Bill Introduced to Increase Reporting Thresholds Under the Bank Secrecy Act

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On October 21, 2025, the Senate Committee on Banking, Housing, and Urban Affairs introduced S.B. 3017, titled the *Streamlining Transaction Reporting and Ensuring Anti-Money Laundering Improvements for a New Era Act* (STREAMLINE Act). The STREAMLINE Act would increase the reporting thresholds for currency transaction reports (CTRs) and suspicious activity reports (SARs) under the Bank Secrecy Act (BSA), which had not been adjusted since the law's enactment in 1970. The press release highlights the need to modernize the BSA's reporting thresholds, saying that the STREAMLINE Act "focuses enforcement where it matters and respects the privacy of law-abiding American consumers." The BSA and its implementing regulations require a broad range of financial institutions, including banks, credit unions, money service businesses, and broker-dealers, to report certain financial transactions to the federal government to prevent financial crimes.

Currently under the BSA, financial institutions are required to report any currency transaction exceeding the daily aggregate amount of $10,000 and to report suspicious activity for amounts of $2,000 or $5,000, depending on the applicable threshold. The STREAMLINE Act would increase these reporting thresholds from $10,000 to $30,000 for CTRs, and from $2,000 to $3,000 and $5,000 to $10,000, respectively, for SARs. The Treasury Department would be required to adjust these amounts every five years for inflation.

Proponents of the STREAMLINE Act find that the outdated thresholds place an unnecessary burden on financial institutions, generating excessive paperwork instead of targeting "true financial crime." The legislation was introduced shortly after the Treasury's Financial Crimes Enforcement Network (FinCEN) issued FAQs on suspicious activity reporting requirements on October 9, 2025. The FAQs clarify that financial institutions are not required to file SARs or conduct reviews for certain low-risk or borderline activities,

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granting them greater discretion in shaping their SAR policies.

The STREAMLINE Act also aligns with the goals of BSA reform expressed by Deputy Secretary of the Treasury Michael Faulkender in June 2025, who similarly stressed the need for modernization of the BSA, including by improving the forms and processes for SAR and CTR reporting so that stakeholders with more limited risk profiles, such as smaller community banks and credit unions, would benefit.

If passed, the STREAMLINE Act, along with other BSA reforms advanced by the Treasury Department and the recent FAQs, would alleviate the burdens of reporting smaller transactions and allow financial institutions to better focus their efforts on combating financial crime and other financial risks.

Frost Brown Todd represents a wide variety of financial institutions and is available to help you navigate key legislative changes and emerging compliance considerations. We will continue to monitor developments in BSA modernization legislation and related regulatory initiatives. For questions, contact the authors or any attorney with Frost Brown Todd's Consumer Financial Services & Consumer Protection team.

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