DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

SMALL BUSINESS/SELF-EMPLOYED DIVISION

July 24, 2014

Control Number: SBSE-05-0714-0055
Expiration Date: July 24, 2016
Impacted IRMs: 5.1.18
5.20.12

MEMORANDUM FOR DIRECTORS, FIELD COLLECTION AREA OPERATIONS

FROM: Rocco A. Steco, /s/ *Rocco A. Steco*
                Acting Director, Collection Policy

SUBJECT: Transition from Web-based Currency and Banking Retrieval System
                (CBRS) to Financial Crimes Enforcement Network Query (FCQ)
                System

This memorandum provides interim guidance for Field Collection employees on how to obtain currency and other Bank Secrecy Act (BSA) reports. These new procedures are effective immediately and will be incorporated into Internal Revenue Manual (IRM) 5.20.12, *Abusive Tax Avoidance Transactions (ATAT)-Initial Contact and Research Actions Related to Abusive Tax Avoidance Transactions and* IRM 5.1.18, *Locating Taxpayers and their Assets.* Please disseminate this information to all affected personnel within your organization.

Background
The Web-based Currency and Banking Retrieval System (CBRS) has been replaced by the Financial Crimes Enforcement Network Query (FCQ) System. Data feeds to CBRS ceased on March 31, 2014, and it is scheduled for complete retirement on July 31, 2014.

FCQ is a web-based application which is owned by the Financial Crimes Enforcement Network (FinCEN), a Bureau within the Department of the Treasury. FCQ is a powerful and versatile tool to query and analyze Bank Secrecy Act (BSA) data, which is accessible through the FinCEN Portal. FCQ stores information reported by financial institutions.

FinCEN Query System
The FCQ system provides authorized users with access to currency and other Bank Secrecy Act reports, such as:

- Currency Transaction Report (CTR) - Cash transactions over $10,000
- Report of Foreign Bank and Financial Accounts (FBAR) - Foreign bank accounts with a total value over $10,000
- Designation of Exempt Person (DOEP)
- Registration of Money Services Businesses (RMSB)
- Report of International Transportation of Currency or Monetary Instruments (CMIR)
- Report of Cash Payments Over $10,000 Received in a Trade or Business (Form 8300)
- Suspicious Activity Report (SAR)

Some FCQ information can also be found on Integrated Data Retrieval System (IDRS) under the IRPTRO command code, but FCQ includes more specific data. FCQ information is useful in identifying cash activity that may not be accurately reported on the income tax return or disclosed on financial statements.

The FCQ system does not segregate SAR data; therefore, general program revenue officers (ROs) will not have direct access to FCQ system at this time. Such direct access is currently available only to ATAT personnel and Grade 13 ROs (referred to hereafter as "Authorized Users").

Directions for how general program ROs can obtain FCQ reports are shown in Attachment 1. Directions for those authorized direct access to FCQ are shown in Attachment 2.

Authorized Users are subject to online security reviews annually. (See Attachment 3 for audit procedure details.)

If you have questions, please contact me, or a member of your staff may contact Collection Policy Senior Program Analyst Kim Borbon at 304-579-6238 regarding any ATAT procedures listed or Michael C. Smith at 562-491-7744 regarding any general program procedures listed.

cc: Director, Field Collection
    Director, ECS
    Director, Fraud/BSA
    www.irs.gov

    Attachments

Attachment 1
PROCEDURES FOR GENERAL PROGRAM REVENUE OFFICERS
TO OBTAIN FCQ REPORTS

Revenue officers can obtain FCQ information when mandated by the IRM or when deemed necessary for case resolution by taking the following steps:

1. Complete the electronic Form 10509, *Web Currency and Banking Retrieval System (WebCBRS) Information Reques*t. This form will be available on ICS as of approximately January 2015.

2. Forward request to manager for approval.

3. Managers will indicate approval by affixing their electronic signatures in the box labeled "Approved by Group Manager".

4. Managers send the approved form to the Functional Automated Support (FAS) employee, via encrypted email, to the following address:

Area of Origin	Send Form 10509 to:
North Atlantic Area and South Atlantic Area	*SBSE CITS FAS East
Western Area, Midwest Area, and Central Area	*SBSE CITS FAS Midstates
Southwest Area and Gulf States Area	*SBSE CITS FAS West

5. FAS will extract the requested information within 5-7 days and return to the requesting RO via encrypted email.

Note: Only BSA data will be provided. SAR documents must be requested separately. IRM 5.20.12.9, *Suspicious Activity Reports (SAR),* contains guidance for ROs to obtain SAR data.

Attachment 2
PROCEDURES FOR AUTHORIZED USERS TO OBTAIN FCQ REPORTS

Abusive Tax Avoidance Transaction (ATAT) and Grade 13 ROs are authorized access to FCQ information in connection with active and assigned cases. In order to be profiled to access the FCQ system, ROs must complete all required training. (See Attachment 3 for more details).

[REDACTED]

#

Authorized Users have the ability to select from one of four search options and use enhancements, such as filters, wildcards, operators and import lists, to facilitate search efforts. ROs can refer to the FCQ User Manual for guidance in interpreting FCQ extracts at: FinCENQueryUserManual1.pdf.

Prior to being authorized access to the FCQ system, the RO must complete the required security briefings: *Safeguarding, Requesting & Using Suspicious Activity Report (SAR) Security* (ELMS #36427) and *Safeguarding Online Access and Using Suspicious Activity Report (SAR) Info Briefing* (ELMS #41166). Managers who have employees that have access to SARs must also take two (ELMS) courses: *Manager SAR Audit Trail Reviews* **(ELMS #36428) and** *Manager Online SAR Audit Trails Reviews Briefing* (ELMS #41167). (BSA is in the process of updating the data security briefings related to SAR reports.)

After completing the training, the RO should complete an Online 5081. Select the application name: *SYS USER FINCEN QUERY SYSTEM-IRS COLLECTION FUNCTIONS (FINCEN QUERY-CURRENCY AND BANKING RETRIEVAL SYSTEM)*.

In addition to the ELMS training, Authorized Users must also take either the Law Enforcement or Regulator Training. A minimum score of 80% is required for this test for users to be able to begin to conduct searches and queries. The link to the FCQ system and test will be provided after the 5081 process is completed. See attachment on the FCQ Account Creation Process.

For FCQ questions, technical support is available by contacting the FinCEN Application Service Desk at FinCENAppsHD@FinCEN.GOV or via (866)272-1310 Monday–Friday 6:30 a.m.–7:00 p.m. Eastern Time.

ATTACHMENT 3
AUTHORIZED USER TRAINING, ACCESS AND REVIEW PROCEDURES

Required Training before Access

1. To query the FCQ system, you **must** first complete either the Law Enforcement or Regulator Training.
2. To access this training, click on the "Training/Help" icon on the main Portal page under FinCEN Tools.
3. The very first training that will load will say:

> BSA Data Certification Training – Mandatory training required every 2 years for access to BSA Data Applications
> Law Enforcement BSA Data Certification Training

4. It will take approximately 45 minutes to complete the training.
5. There will be a test at the end. 80% or better is passing.
6. You **MUST** click on "Record Results" or the system will not update your profile.
7. Next, log out and log back into the Portal. Your profile will update automatically and grant access to query.

Requesting Access

1. After the RO submits the Online 5081 and it is approved, the Agency Coordinator (AC) will create your account in the FinCEN Portal.

2. You will automatically receive an email that contains:
   a. The link to the FinCEN Identify Manager, to update your profile
      - There are two sections to the FinCEN Identify Manager that you must fill out:
        - User Contact Information (Must include the Background Investigation Completed)
        - Supervisor Information
   b. A temporary password
      - You will be required to create a new password and answer three Challenge questions.
3. Fill out all the information referenced above and click on Submit. (If successful, the page goes black and then you will see a confirmation on the top of the page with a Request ID.)
4. You will soon receive an email certifying your information is complete and correct.
5. Once approved, your request for access is routed to FinCEN Liaison Services (LS).
6. LS will then review the request. If approved, you will receive a confirmation email.

Procedures for Authorized Users with SMART CARDS

IRS users who have a Personal Identity Verification/SMART card (PIV) should take the following steps:

      a. Insert PIV into the computer
      b. Open up an Internet Explorer page
      c. Enter the website: https://bsa.fincen.gov
             • A list of certificates will appear.
             • The first one will automatically be highlighted.
      d. Click OK.
      e. If you receive a message saying "Incorrect PIV.," this just means the wrong certification was selected.
      f. If this message appears, close completely out of Internet windows, log back in and select the 2nd certificate.
      g. Users will most likely be prompted to enter their PIN# that is associated with their PIV.
      h. You will then be taken into the FinCEN Portal.

IRS users who do not have a PIV will need to call the Applications Help Desk (866-272-1310, Option #2) and request a Soft Certificate.

BSA Review Procedures for Managers

Collection managers of employees with electronic access to BSA information must conduct online reviews of the FinCEN audit trails at least annually. Collection managers with ATAT or Grade 13 ROs are responsible for conducting reviews on their employees. The IDRS Data Security Staff is responsible for conducting reviews on FAS employees. The audits must include all FCQ searches within a selected 30 day period within the past year. BSA will provide an audit trail report, which is a history of the query parameters used by the FCQ user. The system will maintain 13 months of user query information.

BSA has established a FinCEN Query audit report mailbox to use when requesting audit trail information on specific FCQ system users. The mailbox address is: *SBSE FCQ AUDIT TRAIL.

When managers or data security analysts need an audit trail report for a FCQ user, they send the full employee e-mail address and the period of the audit trail request using the above mailbox address. Multiple FCQ user audit trails can be included in each e-mail request.

BSA will send the requested audit trail information directly to the requestor through secure e-mail. Managers or data security analysts should contact their FCQ administrators for specific audit trail requirements beyond the basics we have outlined here.