

Question: I understand that one of the criteria for issuing a warning letter is that the person must file delinquent FBARs. I also understand that all FBARs, including delinquent FBARs, must be filed electronically - effective July 1, 2013. How can I confirm whether a delinquent FBAR has been electronically filed?

Answer: FBARs filings can be verified by conducting a search using the FinCEN Query (FCQ). The FCQ is a new database developed by FinCEN for researching BSA documents, such as FBARs. It replaces WebCBRS.

Electronically filed FBARs should appear on the FCQ within approximately 3 days.

We have learned through some sample testing (and confirmed by Detroit), that electronically filed FBARs have not been uploaded to the WebCBRS database. If you have WebCBRS access, that database may be helpful for researching older years – but you should definitely be using FCQ going forward.

According to FinCEN, the earliest a person could have electronically filed an FBAR was August 2011. Paper-filed FBARs will show up on both databases. However, electronic filing of FBARs is mandatory effective July 1, 2013.

Currently, only SAR Gatekeepers are granted access to FCQ because the FinCEN database allows users access to all BSA documents – including Suspicious Activity Reports (SARs).

If your local SAR Gatekeeper does not have FCQ access, then complete Form 10509 - CBRS Info Request and email it to (b) (6).

To find the CBRS/FinCEN request forms as well as the requesting procedures, simply go to the SEP section of this SharePoint site and look for the FinCEN Query (CBRS) Research library. For any other questions, contact (b) (6).