

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

July 15, 2020

COAC

COMMERCIAL CUSTOMS OPERATIONS
ADVISORY COMMITTEE

**Commercial Customs Operations Advisory Committee (COAC)
July 15, 2020**

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

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, Warren Hastings, Amy Magnus, Madeleine Veigel, Brian White, 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, USMCA Working Group, 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 three areas this past quarter. The members received an update from the Continuing Broker Education Task Force and discussed the feedback the members submitted to CBP regarding the top three reasons for Continuing Education for Brokers, and the status of the notice of proposed rulemaking. Further, the Broker Exam Modernization Working Group has put together five recommendations, while the United States-Mexico-Canada Agreement (USMCA) Working group worked through implementation of USMCA on July 1, 2020, and is now on hiatus.

Broker Exam Modernization Working Group (BEMWG):

The BEMWG was created on April 23, 2020, to assist CBP in identifying Broker exam recommendations on how to improve the exam procedures, quality of the test, and test results during the crises of COVID 19. The BEMWG has had an aggressive agenda to provide CBP with insights on the industry's perspective regarding the administration and improvements to the Customs Broker examination. The BEMWG has identified with information provided by CBP,

which allowed the group to propose recommendations for a contingency plan on social gathering restrictions and limited resources to include state or local municipality safety guidelines at the July 15, 2020 COAC public meeting. The work group will present five recommendations during the July 15th COAC meeting.

Continuing Broker Education Task Force: The consensus of the Task Force continues to be that the degree of ongoing change within the trade environment has created a higher level of receptivity and support for mandatory continuing education. The Task Force is considering multiple issues including: an accreditation approach, the method and types of content that would be included, and compliance and connection with the Triennial report. Several areas have been identified where a knowledge gap still exists. The Task Force is not anticipating another in-person for the near-term.

United States-Mexico-Canada Agreement (USMCA) Working Group: The USMCA Working Group worked diligently with CBP on the implementation guidelines for the July 1, 2020 entry into force of USMCA Protocol. The recommendation, from this group, for Informed Compliance for the first six months was well received by CBP. This group has been placed on hiatus. It is expected; however, for a focus on the automotive sector to take place in the next quarter.

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.