

**Commercial Customs Operations Advisory
Committee (COAC)
Rapid Response Subcommittee**

December 16, 2020

COAC

COMMERCIAL CUSTOMS OPERATIONS
ADVISORY COMMITTEE

**Commercial Customs Operations Advisory Committee (COAC)
December 16, 2020**

**Report of the Work of the COAC
Subcommittee on Rapid Response (RR)**

Co-Chairs

**Brenda Barnes – Geo. S. Bush & Co., Inc.
Brian White – The J.M. Smucker Company
Kathy Wilkins – Alliance Operating Services**

Rapid Response Subcommittee Members

Cindy Allen, Brenda Barnes, Barry Baxter, Celeste Catano, Lenny Feldman, Lisa Gelsomino, Amy Magnus, Madeleine Veigel, Brian White, and Kathy Wilkins.

Background

The COAC Rapid Response Subcommittee was established October 2018, following the restructuring of COAC Subcommittees and underlying Working Groups to better align with CBP's Trade Strategy 2020. This strategy focuses on three areas aimed at modernizing import/export processes, improving trade intelligence, and maximizing efficiencies.

This past quarter, the Rapid Response Subcommittee received updates from the Broker Continuing Education Task Force and the Broker Exam Modernization Working Group.

All subcommittee objectives and scope are consistent with the official charter of COAC.

Summary of Work

The Rapid Response Subcommittee has focused on the following areas this past quarter; Broker Exam Modernization Working Group and the Continuing Broker Education Task Force. The members received an update from the Continuing Broker Education Task Force and an Advance Notice of Proposed Rulemaking was issued on October 28, 2020. Further, the Broker Exam Modernization Working Group continues to work on getting a pilot for the April 2021 test.

Broker Exam Modernization Working Group (BEMWG):

Since the October 7, 2020 COAC public meeting, the BEMWG has held three (3) full working group conference calls. The discussions have mainly been focused on the October 2020 broker exam experience. The October exam was administered in two sessions on a single day, in order to accommodate as many participants as possible, considering that the April exam had to be cancelled due to pandemic restrictions. Generally, it was an incredible achievement for CBP to have planned and executed a two session exam offering on a single day, in the height of an

unprecedented pandemic; however, there were also multiple areas of concern that were identified by the test takers and others associated with the exam that need to be addressed. The team is using the learnings from the October exam to address opportunities to improve the process and experience for future examinations. These conversations will continue as preparations are being made for the April 2021 exam.

In addition, the team also continues to discuss the future of the examination and additional opportunities to improve the overall quality and experience.

Continuing Broker Education Task Force:

The Task Force has worked with CBP on the potential requirements for a mandatory continuing education program. An Advance Notice of Proposed Rulemaking was issued on October 28, 2020, which is now in a comment period, on a potential framework for the education requirements for licensed customs brokers and an analysis on the potential impact of such on customs brokers.

Conclusion

The Rapid Response Subcommittee looks forward to continued collaboration with CBP on the Continuing Broker Education Task Force objectives. Additionally, we stand ready to support CBP and their partnering government agencies in the modernization of the broker exam process.