

**Commercial Customs Operations Advisory  
Committee (COAC)  
Secure Trade Lanes Subcommittee  
Trusted Trader Recommendations**

July 15, 2020

**COAC**

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COMMERCIAL CUSTOMS OPERATIONS  
ADVISORY COMMITTEE

## **CTPAT- Trusted Trader Program Benefits Methodology Recommendations**

### **Development of metrics to measure the performance of benefits for both CBP and Trade:**

1. COAC recommends that CBP develops a list of the most important quantifiable indicators (both for CBP and Trade) related to the benefits of participating in the Trusted Trader program and develops a mechanism to measure them consistently and periodically.
2. COAC recommends that CBP develops a metrics' dashboard or report available to each Trusted Trader account, which incorporates key metrics related to their specific Trusted Trade Program benefits (e.g. Number of inspections, average of exams, detentions, etc.)
3. COAC recommends that CBP issues the benefits metrics' report on a periodic know basis (e.g. quarterly) and it is uploaded in the TT CTPAT portal account for easy access.
4. COAC recommends that CBP also publishes at least on an annual basis, a metrics report on CBP's website and accessible to the public, with general CTPAT Trusted Trader Program benefit' statistics. For instance, CBP could publish the average percentage of extensive examinations, and in-person validations that non-CTPAT Trusted Trader companies experienced vs program participants, etc.

### **Evaluation of Existent CTPAT Trusted Trader Program Benefits:**

5. COAC recommends that CBP develop a methodology to evaluate the performance and value added to trade and CBP of existent CTPAT TT program benefits and determine when a benefit should be phased out or needs to be modified, based on the assessment results. For this effort, COAC recommends that CBP continues to partner with external expert organizations such as the University of Houston, GAO, etc. to run an independent assessment that evaluates the efficiency and relevance of existent CTPAT Trusted Trader benefits every two or three years (the time that it takes on average for new benefits to be fully implemented). The results of the assessment should be made public and incorporate feedback from Trusted Trader accounts.

### **Visibility and communication of the implementation status and deployment timeline for CTPAT- Trusted Trader benefits.**

6. COAC recommends that CBP communicates periodically (e.g. quarterly) the implementation status of approved benefits, expected deployment timeline for Trusted Trader members, and adjustments to estimated completion dates when applicable. The updates on the implementation should be available to the public at CBP's CTPAT webpage.

**Consideration of new potential benefits (both from CBP and Trade)**

7. COAC recommends that CBP develops and documents a formal process to receive and process feedback on existent benefits, as well as suggestions for new potential benefits from both CTPAT Trusted Trader Program members, PGAs, Non-government organizations and the general public.
8. COAC recommends that CBP expands its current process of receiving comments via the general CTPAT information email, and develops guidance on the most efficient mechanism that the trade and other parties should use to submitting feedback on existent benefits and potential new benefits for consideration. Some options CBP could consider are an e-submission form through CBP's CTPAT website, a comments/suggestions box through the CTPAT portal, etc. CBP should also consider a 'once a year' open period for public comments on existent and potential new benefits.
9. COAC recommends that as CBP evaluates and considers potential new benefits, it should open a 'public comments' period to the public, sharing the benefits that are being considered and requesting additional input to be included in the evaluation process.
10. COAC recommends that CBP's process for evaluation of new benefits balances the enforcement value and the return on investment for trade of the particular benefit.

**CTPAT's Trusted Trader Program Benefits Methodology (Consideration of new benefits, evaluation of existent benefits, and metrics) should be documented and available to the public.**

11. COAC recommends that once CBP adopts and implements the Trusted Trader Program Benefits methodology recommendations, CBP documents the end to end process and includes it as a reference document available in the CTPAT- Trusted Trader Handbook and CBP CTPAT's Website.