

FinCEN – Domestic Analytic Products Survey Customer Satisfaction Survey 2013

Introduction

FinCEN is committed to serving and satisfying their customers and has commissioned the CFI Group, an independent third-party research group, to conduct this survey. FinCEN is asking for general feedback about the product or service you received so they can improve their service to you; there will not be any specific questions concerning past or current investigations.

The survey will take approximately 15 minutes to complete. Your answers are voluntary, but your opinions are very important. Your responses will remain anonymous and will only be reported in aggregate. This interview is authorized by Office of Management and Budget Control No. 1090-0007 which expires on March 31, 2015.

Demographics

Demo1. Which of the following best describes your organization?

1. Department of Defense
2. Department of Homeland Security
3. Department of Treasury
4. Department of Justice
5. Other Federal Government Department/Agency
6. State/Local Law Enforcement
7. Other (specify)

Demo2. Which of the following best describes the scope of your response?

1. Headquarters element
2. Regional or field office
3. Individual agent

Domestic Law Enforcement Case and Project Support

FinCEN supports domestic law enforcement efforts to deter, identify, and investigate crimes including threats to national security, terrorism financing, money laundering, and other significant crimes. FinCEN provides specialized investigative research and analysis of FinCEN data, both in basic tactical case support and complex analytical products, to support active criminal investigations.

CS1 Have you ever received case or project support from FinCEN?

1. Yes (Continue to QCS2)
2. No (Skip to next Section- Proactive Strategic Analytical Products)
3. Don't Know (Skip to next Section-Proactive Strategic Analytical Products)

CS2 How many times have you have received case or project support from FinCEN in response to your request during the past 12 months?

1. Once
2. 2-3 times
3. 4 or more times

On a scale from "1" to "10," where "1" is "not at all important" and "10" is "very important," please rate the

importance of each of the following reasons that you/your agency typically request case or project support from FinCEN?

If you/your agency have never requested case or project support, please select N/A.

- CS3. FinCEN has unique expertise related to analyzing the Bank Secrecy Act (BSA) data
- CS4. FinCEN has access to unique sources of information
- CS5. FinCEN has access to unique resources/analytical software
- CS6. FinCEN has unique expertise or knowledge in/of specific field(s) of money laundering or financial crime relevant to my area of responsibility.
- CS7. I do not/my agency does not have sufficient experience to do the analysis internally
- CS8. I do not/my agency does not have access to the Bank Secrecy Act (BSA) database
- CS9. Please specify any other reasons that you/your agency requested case or project support from FinCEN. (Open end)

On a scale from “1” to “10,” where “1” is “not at all useful” and “10” is “very useful,” please rate the usefulness of case or project support you received from FinCEN for the following.

If a choice does not apply, please indicate N/A.

- CS10. Verifying existing information
- CS11. Supplementing or expanding known information
- CS12. Providing information previously unknown
- CS13. Usefulness of financial information to investigation, if provided
- CS14. Helping you identify new leads (e.g., financial transactions, bank accounts, assets, subject associations, etc.)
- CS15. Relevancy of information for planning/developing investigative plan
- CS16. Providing case support
- CS17. Helping you better use resources

CS18. Have you ever received ASIS training from FinCEN?

- a. Yes (Continue to QCS19)
- b. No (Skip to QCS20)
- c. Don't Know (Skip to QCS20)

CS19. On a scale from “1” to “10,” where “1” is “not at all useful” and “10” is “very useful,” please rate the usefulness of training FinCEN has provided you or your agency on the Analytical System for Investigative Support (ASIS).

On a scale from “1” to “10,” where “1” is “not at all useful” and “10” is “very useful,” please rate the usefulness of the case support to provide information on the following US threats.

If a choice does not apply, please indicate N/A.

- CS20. Mexican Drug trafficking organizations
- CS21. Transnational criminal organizations
- CS22. Fraud against USG or affecting integrity
- CS23. Foreign corrupt officials/rogue regimes
- CS24. Terrorist Organizations/WMD proliferators
- CS25. Please provide any suggestions for how FinCEN can improve its Domestic Law Enforcement Case and Project Support. (Open ended)

Proactive Strategic Analytical Products

FinCEN also produces strategic analytical reports for the law enforcement community about national and international financial crime trends, patterns, methodologies and activities. These products, when provided to FinCEN's partners in an unsolicited manner, are considered "Proactive Strategic Analytical Products."

SP1. From the following list of strategic analytical products, please indicate if you received each of the products? (Select all that apply.)

1. Unusual Activity Associated with Western Union Money Transfers to Sinaloa, Mexico between 2008 and 2012 (March 2013)
2. CMIR to CTR Matching - Linking Cash Imports from Mexico to Deposits in the Southwest Border Region (August 2012)
3. Recent Trends in Funnel Account Activity (April 2012)
4. Effects of Mexican Cash Restrictions on Regional Money Laundering and Cash Flow Trends (February 2012)
5. Effects of Mexican Regulations on U.S. Dollar Cash (Advisory and/or Key Points Summary – March 2011)
6. Update on Mexican Regulation of U.S. Dollar Cash and Related Trends (Advisory – October 2010)
7. Recent Trends Associated with SAR-MSB Transactions Involving Mexico (Advisory – September 2010)
8. The Physical Flow of Dollars in the Mexican Financial System (Joint Study FinCEN/Mexican FIU- June 2010)
9. Trade Based Money Laundering Trends and Red Flag Indicators (Advisory- January 2010)
10. Other, including tactical and strategic information provided via presentations or training seminars at conferences or other informational venues
11. Mexico/SWB target referrals, tactical financial analysis, or pattern/trend information in support of USG SWB efforts to detect, interdict or investigate narcotics, firearms or human smuggling activities.
12. None of the above **(SKIP TO SP8)**

SP2. What action did your organization take in response to the strategic analytical product from FinCEN? (Check all that apply)

1. Case, inquiry or project opened
2. Associated with ongoing case, inquiry, or project (program)
3. Assigned for preliminary investigation
4. Referred to other office
5. Retained for future use
6. Incorporated information into intelligence or investigative report
7. Initiated intelligence collection
8. Other (Specify)

On a scale from "1" to "10," where "1" is "not at all useful" and "10" is "very useful," please rate the usefulness of the strategic analytical products that you or your agency have used.

If an item does not apply, please indicate N/A.

SP3. Relevancy to your work

SP4. Product provided information previously unknown

SP5. Product supplemented/expanded or reinforced known information

SP6. Product contradicted known information

SP7. Information assisted in planning or developing agency or unit objectives

SP8. How can FinCEN improve its strategic analytical products? (*open ended*)

Technical Reference Manuals and Informational Bulletins

FinCEN also produces a number of technical reference manuals on issues relevant to investigating money laundering, terrorist financing, and other financial crimes. Manuals typically cover and illustrate the operations and records processes of key financial mechanisms used for moving money and making payments. These manuals also include specific guidance for investigative officials in obtaining records from the financial industry, working with the industry, and applying practical analytical techniques to enhance ongoing financial investigations. The reference products also explain the value and utilization of BSA data to support investigations and the practical interpretation and analysis of information contained in SAR narratives and related supporting documentation, pertaining for example, to complex bank funds transfers, money services business operations and prepaid cards.

FinCEN has also produced Informational Bulletins which highlight the operations, financial transaction “flows”, informational records, law enforcement assistance contact points, vulnerabilities, and potential criminal misuse of both existing and emerging payment mechanisms. These products are intended to readily provide information to our external customers and also solicit and network their valued related observations and input.

On a scale from “1” to “10,” where “1” is “not at all useful” and “10” is “very useful,” please rate the usefulness of each technical reference manual to your agency’s investigations of financial crimes or money laundering?

If you did not receive or use a particular Reference Manual or Informational Bulletin, please select N/A.

Reference Manuals

- TM1. Interpreting SAR Narratives: General Purpose Reloadable (GPR) Prepaid Cards (May 2012)
- TM2. Interpreting SAR Narratives: Funds Transfers and Money Orders (June 2011)
- TM3. Mobile Payments: Operations and Record Processes (July 2011)
- TM4. Interpreting SAR Narratives: Money Transfers (September 2011)
- TM5. Funds Transfers – Update, Correspondent Accounts (January 2010)
- TM6. Green Dot – Operations and Record Processes (July 2010)
- TM7. NetSpend – Operations and Record Processes (August 2010)
- TM8. Western Union, Operations & Record Processes (August 2009)
- TM9. MoneyGram, Operations & Record Processes (June 2008)
- TM10. Utilizing Bank Secrecy Act Data (December 2008)
- TM11. PayPal, Operations & Record Processes (December 2007)
- TM12. Funds Transfers (March 2005)
- TM13. Postal Money Orders (December 2005)

Informational Bulletins

- TM14. Crypto-currencies (March 2013);
- TM15. Utilizing Bank Secrecy Act Data: Check Cashers (March 2013);
- TM16. Green Dot Reference Manual Addendum (May 2013);
- TM17. PayPal (Law Enforcement Update) (October 2012);
- TM18. Prison Inmates and Prepaid Cards: Profiting from Inside Crime Outside of Prison Walls (July 2012);
- TM19. Xoom Corporation (June 2012);
- TM20. M-via (Boom) (February 2012);
- TM21. Fedwire Funds Service Extended Remittance Information (February 2012)
- TM22. Letter of Credit (November 2011);
- TM23. Automated Clearing House (ACH) System (December 2010);
- TM24. Money Transfer Data Analysis (September 2010);
- TM25. Money Orders (September 2009).

- TM26. Please provide any suggestions for how FinCEN can continue to enhance its Technical Reference Manuals and Bulletins, including any additional topical realms. (Open ended)

314(a) Information Sharing Requests

FinCEN's regulations under Section 314(a) of the USA PATRIOT Act enable law enforcement agencies, through FinCEN, to reach out to U.S. financial institutions to locate accounts and transactions of persons that may be involved in terrorism or significant money laundering. FinCEN receives requests from law enforcement and upon review, makes the information available to designated contacts within financial institutions via a secure Internet web site.

IS1. How many times have you utilized FinCEN's 314(a) program during the past 12 months?

1. None (skip to next Section – Foreign FIU Requests)
2. Once (continue to QIS2)
3. 2-3 times (continue to QIS2)
4. 4 or more times (continue to QIS2)

IS2. On a scale from “1” to “10,” where “1” is “not at all useful” and “10” is “very useful,” please rate the usefulness of the 314(a) requests FinCEN processed on behalf of your agency for investigations of financial crimes or money laundering?

Foreign Financial Intelligence Unit (FIU) Requests

FinCEN is the FIU representing the United States that participates in a global network of FIUs called the Egmont Group. As such, at the request of domestic law enforcement agencies, FinCEN can facilitate information exchange with FIUs in other countries on law enforcement investigations that have an international component.

On a scale from “1” to “10,” where “1” is “not at all useful” and “10” is “very useful,” please rate the usefulness of the following types of FIU requests in your agency's investigations of financial crimes or money laundering.

If you have not utilized this service, please select N/A.

- FR1. Responses to you/your agency's requests for foreign FIU information
- FR2. Referrals to you/your agency regarding foreign countries' requests for information

Training/Outreach Services

FinCEN provides a variety of training and outreach to law enforcement including CBRS/Gateway, and its successor, FinCEN Query/FinCEN Portal, as well as training sessions on such issues as funds transfers, money transfers, prepaid cards, utilizing BSA data, etc. FinCEN also conducts outreach to law enforcement by attending a number of conferences each year and conducting information sessions for individual agencies on the types of products and services it offers to law enforcement.

TO1. Have you/any agents or other staff from your agency attended training or outreach sessions offered by FinCEN?

1. Yes
2. No (Skip to next Section – Communication)
3. Don't Know (Skip to next Section - Communication)

The following questions ask about FinCEN Query Training Tools. On a scale from “1” to “10,” where “1” is “poor” and “10” is “excellent,” please rate the usefulness of each FinCEN Query Training Tool you have used. If you have not used one of the tools listed, select N/A.

- TO2. Web-Based Training
- TO3. Job Aids
- TO4. Online Help Training

- TO5. FinCEN Query Quick Reference Guide
- TO6. FinCEN Query User Manual
- TO7. FinCEN Instructor Led Training

TO8. On a scale from “1” to “10,” where “1” is “not at all useful” and “10” is “very useful,” please rate the usefulness of the training and outreach sessions you or other staff from your agency have attended.

Communication

On a scale from “1” to “10,” where “1” is “not very satisfied” and “10” is “very satisfied,” please rate your/your agency’s satisfaction with the opportunities it has had to provide FinCEN with input or feedback on the following issues.

If you have not provided FinCEN input or feedback on an issue, please select N/A.

- C1. Planned changes to the Bank Secrecy Act (BSA) forms
- C2. Proposed guidance for financial institutions submitting BSA reports
- C3. Development, prioritization, and implementation of its case and project support products
- C4. Development, prioritization, and implementation of its proactive strategic analytical products
- C5. Topics, structure and content of Technical Reference Manuals
- C6. Development, prioritization, and implementation of its 314(a) process
- C7. Development, prioritization, and implementation of its FIU process
- C8. Please provide any suggestions for how FinCEN can improve its customer communication. (*Open ended*)

ACSI Benchmark Questions

Now we are going to ask you to please consider your overall experiences with FinCEN:

- ASCI1. First, please consider your experiences with FinCEN’s law enforcement support products and services over the past 12 months. Using a 10-point scale on which “1” means “Very dissatisfied” and “10” means “Very satisfied,” how satisfied are you with these products?
- ASCI2. To what extent have FinCEN’s law enforcement support products and services met your expectations? Please use a 10-point scale on which “1” now means “Falls short of your expectations” and “10” means “Exceeds your expectations.”
- ASCI3. Forget about FinCEN’s law enforcement support products and service for a moment. Now, imagine the ideal law enforcement support product or service. How well do you think FinCEN’s products and services compare with that ideal? Please use a 10-point scale on which “1” means “Not very close to the ideal” and “10” means “Very close to the ideal.”

Closing

FinCEN would like to thank you for your time and participation today. Your feedback is greatly appreciated.