

REQUEST FOR RECORDS DISPOSITION AUTHORITY <i>(See Instructions on reverse)</i>		LEAVE BLANK (NARA use only)	
TO NATIONAL ARCHIVES and RECORDS ADMINISTRATION (NWML) 8601 ADELPHI ROAD, COLLEGE PARK, MD 20740-6001		JOB NUMBER N1-559-09-1	
1 FROM (Agency or establishment) Department of the Treasury		DATE RECEIVED 6/5/09	
2 MAJOR SUBDIVISION Financial Crimes Enforcement Network		In accordance with the provisions of 44 U.S.C. 3303a the disposition request, including amendments, is approved except for items that may be marked "disposition not approval" or "withdrawn" in column 10	
3 MINOR SUBDIVISION Office of Compliance			
4 NAME OF PERSON WITH WHOM TO CONFER Steve Rudzinski	5 TELEPHONE 703-905-3845	DATE 10-26-09	ARCHIVIST OF THE UNITED STATES <i>Adrienne Thomas</i>
5 AGENCY CERTIFICATION I hereby certify that I am authorized to act for this agency in matters pertaining to the disposition of its records and that the records proposed for disposal on the attached <u>2</u> page(s) are not now needed for the business of this agency or will not be needed after the retention periods specified, and that written concurrence from the General Accounting Office, under the provisions of Title 8 of the GAO Manual for Guidance of Federal Agencies, <input type="checkbox"/> is not required, <input type="checkbox"/> is attached, or <input type="checkbox"/> has been requested			
DATE June 2, 2009	SIGNATURE OF AGENCY REPRESENTATIVE <i>Steve Rudzinski</i>		TITLE Records Officer
7 ITEM NO	8 DESCRIPTION OF ITEM OF PROPOSED DISPOSITION	9 GRS OR SUPERSEDED JOB CITATION	10 ACTION TAKEN (NARA USE ONLY)
	<u>Regulatory Policy Program (RPP) Case Management System (CMS)</u> Background: Retention based on previously approved textual disposition authority The Regulatory Policy Program (RPP) Case Management System (CMS) enables the tracking of all cases, referrals and correspondence related to Bank Secrecy Act compliance There are multiple types of records kept within CMS Each federal and state regulatory agency that has a Memorandum of Understanding Agreements with FinCEN send information to the Office of Compliance. Each agency has different types of information in various formats The types of records received from the various agencies kept within CMS include Reports of Examination, Consent Orders, Orders to Cease and Desist, Board Resolutions, Memoranda of Understanding, memos, emails, contact information, and general letters and correspondence. In addition, cases are created for financial institutions that self-report incidences of Bank Secrecy Act non-compliance. For cases of non-compliance, office staff prepare memoranda assessing the matter and make recommendations to the Assistant Director on how FinCEN should resolve the issue(s). Records are maintained from Fiscal Year 2004 through Fiscal Year 2009. The Office of Compliance intends to possess the informational content indefinitely, or as long the Office of Compliance continues to pursue and retain its current objectives within the Regulatory Policy Program Division (RRPD)		revised schedule sent electronically see attached per email of 7/29 from Records officer. - RF

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	<u>Regulatory Policy Program (RPP) Case Management System (CMS)</u> Background: The Regulatory Policy Program (RPP) Case Management System (CMS) enables the tracking of all cases, referrals and correspondence related to Bank Secrecy Act compliance. There are multiple types of records kept within CMS. Each federal and state regulatory agency that has a Memorandum of Understanding Agreements with FinCEN send information to the Office of Compliance. Each agency has different types of information in various formats. The types of records received from the various agencies kept within CMS include: Reports of Examination, Consent Orders, Orders to Cease and Desist, Board Resolutions, Memoranda of Understanding, memos, emails, contact information, and general letters and correspondence. In addition, cases are created for financial institutions that self-report incidences of Bank Secrecy Act non-compliance. For cases of non-compliance, office staff prepare memoranda assessing the matter and make recommendations to the Assistant Director on how FinCEN should resolve the issue(s). Records are maintained from Fiscal Year 2004 through Fiscal Year 2009. Description: The Regulatory Policy and Program (RPP) Case Management System is a web-based interface and database application that captures data and allows the Office of Compliance to manage and track the status of their cases, referrals and correspondence		

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The system also produces management reports with aggregate case processing information in the RRPD

A. Inputs:

Compliance cases are primarily developed through referrals from federal and state regulatory agencies in accordance with Memoranda of Understanding between FinCEN and the agencies with delegated authority to conduct Bank Secrecy Act examinations, including

- Board of Governors of the Federal Reserve System
- Commodity Futures Trading Commission
- Federal Deposit Insurance Corporation
- Internal Revenue Service
- National Credit Union Administration
- Office of the Comptroller of the Currency
- Office of Thrift Supervision
- Securities and Exchange Commission
- Commodity Futures Trading Commission

Additionally, multiple state supervisory agencies that conduct Bank Secrecy Act-style examinations have also signed similar information sharing agreements with FinCEN. Under the terms of the Memoranda of Understanding, agencies are required to notify the Office of Compliance of significant Bank Secrecy Act violations or deficiencies. Through this information sharing, the Office of Compliance aims to further FinCEN's responsibilities to administer and implement the Bank Secrecy Act. The information is scanned in to the system as it is received

Disposition: TEMPORARY Cut-Off at end of processing year
Destroy 5 years after processing year.

B. System Data:

Along with using CMS to track case processing activity, CMS is used in various ad-hoc reporting capacities, i.e. data trending and analysis, which consequently requires a significant duration of time to more accurately evaluate informational content.

Disposition: TEMPORARY. Destroy when 20 years old or no longer needed for operational purposes whichever is longer

C. Outputs:

The system produces management reports to track case processing activity. Some reports are generated on a monthly basis, but many are produced on an ad hoc basis

Disposition: TEMPORARY Cut-Off at end of processing year
Destroy 20 years after processing year

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D. System Documentation:

Codebooks, records layout, user guide, and other related materials.

Disposition: Temporary..

Destroy or delete upon authorized deletion of the related electronic records or upon the destruction of the output of the system if the output is needed to protect legal rights, whichever is later. GRS 20