

CTPAT Job Aid

Business Partner Screening & Monitoring Log Sample



Last Updated: October 19, 2021

Business Partner Screening & Monitoring Log ABC Company

CTPAT Members must have a written, risk based process for screening new business partners and monitoring current partners. A factor that Members should include in this process is checks on activity related to money laundering and terrorist funding. To assist with this process, please consult CTPAT's Warning Indicators for Trade-Based Money Laundering and Terrorism Financing Activities.

The business partner screening process must take into account whether a partner is a CTPAT Member or a Member in an approved Authorized Economic Operator (AEO) program with a Mutual Reconciliation Arrangement (MRA) with the U.S. (or an approved MRA). Certification in either CTPAT or an approved AEO is acceptable proof for meeting program requirements for business partners, and Members must obtain evidence of the certification and continue to monitor these business partners to ensure they maintain their certification.

When a CTPAT Member outsources or contracts elements of its supply chain, the Member must exercise due diligence (via visits, questionnaires, etc.) to ensure these business partners have security measures in place that meet or exceed CTPAT's Minimum Security Criteria (MSC).

If weaknesses are identified during business partners' security assessments, they must be addressed as soon as possible, and corrections must be implemented in a timely manner. Members must confirm that deficiencies have been mitigated via documentary evidence.

To ensure their business partners continue to comply with CTPAT's security criteria, Members should update their security assessments of their business partners on a regular basis, or as circumstances/risks dictate.

CTPAT Members should have a documented social compliance program in place that, at a minimum, addresses how the company ensures goods imported into the U.S. are not mined, produced, or manufactured, wholly or in part, with prohibited forms of labor, i.e., forced, imprisoned, indentured, or indentured child labor.

CTPAT Members should use a business partner screening checklist to screen new business partners and monitor existing ones to ensure they have appropriate security measures in place to secure the goods throughout the international supply chain. CTPAT Partners should maintain electronic or paper files for each business partner. The files should include copies of all documents obtained when conducting the screening measures identified in the charts below, as applicable.



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Screening:

Company Name: _____

Company Address: _____

Business Type: _____

Were open source checks conducted on company and principals? Yes: No:

Date of Check	Performed By	Sources Checked	Issues Discovered	Comments

Were business references checked? Yes: No:

Date of Check	Performed By	References Checked	Issues Discovered	Comments

Was a credit check conducted? Yes: No:

Date of Check	Performed By	Credit Bureaus Checked	Issues Discovered	Comments

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Was potential Business Partner screened against government watch lists? Yes: No:

Date of Check	Performed By	Government Lists Checked	Issues Discovered	Comments

Does Business Partner participate in CTPAT? Yes: No:

If yes, is Business Partner monitored in the CTPAT Portal? Yes: No:

Date of Check	Performed By	Partner Status	Comments

Does Business Partner Participate in Partners in Protection (PIP), Authorized Economic Operator (AEO), etc.? Yes: No:

Date of Check	PIP/AEO Program Country	Performed By	Partner Status	Comments

If not CTPAT, PIP, AEO, have you verified that Business Partner has procedures in place that meet the CTPAT minimum security criteria (MSC). Yes: No:

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If yes, what type of security assessment was conducted to verify their security measures meet the CTPAT MSC?

Type of Check	Date of Check	Performed By	Deficiencies Discovered (Please Indicate)	Deficiencies Addressed (Resolution and Verified By)	Date of Resolution	Report Attached	Does Company Meet CTPAT Standards
Site Visit							
Third Party Audit							
Security Questionnaire							

Does company physically handle cargo? Yes: No:

Does company subcontract cargo handling services to another company? Yes: No:

Subcontracted Company	Checks Performed	Date of Check	Performed By	Issues Discovered	Corrective Actions Issued	Does Company Meet CTPAT Standards

Did you verify the potential Business Partner for activity related to money laundering and terrorist financing? Yes: No:

Date of Check	Performed By	Indicators Verified	Issues Discovered



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Does potential Business Partner have a social compliance program in place? Yes: No:

Did you verify how the company ensures goods imported into the U.S. are not mined, produced or manufactured, wholly or in part, with prohibited forms of labor, i.e., forced, imprisoned, indentured, or indentured child labor? Yes: No:

Date of Check	Performed By	Areas of Compliance Program Covered	Issues Discovered	Comments

Was this company selected as a Business Partner? Yes: No:

Monitoring:

Do you have a signed contract with the Business Partner? Yes: No:

Date of Contract	Signed By	Does the Contract Require Adherence to CTPAT Requirements	Is the Contract Updated if CTPAT Requirements Change	Comments

Does Business Partner participate in CTPAT? Yes: No:

If yes, is Business Partner monitored in the CTPAT Portal? Yes: No:

Date of Check	Performed By	Partner Status	Comments



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Does Business Partner Participate in Partners in Protection (PIP), Authorized Economic Operator (AEO), etc.? Yes: No:

Date of Check	PIP/AEO Program Country	Performed By	Partner Status	Comments

If not CTPAT, PIP, AEO, have you verified that Business Partner has procedures in place that meet the CTPAT minimum security criteria (MSC). Yes: No:

If yes, what type of security assessment was conducted to verify their security measures meet the CTPAT MSC?

Type of Check	Date of Check	Performed By	Deficiencies Discovered (Please Indicate)	Deficiencies Addressed (Resolution and Verified By)	Date of Resolution	Report Attached	Does Company Meet CTPAT Standards
Site Visit							
Third Party Audit							
Security Questionnaire							

Is Business Partner periodically screened against government watch lists? Yes: No:

Date of Check	Performed By	Government Lists Checked	Issues Discovered	Comments



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Reminders:

Examples of business partners that need to be screened are direct business partners such as manufacturers, product suppliers, pertinent vendors/service providers, and transportation/logistics providers. Any vendors/service providers that are directly related to the company's supply chain and/or handle sensitive information/equipment are also included on the list to be screened; this includes brokers or contracted IT providers. How in-depth to make the screening depends on the level of risk in the supply chain.

Determining if a business partner is compliant with the MSC can be accomplished in several ways. Based on risk, the company may conduct an onsite audit at the facility, hire a contractor/service provider to conduct an onsite audit, or use a security questionnaire. If security questionnaires are used, the level of risk will determine the amount of detail or evidence required to be collected. More details will be required from companies located in high-risk areas. If a Member is sending a security questionnaire to its business partners, consider requiring the following items:

Name and title of person(s) completing it;

Date completed;

Signature of the individual(s) who completed the document;

Signature of a senior company official, security supervisor, or authorized company representative to attest to the accuracy of the questionnaire;

Provide enough detail in responses to determine compliance; and

Based on risk, and if allowed by local security protocol, include photographic evidence, copies of policies/procedures, and copies of completed forms like Instruments of International Traffic (IIT) inspection checklists and/or guard logs.

Signatures may be electronic. If a signature is difficult to obtain/verify, the respondent may attest to the questionnaire's validity via email, and that the responses and any supporting evidence was approved by a supervisor/manager (name and title are required).

Exporters:

Where applicable, the process for screening and selecting business partners must include checks against applicable lists from the following U.S. government entities:

- U.S. Department of Commerce - Bureau of Industry and Security (BIS)
- U.S. Department of State - Directorate of Defense Trade Controls (DDTC)
- U.S. Department of the Treasury - Office of Foreign Assets Control (OFAC)



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In the event that a company, entity or person on these lists appears to match a party potentially involved in an export transaction, additional due diligence must be conducted before proceeding. There may be a strict export prohibition, requirement for seeking a license application, evaluation of the end-use or user to ensure it does not result in an activity prohibited by any U.S. export regulations, or other restrictions. Individuals or entities on any of these lists must be reported to the SCSS and relevant authority within 24 hours prior to departure.

Highway Carriers:

Written screening processes must include indicators to identify shipments or customers that might not be legitimate. If a higher risk factor is flagged when screening a shipment/customer, the carrier must complete a more in-depth review. If the vetting leads to substantial doubt to the veracity of the shipment/customer, the carrier must notify U.S. Customs and Border Protection of its suspicions.

Some of the warning signs could be willing to pay above the standard rate, in cash; having little knowledge of the commodity to be shipped; being evasive; minimal contact information (cell phone, P.O. box); new business/no business history, etc.

CTPAT Program

CBP.GOV/CTPAT

1300 Pennsylvania Avenue, NW Washington, DC 20229

