



# Audit Report



OIG-18-040

TERRORIST FINANCING/MONEY LAUNDERING

FinCEN's Regulatory Helpline Provides Guidance But Controls  
Need to be Enhanced

February 26, 2018

Office of  
Inspector General

Department of the Treasury

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## Abbreviations

BMC Remedy User Tool	Remedy
BSA	Bank Secrecy Act
ECC-D	Enterprise Computing Center Detroit
FinCEN	Financial Crimes Enforcement Network
FRC	FinCEN Resource Center
FY	Fiscal Year
GAO	Government Accountability Office
Helpline	Regulatory Helpline
ID	Identification
IRS	Internal Revenue Service
IT	Information Technology
JAMES	Joint Audit Management Enterprise System
MSB	Money Services Business
OIG	Office of Inspector General

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OMB	Office of Management and Budget
Outlook	Microsoft Outlook
RSS	Regulatory Support Section
Treasury	Department of the Treasury

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*The Department of the Treasury  
Office of Inspector General*

February 26, 2018

Kenneth A. Blanco  
Director  
Financial Crimes Enforcement Network

This report presents the results of our audit of the Financial Crimes Enforcement Network's (FinCEN) Resource Center's (FRC) Regulatory Helpline (Helpline). FinCEN is responsible for implementing, administering, and enforcing compliance with the Bank Secrecy Act (BSA)<sup>1</sup> and anti-money laundering regulations including the USA PATRIOT Act.<sup>2</sup> BSA requires financial institutions to keep records and file reports that are determined to have a high degree of usefulness in criminal, tax, and regulatory matters. FRC operates a Helpline which provides guidance and support to financial institutions, money services businesses (MSB), casinos, and others who have questions on regulatory and compliance matters.

Our audit objective was to determine and assess the controls over the Helpline to provide guidance to users that is responsive and consistent with the BSA, USA PATRIOT Act, and related regulations. We conducted our fieldwork from June 2014 through February 2015 with subsequent follow up through June 2017. We interviewed FinCEN officials and reviewed Helpline operations and applicable documentation. Appendix 1 provides a more detailed description of our audit objective, scope, and methodology.

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<sup>1</sup> Public Law 91-508, 84 Stat. 1114 through 1136 (October 26, 1970).

<sup>2</sup> Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001, P.L. 107-56, 115 Stat. 296 through 342 (2001) (USA PATRIOT Act). Title III of the USA PATRIOT Act is separately entitled "International Money Laundering and Anti-Terrorist Financing Act of 2001." Title III contains the majority of the USA PATRIOT Act's anti-money laundering and anti-terrorist financing provisions.

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## Results in Brief

Customer satisfaction surveys authorized by the Office of Management and Budget (OMB) show that users understood the guidance provided by FinCEN's Helpline staff, however we found that internal controls over the process need to be enhanced.

FinCEN measured customer satisfaction by analyzing results from its annual FinCEN Resource Center Customer Satisfaction Survey. FinCEN reported that for fiscal years (FY) 2012 through 2016, the percentage of Helpline customers understanding guidance ranged from 89 to 92 percent.

Regarding internal controls over the Helpline, FinCEN could not provide a universe of inquiries limited to those handled by Helpline staff. FinCEN cited limitations with its BMC Remedy User Tool (Remedy), an "off-the-shelf" call center application used to enter, store, and track inquiries received by the Helpline. Additionally, FinCEN could not provide a record of all request identification (ID) numbers created in Remedy for the audit period January 1, 2012 through June 30, 2014, to ensure all inquiries made to the Helpline were accounted for. We identified several gaps in the sequential numbering of request ID numbers. FinCEN officials told us the missing request ID numbers we identified were created for information technology (IT) testing purposes only and were deleted after testing was completed. No record was kept of the deleted request ID numbers. Therefore, we could not verify that these numbers had been used for testing purposes.

Furthermore, we were unable to obtain a sample of Helpline voicemail and email inquiries to determine if they were properly recorded in Remedy, and properly addressed by staff. In response to limited storage capacity, FinCEN's Helpline procedures directed Helpline staff to delete voicemail and email inquiries after responding and logging the response in Remedy. Consequently, we could not audit the accuracy of the information entered into Remedy to determine that guidance to users was responsive and consistent with the BSA, USA PATRIOT Act, and related regulations.

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In addition, we could not assess the timeliness of responses to Helpline inquiries. FinCEN's goal is to respond to inquiries within 1 hour and no more than 24 hours. Helpline staff, however, were not required to document in Remedy the actual date and time an inquiry was received at FinCEN. In most cases, Helpline staff input an inquiry in Remedy and closed out the inquiry at the same time resulting in the date and time the inquiry was created and resolved being identical. Per FinCEN's standard operating procedures if a question requires further research, the inquiry is entered into Remedy with a status of "Pending" and would show a longer time to resolve.

Although we were told that quality control reviews of the Helpline inquiries were performed, the results of these internal reviews were not always documented by FinCEN.

We recommend that FinCEN (1) retain all request ID numbers created in order to provide an accounting of all actions taken in the system used to record Helpline inquiries; (2) implement processes to ensure that every inquiry received is appropriately documented to determine the timeliness of the response; and (3) document the methodology and results of quality control reviews and retain complete and accurate records of these reviews.

In a written response, which is included in its entirety as appendix 3, FinCEN management reported that it is committed to providing quality customer service regarding BSA regulatory and compliance matters. FinCEN management reported its Technology Division updated Remedy to ensure numbers assigned in the system cannot be skipped and tickets cannot be deleted. FinCEN management also reported it has implemented a process to ensure that every inquiry received is appropriately documented and reviewed for timeliness. Finally, FinCEN's Liaison Division Regulatory Support Section Chief has formalized a process to document the results of Helpline quality control reviews.

We consider FinCEN's corrective actions taken responsive to our recommendations. Management will need to record the actual date of completed corrective actions in the Joint Audit Management

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Enterprise System (JAMES), Treasury's audit recommendation tracking system.

## Background

FinCEN operates a Helpline that provides support on BSA regulatory and compliance matters. The Helpline receives a wide variety of requests for assistance from stakeholders including financial institutions, MSBs, casinos, and others seeking information or clarification of their obligations under the BSA and related regulations. Helpline staff provide assistance with published guidance on currency transaction reports, suspicious activity reports, MSB requirements, and other BSA matters. The Helpline staff also track inquiries received to identify important concerns and trends with respect to compliance, and to identify areas for which FinCEN may need to clarify current regulations, rulings, or guidance. FinCEN also posts direct links to useful information for addressing the most common and important questions asked of the Helpline on its website. The web page is updated regularly to reflect the changing nature of questions regarding anti-money laundering and FinCEN regulations.<sup>3</sup>

FinCEN implemented a significant reorganization on June 24, 2013. Prior to FinCEN's reorganization, the Helpline operations were located within the Office of Outreach Resources. As a result of the reorganization, FinCEN's Helpline operations were moved to FRC Regulatory Support Section (RSS) located in FinCEN's Liaison Division. FinCEN's Home web page directs financial institutions and others needing assistance to first contact the FRC which handles a broad range of intake requests, information exchange mechanisms, and requests for information.<sup>4</sup>

The Helpline receives the majority of inquiries by voicemail but may also receive inquiries by email.<sup>5</sup> FinCEN requires callers to leave voicemail messages with identifying information and are told in a recorded message that a Helpline staff member will return their call

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<sup>3</sup> The FinCEN "Regulatory Helpline Hot Topics" web page is at <https://www.fincen.gov/hot-topics>.

<sup>4</sup> FinCEN's Home web page is at <https://www.fincen.gov>.

<sup>5</sup> Inquiries can be made to the Helpline by leaving a voicemail message at 1-800-949-2732 or emailing [FRC@fincen.gov](mailto:FRC@fincen.gov).

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promptly. The Helpline operations were designed this way to allow staff time to research a response to the inquiry.

Messages left by callers are stored in voicemail extensions accessible from each Helpline staff's Microsoft Outlook (Outlook) account. Helpline staff are assigned a voicemail extension each day and are responsible for answering their respective inquiries. Helpline staff are also assigned email inquiries received at FRC for resolution. Those emails are retrieved by senior Helpline staff and forwarded to the appropriate staff member for resolution.

FinCEN's goal is to respond to inquiries within 1 hour and no more than 24 hours. FinCEN's responses are generally provided via telephone. An email response is provided only if the answer to an inquiry can be found in published information. Appendix 2 outlines the sequence of steps taken to respond to a Helpline inquiry.

According to a FinCEN official, Remedy is primarily used as the key information source used by the Helpline to document common inquiries and FinCEN responses that can be shared across the FRC to ensure consistent and appropriate responses are provided to users. As part of this process, Remedy is used by staff to enter, store, and track inquiries received at the Helpline. Staff can also search Remedy, modify existing requests, and generate reports. Additionally, Remedy is used for trend analysis of Helpline inquiries received. Trend analysis reports are generated to identify hot topics and areas where additional guidance materials are needed to assist in complying with regulations and FinCEN requirements.

The Helpline staff was not the only group that used Remedy to document inquiries or correspondence. FinCEN's Policy Division used Remedy to track BSA reports filed via paper and record correspondence with filers explaining the mandatory BSA E-Filing requirement.<sup>6</sup> Also, the Internal Revenue Service (IRS) Enterprise Computing Center Detroit (ECC-D) used Remedy to document inquiries related to MSBs and BSA filings until FY 2013 when FinCEN staff began handling many of these inquiries.

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<sup>6</sup> The BSA E-Filing System supports electronic filing of BSA forms through a FinCEN secure network.

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FinCEN measured customer satisfaction as part of monitoring the effectiveness of the Helpline for FY 2012 through 2016, by analyzing the results from the annual FinCEN Resource Center Customer Satisfaction Survey. Customer satisfaction results were based on approximately 250 participant responses to one question presented in the survey asking whether the Helpline response received was understandable.

## **Audit Results**

### **Helpline Internal Controls Need to be Enhanced**

Stronger internal controls over Helpline processes are needed. FinCEN could not provide a record limited to Helpline inquiries from January 1, 2012 through June 30, 2014, our audit period. In addition, FinCEN did not keep a record of all entries made in Remedy as missing request ID numbers were identified. Further, we were unable to determine if inquiries were being properly recorded in Remedy because FinCEN's policy was to delete Helpline messages immediately after resolution. Also, the timeliness of responses to Helpline inquiries could not be assessed. Helpline staff were not required to document the time and date inquiries were actually received at FinCEN. Because Helpline voicemail and email inquiries were deleted, we could not audit the accuracy of information entered into Remedy and could not determine that guidance to users was responsive and consistent with the BSA, USA PATRIOT Act, and related regulations. Lastly, the results of internal quality control reviews were not consistently documented by FinCEN.

#### FinCEN Could not Provide a Universe Limited to Helpline Inquiries

FinCEN was unable to provide an exclusive universe of inquiries limited to those handled by Helpline staff during our audit period. In June 2014, we requested documentation of all information fields in Remedy used by FRC to document inquiries handled by the Helpline staff. The documentation was to include, but not limited to, the date the Helpline was initially contacted, the manner of contact (telephone or email), the issue area, the type of caller if known, the question asked, FinCEN's response, and the date of that response.

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FinCEN made several attempts to provide us with a log of only Helpline inquiries and corresponding responses. Those attempts however, were unsuccessful. We found discrepancies in the data provided and differing counts on the number of inquiries handled by Helpline staff. Some versions included correspondence to users from FinCEN's Policy Division and entries made by IRS ECC-D staff.

According to FinCEN officials, Remedy was not designed to generate bulk data extracts. Our data request required FinCEN to run customized Helpline logs but Remedy was limited to creating summary level reports for senior management on topics which included the volume of inquiries received for the fiscal year categorized by issue area such as general information on BSA E-Filing or requirements for MSBs.

#### Request ID Numbers Deleted from Remedy

FinCEN did not keep a record of all request ID numbers created in Remedy during the audit period. Request ID numbers were automatically generated and assigned sequentially when an entry was made in Remedy. The assigned number was populated by the system regardless of the group that made the entry. FinCEN officials told us that request ID numbers could only be deleted by FinCEN IT staff who also made entries in Remedy when performing tests on the system.

We found a total of 81,536 entries generated in Remedy during our audit period, January 1, 2012 through June 30, 2014.<sup>7</sup> We accounted for 79,997 request ID numbers in Remedy and identified 1,539 missing request ID numbers. Assigning a unique request ID number to each entry in Remedy provides a record of all activity. FinCEN officials told us that the missing request ID numbers were created for IT testing purposes only and were deleted by IT personnel after testing was completed. No record, however, was kept of the deleted request ID numbers for us to verify this.

FinCEN officials said there was no need to retain these deleted request ID numbers. They did not consider them important to track

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<sup>7</sup> Total entries were determined by taking the last request ID number created in Remedy during our audit period and subtracting the first request ID number created.

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Helpline inquiries, and the request ID numbers were not included in reports generated by Remedy for senior management. In order to maintain proper internal controls, FinCEN needs to keep a record of all request ID numbers created in Remedy to determine that all inquiries are appropriately recorded and resolved.

Government Accountability Office (GAO), formerly known as General Accounting Office *Standards for Internal Control in the Federal Government* call for controls over information processing to include accounting for transactions in numerical sequences.<sup>8</sup> In addition, Department of the Treasury (Treasury) Directive 80-05, *Records and Information Management Program*, requires all Treasury bureaus and offices establish adequate and proper documentation of essential transactions in a manner that promotes accountability and establishes a historical record.

#### Entries Made in Remedy Could not be Assessed

We were unable to audit the accuracy of the information entered into Remedy to determine if inquiries were being properly addressed by staff. Following policy, Helpline staff deleted the voicemail message immediately after responding to the caller and logging the inquiry and response in Remedy due to FinCEN's limited storage capacity. Emails are also deleted after resolution.

The RSS Chief told us that he compared call volumes received through Outlook to the volume of inquiries entered in Remedy as part of his daily quality control monitoring process to ensure that all inquiries were addressed by his staff. He looked at messages received through Outlook and identified such things as the volume of calls coming in by an area code and compared this with the volume of inquiries entered into Remedy with the same area code. Spot checks were also performed to verify the accuracy of responses by reviewing randomly selected voicemail messages received through Outlook and locating the corresponding log entry in Remedy. However, if a caller's voicemail was mistakenly deleted by a Helpline staff member prior to being responded to and entered

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<sup>8</sup> GAO, *Standards for Internal Control in the Federal Government* (GAO/AIMD-00-21.3.1; issued Nov. 1999). GAO's September 2014 revision (GAO-14-704G), which becomes effective in 2016, also includes these requirements.

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into Remedy, the RSS Chief had no means of knowing that the inquiry was ever received. Monitoring of email inquiries was managed within an Outlook file folder. Inquiries not resolved immediately were reviewed on a daily basis.

Quality control reviews were not always documented. Since most of the quality control reviews conducted showed that the Helpline was operating effectively and efficiently, the RSS Chief stated that there was no need to document the results of the reviews. Written evidence of quality control reviews could be found when a staff member reached out for assistance or when additional guidance was required in answering an inquiry. While we were told quality control reviews were conducted, *GAO Standards for Internal Control in the Federal Government* call for control activities to be completely and accurately recorded. Creation of appropriate documentation provides evidence of execution of these activities.

#### Staff Was not Required to Record in Remedy the Actual Date and Time FinCEN Received a Helpline Inquiry

We found that Helpline staff were not required to record in Remedy the actual date and time an inquiry was received at FinCEN. The RSS Chief stated that when responding to an inquiry, the Helpline staff often created a request in Remedy, entered the users' questions and FinCEN's response to the questions all at the same time. This caused the create date and resolve date to show the same date and time. This was the procedure followed in most cases. An exception to this process was when a difficult question was received at the Helpline. In those instances, Helpline staff logged in the call and left the inquiry pending until resolved.

Due to this process, we could not assess the timeliness of responses to Helpline inquiries. Cognizant of FinCEN's goal to respond to inquiries within 1 hour and no more than 24 hours, FinCEN's RSS Chief estimated that most inquiries were responded to and resolved within 2 hours.

*GAO Standards for Internal Control in the Federal Government* also call for managers to compare actual performance to planned or expected results and analyze significant differences. In order to assess the timeliness of FinCEN's response to Helpline inquiries,

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the time an inquiry is received at FinCEN should be recorded in Remedy. FinCEN's Helpline procedures state that Helpline staff are required to create a log in Remedy immediately upon receiving an inquiry.

The RSS Chief said quality assurance reviews included a review for the timeliness of responses. He said he would follow up with Helpline staff if delays were found in addressing inquiries. However, we could not verify this information as these quality assurance reviews were also not consistently documented.

Additionally, FinCEN used the Resource Center Customer Satisfaction Survey to monitor the effectiveness of the Helpline as a tool to determine the timeliness of Helpline responses. The questionnaire used in the survey asked the sample of Helpline users how long it took before a reply was received from FinCEN. FinCEN's goal is to establish contact with the caller within 24 hours to acknowledge receipt of the inquiry. FinCEN reported that for FYs 2012 through 2016, the percentage of Helpline customers receiving a reply from FinCEN within one business day ranged from 65 to 87 percent.

Regarding whether users understood the guidance from the Helpline staff, FinCEN analyzed the results of the Resource Center Customer Satisfaction Survey and reported in FYs 2012 through 2016, the percentage of Helpline customers understanding guidance ranged from 89 to 92 percent.

The disadvantage of the FinCEN survey however, is that while it is a useful tool to obtain user input, the sample population is limited to one month of inquiries and may or may not be representative of the effectiveness of the Helpline as a whole. Some months have higher call volumes than others, for example, because FinCEN may have issued new guidance such as its mandatory BSA E-Filing requirements and users need assistance with it. Therefore, the performance of the Helpline staff during these months would not be representative of normal operations.

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## Conclusion

Helpline inquiries received via voicemail or email were not retained by FinCEN so we could not audit the information recorded in Remedy. Because of this, we could not determine if guidance provided to users was responsive and consistent with the BSA, USA PATRIOT Act, and related regulations. FinCEN could not provide us with Remedy records limited to inquiries handled by the Helpline staff and did not keep a record of all request ID numbers created in Remedy. FinCEN also did not have a process to reliably record in Remedy the date and time inquiries were received and resolved to determine if its responses were appropriate and timely. Although we were told that quality control reviews of the Helpline inquiries were performed, the results of these internal reviews were not consistently documented by FinCEN. We believe FinCEN needs to address these issues with corrective action to improve controls over its Helpline.

## Recommendations

We recommend that the Director of FinCEN:

1. Retain all request ID numbers created in order to provide an accounting of all actions taken in the system used to record Helpline inquiries.

### Management Response

FinCEN management concurred with the recommendation. According to its response, FinCEN's Technology Division has updated Remedy to ensure numbers assigned cannot be skipped and tickets cannot be deleted.

### OIG Comment

FinCEN's actions taken meet the intent of our recommendation. We believe that FinCEN's reported system update will provide for an accounting of all actions taken in the system used to record Helpline inquiries in Remedy.

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2. Implement processes to ensure that every inquiry received is appropriately documented to determine the timeliness of the response.

Management Response

FinCEN management concurred with the recommendation. FinCEN has implemented a process to ensure that every inquiry received is appropriately documented. The voice messages received by way of the Helpline contain a .wav file with an associated timestamp as do emails received. The timestamp associated with the Remedy call log is compared with the timestamp of the .wav file or email inquiry to determine the timeliness of the response.

OIG Comment

FinCEN's actions taken meet the intent of our recommendation.

3. Document the methodology and results of quality control reviews and retain complete and accurate records of these reviews.

Management Response

FinCEN management concurred with the recommendation. FinCEN management stated that the Liaison Division Regulatory Support Section Chief has formalized a process to document the results of Helpline quality control reviews. The process is included in FinCEN's revised standard operating procedures and includes recording the results on a spreadsheet, which is saved on a local network drive.

OIG Comment

FinCEN's actions taken meet the intent of our recommendation.

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We appreciate the cooperation and courtesies extended to our staff during the audit. If you wish to discuss the report, you may contact me at (617) 223-8638 or Maryann Costello, Audit Manager, at (617) 223-8642. Major contributors to this report are listed in Appendix 4. A distribution for this report is provided as Appendix 5.

/s/  
Sharon Torosian  
Director

The overall objective of our audit was to determine and assess the controls over the Financial Crimes Enforcement Network's (FinCEN) Resource Center's Regulatory Helpline (Helpline) to provide guidance to users that is responsive and consistent with the Bank Secrecy Act, USA PATRIOT Act, and related regulations.

To accomplish our objective, we identified the Department of the Treasury (Treasury) and government-wide guidance on internal control standards and actions federal agencies must take to increase transparency, participation, and collaboration in government, including:

- Government Accountability Office, *Standards for Internal Control in the Federal Government* (September 2014)
- General Accounting Office, *Standards for Internal Control in the Federal Government* (November 1999)
- Treasury Directive 80-05, *Records and Information Management Program* (June 26, 2002)
- Office of Management and Budget (OMB) Memorandum M-11-24, *Implementing Executive Order 13571 on Streamlining Service Delivery and Improving Customer Service* (June 13, 2011)
- OMB Memorandum M-10-06, *Open Government Directive* (December 8, 2009)
- OMB, *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies* (October 1, 2001)
- President's Memorandum on Transparency and Open Government (January 21, 2009)

We obtained and reviewed policy and procedure documents related to Helpline operations to assess the process used by staff when responding to Helpline inquiries. During a field visit to FinCEN, we observed the process used by staff in recording and responding to Helpline inquiries.

In addition, we reviewed documentation provided by FinCEN, on Helpline operations including, reports on Helpline activity, Regulatory Resource Center Call Center Customer Satisfaction Survey Reports, reorganization planning documents, staffing levels, training activities and materials, and quality control measures used

to monitor the Helpline staff. We obtained data from the BMC Remedy User Tool (Remedy) used by staff to enter, store, and track inquiries received at the Helpline. This included inquiries and correspondence logged in Remedy for the audit period, January 1, 2012 through June 30, 2014.

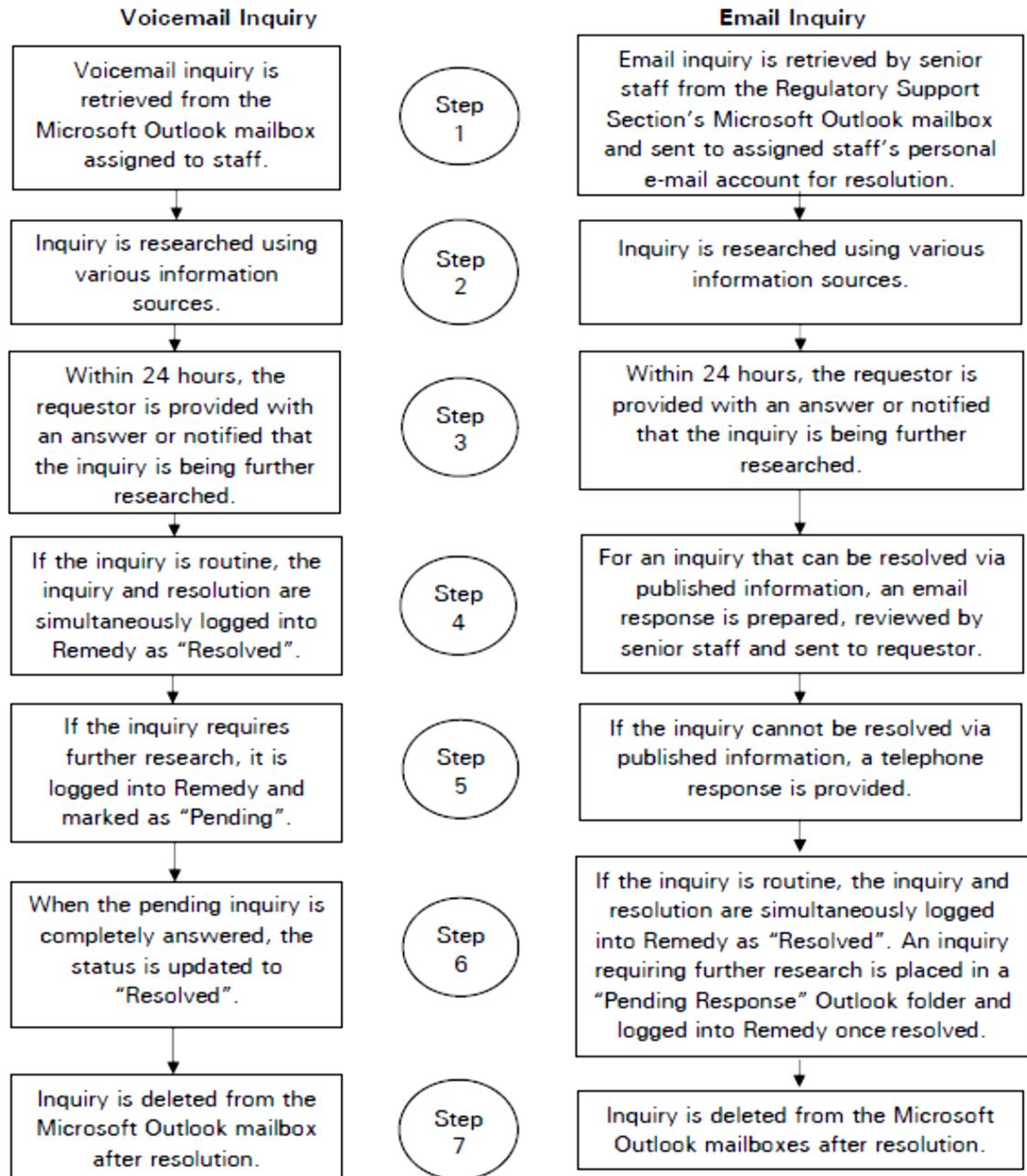
We interviewed FinCEN officials responsible for Helpline operations, including the Resource Center Law Enforcement Support Section Chief, Resource Center Regulatory Support Section Chief, Lead Resource Center Specialist, and Information Technology Specialists. During these interviews, we obtained an understanding of FinCEN's processes and procedures used in operating and measuring the effectiveness of the Helpline.

We encountered scope limitations during fieldwork. FinCEN was unable to provide an exclusive universe of inquiries limited to those handled by Helpline staff for the audit period. Additionally, FinCEN could not provide us a record of all request identification numbers created when an entry was made in Remedy for the audit period. Because FinCEN did not retain voicemails and emails of the inquiries made to the Helpline, we could not review these to determine if they were properly recorded in FinCEN's Remedy system and appropriately addressed. We also found that the date and time an inquiry was originally received at FinCEN was not recorded in Remedy, so we could not assess the timeliness of FinCEN's responses to Helpline users. Consequently, we could not audit the accuracy of the information entered into Remedy to determine that guidance to users was responsive and consistent with the BSA, USA PATRIOT Act, and related regulations.

We performed the majority of fieldwork from June 2014 through February 2015 with subsequent follow up through June 2017 to ensure the information supporting our conclusions had not changed.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Figure 1: FinCEN Regulatory Helpline Process



Source: Office of Inspector General review of FinCEN Resource Center Manual and interviews with Helpline staff.



**MEMORANDUM FOR ASSISTANT INSPECTOR GENERAL HARKER**

**FROM:** Jamal El-Hindi /s/  
Deputy Director  
Financial Crimes Enforcement Network

**SUBJECT:** *Management Response to the Draft Report – FinCEN’s Regulatory Helpline Provides Guidance But Controls Need To Be Enhanced*

Thank you for the opportunity to review the formal draft report on the Financial Crimes Enforcement Network’s (FinCEN) Regulatory Helpline. In FinCEN’s Resource Center, the Regulatory Support Section (RSS) is committed to providing quality customer service regarding Bank Secrecy Act (BSA) regulatory and compliance matters. We appreciate your noting that FinCEN regularly conducts Office of Management and Budget (OMB) authorized Customer Satisfaction surveys, and that those surveys indicate that users understand the guidance being provided by the RSS. In addition, the customer surveys indicate that the RSS has consistently scored above the government average for the last three years and continues to improve overall efforts to keep customer satisfaction levels high.

It is worth noting that, at the time this audit was conducted, FinCEN had recently undergone a reorganization and that disruption may have influenced some of the report findings. Still, FinCEN acknowledges that its internal processes and management controls were areas in need of improvement. While working through the audit process and since reviewing the audit recommendations, FinCEN has put in place improvements to our processes and procedures to address the recommendations, which are noted in the attached FinCEN Corrective Actions.

If you have any questions or need additional information, please contact Becky Martin, Deputy Chief Financial Officer, Office of Financial Management, on 703-905-3860.

Attachment:  
FinCEN Corrective Actions

[www.fincen.gov](http://www.fincen.gov)

FinCEN Corrective Actions

1. Recommendation 1: Retain all request ID numbers created in order to provide an accounting of all actions taken in the system used to record Helpline inquiries.

Management Response: Concur. FinCEN's Technology Division has updated Remedy to ensure numbers assigned cannot be skipped and tickets cannot be deleted.

Status: Closed

2. Recommendation 2: Implement a process to ensure that every inquiry received is appropriately documented to determine the timeliness of the response.

Management Response: Concur. FinCEN's Regulatory Support Section (RSS) has Standard Operating Procedures (SOP) for performing quality control. The RSS Section Chief (or designated staff member) compares the number of inquiries received via the Helpline and FinCEN Resource Center (FRC) email inbox ([frc@fincen.gov](mailto:frc@fincen.gov)) over the period of a work week, which is Monday through Friday and compares them with the inquiries logged in Remedy for that same week that is under review. Inquiries received on weekends/holidays are attributed to the following business day. The voice messages received by way of the Regulatory Helpline contain .wav files with an associated timestamp, as do emails received via the FRC email inbox. The timestamp associated with the Remedy call log is compared with the timestamp of the .wav file or email inquiry to determine the timeliness of response. A timely response is one that is provided within 24 hours (taking business days into account) from the time that the voice message is received on the Regulatory Helpline (or FRC email inbox if the inquiry is an email). The results are recorded on a spreadsheet, which is saved on a local network drive. All .wav and email inquiries are archived on the local network drive as well. The person performing quality control listens to the .wav file and searches Remedy to locate the associated log. Once the .wav file is matched with its associated Remedy log, quality control is performed to determine the accuracy and timeliness of the response, documenting the results on the aforementioned spreadsheet.

Status: Closed

3. Recommendation 3: Document the methodology and results of quality control reviews and retain complete and accurate records of these reviews.

Management Response: Concur. FinCEN's Liaison Division Regulatory Support Section Chief has formalized a process to document the results of quality control reviews. This process is annotated in the Standard Operating Procedures.

Status: Closed

Appendix 4  
Major Contributors to This Report

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Maryann Costello, Audit Manager  
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Kar Yan Lee, Auditor-in-Charge  
Adelia Gonzales, Referencer

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Counselor to the Secretary  
Under Secretary, Office of Terrorism and Financial Intelligence  
Office of Strategic Planning and Performance Improvement  
Office of the Deputy Chief Financial Officer, Risk and Control  
Group

**Financial Crimes Enforcement Network**

Director  
OIG Audit Liaison

**Office of Management and Budget**

OIG Budget Examiner

**U.S. Senate**

Chairman and Ranking Member  
Committee on Banking, Housing, and Urban Affairs

Chairman and Ranking Member  
Committee on Finance

**U.S. House of Representatives**

Chairman and Ranking Member  
Committee on Financial Services

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## **Treasury OIG Website**

Access Treasury OIG reports and other information online:

<http://www.treasury.gov/about/organizational-structure/ig/Pages/default.aspx>

## **Report Waste, Fraud, and Abuse**

**OIG Hotline for Treasury Programs and Operations** – Call toll free: 1-800-359-3898

**Gulf Coast Restoration Hotline** – Call toll free: 1-855-584.GULF (4853)

Email: [Hotline@oig.treas.gov](mailto:Hotline@oig.treas.gov)

Submit a complaint using our online form:

<https://www.treasury.gov/about/organizational-structure/ig/Pages/OigOnlineHotlineForm.aspx>