

Commercial Customs Operations Advisory Committee (COAC) Rapid Response Subcommittee Requirements for Continuing Broker Education Task Force

December 2019



U.S. Customs and
Border Protection



Requirements for Continuing Education for Licensed Customs Brokers

November 19, 2019

Action Required:

- The Requirements for Customs Broker Continuing Education Task Force (the Task Force) was created in September 2019 by CBP's Deputy Commissioner in response to the ongoing need for professionalism in the licensed broker community, especially in light of an increasingly complex and dynamic global trade environment.
- The goals of the Task Force are to develop a proposed framework for a continuing education program for customs brokers that takes into account several key considerations:
 - Accredited education must be available from a host of content providers, not a single entity.
 - Multiple entities should be approved to accredit education. Due to resource constraints, CBP cannot be responsible for providing accreditation.
 - A broker should be able to obtain all continuing education credits through free content available online via multiple sources, including the private sector, CBP, and other government agencies, keeping in mind that small businesses should not be disproportionately disadvantaged.
- The Task Force is comprised of representatives from the CBP Office of Trade, COAC, and licensed customs brokers from around the country with decades of experience in trade and the broker community.
- The Task Force met for 2 days in November 2019. Issues discussed were: mandatory requirements for continuing education, a methodology for approving education accreditors, and possible hurdles to implementation.

Background:

- As part of its 'Role of the Broker' regulatory modernization effort, CBP conducted an extensive series of workshops around the country in 2012 to receive feedback on permitting requirements, the broker-importer relationship and its validation, and mandatory continuing education. These workshops covered the largest ports across the country, with over 50 visits and hundreds of participants.
- At that time, the feedback on a continuing education requirement was mixed. Given the feedback from the broker community and the CBP resources required to administer a continuing education program, the requirement was dropped from the proposed rulemaking under development at that time.
- In light of increasing complexities in the trade environment in the intervening time period, the question of a continuing education requirement is ripe for re-examination.

Current Status:

- The Task Force is developing a proposed framework for a continuing education program and discussing remaining questions surrounding implementation.

Next Steps:

- The Task Force will meet via webinar as needed and plans another in-person meeting in March 2020.

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