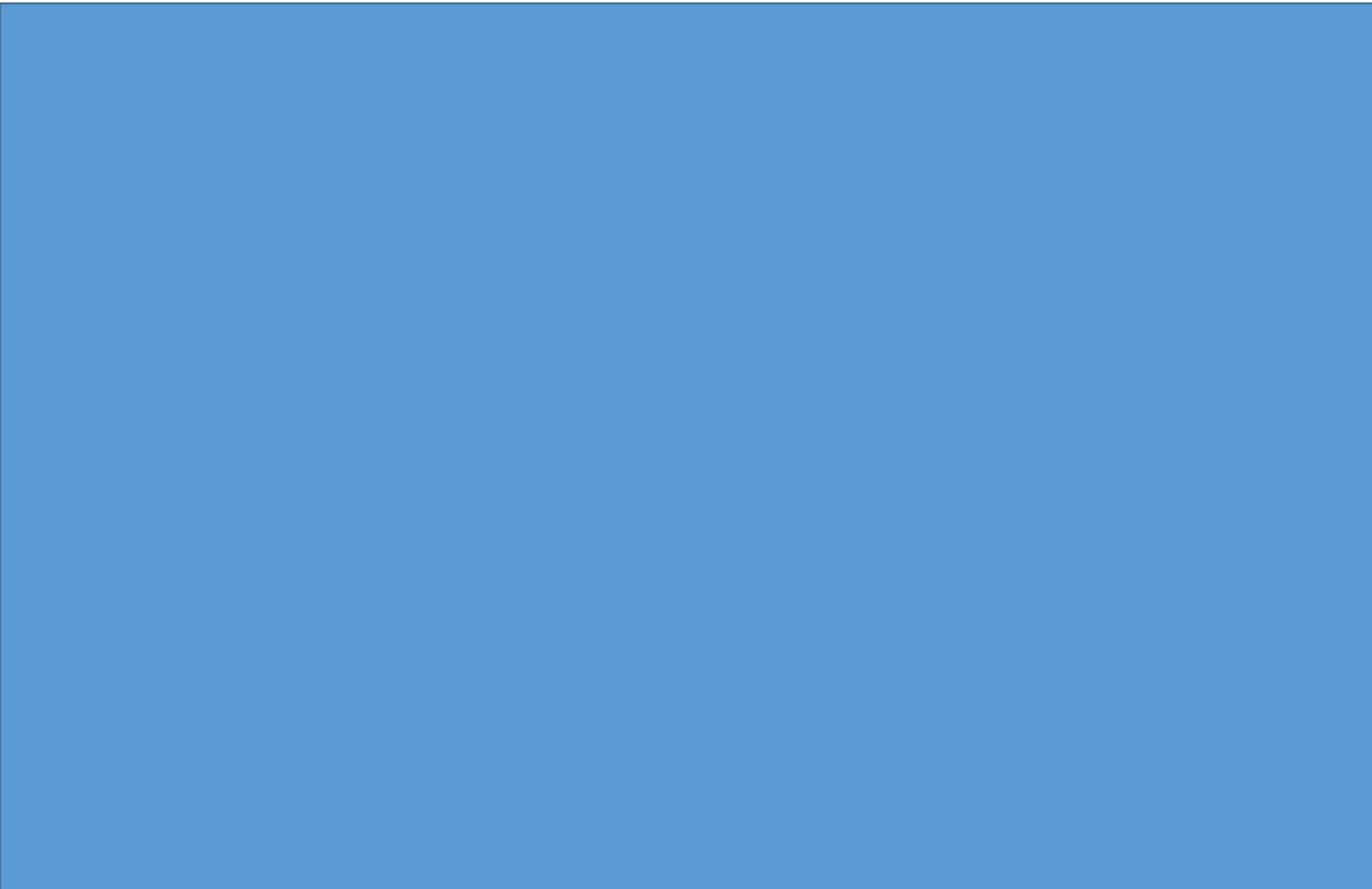


**Commercial Customs Operations Advisory Committee (COAC)
Rapid Response Subcommittee
Issue Paper: Requirements for Continuing Broker Education Task Force**

October 2020



**U.S. Customs and
Border Protection**



Requirements for Continuing Education for Licensed Customs Brokers
September 21, 2020

Action Required:

- The Requirements for Customs Broker Continuing Education Task Force (the Task Force) was created in September 2019 by CBP Deputy Commissioner Robert Perez 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 goal of the Task Force is 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. CBP cannot be responsible for providing accreditation due to resource constraints.
 - 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 affected.
- The Task Force is comprised of representatives from the CBP Office of Trade, Commercial Customs Operations Advisory Committee (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. The Task Force discussed 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 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:

- CBP has drafted a notice to be published in the *Federal Register* for comments. This draft is currently under review with the Department of Homeland Security.

Next Steps:

- CBP waiting for comments pending DHS review.