



BSA 2026 | Program Essentials

A risk-based program creates the paper trail needed to detect and prevent financial crime.

PROGRAM OVERSIGHT

- **Board:** approve annually; review updates, documented discussions, examination findings, reputation risk, and resources.
- **Supervisory committee:** monitor whether the board and officials act within authority and perform responsibilities promptly and competently.
- **Compliance officer:** maintain required program elements; designated in minutes/policy and provided sufficient time, resources, authority, and training.

CONTROLS & TRAINING

- **Controls:** mitigate assessed risk, maintain continuity, support oversight and regulatory updates, and use dual controls/segregation where possible.
- **Testing:** use a qualified independent person who does not handle BSA transactions; test every 12–18 months and report results to the supervisory committee and/or board.
- **Training:** provide annual, role-specific training; document attendance and content; train promptly at hire or role change.

RISK ASSESSMENT

- **Scale to risk:** program complexity should grow with risk. Assess FOM, products/services, demographics, geography, HIDTA areas, and major routes.
- **Higher-risk examples:** MSBs, new businesses, marijuana-related businesses, writs/levies, private ATMs, and vague-purpose or early-paid loans.
- **Monitoring:** system reports, staff knowledge, account behavior, and current circumstances.

MEMBER ID & DUE DILIGENCE

- **MIP:** collect and retain name, physical address, date of birth, and tax ID; establish a “reasonable belief” that identity is known.
- **Verify:** use government ID and other documents or non-documentary methods such as credit reports, references, databases, and address resources.
- **MDD:** understand expected activity and account purpose; rate and monitor higher-risk accounts and special situations.
- **Beneficial owners/MSBs:** collect owners above 25% or the significant-control person. Retain at the credit union; confirm MSB registration and program diligence.



BSA 2026 | Reporting Essentials

Key thresholds, deadlines, information-sharing rules, and recordkeeping requirements.

CTR & EXEMPTIONS

- **CTR trigger:** cash over \$10,000 on the same day, by or on behalf of the same person; includes deposits, withdrawals, loan payoffs, and currency exchange.
- **File:** within 15 days; use daily system reporting, maintain a clear BSA-officer notice process, and recognize structuring.
- **Exemptions:** account open 2+ months; 5+ reportable transactions per year; organized under federal/state law; review annually
- **Education:** Ensure not assisting with structuring; provide brochure from <https://www.fincen.gov/system/files/shared/CTRPamphlet.pdf>.

SUSPICIOUS ACTIVITY (SAR)

- **Confidential:** file when investigated unusual activity does not make sense or may involve illegal activity.
- **Triggers:** insider abuse at any amount; \$5,000+ with an identified suspect; \$25,000+ regardless of suspect; \$5,000+ BSA/structuring; or useful law-enforcement information.
- **Timing and governance:** file in 30 days, or up to 60 if no suspect. Report filing activity to the board and monitor continuing activity.

SECTION 314 REQUESTS

- **314(a):** designated FinCEN contacts; search accounts for 12 months and transactions for 6 months; report matches within 2 weeks. Do not use results for another purpose.
- **314(b):** sharing is voluntary after both institutions register. Renew annually; use information only to identify and report possible terrorist or money-laundering activity. Confirmed for fraud too!

RECORDS & WATCH LIST

- **Monetary instruments:** for cash purchases of \$3,000–\$10,000, record purchaser, date, instrument type, serial number, and amount.
- **Retain 5 years:** CTR/SAR reports and support, identification documents, beneficial ownership forms, and training records.
- **Account opening:** obtain, verify, and record identifying information; a driver's license or another document may be requested.
- **FinCEN proposal themes:** AML/CFT terminology, deeper risk assessment, national priorities, and possible reporting-threshold changes.