



U.S. Customs and
Border Protection

Continuing Education Webinar – New Requirements for Individual Licensed Customs Brokers

The following questions were submitted by webinar attendees during the August 3rd Continuing Education webinar but were not answered during the allotted time for the webinar.

Will corporate trade compliance training qualify as continuing education?

Until CBP selects accreditors, CBP cannot say for certain that trade compliance training offered by a company employing customs brokers will meet the continuing education requirement. Once the continuing education requirement goes into effect and accreditors have been chosen, brokers who work for a corporation should collaborate with each other and the corporation's management to submit their corporate training materials to one of the selected accreditors for consideration. The criteria for receiving approval and instructions for submitting materials for consideration will be provided by each accreditor as part of their public-facing website. In-house training is, presumably, intended to provide individuals within the company the most relevant information on that company's processes and best practices, something that is vital to a business's viability. CBP supports these activities and believes they should be considered by an accreditor for potential continuing education credit.

What happens if I fall just short of completing the continuing education credit hours in the given triennial reporting period? If I don't complete the continuing education credits 2027 and my license is suspended, how do I reinstate my license?

If you do fall short of credit hours, then your license is at risk of being suspended. Unless you take corrective action to make up the credit hours, then CBP will move to suspend your license (See § 111.104(b)(2)). You will be given notice that your license is about to be suspended, and you will then have 30 days to take corrective action (See § 111.104(c)). If you fail to take corrective action during this 30-day window, then your license will be suspended.

If an individual broker license is suspended, you can still take corrective action on or before 120 calendar days from the date of issuance of the order of suspension (See § 111.104(d)). Corrective action can range from certifying completion of the requirement to completing 36 continuing education credits.

In setting this 120-day window (approximately four months), CBP believes that we have provided sufficient time in the most extreme situation for a broker to complete all 36 hours of education and return to good standing. You as an individual broker should be aware that CBP is serious about compliance with the continuing broker education requirement. CBP also wants to ensure minor mistakes and life circumstances can be addressed and mitigated with a limited effect on your license.



Will a certain number of credits be required for a specific topic?

CBP is not requiring that a minimum or specified number of continuing education credits be on any specific topic. These regulations do not require individual brokers to fill the 36 continuing education credits with specific training or educational activities, such as ethics training. Individual brokers are encouraged to seek the training, educational activities, and topics that best suit their needs during each triennial period.

If a broker earns credit for information that becomes obsolete, will the earned credit still be acceptable?

Any accredited continuing education credit or government-hosted activity designated as good for continuing education that is taken during the triennial period will count, no matter at what point during the period that the credit was earned. CBP notes that the accreditation period for any training or educational activity is one year. If the trainer or education provider would like the activity to be valid for longer than one year, then they will need to resubmit their materials to one of the approved creditors for consideration and reaccreditation. However, if you took the accredited training in the year it was approved, you do not need to take it again the next year unless you find the activity useful or of value to you. It is the responsibility of the education providers, through accreditation, to keep their materials fresh. It is your responsibility as a broker to obtain the education when it is offered and of value to you.

Will I have to send proof of credit to accreditors or just keep it for CBP/Broker Management Branch auditing purposes?

You will not have to provide anything to an approved accreditor proving that you completed any educational offering. You must retain the following information and documentation for your continuing education credits:

- The title of the qualifying continuing education attended
- The date(s) attended
- The location of the qualifying continuing education (“online” if the activity is web-based)
- Any documentation received from the provider or host of the activity that proves you attended and completed the activity

(See § 111.102(d)(1))

Note that CBP is not requiring any specific format for this information. A simple spreadsheet or electronic table with accompanying certificates or receipts (paper or electronic) would be considered acceptable, so long as it can be provided to CBP upon request (See § 111.102(d)(2)).



Will there be opportunities to add additional accreditors if an accreditor is not selected in the initial process?

CBP has determined that the initial term of being an approved accreditor will be three years. If a party is not selected in the first selection cycle, they can respond to future Requests for Proposals for consideration. CBP has determined three years is an appropriate period of time and allows CBP to ensure that the accreditor selection process does not interfere with the close of a triennial period. CBP may adjust the term in future Requests for Proposals as circumstances and hindsight dictate the best practice.

Does instruction count as accredited time?

Yes. As described in § 111.103(b) CBP has made a special allowance for instructors, discussion leaders, and speakers. Per triennial period, a broker may claim up to 12 hours of continuing education credit for time spend preparing and presenting subject matter related to customs business. This material and activity will need to first be approved by one of the selected accreditors.

I work for an importer. Would I be able to take accreditor-approved courses through the broker companies that we use?

Yes. You may take advantage of any accreditor-approved or CBP/PGA courses offered during any given triennial period.

Will an European Union (EU) Masters of Customs, Taxation and International Trade Law (MCA) program or other EU customs classes be applicable for credits?

Courses provided by non-U.S. government agencies will not be approved as continuing education credit. The U.S. individual broker license is based on knowledge of U.S. laws, regulations, and systems. U.S.-based accreditors will not be able to assess the value of programs and courses that do not pertain to U.S. laws and regulations. While CBP does not want to discourage any broker from taking courses and training that are of value, CBP cannot approve non-U.S.-based activities.

Would trade compliance conferences like the International Compliance Professionals Association (ICPA) be considered for the accreditation?

CBP cannot say what will be approved or not because CBP is not an accreditor. Once the accreditors have been identified and the approval process for getting activities is in place, associations that hold conferences, such as the ICPA, should submit their draft agendas to one of the accreditors for full consideration. In general, CBP finds conferences and symposia to be valuable educational and networking opportunities for all trade professionals, whether public or private sector.



How often will the accreditors be evaluating curriculum or internal corporate training for approval?

CBP envisions accrediting as a full-time activity for whoever is selected to become an approved accreditor for continuing education. CBP believes it is important for those offering continuing education activities to have their work considered quickly and for accreditors to send timely responses back to the submitter. This “turn-around time” is likely to be one of the criteria that CBP considers during the Proposal Review following the RFP. Accreditor turn-around time will also be one of the metrics CBP uses to evaluate performance and effectiveness as the new program is rolled out.

What would be required to suspend a license if an individual is not conducting customs business and chooses not to be subject to the CE requirements?

Per § 111.52, the Office of Trade Broker Management Branch may accept a broker’s written voluntary offer of suspension of the broker’s license or permit for a specific period of time under any terms and conditions to which the parties may agree.

Will CBP-hosted events by themselves be sufficient for the 36 hours?

While CBP cannot anticipate specific events that far into the future, we anticipate hosting events, such as the Trade Facilitation and Trade Enforcement Conference, well into the future, so long as participants get value out of them and attendance is high. Local CBP offerings will also remain robust, as Port Directors view local communication opportunities as essential to a safe and secure port environment. CBP believes it is highly likely that our events will be sufficient given their length and the fact that they can be earned over three years at any time during that time period.

Is there any way to get credit for self-study?

Yes. CBP has always intended for self-guided online modules to be viable sources of continuing education because they represent a significant expansion of the types of education available to brokers. In the Final Rule, CBP added a new subparagraph, § 111.103(a)(2)(iii), to allow for online education and educational activity, whether live or self-guided, that culminates in a retention test. This allows individual brokers to engage in qualified self-guided learning that also guarantees a minimum level of engagement from the participant.

Can we shop different accreditors for different topics?

CBP isn’t sure what this question is asking, but if you have a course or other activity that you would like approved for continuing education credit, you may submit that material to any of the approved accreditors you’d like.



Will training content in other “trade” areas, such as food and drug imports or C-TPAT updates, be considered eligible for continuing education credit?

In general, if CBP or partner government agencies (PGAs) offers webinars and other activities that cover FDA importing requirements, the C-TPAT program, or other trade topics of interest, this would be considered eligible for continuing education credit. CBP intends to “brand” our activities that are approved for broker continuing education credit and will work with the PGAs to do the same.

Will training taken in January 2027 count toward the 2027 triennial submission? Can that same training be counted again in the 2030 triennial submission?

Any continuing education taken in any given triennial period is good only for that triennial period; credits cannot count twice.

CBP will provide guidance on this upcoming situation as the date draws closer. The reporting period for the 2027 triennial report usually opens at the end of December (2026 in this case). Brokers then have January and February to respond, with a closing date of March 1 (2027 in this case). If you have training courses or a conference scheduled for January, you may complete those activities and then include them with your materials for the *2030 triennial period*.

Would a copy of the transcript of my credits from NCBFAA NEI CCS/CES programs suffice as proof for 2024-2027 courses taken?

Until CBP selects accreditors, CBP cannot say for certain whether the education requirement for a CCS or CES will meet the new continuing education requirement. However, CBP envisions future accreditors will likely determine that training and activities designated for CCS and CES will qualify as continuing education under § 111.103, given the history of these certificate programs and their reputation in the broker community. If this is the case, a transcript based on the credits taken for a CCS or CES would be sufficient proof of a course taken or other activity available through this program.

How will you audit individual brokers if they are not providing what training they did?

Following the end of the triennial period, CBP will first make an assessment of all the reports received (the vast majority of reports are received through the eCBP portal). If a broker does not complete the certification process (see § 111.30(d)(2)), CBP will then follow the process in § 111.104(a)-(d), where we will send the broker notification of failure to report and proceed based on the response received.

Following this initial determination of compliance, CBP will then select a percentage, likely five to ten percent, of the brokers who needed to complete continuing education and will randomly select them for an audit. CBP will then communicate with these brokers based on the address information provided on the triennial report and ask for proof of the education credit obtained.



U.S. Customs and Border Protection

The broker would then provide the necessary recordkeeping as described in § 111.102(d)(i)-(vi). The broker will then have 30 calendar days to respond (see § 111.102(d)(2)).

Note that CBP will not conduct audits of brokers whose license has been voluntarily suspended or brokers who have not held their license for an entire triennial period at the time of the submission of their status report.