Usually, you should not expect a running update—or a direct confirmation—that your information helped an investigation. The U.S. Treasury Department's Financial Crimes Enforcement Network (FinCEN) administers the Bank Secrecy Act (BSA) whistleblower program, but investigations are confidential. FinCEN or another agency may not be able to tell you whether it opened a case, used your tip, or took action based on it.

That does not necessarily mean your information was ignored. It may be reviewed, combined with evidence from other sources, or used in an investigation that takes years. If an enforcement action results and you may qualify for an award, you generally need to follow the program's award application process. Filing a tip and applying for an award are related, but they are not the same step.

https://openclassactions.com/blog/aml-bsa-whistleblower-program-faqs.php

This guide explains what the program covers, who may qualify, what confidentiality rules mean in practice, and what to do if you are considering reporting suspected financial misconduct.

What Is the AML/BSA Whistleblower Program?

The program encourages people to provide original information about certain violations of the BSA and related anti-money-laundering laws. It is run by FinCEN, which receives and analyzes financial intelligence, including Suspicious Activity Reports (SARs). The Department of Justice and other authorities may also be involved in investigating or bringing enforcement actions.

The program may provide an award to an eligible whistleblower when original information leads to a successful enforcement action that meets the law's requirements. An award is not automatic. Eligibility, the usefulness of the information, the result of the enforcement action, and other statutory factors can all matter.

A SAR is a confidential report that a financial institution files when it detects activity that may indicate a possible crime or other suspicious conduct. A whistleblower generally does not file a SAR on behalf of a bank. Instead, a person may report suspected failures to file SARs, conduct related to suspicious transactions, or other covered violations. SAR confidentiality rules are separate from the whistleblower program's protections.

Legal Origin and Timeline

Congress created the current BSA whistleblower framework through the Anti-Money Laundering Act of 2020. It then significantly strengthened the program in the National Defense Authorization Act for Fiscal Year 2023, enacted on **December 23, 2022**. The changes expanded the potential scope of awards and reinforced protections for people who provide information about covered violations.

The statute authorizes awards in qualifying cases when an enforcement action results in monetary sanctions above the statutory threshold. It generally sets awards at 10 to 30 percent of collected monetary sanctions, subject to the law and the facts of the case. The exact amount is not promised in advance, and a person's tip alone does not guarantee either an enforcement action or an award.

FinCEN's website, fincen.gov, is the official place to check current program information, submission instructions, and any applicable rules or notices. Procedures can change, so use the current instructions rather than relying only on an older article or a third-party summary.

What Does "Original Information" Mean?

In general, original information is specific, credible information that is not already known to the government and is not simply copied from public sources. It may come from a person's direct knowledge, observations, documents they lawfully possess, or a careful analysis of information that is not publicly available.

For example, an employee who personally observed managers repeatedly instructing staff to split cash transactions to avoid reporting requirements may have firsthand information. A person who only repeats a news article about a bank's past enforcement case is less likely to be providing original information on that subject.

"Original" does not necessarily mean that no one else knows about the conduct. Another person may have reported similar facts, or an agency may already have some information. But information that is already known to authorities, or that merely repeats public allegations, may not support an award. The program evaluates the particular information and circumstances.

Who May Be Eligible?

Eligibility depends on the statute and the individual facts. A person may be able to report information even if they are not eligible for an award. For instance, an employee, contractor, or other person with relevant knowledge might submit a tip, but award eligibility can be affected by their role, conduct, or how the information was obtained.

Some people may be excluded or restricted under the law, including certain people who participated in the underlying violation or who obtained information through roles subject to specific legal duties. There are also rules that can affect attorneys, auditors, compliance personnel, and people who learned information through privileged or otherwise protected channels. Do not assume that a job title automatically makes you eligible—or ineligible. A whistleblower attorney can assess the details.

What Violations Can Be Reported?

The program concerns specified violations of the BSA and related laws. Relevant information may involve failures in a financial institution's anti-money-laundering controls, reporting, recordkeeping, or compliance obligations. Examples can include:



- **SAR issues:** A financial institution allegedly failed to file required SARs, filed them late, or handled suspicious-activity reporting in a way that may violate applicable requirements.

- **Structuring:** Someone allegedly divided transactions into smaller amounts to evade reporting or recordkeeping requirements. Structuring is not established simply because a person made multiple cash deposits; the facts and intent matter.
- **Customer due diligence (CDD):** A covered institution allegedly failed to meet applicable customer due diligence or beneficial ownership requirements.
- **Records and reporting:** Possible violations involving required financial records, reports, or related BSA controls.
- **Sanctions and related conduct:** Facts may also involve sanctions violations or other conduct within the program's covered legal scope. The precise law and agency jurisdiction matter.

These examples are not a finding that a violation occurred. A compliance weakness, policy disagreement, or isolated mistake is not automatically a whistleblower case. The relevant question is whether specific facts point to a covered legal violation.

Confidentiality Rules: What They Do and Don't Promise

Confidentiality is a central concern for many potential whistleblowers. The law provides protections for a whistleblower's identity in specified circumstances, but that does not mean every detail is guaranteed to remain secret under every possible circumstance. Statutory exceptions may apply, including situations involving legal proceedings or disclosure required by law.

There is also an important distinction between whistleblower confidentiality and SAR confidentiality. Financial institutions generally may not disclose a SAR—or information that would reveal its existence—to the person who is the subject of the report. A person who works at a bank should not copy, forward, or discuss SARs outside authorized channels. A whistleblower tip should not include a SAR merely because the person has access to it; get legal advice about how to describe relevant facts without improperly disclosing protected material.



Confidentiality rules do not authorize someone to access records without permission, remove customer information, breach a court order, or violate workplace or professional duties. If you have sensitive documents, do not send them from a work account or use a work laptop to contact an attorney or submit a tip. Ask counsel how to preserve and share evidence lawfully.

Why You May Receive Only Limited Updates

People often expect an agency to say whether a tip "worked." In practice, investigators may be unable to share that information. Confirming an investigation could reveal confidential law-enforcement activity, alert a subject, expose other sources, or compromise an ongoing case. Agencies may therefore provide limited updates—or no case-status updates at all.

Even when an agency uses information, it may be one part of a much larger investigation. Authorities might rely on bank records, interviews, regulatory examinations, or other tips. A later enforcement action may not identify which specific tip prompted a lead, and public documents may not describe every source of evidence.

So, **no news is not proof that your information was unused**. Nor does a public enforcement action necessarily prove that your submission led to it. The process is not designed to provide a whistleblower with a live case tracker.

A Tip Is Not an Award Application

If you want to seek an award, pay close attention to the distinction between reporting information and making an award application. A tip gives information to authorities. An award application is a separate request for compensation under the program, generally connected to a qualifying enforcement action and subject to specific procedures and deadlines.

Do not assume that submitting a tip automatically puts you in line for an award. Read FinCEN's current instructions and keep a record of the date and method of your submission. If an action is announced, promptly check the official notice and applicable deadline. Missing a filing deadline can affect eligibility, so consider getting advice from a lawyer familiar with the BSA whistleblower program before submitting or waiting for an enforcement outcome.

Step What it does What to keep in mind Submit a tip Provides information about suspected covered violations. A tip does not guarantee an investigation, award, or status updates. Monitor official notices Helps you identify whether a potentially relevant action has been announced. A public action may not reveal whether your information was used. File an award application, if appropriate Asks the program to consider you for an award under the law. Follow current instructions and deadlines; the application is not automatic.

What to Do Next

1. **Write down what you know.** Record dates, people involved, transactions, and how you learned the facts. Separate firsthand observations from assumptions or secondhand information.
2. **Preserve information lawfully.** Do not access systems without authorization, remove customer files, or disclose a SAR improperly. Ask a lawyer how to handle documents you already have.
3. **Review FinCEN's current guidance.** Visit fincen.gov for official whistleblower information and submission procedures.
4. **Consider independent legal advice.** Counsel can help evaluate eligibility, confidentiality concerns, possible workplace retaliation risks, and whether the facts fit the program.
5. **Keep submission records and track deadlines.** Save confirmation details securely. If an enforcement action becomes public, promptly review whether an award application is available and when it is due.

The Bottom Line

You may not be told whether your whistleblower information was used. FinCEN and other authorities can keep investigations confidential, and they may provide only limited updates. A lack of feedback does not tell you what happened behind the scenes.

If your information concerns a covered BSA violation and you hope to seek an award, focus on providing specific, original information through the official process, protecting confidential material, and understanding that a separate award application may be required. Check FinCEN's website for current requirements and consider speaking with a qualified attorney before taking steps that could affect your privacy, employment, or legal rights.