BOARD OF GOVERNORS
OF THE
FEDERAL RESERVE SYSTEM
WASHINGTON, D.C. 20551

DIVISION OF SUPERVISION
AND REGULATION

SR 26-10

November 25, 2026

**TO THE OFFICER IN CHARGE OF SUPERVISION
AT EACH FEDERAL RESERVE BANK**

SUBJECT: Joint Statement of Supervisory Policy for Bank Secrecy Act Reporting in Response to a Service Disruption

Applicability: This guidance applies to all financial institutions supervised by the Federal Reserve that are subject to the Bank Secrecy Act (BSA).

As a result of a service disruption that is hindering the ability of financial institutions to adhere to BSA related reporting obligations, including suspicious activity reporting (SAR) obligations, the Financial Crimes Enforcement Network (FinCEN) announced temporary, limited exceptive relief for certain BSA and Corporate Transparency Act submissions.[1] Staffs of the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the Office of the Comptroller of the Currency, and the National Credit Union Administration (collectively, the agencies) have issued the attached *Joint Statement of Supervisory Policy for Bank Secrecy Act Reporting in Response to a Service Disruption* (joint statement) to support FinCEN's exceptive relief order.

The joint statement announces that the agencies will not take any supervisory action, including citing a violation of law, or pursue an enforcement action against a supervised financial institution that utilizes FinCEN's Secure Data Transfer Mode, the filing method particularly impacted by this service disruption, related to either a BSA reporting requirement[2] or the agencies' SAR filing requirements,[3] for late filing as a result of the service disruption. Among other things, the joint statement provides additional information about extension timeframes for submissions as well as the expedited delivery of suspicious activity information to law enforcement.

[1] *See* Financial Crimes Enforcement Network, *Temporary, limited exceptive relief for certain Bank Secrecy Act and Corporate Transparency Act submissions* (Nov. 24, 2026).

[2] For purposes of this joint statement, the term "BSA Reporting" refers to any reporting obligation under the Bank Secrecy Act and its implementing regulations in chapter X of Title 31 of the Code of Federal Regulations.

[3] Refer to 12 CFR 208.62, 211.5(k), 211.24(f), and 225.4(f) (Federal Reserve).

Reserve Banks are asked to distribute this SR letter to Federal Reserve-supervised institutions in their districts as well as to supervisory and examination staff. In addition, questions may be sent via the Board's public website.[4]

Randall D. Guynn
Director
Division of
Supervision and Regulation

Attachment

- *Joint Statement of Supervisory Policy for Bank Secrecy Act Reporting in Response to a Service Disruption*

[4] *See* http://www.federalreserve.gov/apps/contactus/feedback.aspx.

Board of Governors of the Federal Reserve System
Federal Deposit Insurance Corporation
National Credit Union Administration
Office of the Comptroller of the Currency

Joint Statement of Supervisory Policy for Bank Secrecy Act Reporting in Response to a Service Disruption

November 25, 2026

The staffs of the Board of Governors of the Federal Reserve System (Federal Reserve), the Federal Deposit Insurance Corporation (FDIC), the National Credit Union Administration (NCUA), and the Office of the Comptroller of the Currency (OCC) (collectively, the Agencies) are issuing this statement of supervisory policy in response to a service disruption that is hindering the ability of entities supervised by the Agencies to adhere to Bank Secrecy Act (BSA) related reporting obligations, including suspicious activity report (SAR) obligations. This Joint Statement is intended to support a similar exceptive relief order by the Department of Treasury's Financial Crimes Enforcement Network (FinCEN) regarding this service disruption (Service Disruption Relief).[1]

The Agencies recognize that the service disruption has adversely impacted the ability of their respective supervised entities to comply with applicable BSA reporting obligations, including the obligation to file a SAR within regulatorily prescribed timelines. The service disruption has particularly impacted institutions that utilize the Secure Data Transfer Mode (SDTM) to submit such required reports. Accordingly, the Agencies commit to their respective supervised entities that they will not take any supervisory action, including citing a violation of law, or pursue an enforcement action against a supervised financial institution that as of November 18, 2026, used the SDTM to submit reports related to either a BSA reporting requirement[2] or the Agencies' SAR filing requirements[3] for late filing as a result of the service disruption now impacting filing with FinCEN. This commitment applies to the extent and for the period of relief provided by FinCEN to address the ongoing service disruption, including the current Service Disruption Relief and any subsequent relief provided by FinCEN related to the ongoing service disruption.

Supervised institutions should document the issues they are having with timely compliance with any BSA reporting requirement or any SAR requirement issued by one of the Agencies, including which submissions have been subject to delay and attempted submission date(s).

Notwithstanding this statement, supervised institutions must comply with all other applicable anti-money laundering and countering the financing of terrorism requirements under the BSA and the Agencies'

[1] *See* Financial Crimes Enforcement Network, *Temporary, limited exceptive relief for certain Bank Secrecy Act and Corporate Transparency Act submissions* (Nov. 24, 2026).

[2] For purposes of this Joint Statement, the term "BSA Reporting" refers to any reporting obligation under the BSA and its implementing regulations in chapter X of Title 31 of the Code of Federal Regulations. This definition is consistent with FinCEN's Service Disruption Relief.

[3] Refer to 12 CFR 208.62, 211.5(k), 211.24(f), and 225.4(f) (Federal Reserve); 12 CFR 353 (FDIC); 12 CFR 748.1(d) (NCUA); 12 CFR 21.11 and 12 CFR 163.180 (OCC).

regulations, including the obligation to conduct ongoing monitoring to identify suspicious transactions. If a bank or credit union needs to expedite the delivery of suspicious activity information to law enforcement, they can use the Financial Institutions Hotline, 1-866-556-3974, which is not impacted by this service disruption.

Please note that this commitment does not apply to statutes or regulations except as specifically addressed above.