FinCEN Filing Preparation



Multi-State

Date: June 2025 **To:** All Agents

From: Elizabeth J. Wysong Berg

Subject: FinCEN Filing Preparation

Creating Accounts in Preparation for Filing FinCEN RRER Forms

Starting on December 1, 2025, settlement agents will be collecting information on residential real estate transactions and reporting the information to the Financial Crimes Enforcement Network (FinCEN). Prior to the start of this new requirement, accounts will need to be created at login.gov and with FinCEN itself. This guide is to assist Supervisory Users and Users in creating these accounts.

There are two types of accounts: **Supervisory User** and **User**. A settlement agent's unique title agency will want to establish who will be supervisory users and users in advance of setting up accounts. Supervisory Users will have authority to change entity information and view all aspects of an organization's filing status while a User will only be able to see the status of their own filings.

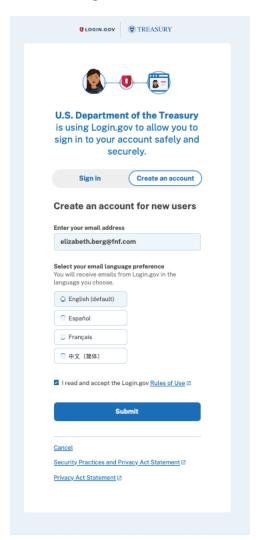
For business continuity purposes, it is advisable to have at least 2 Supervisory Users.



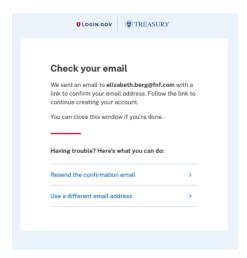
Login.gov

Login.gov is the federal government's method of cybersecurity. To file FinCEN reports, accounts for all FinCEN Supervisors and Users will need to be filed.

Step 1: Provide the User's email and other information to Login.Gov

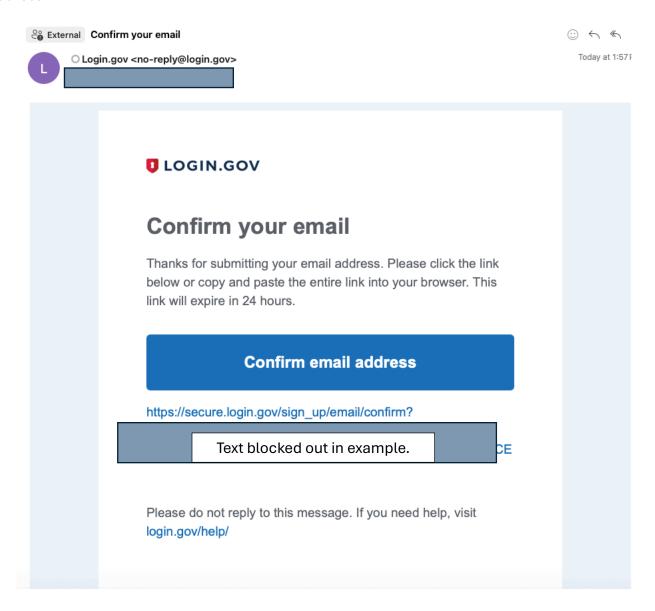


Step 2: An email will be sent by Login.Gov



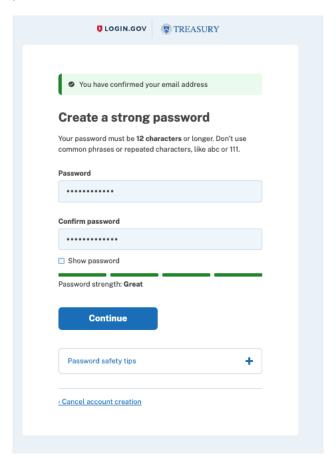


Step 3: The User will receive an email that looks like this requiring the User to confirm their email address





Step 4: After the User's email is confirmed, the User will need to create a strong password.

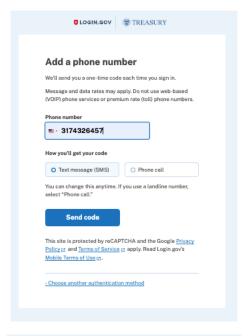


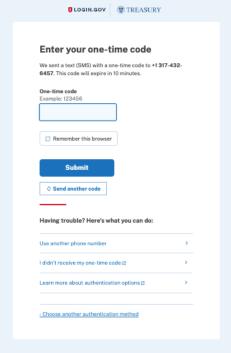
Step 5: The user will set up their first multifactor method to authenticate their account.



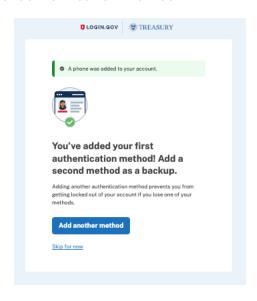


Example: Multi-factor authentication using a telephone number.



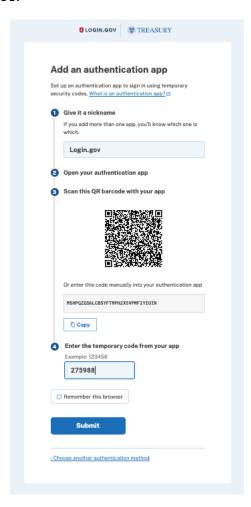


Step 6: The User will set up a second multifactor authentication method

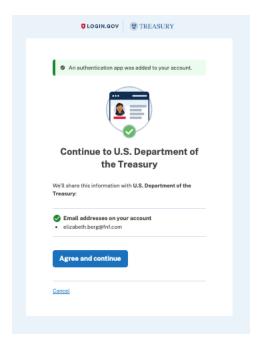




Example: Setting up using an authentication application on the User's cell phone or other device.



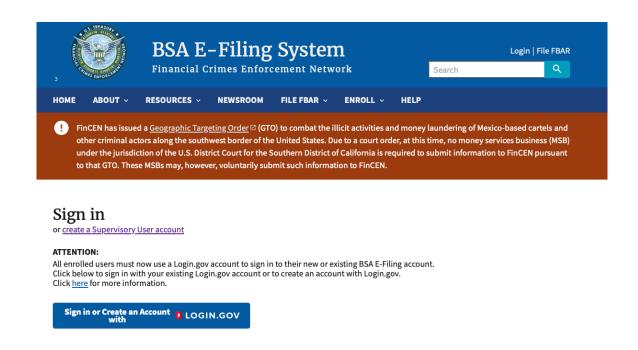
Step 7: The User is ready to continue to the U.S. Department of Treasury to create Supervisory Users, register the Organization company and create other Users.



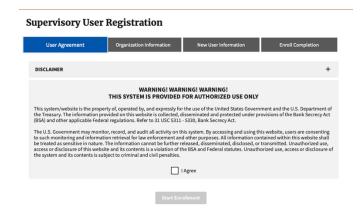
BSA E-Filing System available at https://bsaefiling.fincen.gov

FinCEN collects many different report types in it's BSA E-Filing System that was created to handle Bank Secrecy Act reporting. Even though the form input portal has not been created by FinCEN yet, Supervisory Users and Users can still begin to explore the system in preparation for the December 1, 2025 start date.

Step 1: A Supervisory User begins on this page to "Create a Supervisory User account." A SUPERVISORY USER IS CREATED AT THE SAME TIME AS THE ORGANIZATION IS REGISTERED WITH FINCEN.



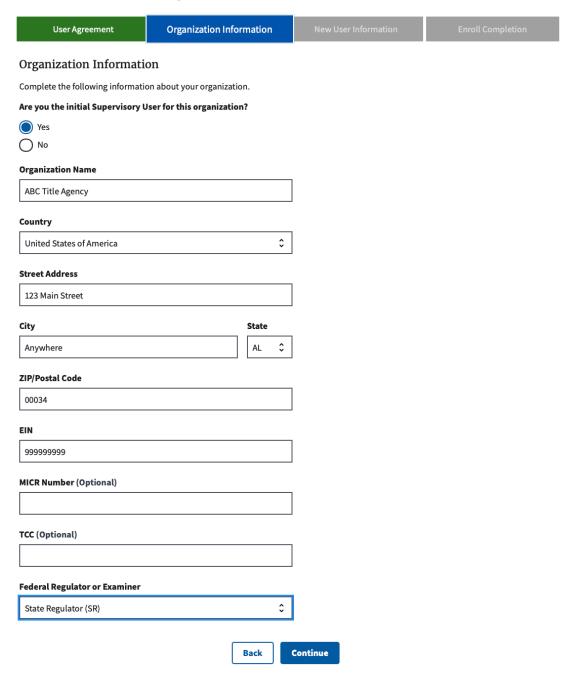
Step 2: Agree to the Warning





Step 3: The Supervisory User will indicate they are the Supervisory User and provide information about the organization including the EIN and who the Federal Regulator or Examiner is. For Title Agents, there is the option of State Regulator.

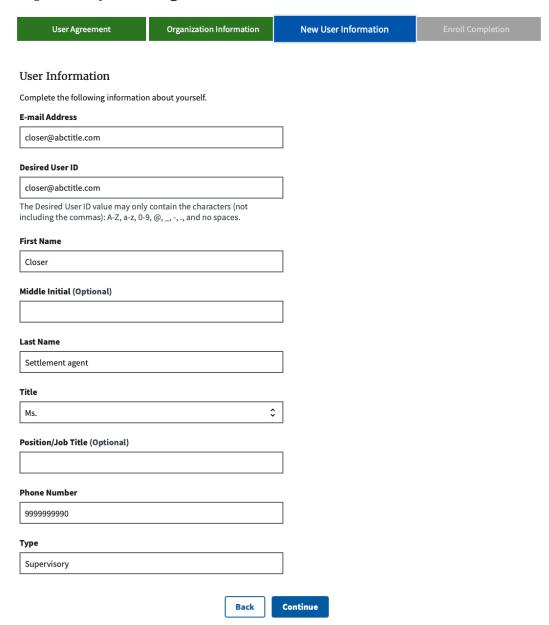
Supervisory User Registration





Step 4: The Supervisory User will enter their information under the New User Information tab and indicate their role is Supervisory.

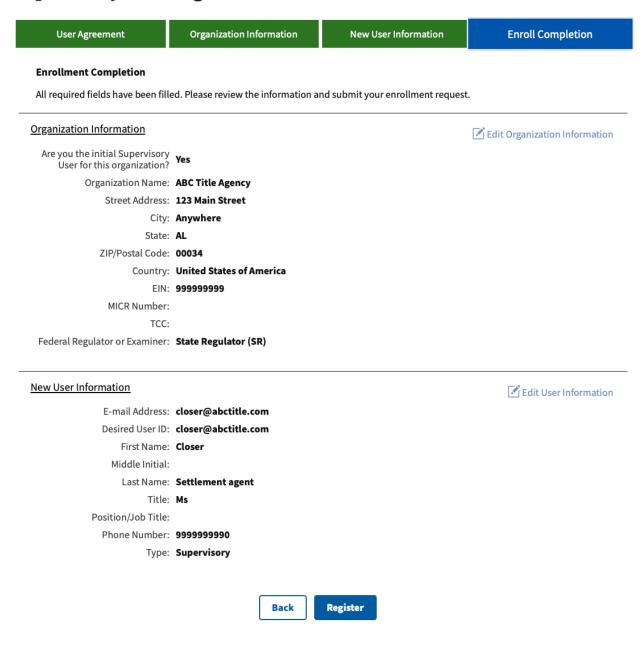
Supervisory User Registration





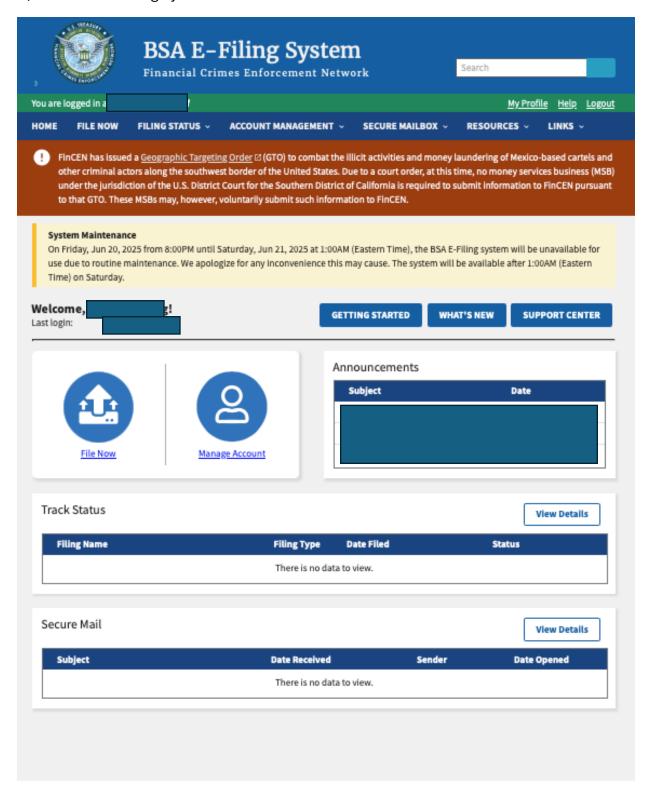
Step 5: The Supervisory User will review the Organization Information and New User Information. If edits are needed, there is an edit option on the right-hand side of the screen. If the information is correct, the Supervisory User clicks Register. Once registered, a number will be provided for the organization that should be saved in a secure location.

Supervisory User Registration



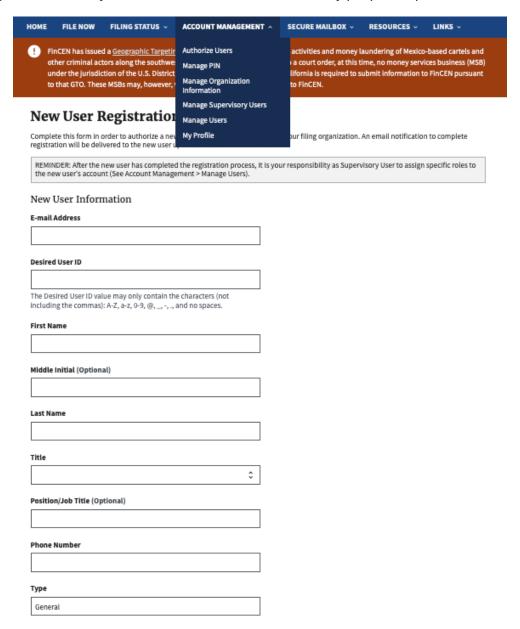


Once, in the BSA E-Filing System looks like the screen below.





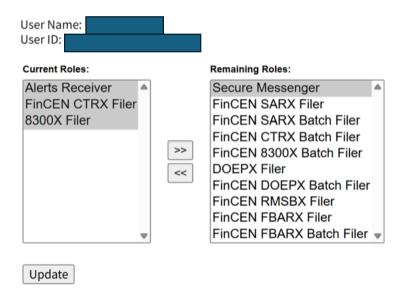
Registering Additional Supervisory Users and Users: Supervisory Users are able to register additional Supervisory Users and Users under the Account Management tab. (Note: At least two Supervisory Users is always advisable for business continuity purposes.)





After creating a User, the Supervisory User will also want to assign roles to the User. If this is not done, the User will be unable to file FinCEN RRER reports.

Edit User Roles

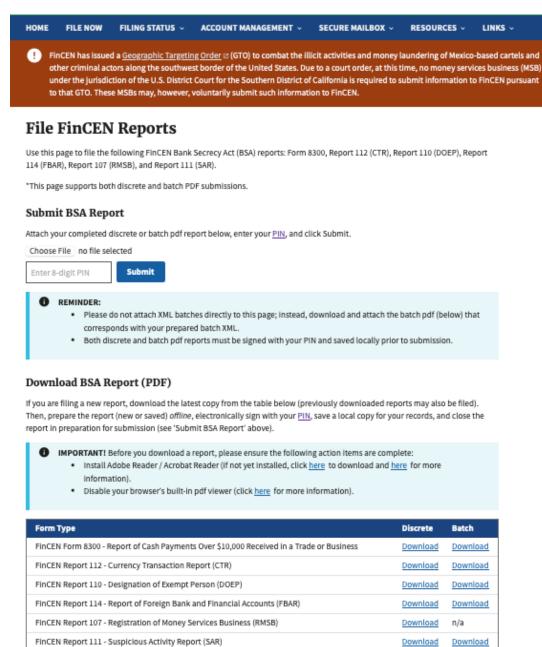


Note: PIN Numbers are issued by FinCEN to Supervisory Users and Users. This number is stored under "Manage PIN" under the BSA E-Filing Account Management Tab. Supervisory Users and Users will input this PIN when filing reports as noted on the next page.





Filing FinCEN Reports: The various FinCEN Reports may be filed starting on this page under the "File Now" tab. The Residential Real Estate Report has not been created by FinCEN yet but will be found here in the future. As more information is provided to the industry, tools are being developed right now to aid settlement agents with filing FinCEN reports. For now, mid-2025, the below screen shots and emails show a snapshot of the manual process.



^{*} If you see "No Access" listed for any of the reports above, then you do not have the associated role to access this report. To obtain access, please contact your filing organization's Supervisory User.



After filing the report with FinCEN, Users will be shown a screen and receive an e-mail from FinCEN stating filing was submitted. The screen and email will provide a BSA E-Filing Tracking ID. The email looks like:

From: cm.bsaefiling@fincen.gov <cm.bsaefiling@fincen.gov> Sent: Friday, June 27, 2025 11:21 AM To Subject: Submission Accepted</cm.bsaefiling@fincen.gov>
IMPORTANT NOTICE - This message sourced from an external mail server outside of the Company.
Type: CTRX Receipt No.: Filing Name:
Your submission was accepted and will be transmitted.
PLEASE NOTE: This email is for notification purposes only. Please do not reply to this email for any purpose. Questions may be routed to the BSA E-Filing Help Desk via the BSA E-Filing System's Contact Us form https://bsaefiling.fincen.gov/HelpTicketForm_;!!LyAuvDCm-53-y27wV7iK5g!wDMsToGzuLV7YLFUrXsIC56vQYMKYVpbF34GEegG0aSLUUPYzIM3LWjSbtPls0bNmj3WqLwVIHg9aPFIXxbHi8xV65qN\$.
FinCEN's Privacy Policy can be accessed at



FinCEN will review the form and if there are no issues, an email will be sent that provides a receipt number and informs you the file has been issued a BSA ID. The filing is complete unless additional information comes to a settlement agent and an amendment has to be done.

From: cm.bsaefiling@fincen.gov <cm.bsaefiling@fincen.gov> Sent: Thursday, June 5, 2025 10:18 PM To Subject: Message Reply</cm.bsaefiling@fincen.gov>
IMPORTANT NOTICE - This message sourced from an external mail server outside of the Company.
Type: REPLY Receipt No.:
PLEASE NOTE: This email is for notification purposes only. Please do not reply to this email for any purpose. Questions may be routed to the BSA E-Filing Help Desk via the BSA E-Filing System's Contact Us form

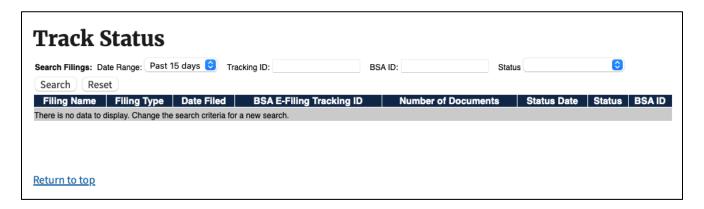


FinCEN does reject filings. Often it is due to formatting and FinCEN not receiving all the required information. If FinCEN rejects, an email is sent that looks like:

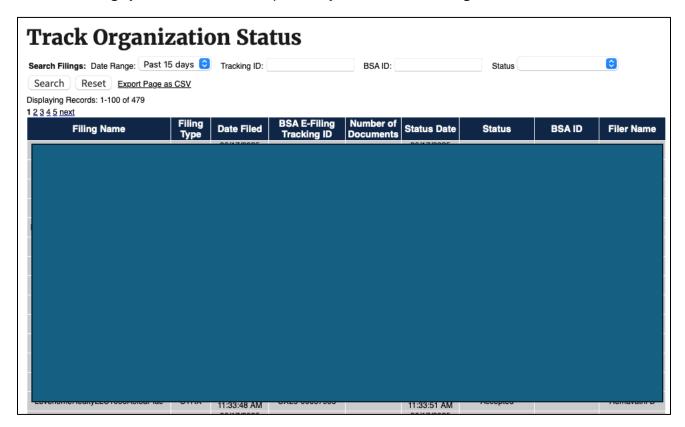
From: cm.bsaefiling@fincen.gov <cm.bsaefiling@fincen.gov> Sent: Monday, May 12, 2025 9:39 AM To: Subject: Submission Rejected</cm.bsaefiling@fincen.gov>
IMPORTANT NOTICE - This message sourced from an external mail server outside of the Company.
Type: 8300X Receipt No.:
Your submission was rejected by the server and will not be transmitted. Please correct the file and resubmit.
For a detailed error description, please login to the site and click Track Status. If the reason for rejection is related to the underlying XML schema structure, it is likely your report version is no longer supported or it has become corrupted and will require that you download a new report from the BSA E-Filing System. PLEASE NOTE: This email is for notification purposes only. Please do not reply to this email for
any purpose. Questions may be routed to the BSA E-Filing Help Desk via the BSA E-Filing System's Contact Us form https://urldefense.com/v3/



Auditing and Compliance: The BSA E-Filing system allows a user to "Track Status" of their submissions.



The BSA E-Filing system also allows Supervisory Users to "Track Organization Status."





Lastly, the BSA E-Filing System has a "Support Center" to assist Supervisory Users or Users.



Support Center

