



August 22, 2025

The Honorable Scott Bessent  
Secretary  
Department of Treasury  
1500 Pennsylvania Avenue, N.W.  
Washington, D.C. 20220

**Re: Follow-Up to Currency Transaction Report (CTR) and Suspicious Activity Report (SAR) Roundtable Discussion**

Dear Secretary Bessent:

On behalf of America's Credit Unions, I am writing to thank the Department of Treasury for convening the August 13 roundtable with stakeholders to discuss Currency Transaction Reports (CTRs) and Suspicious Activity Reports (SARs). It was a productive, engaging discussion bringing together law enforcement, financial institutions, and key government partners to share perspectives on improving the Bank Secrecy Act (BSA) reporting framework. We greatly appreciate Treasury's commitment to reducing burdensome BSA reporting requirements while enhancing the overall effectiveness of the reporting framework.

America's Credit Unions and our member institutions share the Department's goal of ensuring that reporting remains effective for law enforcement while being sustainable for credit unions of all sizes. We look forward to continuing our collaboration with Treasury and other stakeholders to modernize these processes.

America's Credit Unions is the voice of consumers' best option for financial services: credit unions. As not-for-profit, member-owned financial cooperatives, credit unions play a vital role in the financial well-being of individuals, families, and small businesses across the country. We advocate for policies that allow credit unions to effectively meet the needs of their over 142 million members nationwide.

**Key Issues Raised**

Credit unions have consistently identified the burden of BSA reporting in the context of CTR and SAR filings as one of their most significant ongoing challenges. We are grateful for the opportunity to use the Roundtable to bring attention to several longstanding and urgent issues facing credit unions.

As discussed, CTR aggregation remains a significant concern. Tracking and aggregating transactions conducted by—or on behalf of—a member across different branches and data points is often a manual, time-intensive process for credit unions, as well as community banks, as

stressed during the Roundtable. This disproportionately impacts smaller institutions that lack the staff or resources to dedicate to this task.

America's Credit Unions' members have consistently emphasized these aggregation challenges, noting that the current process not only diverts resources away from serving members but distracts from detecting and reporting higher-value financial crimes investigations. In addition, credit unions and other financial institutions have long expressed concern that the vast majority of CTRs appear to provide minimal investigative value to law enforcement. While law enforcement has pushed on this point, it raises valid questions about efficiency, impact, and overall utility, particularly given the sheer volume of CTR filings.

In addition, we strongly support streamlining CTR and SAR data fields to remove redundancies and clarify confusing items and perhaps permitting the use of templates for certain redundant instances and typologies of financial crimes, thereby improving reporting quality. SAR preparation, particularly drafting the detailed narrative, remains an extremely time-consuming task and is a major burden for credit unions. This challenge is compounded by the limited feedback received from law enforcement on the quality and usefulness of the reports submitted. Notably, there is broad consensus among credit unions, community banks, and even the largest banks that scarce compliance resources could be better directed toward higher-value investigations.

### **Additional Recommendations from America's Credit Unions**

America's Credit Unions would like to offer several additional recommendations that we were unable to share during the Roundtable.

First, while we referenced threshold concerns, we would like to formally urge Treasury to support efforts to raise the CTR reporting threshold and index it to inflation, or, in the alternative, a risk-tiered threshold based on transaction amount and risk. On Capitol Hill, America's Credit Unions supports Representative Barry Loudermilk's bill, Financial Reporting Threshold Modernization Act (H.R. 1799),<sup>1</sup> which updates the CTR threshold from \$10,000 to \$30,000, and ensures it is periodically adjusted for inflation. Although during the Roundtable government partners flagged potential concerns with raising the threshold, updating it will protect privacy, reduce compliance costs, and realign the threshold with Congressional intent.

We also recommend considering a simplified "CTR-Lite" process for long-standing, low-risk members, along with extending filing windows for smaller credit unions. Similarly, a "SAR-Lite" model could apply to low-level suspicious activity, maintaining the narrative template while preserving investigative value. On the SAR form, enhancing categories with clear checkboxes and fraud-type categories, including cryptocurrency scams, money-mule activity, and romance

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<sup>1</sup> Financial Reporting Threshold Modernization Act, H.R. 1799, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/house-bill/1799>.

scams, would improve tracking and detection. Additional guidance would be helpful as new forms of money transfers emerge, including P2P, cryptocurrency transactions, sports betting, and online gambling.

Lastly, a secure feedback dashboard or interface showing which SARs are most useful to law enforcement would help institutions better target their reporting efforts. Within that interface, exploring a safe harbor for credit unions using approved artificial intelligence or machine learning models that meet certain false-positive benchmarks could further improve efficiency and accuracy.

## **Conclusion**

We greatly value Treasury's leadership in addressing these longstanding challenges and look forward to continued dialogue and engagement. By focusing on targeted reporting and reducing unnecessary burdens, we can enhance both compliance efficiency and the effectiveness of law enforcement efforts.

Thank you again for including us in this important dialogue and for your partnership in strengthening the BSA reporting framework. Should you have any questions or require additional information, please contact me at [lmartone@americascreditunions.org](mailto:lmartone@americascreditunions.org).

Sincerely,

A handwritten signature in blue ink that reads "Luke Martone". The signature is fluid and cursive, with the first name "Luke" and last name "Martone" clearly distinguishable.

Luke Martone  
Regulatory Advocacy Senior Counsel