

**Commercial Customs Operations
Advisory Committee (COAC)
Rapid Response Subcommittee
Broker Exam Modernization Working Group
Draft Recommendations**

July 15, 2020



COAC 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 following are the COAC recommendations on broker exam modernization for the July 15, 2020 COAC public meeting.

1. COAC recommends that CBP provide a paper based exam in lieu of the automated exam for the October 2020 (including the rescheduled April 2020) exams due to the challenges of the current COVID19 emergency and the possibility that a resurgence of cases could force states to reinstitute closure orders which could limit gatherings to 10 or fewer people.
2. COAC recommends that CBP identify locations where the current CBP Proctor could offer the paper exam which accommodate the space for proper social distancing. If Proctor locations are unable to accommodate the anticipated number of exam participants, CBP should allow alternate private sector locations within 30 miles of the CBP ports of entry. Selected private sector locations would include the allowance of a CBP Proctor and/or CBP direct oversight.
3. COAC recommends that CBP outline the minimum criteria for private sector locations to ensure that the exam experience is standard across all locations with social gathering guidelines based on state or local municipality procedures. This should include sanitation standards, equipment, access, etc.
4. COAC recommends that CBP move forward under the assumption that the contingent plan is the primary plan. If, by the registration start date of August 3, 2020, it is clear that emergency measures will not be taken in all planned Proctor locations, CBP would revert to a normal electronic exam at the designated proctor locations.
5. COAC recommends that CBP work with the Proctor to ensure a minimum of 1 hour between the first and second examination sessions in order to sanitize the facilities and equipment to the required standards and allow adequate set-up time for exam takers, including accommodating those with disabilities.