Secure Direct Transfer Mode

Connection and file transfer requirements between BSA Direct E-Filing and filing organizations using the Secure Direct Transfer Mode (SDTM).

FinCEN recommends the use of CONNECT:Direct Secure+ as the mechanism for transferring files between BSA Direct E-Filing and any filing organization. This type of transmission will work with the use of a server certificate on each server to ensure mutual authentication between the 2 servers. It will be expected that each side will perform a push of the file from their server to the other.

Any filing organization that wishes to use the SDTM to transmit their batched submissions will need to contact the FinCEN Adminstrator

If your organization is not currently registered with the BSA E-Filing system, a User ID will need to be acquired. To request a User ID go to the BSA Direct E-Filing public web page (http://BSAefiling.fincen.treas.gov/) and fill out the Supervisory User Application Form. Once your application is received, FINCEN will perform a vetting process on your organization and then issue you a User ID to access the BSA E-Filing system. Once your User ID has been issued, you will be assigned a Filing Organization Code (FO code) for your Organization.

- Each side must have a version of CONNECT:Direct Secure+ using Triple DES with TLS protocol installed on the server
- Prepare private key through the CONNECT:Direct interface and obtain a server certificate
- Install server certificate for server identification and authentication
- Data files to be pushed using Secure+ between servers
- The files are to follow the prescribed naming standard

There is a file naming convention proposed which will help in the processing of these files.

1) submission type – This needs to indicate the type of batch file being placed onto the server (i.e. CTRST, SARST…).
2) Date/Time – This will be a date-time stamp to guarantee filename uniqueness
    o year – YYYY
    o month – MM

o day – DD
o hour – hh
o minute – mm
o second – ss
3) organization naming – set aside for custom naming by
an organization.

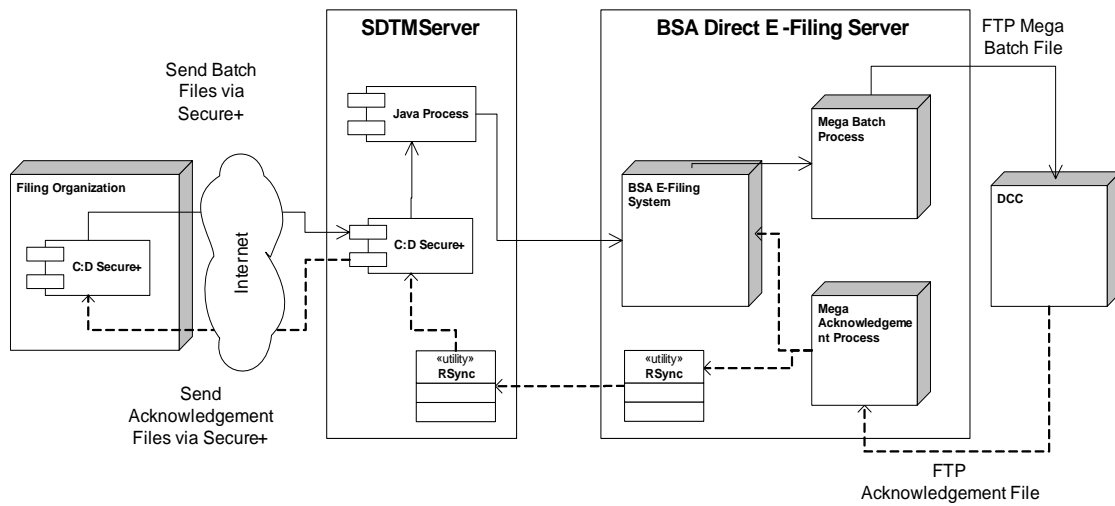Example file name: **CTRST.20050609153015.REGION6**

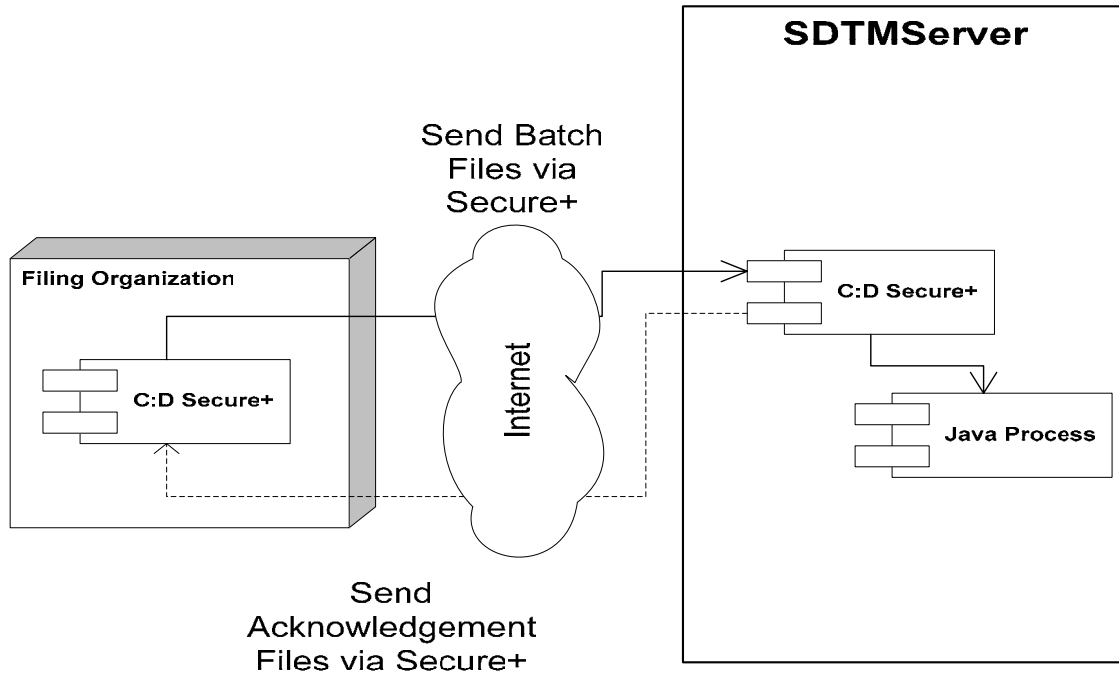Figure 1 Secure Direct Transfer Mode Architecture

Figure 2 Front-end Processing

Both filing organizations and the BSA Direct E-Filing (BSA E-Filing) system will install and use a Sterling Commerce product for file transfers.
   - Connect:Direct Secure+

Filing organizations and the BSA E-Filing system will always push files they create.

Batch files will be transferred via a secure connection.

The SDTM server will kick off a process through the file agent or from a RUNTASK initiated by the sender.
   - Populate a form using data in the transferred batch files.
   - Provide an affidavit and a place to add a digital signature on the form
   - Attach the transferred batch file to this form.
   - Submit the form into the BSA E-Filing system

BSA Direct E-Filing Server

FTP Mega
Batch File

Mega Batch
Process

BSA E-Filing
System

Mega
Acknowledgement
Process

DCC

«utility»
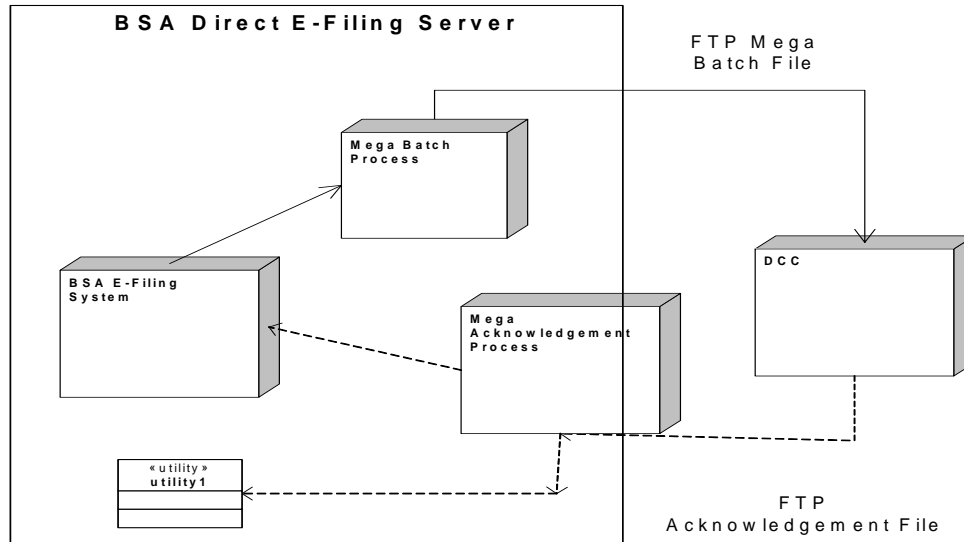utility1

FTP
Acknowledgement File

Figure 3 Back-end Processing

A confirmation email will be generated and sent to the filing organization's user containing:
- Process id
- Status information

A process will be run once a day that goes through all the submissions received in the last 24 hours and pulls them together into a Mega Batch file to be sent to DCC.

A work list will be defined inside BSA E-Filing that will list all of the received batched files from the organization. These forms will remain in the system for 30 days Users will be able to access a work list to add their signature, print or save the forms. The process ids for these forms will also appear in a Track Status work list for tracking purposes.

DCC will send a Mega Acknowledgement file back to the BSA Direct E-Filing system as they do today. The organization's acknowledgement data will be parsed out of the returned Mega Acknowledge file to separate files and placed on the SDTM Server. The Acknowledgement files will be pushed back to the organization via Connect:Direct Secure+ and a RUNTASK will notify the receiving server that the acknowledgements have been transferred.

An email notice will be sent to one selected organization user indicating their acknowledgements are on their server and ready to be picked up.