized as follows:

4.1.1. Initial Supervisory User Enrollment (New Filing Organization)

In order to gain access to the *User Test* system, you or someone from your filing organization must submit the initial Supervisory User Registration form [here](#) in order to register your organization and obtain the assigned filing organization (FO) enrollment code. The FO enrollment code can then be referenced on subsequent Supervisory User Registration forms when adding additional Supervisory users to the organization for testing purposes (NOTE: General User enrollment is a separate process executed by a Supervisory User selecting "Authorize Users" once logged into the site).

4.1.2. Additional User Enrollment (Existing/Enrolled Filing Organization)

If your organization is already established in the BSA E-Filing *User Test* System, additional users can be added to the organization for testing purposes in one of two ways:

- Contact the initial/existing Supervisory User to "authorize" you as a new user (the Supervisory User logs into the *User Test* system and clicks "Authorize Users"). Once the new user account is setup by the new user, the existing Supervisory User can assign roles to the account or promote the account to Supervisory User status (the Supervisory User logs into the *User Test* system and clicks "Manage Supervisory Users")
- Obtain the filing organization (FO) enrollment code from the initial/existing Supervisory User (the Supervisory User logs into the *User Test* system and selects "View FO Enrollment Code") and reference this code in the "Organization Information" section of the Supervisory User Registration form.

4.2. Submit Batch Test Data to the BSA E-Filing *User Test* System

Submit batch test data generated via program/software either developed by the filing organization or via third party vendor on behalf of the filing organization.

4.2.1. Batch Test Data Composition

Batch files should NOT contain any *real* customer data; instead, it should contain test data consisting of multiple scenarios of sample forms. FinCEN recommends that batch test data contain at least 25 forms/activities total.

Batch test data must use the following test Transmitter Control Code (TCC): TBSATEST. Please refer to the corresponding XML User Guide (available for download on the BSA E-Filing *User Test* System homepage under the "Batch Filers" section) and navigate to the *PartyIdentification* element definition for the Transmitter party type for detailed guidance regarding how to report the TCC. The following image is of a sample batch file showing the test TCC recorded (NOTE: *PartyIdentificationTypeCode* "28" indicates that the value recorded for the *PartyIdentificationNumberText* is the TCC):

```
<fc2:PartyIdentification SeqNum="8">
  <fc2:PartyIdentificationNumberText>TBSATEST</fc2:PartyIdentificationNumberText>
  <fc2:PartyIdentificationTypeCode>28</fc2:PartyIdentificationTypeCode>
</fc2:PartyIdentification>
```

4.2.2. Batch Test Data Validation

There are two (2) types of batch validation that are applied to batch files:

4.2.2.1. XML Schema Validation

Prior to submission, filers can validate their XML batch test file against the corresponding XML schema using any XML editor that supports schema validation. This external validation of the batch file ensures that the XML batch is formatted in accordance with the associated XML schema definition, listed below for each form type:

- Form 8300: https://www.fincen.gov/sites/default/files/schema/base/EFL_8300XBatchSchema.xsd
- FinCEN CTR: https://www.fincen.gov/sites/default/files/schema/base/EFL_CTRXBatchSchema.xsd
- FinCEN DOEP: https://www.fincen.gov/sites/default/files/schema/base/EFL_DOEPXBatchSchema.xsd

- FinCEN SAR: https://www.fincen.gov/sites/default/files/schema/base/EFL_SARXBatchSchema.xsd
- FinCEN FBAR: https://www.fincen.gov/sites/default/files/schema/base/EFL_FBARXBatchSchema.xsd

In order to validate your batch test file using the corresponding form type schema definition (above), the XML batch file must include the following attributes for the *EFilingBatchXML* element (FinCEN SAR XML batch example):

```
<?xml version="1.0" encoding="UTF-8"?>
<fc2:EFilingBatchXML ActivityCount="3" TotalAmount="125050" PartyCount="4" AttachmentCount="1" ActivityAttachmentCount="1"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:fc2="www.fincen.gov/base" xsi:schemaLocation="www.fincen.gov/base
https://www.fincen.gov/sites/default/files/schema/base/EFL_SARXBatchSchema.xsd">
```

If your XML editor and batch xml file location on your network is able to connect to the internet, then you should be able to reference the URL location of the XML batch schema (see example above) in your XML batch file in order to execute schema validation. However, if you are not able to connect to the internet with your XML validation tool, then please see the Local Schema Reference section [here](#).

IMPORTANT: Your batch File must pass schema validation before attempting to submit in the *User Test* system.

4.2.2.2. Business Rule Validation

At the time of submission, your batch test data is validated against the various business rules defined in the corresponding XML User Guide. Any rule that is violated in your batch test data will produce a validation error that is available for review in the submitter's "Track Status" table (see "Filing" section) on the site. Depending on the severity of the business rule validation will determine if your batch file submission is accepted with warnings or rejected. All errors received as a result of your batch test submission must be reviewed and resolved. Again, the objective of this process is to submit various test scenarios without receiving fatal errors and/or warning errors.

4.3. Process Corresponding Acknowledgement File

Returned to the filer for every accepted batch file submission is a corresponding acknowledgement file. This file contains a BSA Identifier and all corresponding validation errors associated with the batch submission. It is the responsibility of the filer to retain, process, and take the appropriate corrective action in accordance with all error(s) included in the acknowledgement file. Within two (2) business days from submission acceptance, filers must process the acknowledgement file in their batch software. Please see the corresponding XML user Guide for detailed information about the acknowledgement file format.

5. Sample Test Data

Please refer to the XML User Guide for sample scenario and/or actual sample test batch files that you may use as a reference when developing and creating your batch test data. Again, the XML User Guides are available on the BSA E-Filing System public homepage under "Batch Filers."

6. Test Completion

When your test batch files consistently pass schema and business rule validations in the BSA E-Filing *User Test* System and your batch software is able to successfully process the corresponding acknowledgement file for each accepted submission, you are ready to start batch filing in the BSA E-Filing *Production* System.

PLEASE BE ADVISED: If you or someone within your filing organization have not already enrolled in the *Production* environment, you must do so in order to begin submitted production batch data. Also, please update your batch software to include the *Production* TCC in your production batch files: PBSA8180.

7. Help Desk Support

If you have questions regarding this process or require technical support related to the BSA E-Filing System, please submit the [BSA E-Filing Technical Support Request Form](#) to create a support ticket.

The BSA E-Filing Help Desk is available Monday - Friday, 8AM - 6PM EST. The Help Desk is closed on Federal holidays.