QUESTIONS & ANSWERS

Electronically Filing Your Registration of Money Services Business (RMSB) Form

1. Who may file an RMSB electronically?

Any financial institution currently required to <u>register</u> as an MSB pursuant to FinCEN regulations is encouraged to take advantage of BSA E-Filing. MSBs can use BSA E-Filing to file an initial registration, renew their registration, re-register, or file corrections to a previous registration.

2. How do I enroll in BSA E-Filing?

Enrolling in BSA E-Filing can be done online or with the assistance of our BSA E-Filing Help Desk. As part of this enrollment your organization will need to designate a Supervisory User for BSA E-Filing and submit a Supervisory User Application Form. The Supervisory User serves as a liaison between BSA E-Filing and his/her filing organization and has primary responsibility for the filing organization's use of BSA E-Filing. FinCEN will then verify your identity and your designation by your institution as its BSA E-Filing Supervisory User to complete your authorization and enrollment in BSA E-Filing. This entire process takes approximately **5 to 7 business days** after submission of the Supervisory User Application Form.

Once the application is processed and the supervisory user is able to enter the E-Filing System, they can initiate the enrollment of additional individuals within the organization

To begin the enrollment process online, please visit the BSA E-Filing <u>home page</u> and click on "Become a BSA E-Filer." For assistance with enrollment from the BSA E-Filing Help Desk, please call 1-866-346-9478 (Option 1).

3. How do I submit my RMSB through BSA E-Filing?

Once your institution is enrolled in BSA E-Filing, you will be able to select the RMSB from the BSA E-Filing Home page under "Filing." Please fill out all the information requested on the report, just as you would have done on the paper form. Embedded instructions for filling out the report are available by placing the pointer from your mouse over each data field. Additionally, the BSA E-Filing System will highlight any errors or critical missing information so they can be corrected or added before you can complete your submission.

4. Will I receive a receipt for my filing?

Yes, once your form is submitted, you will receive a confirmation from BSA E-Filing that it was accepted for processing. Within two business days you will then receive a message from the BSA E-Filing System that provides acknowledgement that your submission was received and processed. This second message will include the number associated with your registration. Finally, your registration information will appear on FinCEN's MSB Registration Web site when it is launched the week of January 23, 2012. We strongly recommend saving your original registration submission and the acknowledgements on your computer or by printing paper copies for your records.

5. When are registration forms due?

The deadlines for filing using the BSA E-Filing System are the same as those for filing on paper.

Initial Registration - The deadline for initial registration is the end of the 180-day period beginning on the day following the date the business is established.

Renewal - After an MSB completes its initial registration, the form to renew its registration must be filed by December 31 of the second calendar year preceding the 24-month renewal period. Thereafter, a registration renewal must be filed every 24 months by December 31. You may wish to consult FinCEN's **MSB Registration Renewal Calculator** as a means to determine informally your upcoming registration renewal dates.

Re-registration - To re-register, the registration form must be completed and filed not later than 180 days after the date the **triggering event** occurs. A re-registration is considered to be a new initial registration for purposes of determining your new renewal deadlines. The calendar year in which the triggering event occurs is treated as the first year of a new 2-year registration period.

6. Can I correct a previous paper form registration using BSA E-Filing?

Yes, you are able to make corrections to a previously submitted paper MSB registration form using BSA E-Filing. To complete a corrected report, please follow the instructions provided within BSA E-Filing. You must complete the entire form.

7. Will paper forms still be accepted?

Yes, paper forms will still be accepted until further notice by FinCEN. Participation in the BSA E-Filing System is currently voluntary, but we strongly encourage you to use the system and take advantage of its many benefits,

including its enhanced audit and recordkeeping capabilities and quicker acknowledgements.

8. Are there penalties for not registering as an MSB?

Yes, there are possible civil and criminal penalties for failure to register.

9. Where can I find more information about E-Filing?

More information about E-Filing and its benefits can be found in the **Frequently Asked Questions** section on the BSA E-Filing System home page or by contacting the BSA E-Filing Help Desk at 1-866-346-9478 (Option 1).