



**BANGKO SENTRAL NG PILIPINAS**

**OFFICE OF THE DEPUTY GOVERNOR  
SUPERVISION AND EXAMINATION SECTOR**

**MEMORANDUM NO. M-2017-033**

**To : ALL BANKS**

**Subject : Transitory Provisions of Circular No. 963 on Bank Responsibility for the Generation and Timely Submission of Required Reports to the BSP**

Pursuant to Circular No. 963 dated 27 June 2017, all covered reports that fall due for submission prior to 1 January 2018 shall continue to be governed by the provisions of Subsection X192.2 of the Manual of Regulations for Banks. Beginning 1 January 2018, these reports will be subject to the provisions of Section X184.

Under Section X184, reporting violations are categorized into Erroneous, Delayed and Unsubmitted. A new monetary penalty structure will apply for these reporting violations by 1 January 2018. Other than the said monetary penalties, non-monetary sanctions for violations that are considered habitual may also be imposed. For this purpose, a bank that accumulates more than 100 demerit points within a calendar year shall be considered a habitual violator. The computation of these demerit points will begin to apply for reports that become due for submission after 1 January 2018. Moreover, as also provided under Section X184, should an assessment of the bank's reporting system disclose significant deficiencies, the bank may be required to submit a Board-approved action plan to correct the cited findings.

In this regard, banks are expected to implement the necessary enhancements to their systems and processes to ensure compliance with Section X184 upon its full implementation beginning 1 January 2018.

For information and guidance.

  
**CHUCHI G. FONACIER**  
Deputy Governor

13 October 2017