Articles about whistleblower awards often include two cautious phrases: the rules can change, and an award is not guaranteed. Those warnings can sound vague, but they point to real features of the anti-money laundering (AML) and Bank Secrecy Act (BSA) whistleblower program. The program has a statutory foundation, yet its procedures depend on laws, regulations, agency decisions, and the facts of each disclosure.

That distinction matters if you are considering reporting suspected financial misconduct. A person may provide useful information and still not qualify for an award. A report may contribute to an investigation without leading to a qualifying enforcement action. And even when an award is possible, the amount is not automatic.

This guide explains what the program is, where it came from, what "original information" means, and why outcomes vary. It is general information, not legal advice. For the current procedures, consult the Financial Crimes Enforcement Network (FinCEN) website at fincen.gov and speak with a lawyer experienced in whistleblower matters before sharing sensitive information.

What Is the AML/BSA Whistleblower Program?

FinCEN administers the federal whistleblower program for certain violations of the BSA and related laws. The BSA requires financial institutions and certain other businesses to maintain records and support efforts to detect and report suspicious financial activity. The program is intended to encourage people with relevant knowledge to provide information that can help authorities investigate and enforce those requirements.

A key part of the reporting system is a Suspicious Activity Report (SAR). A SAR is a confidential report that a financial institution may be required to file when it detects activity that could involve money laundering, fraud, or other suspicious conduct. A SAR is not proof that a customer committed a crime, and people outside an institution generally should not assume they can access or disclose one. Whistleblowers can, however, report facts they know about suspected failures to detect, investigate, or report suspicious activity.

The program is not simply a reward for making an accusation. To qualify, information must meet legal requirements, and the government's action must meet additional conditions. FinCEN evaluates claims under the governing law and applicable procedures.

Legal Origin and Timeline

Congress established a broader framework through the Anti-Money Laundering Act of 2020. Later, the whistleblower provisions were revised by the National Defense Authorization Act for Fiscal Year 2023, signed on December 23, 2022. That legislation strengthened and clarified the program's award structure and scope.

Under the statute, an eligible whistleblower may receive an award when qualifying information leads to a successful enforcement action resulting in monetary sanctions above the statutory threshold. The law provides for an award of 10% to 30% of collected monetary sanctions in qualifying actions. That range is not a promise that a particular person will receive an award or that the award will be at the upper end. Eligibility, contribution, enforcement results, and the applicable rules all matter.

FinCEN has also issued procedures explaining how people may submit information and seek awards. Regulations and administrative practices can be updated, interpreted, or supplemented. Congress can amend the statute as well. This is why a guide written at one time may not describe every procedural requirement in effect later.

Why Do the Rules Change?

"Rules change" can refer to several different things. The statute may be amended by Congress. FinCEN may issue or revise regulations. The agency may clarify how it applies a requirement in particular circumstances. Forms, submission instructions, deadlines, or review procedures may also be updated.

There is an important difference between a change in the law and a change in how the agency explains or administers it. The underlying award framework comes from federal law, but procedural details help determine how a person submits information, protects confidentiality, and requests an award. A missed step can complicate a claim even if the underlying information is valuable.

For example, a person might read an older article that describes a particular submission method. If FinCEN has since updated its instructions, following the old description could create avoidable problems. The sensible approach is to use current instructions on FinCEN's website and get independent legal advice where appropriate, rather than relying on a past article or a general summary.

Who May Be Eligible?

The program can cover individuals who provide qualifying information. Depending on the circumstances, that may include current or former employees, contractors, consultants, or people outside the institution who have relevant knowledge. A person's job title alone does not determine eligibility.

But eligibility is not universal. The law and regulations contain limits and exclusions. For instance, a person's own involvement in misconduct can affect eligibility or the size of an award. Certain government personnel and people who obtained information through particular professional duties may face restrictions. Rules may also address compliance, audit, or legal personnel and circumstances in which an exception applies.



Confidentiality and privilege require special care. A whistleblower should not assume that all workplace information may be taken or disclosed. Customer records, SAR-related information, and communications protected by attorney-client privilege can raise serious legal issues. A lawyer can help assess what can be shared, through which channel, and how to avoid unnecessary disclosure.

What Does "Original Information" Mean?

"Original information" generally means information that is derived from a person's independent knowledge or independent analysis, is not already known to the government from another source, and is not merely drawn from

public allegations or proceedings. The exact legal test and exceptions depend on the governing provisions and facts.

Independent knowledge can come from what a person observed, heard, or learned through work or other direct experience. Independent analysis may involve examining information in a way that produces insight not readily apparent from public material. Simply repeating a news story, public filing, or rumor may not satisfy the requirement.

Original information does not have to be a complete case file. A concrete detail can be useful if it helps investigators identify records, transactions, people, or patterns. For example, an employee might describe how a branch repeatedly escalated cash deposits just below an internal review threshold, or explain that managers discouraged staff from documenting a customer's unusual transfers. The tip becomes more useful when it includes dates, locations, roles, and a clear account of how the person knows the facts.

At the same time, a report can be original and credible without ultimately supporting an award. Authorities may investigate and find insufficient evidence, or the information may not lead to a qualifying action. Originality is one requirement, not a guarantee of enforcement or payment.

What Violations May Qualify?

The program is associated with BSA and related violations. Depending on the facts and applicable law, reported conduct may involve failures concerning suspicious-activity reporting, transaction records, customer due diligence, or compliance systems. The label attached to a concern is less important than the actual conduct and the evidence supporting it.

Issue Example of a concern Why facts matter SARs A financial institution may have ignored repeated warning signs or failed to file required reports. A missed SAR is not automatically a violation; reporting duties, available information, timing, and institutional actions must be assessed. Structuring Transactions may have been divided or arranged to evade reporting or recordkeeping requirements. Ordinary cash activity is not necessarily structuring. Purpose, pattern, knowledge, and supporting records can be important. Customer due diligence (CDD) A business may have failed to identify or understand customers or beneficial owners when required. The relevant duties depend on the institution, customer, risk, and rules in force at the time. Records Required transaction or customer records may have been omitted, altered, or inadequately maintained. Investigators may need to establish what records were required and whether the failure was material or deliberate. Sanctions Transactions may have involved prohibited parties or evasion of sanctions restrictions. Sanctions matters can involve laws and agencies beyond the BSA program, so the right reporting route and award rules require careful review.

These are examples, not conclusions about any particular conduct. A suspicious pattern is a reason to examine facts; it is not, by itself, proof of a legal violation.

Why Are Outcomes Fact-Specific?

Whistleblower cases rarely turn on a single sentence or document. Authorities may consider whether the information was timely, credible, sufficiently detailed, and useful to an investigation. They may compare it with what they already knew, assess whether it led to a successful action, and determine whether the action produced qualifying monetary sanctions.

Two people who report similar concerns can have different results. One may provide firsthand records that lead investigators to an unknown scheme. Another may describe conduct already under investigation, or offer

conclusions without facts that can be checked. The people's roles, knowledge, timing, and cooperation may differ as well.



The possible award amount is also not a simple calculation from the reported loss or the seriousness of the allegation. The statutory range is tied to collected sanctions in qualifying enforcement actions, and the final award decision depends on the law and agency assessment. An investigation can take years, close without action, or produce a result that does not meet the program's award conditions.

What "No Guarantees" Really Means

"No guarantees" does not mean the program is meaningless. It means that reporting information does not create an automatic right to payment. A person generally must sar not filed satisfy eligibility requirements, provide qualifying information, and connect that information to an enforcement outcome meeting the statutory criteria.

It also means no one should promise a particular award, timeline, or enforcement result. A lawyer can explain potential routes and risks, but cannot control what FinCEN or another agency will do, what evidence investigators will find, or whether sanctions will be collected. Be cautious of sales pitches that treat an award as certain before those questions are answered.

What to Do Next

1. **Write down what you know.** Separate firsthand observations from assumptions, and note relevant dates, people, transactions, and records.
2. **Preserve information lawfully.** Do not access, copy, remove, or send records you are not authorized to handle. Avoid altering original materials.
3. **Protect sensitive information.** Do not send confidential customer information, SAR material, or privileged communications to a personal account or an unverified recipient.
4. **Check current procedures.** Review FinCEN's current whistleblower information and submission instructions at fincen.gov.
5. **Get independent advice.** A lawyer familiar with whistleblower matters can discuss eligibility, confidentiality, retaliation concerns, and whether another agency or reporting channel may be relevant.

6. **Keep expectations realistic.** A strong report can help authorities, but the rules, evidence, and enforcement outcome determine whether an award is available.

The Bottom Line

Articles say award procedures change because statutes, regulations, and agency instructions can evolve. They say results are not guaranteed because eligibility and payment depend on specific facts and a qualifying enforcement outcome. The program offers a potential path for people with original information about BSA-related misconduct, including issues involving SARs, structuring, customer due diligence, records, and sanctions—but it is not an automatic reward for making a report.

Before acting, verify the current rules through FinCEN and consider confidential legal advice. Careful, lawful preparation is more useful than relying on broad promises or assuming that a concerning pattern will necessarily lead to an award.