

# Account Management Handbook

October 2001

## Foreword

The Account Management program began as part of the Customs trade compliance redesign initiated in 1994 to increase compliance while reducing costs for Customs and the trade. To facilitate its informed compliance efforts, Customs began shifting its focus from a transaction-based operation to account-based processing. What began as a national-level program has grown into a robust array of national and port-level accounts whose trade performance is viewed in the aggregate.

As the Account Management program has expanded and matured, it has become a cornerstone of the U.S. Customs Service risk management approach. Today, the establishment of accounts enables us to allocate our limited resources to importers that pose the highest level of risk. Account Managers work in partnership with selected accounts to analyze compliance problems, determine their causes, develop strategies to address the issues, and monitor progress to ensure that problems are resolved and compliance is improved. Headquarters provides coordination and support to ensure a unified approach throughout the Customs Service.

This handbook sets forth U.S. Customs policy for the Account Management program and outlines the standard operating procedures for processing accounts. A key focal point of this handbook is the intersection of the Account Management process with the Trade Risk Management Process. The operating procedures by their very nature embody the risk management steps of collecting data, analyzing and assessing risk, prescribing action, and tracking and monitoring. Thus, by employing the procedures set forth in these pages, account managers and account management teams contribute significantly to the overall Customs effort to manage the risk of noncompliance.

All Customs employees will follow the guidance outlined in this handbook. Customs managers will ensure that the policy established by this handbook is followed.

Assistant Commissioner  
Office of Field Operations  
United States Customs Service

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# Chapter 1

## The Account Management Program: An Overview

The trade compliance goals of the U.S. Customs Service focus on improving compliance and reducing estimated discrepancies while addressing national trade priorities and issues. The Account Management program plays a vital role in achieving those goals by creating a partnership with selected companies that may represent a higher level of risk for non-compliance and working with those companies to improve their compliance.

### A. Account Management

Account Management is the Customs process of viewing a company and its trade performance in the aggregate rather than by individual transactions. Account Management is designed to increase Customs efficiency, uniformity, and customer service. It does so in part by providing a primary point of contact within Customs for the account and by establishing and supporting smooth working relationships among the many Customs disciplines that interact with the account. For some accounts, that point of contact is an Account Manager (AM); for others, it is an Account Management team (AM team).

The AM—whether an individual or a team—follows a series of steps to analyze the account's performance, coordinate the account's activities, identify trade compliance problems, and work with the account to resolve those problems.

### B. Account Designation

An account is an importer or a group of Importer of Record (IR) numbers that has been assigned a Customs point of contact at either the national level or the port level. Companies receive this designation based on their importing volume and value, trade area, impact on priority trade issues, and compliance history. The account designation means that Customs will view the account's importing activity in the aggregate and not by individual transactions.

For example, a parent company might have several subsidiaries that enter merchandise at multiple ports. If the company and the subsidiaries are designated as one account, all of the company's imports at all ports—including those of the subsidiaries—will be treated as one account. Doing so enables Customs to create a "big picture" of the company's trade activity and address any compliance problems at the root.

### C. The Account Management Process at a Glance

Account Management is a comprehensive process that includes the following stages and activities.

- Selection of a Potential Account
- Vetting
- Establishment of the Account
- Management of the Account

## Chapter 1: The Account Management Program: An Overview

- Profile Development
- Account Evaluation
- Development of an Action Plan to Improve Compliance
- Monitoring and Reporting of Progress
- Maintenance of Compliant

Detailed guidelines for carrying out these activities are provided in Chapter 3. Roles and responsibilities related to Account Management are described in Chapter 2. Chapters 4, 5, and 6 provide information about the following aspects of Account Management:

- Response to Business Changes Affecting Accounts
- Account Risk Adjustments and Reassignments
- Measures of Effectiveness

### D. Risk Management

To achieve our national trade compliance goals, Customs must focus its limited resources toward areas with the highest risk for significant trade violation. Many importers have a record of complying with import laws and do not present a risk that justifies a significant allocation of resources. Therefore we must perform a risk assessment to determine which importers merit attention. The four-step Trade Risk Management Process, outlined below, gives us a practical means to do this.



**Figure 1-1: The Risk Management Process**

#### Trade Risk Management Process

**Step 1—Collect Data and Information:** Systematically collect useful data through Compliance Measurement, Focused Assessment, criteria and exams, and Account Management.

**Step 2—Analyze and Assess Risk:** Use automated tools to analyze available data and information, and generate a risk assessment based on EET impact levels, Account Evaluation, and other assessment devices.

**Step 3—Prescribe Action:** Determine the cause of the identified risk and select and implement an appropriate response. Actions may involve Informed Compliance, Enforced Compliance, Enforcement Evaluation Teams, Compliance Improvement Plans, account action plans, and other measures.

**Step 4—Track and Report:** Monitor and document progress through the monitoring of accounts, Quarterly Reports, Follow-Up Verification, and other tracking devices, and feed the results back into the ongoing Risk Management Process.

### E. Relationship of Account Management and Risk Management

Account Management and Risk Management are inextricably interwoven. Account Management is a critical component of the Trade Risk Management Process. It weaves its way throughout the entire Risk Management Process, and details of the Account Management program are found at every step.

Likewise, the Trade Risk Management Process underlies the entire Account Management process. Account Management begins with data collection, analysis, and risk assessment (risk management steps 1 and 2) in the selection of an account. After a compliance problem is identified and an account is selected, the cycle is repeated: data is collected and analyzed, an account profile is developed, and the account is evaluated.

Following the evaluation, action is prescribed (risk management step 3) in the form of an account action plan, which identifies specific compliance and/or processing problems and remedies for those problems. Finally, the account's progress on the action items is tracked and reported (risk management step 4). The entire risk management cycle is then repeated in the ongoing process of monitoring the account.

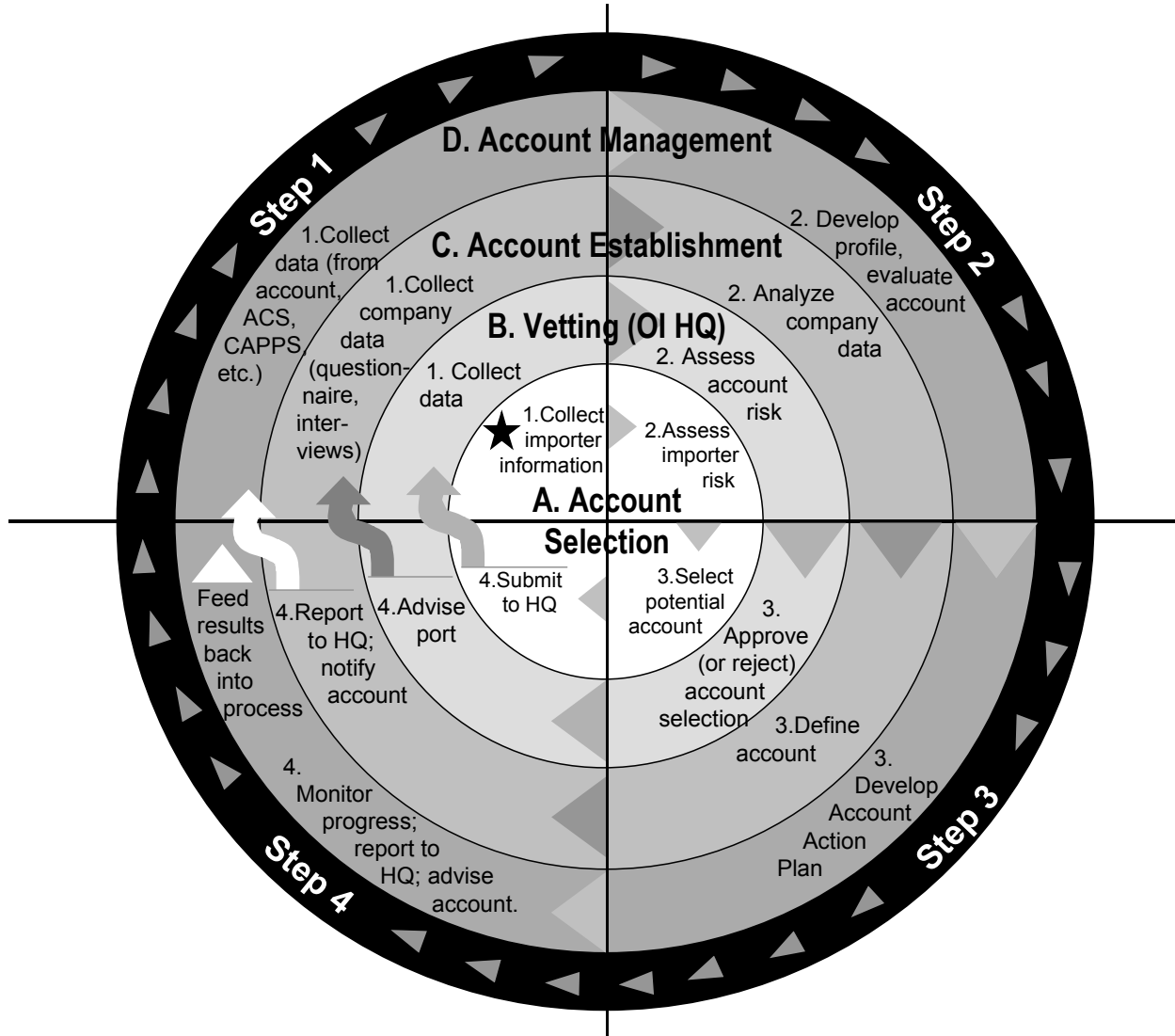
It is important to remember that risk management is a cyclical—not linear—process, and that the process is fluid and continual. The results of one step will move you forward in the process, and they may also take you into another cycle of the Risk Management Process.

Figure 1-2 represents the stages of the Account Management process as concentric circles, **beginning at the center circle and moving outward**. The outermost ring represents the four steps of the Trade Risk Management Process. Each Account Management stage cycles through the steps of the Risk Management Process, and the results from each stage are fed into the Risk Management Process in the next stage.



E. Relationship of Account Management and Risk Management (Continued)

Figure 1-2. Account Management and Risk Management



## **Chapter 2**

### **Account Management Roles and Responsibilities**

This chapter describes the Account Management responsibilities of those who are or who may be involved in the Account Management process.

#### **A. Overview of Account Management Roles**

All accounts have a primary point of contact within Customs—either a national-level AM or a port-level AM team. The core AM team, whose members work together to manage the account, includes an AM team leader and Import Specialists (ISs).

In addition to the AM team, the following personnel and entities within Customs are also involved in the Account Management process:

- Customs Management Centers (CMCs)
- Drawback Specialists (DSs)
- Enforcement Evaluation Teams (EETs)
- Entry Specialists (ESs)
- Field Analysis Specialists (FASs)
- Fines, Penalties, and Forfeiture (FP&F) Officers
- Focused Assessment (FA) Teams
- Headquarters Account Management (HQ AM) Team
- Importer Compliance Monitoring Program (ICMP) Teams
- Import Specialists (ISs)
- Inspectors
- International Trade Managers and Specialists (ITMs and ITs)
- National Analysis Specialists (NASs)
- National Import Specialists (NISs)
- Office of Investigations (OI)
- Office of Regulations and Rulings (OR&R)
- Ports of Entry (POEs)
- Regulatory Auditors

### B. Role of the Account Manager or Account Management Team

The AM (whether an individual or a team) is at the center of the trade compliance and enforcement process as it pertains to accounts. AMs are responsible for working with their assigned account(s) to achieve and maintain maximum compliance. The AM is the primary point of contact for the account within the Customs Service. This role includes the following major responsibilities:

- **Developing and maintaining knowledge of the account:** Developing, through data collection, an in-depth knowledge about the account and the issues and programs that affect it, and maintaining current knowledge through account and industry monitoring.
- **Facilitation:** Serving as facilitator between the account and Customs, and with other government agencies when appropriate.
- **Analysis and risk assessment:** Analyzing account information and identifying patterns of noncompliance and significant issues affecting compliance. The AM provides information, when appropriate, to assist in the vetting and ongoing review of accounts for the low-risk and high-risk programs.
- **Action planning and problem solving:** Working with the account to determine the causes of problems, identify effective solutions, and assist in the development of an action plan to achieve improved compliance.
- **Outreach and education:** Working with the account to encourage understanding and cooperation with regard to needed compliance improvements. Emphasis is placed on the account's responsibility to exercise reasonable care under the Mod Act.
- **Account Monitoring:** Monitoring the account's progress on account action plans, and communicating the results to other Customs disciplines as needed.

Procedures for carrying out these responsibilities are described in Chapter 3, Account Management Activities.

### C. Other Customs Roles in Account Management

The roles of other Customs personnel, entities, and disciplines in the Account Management process are briefly described below.

#### 1. Customs Management Centers

The Customs Management Centers are responsible for oversight of operations within their area of jurisdiction (CMC and ports) and exercise line authority over the ports. They:

- Provide technical assistance and participate with the ports in addressing operational problems.
- Assure dissemination and implementation of HQ policy and, through measurement and a self-inspection program, assess core processes performance.
- Participate in implementing corrective action to effect improvement.
- Designate a special AM coordinator to coordinate the flow of AM information from the port-level AM teams to the HQ AM team.
- Coordinate with the HQ AM team before selecting importers for the Trade Compliance Enforcement Strategy.

CMCs are also responsible for all support functions within their areas with respect to resource management, equal employment opportunity, labor and employee relations, other human resources management functions, and cross-servicing.

#### 2. Drawback Specialists

Drawback Specialists are responsible for reviewing and processing drawback claims and supporting documentation to ensure compliance with all Customs laws and regulations. Their responsibilities include providing guidance to claimants, manufacturers, exporters, importers, and other Customs officers on drawback policy and procedures. The DS will notify the AM of egregious acts by their accounts that result in penalty actions taken by Customs that are covered under 19 U.S.C. 1593a and prior disclosures.

### C. Other Customs Roles in Account Management (Continued)

#### 3. Enforcement Evaluation Teams

Enforcement Evaluation Teams are responsible for deciding on the appropriate action to take when violations or discrepancies are detected. EETs are led by a port's Assistant Port Director for Trade (APD-T) and the OI Group Supervisor. AMs are mandatory members of the EET when their accounts are involved. The EET coordinators will contact the AM when their accounts are referred to the EET. Team members may also include:

- Regulatory Audit Assistant Field Director
- Local FP&F officer
- Supervisory Import Specialist (SIS)
- FAS team leader
- FA team leader

The central point of contact for referrals to the EET is the Trade Enforcement Coordinator (TEC).

#### 4. Entry Specialists

Entry Specialists provide a vital link to the Account Management process. They are assigned to various filer teams and are responsible for review and processing of entry documents in various computer applications such as the Port Activity Tracking System (PATS). They also determine when liquidated damage cases are to be set up in the Seized Asset Case Tracking System (SEACATS). ESs identify trends and make referrals to the EET and AMs.

#### 5. Field Analysis Specialists

Field Analysis Specialists are responsible for providing to the Directors of Field Operations (DFOs) analytical products that will enhance their ability to effectively manage limited Customs resources. Their duties range from creating and maintaining local cargo and summary criteria to modeling current business processes and making recommendations for optimizing those processes. These specialists need to interact with AMs, AM teams, Chief Inspectors, Port Directors, and NASs. They are responsible for providing the AM or AM team with data analysis to assist in identifying compliance problems.

### C. Other Customs Roles in Account Management (Continued)

#### 6. Fines, Penalties, and Forfeiture Officers

The Fines, Penalties, and Forfeiture officer reviews the reports of investigation issued by OI and determines the level of culpability of the violators and the appropriate penalty. The FP&F officer is responsible for:

- Issuing penalty notices that are initiated by other offices.
- Reviewing and directing offers in compromise to Headquarters.
- Responding to mitigation requests.
- Monitoring and controlling seizures, liquidated damages, and penalties.

When accounts are involved, the FP&F officer seeks and provides information on penalties to the AM.

#### 7. Focused Assessment Teams

The Focused Assessment team evaluates a company's internal control systems to ensure that they promote the filing of transactions and/or declarations that are in compliance with laws and regulations. (Note: Regulatory Audit has changed its methodology from compliance assessment (CA) to focused assessment (FA) directed at areas of identified risks.) The auditor-in-charge is always the FA team leader. The FA team leader is responsible for:

- Ensuring that the FA is performed in accordance with established standards and in a timely manner.
- Providing guidance and direction to the FA team and ensuring an integrated team process.
- Including the AM and ISs in discussions about the account.
- Providing copies of all FA reports and updates to the AM and ISs.

#### 8. Headquarters Account Management Team

The Headquarters Account Management team manages and monitors the Account Management program. Responsibilities include:

- Program oversight.
- Establishing policies and procedures for effective program performance.
- Submitting account nominees to OI for clearance and acceptance into the program.
- Coordinating account selections and reassignments.
- Facilitating account-related disagreements between ports.

The HQ AM team members are also involved in low-risk initiatives.

### C. Other Customs Roles in Account Management (Continued)

#### 9. Importer Compliance Monitoring Program Teams

The Importer Compliance Monitoring Program (ICMP) team also evaluates a company's internal control systems to ensure that the filing of transactions and/or declarations are in compliance with laws and regulations. The auditor-in-charge is always the ICMP team leader, and his/her responsibilities are the same as those of a FA team leader.

#### 10. Import Specialists

Import Specialists participate on teams specializing in various commodities. Each team has a leader who is responsible for coordinating the team members' efforts. Upon account selection, team members are responsible for increasing the account's compliance. They do this through coordination and resolution of trade compliance issues and referrals to the EET, the FP&F officer, and OI. The IS works in partnership with Inspectors, Agents, auditors, ESs, and AMs through open communication to increase account compliance.

#### 11. Inspectors

Inspectors process entries and make cargo examination decisions that affect the release of merchandise imported by accounts. Inspectors coordinate all communication with designated low-risk importers through the appropriate AM. They also keep AMs informed of any decision to examine merchandise imported by a designated low-risk importer.

#### 12. International Trade Managers and Specialists

International Trade Managers and International Trade Specialists work on a broad industry scale and are critical sources of industry knowledge for the AM. Their responsibilities include:

- Providing the AM with observations on specific industries and emerging trade issues.
- Developing, maintaining, and monitoring interventions and compliance measurements within their assigned industry.
- Assisting in the development and monitoring of industry plans.
- Producing profiles for accounts scheduled for FAs.
- Analyzing trade data, proposing and reporting interventions, and engaging in industry-wide analyses.
- Providing advanced notification to the AM when interventions (if applicable) affect their accounts.

### C. Other Customs Roles in Account Management (Continued)

#### 13. National Analysis Specialists

National Analysis Specialists manage and maintain the various aspects of the national Compliance Measurement program. The NASs provide data and analytical reports for use by ITMs, auditors, and AMs. Their responsibilities include:

- Reviewing completed FAs to ensure that targeting criteria are appropriate.
- Creating and maintaining national cargo and entry summary criteria.
- Monitoring the criteria's effectiveness.
- Coordinating Compliance Measurement efforts, including assisting in targeting and monitoring interventions.

#### 14. National Import Specialists

National Import Specialists, the commodity experts for the Customs Service, provide advice to Customs officers and the importing public on classification and related import issues. They promote uniformity through a variety of informed compliance activities, such as:

- Issuing classification rulings.
- Preparing informed compliance publications.
- Conducting commodity-specific outreach sessions for the trade.
- Providing commodity training to ISs and other Customs disciplines.

AMs interact with NISs to find out about the latest compliance information available that might be beneficial to their accounts (e.g., new or updated informed compliance publications), the effect of recent decisions of the CIT, and precedent-setting rulings. AMs also contact NISs to resolve differences between ports over classification and related matters that involve their accounts.

#### 15. Office of Investigations

The Office of Investigations is responsible for investigating civil and criminal violations related to imported and exported merchandise.



### C. Other Customs Roles in Account Management (Continued)

#### 16. Office of Regulations and Rulings

The Office of Regulations and Rulings conducts major informed compliance initiatives. Attorneys in this office:

- Provide policy and technical support on the application of laws and regulations to Customs and importers.
- Issue rulings, legal determinations, and guidelines relating to all aspects of the Customs trade compliance process.

AMs interact with attorneys in OR&R for clarification of regulatory, policy, and procedural matters that affect their accounts.

#### 17. Ports of Entry

Port of Entry personnel are responsible for all daily operational aspects of the Customs Service. They are responsible for maintaining a focus on Trade Compliance (imports and/or cargo), Passenger Operations, Outbound Operations (exports), and Anti-Smuggling/Canine. Policy and process direction and information flows from Headquarters through CMCs to Ports of Entry. Port personnel contact the AM with specific questions about an account and provide information to the AM on significant issues.

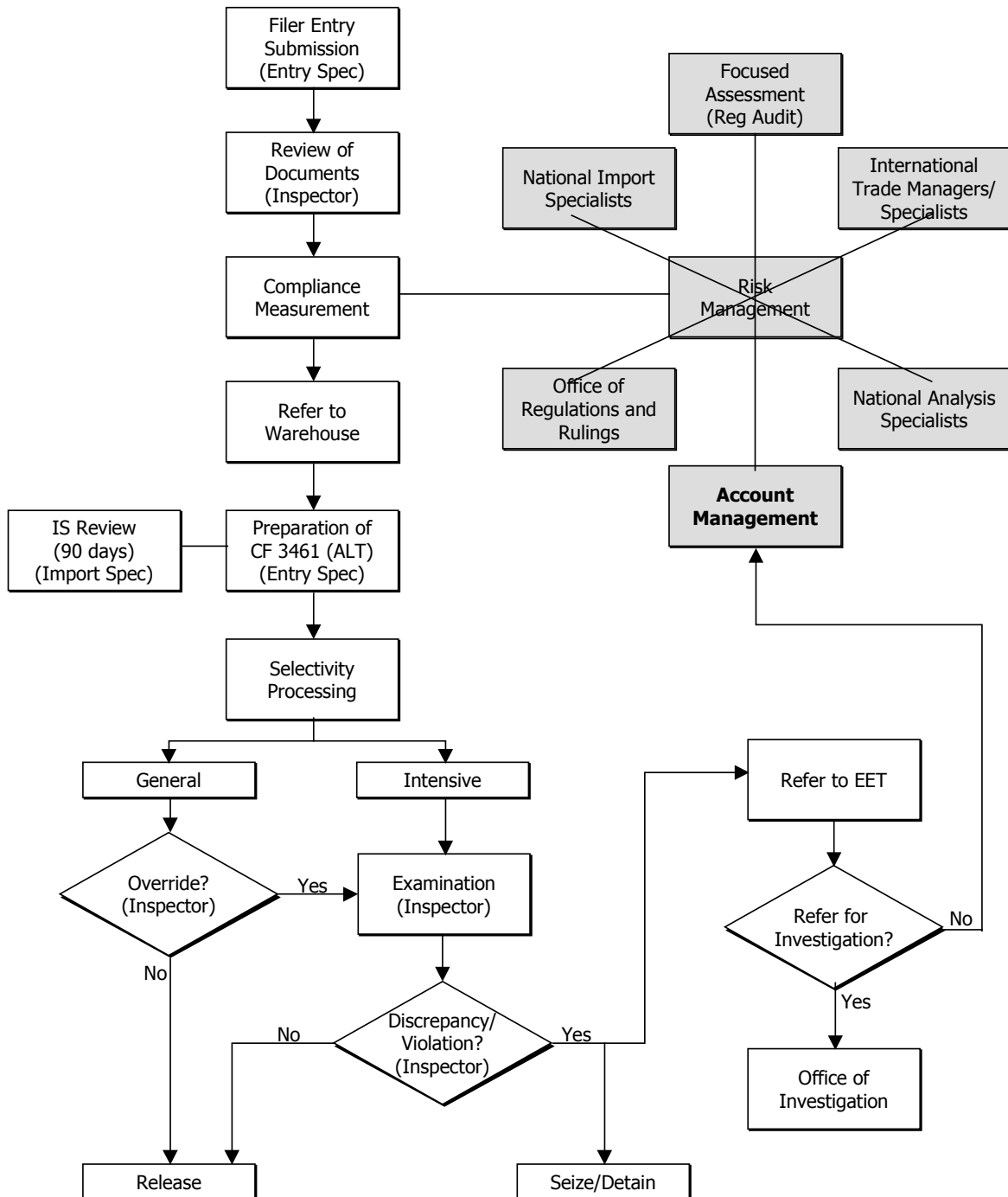
#### 18. Regulatory Auditors

Regulatory Auditors are responsible for conducting audits to: (1) assess the level of compliance with Customs laws and regulations in trade areas and (2) determine the adequacy of internal controls over operations. These audits include FAs, follow-up reviews, and drawback audits. Auditors serve as the team leader and primary liaison with the company during these reviews. In addition, they coordinate with Account Management to identify trade risk, assess internal controls to address trade risk, and communicate best practices to the trade community.

D. Account Management Role Interactions

The flowchart in Figure 2-1 illustrates the relationships among many of the disciplines that are involved in Account Management.

Figure 2-1. Account Management Role Interactions



## **Chapter 3**

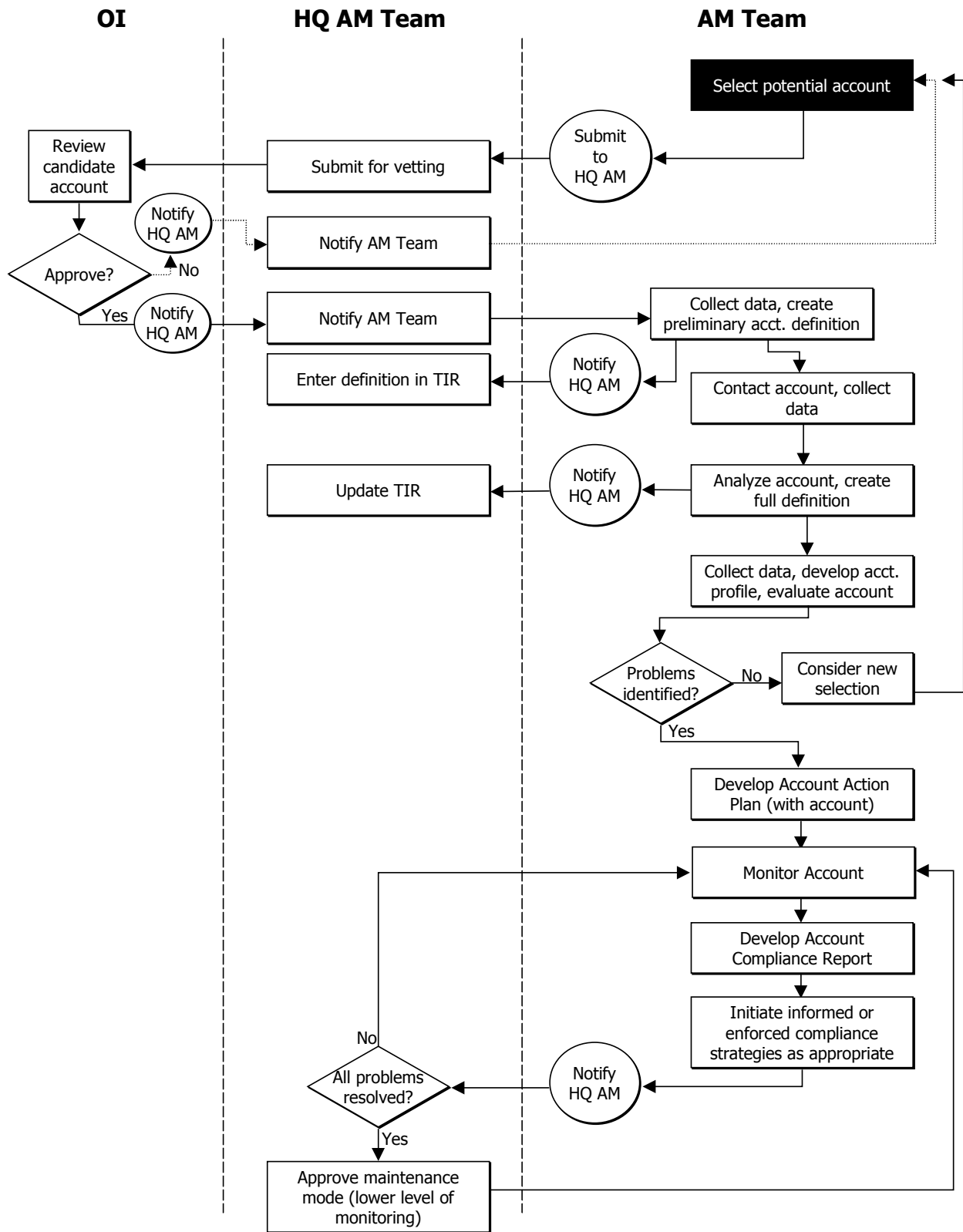
### **Account Management Activities**

This chapter provides detailed guidance for carrying out the following activities of the Account Management process:

- Selecting a Potential Port-Level Account
- Vetting
- Establishing the Account
  - Defining the Account
  - Establishing Communication
- Managing the Account
  - Developing an Account Profile
  - Evaluating the Account
  - Developing Action Plans to Improve Account Compliance
  - Monitoring the Account
  - Reporting Progress
  - Maintaining Compliant Accounts

This process is depicted in the flowchart in Figure 3-1.

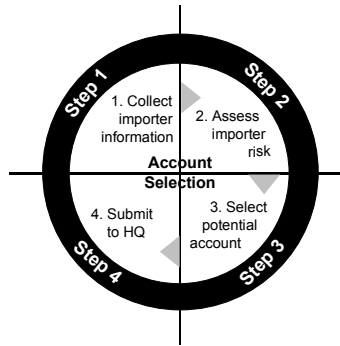
Figure 3-1. Account Management Flowchart



### A. Selecting a Potential Port-Level Account

Risk management principles will be used when selecting port-level accounts.

**Figure 3-2. Account Selection**



#### 1. Collect Data and Information about Potential Accounts

To initiate the selection process, all data related to potential accounts must be collected and analyzed. Data collection is critical in gaining a historic view of an importer's compliance and relative impact on port performance. Information can be obtained from a variety of Customs sources, including the following:

- **TAP2000:**
- **Customs Automated Port Profile System (CAPPS):**
- **Entry Summary Findings Analysis System (ESFAS):**
- **Dataquery:**
- **Account selection tool**
- **Trade Integration Report (TIR).**

All available preliminary information should be analyzed to identify companies that may qualify as potential accounts.

### A. Selecting a Potential Port-Level Account (Continued)

#### 2. Check for Focused Assessments or ICMP Participation

The ports should check the Trade Compliance and Enforcement Strategy (TCES) to see if the potential account has had a FA or is scheduled for one in the near future, or if the potential account is an ICMP applicant or participant. If the company has had or is scheduled for a FA or is participating in ICMP, the port should obtain copies of the account profile and evaluation work completed by the FA/ICMP team.

#### 3. Check for EET Impact Level and National Enforcement Activities

The port should check with the EET for impact levels or other assertions that apply to the potential account. (Refer to the *EET Handbook* for descriptions of the impact levels.) The port should also check with other HQ branches (e.g., Quota, Manifest and Conveyance, Other Government Agencies) for relevant issues.

#### 4. Analyze and Assess Risk

Tentatively selected accounts should undergo a thorough analysis and risk assessment before being forwarded to the HQ AM team for review and approval.

Every good risk assessment takes into account national policies and priorities and uses uniform standards, such as the following:

- **Major Issue Discrepancies and Major Transaction Discrepancies**
- **Impact levels**
- **Eye On Compliance Matrix and Trade Compliance Measures**
- **Balanced Scorecard**
- **Risk vs. Resources Chart**
- **Top Importers List**
- **Statistical Risk Assessment**

#### 5. Coordinate with Other Ports

If the selecting port is not the company's top port of entry, the port must obtain concurrence from any ports at which the company has a higher level of import volume. Agreement should be reached on which port will submit and manage the account before the selection is submitted to HQ. If agreement cannot be reached, the HQ AM team will make the final decision, taking into consideration the account's location, potential travel costs involved, and time already invested in the aggregate account.

### 6. Submit Selection to HQ AM Team

After a port has selected a company as a potential account, the selection is given to the Account Management Coordinator, who forwards the selection to the HQ AM team along with all pertinent information on the company. The New Account Request Form must accompany the submittal.

The HQ AM team coordinates the account selections and begins the vetting process.

**Note:** The HQ AM team has assigned each port a national-level AM to serve as a mentor (see the Account Management Bulletin Boards, or contact the HQ AM team for the current list of mentors). Any questions about account selection that cannot be answered locally may be referred to the port mentor.

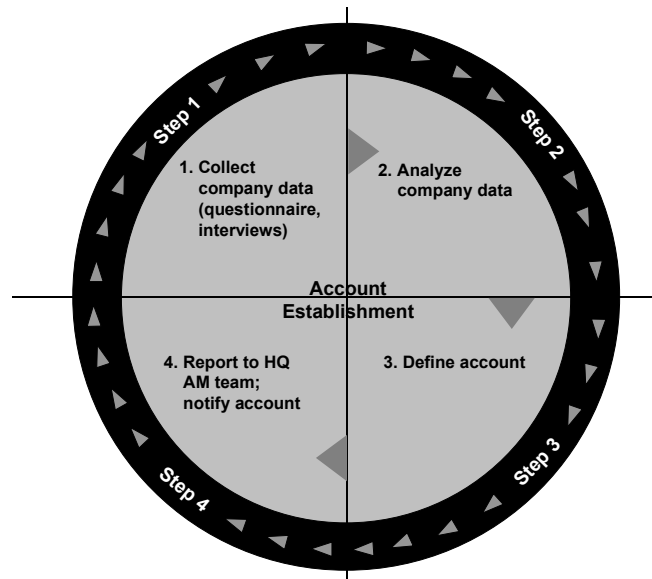
### C. Establishing the Account

When notification is received that the company has been approved for the Account Management program, the account is then officially established. Establishing the account includes defining the account and establishing communication.

For simplicity, these steps are described as discrete activities. However, these activities are not sequential; rather, they tend to be interwoven. The process of defining the account, which began during the selection process, continues in stages. After collecting and analyzing information for a preliminary account definition, the company must be contacted to obtain additional information before a more comprehensive account definition can be developed. Communication with the account then continues in an ongoing cycle.

The information gained in the process of defining the account will later become the basis for the account profile. Each time the AM completes the Risk Management cycle (collect data, analyze, prescribe action, track and report), the body of information about the account becomes more detailed, and the results are fed into the next risk management cycle. Figure 3-5 illustrates how the process of establishing the account coincides with the Trade Risk Management Process.

Figure 3-5. Establishing the Account





### C. Establishing the Account (Continued)

#### 1. Creating a Preliminary Account Definition

Creating an account definition is the process of identifying all the Importer of Record (IR) numbers that will make up the account—in effect, determining the boundaries of the account. To begin, the AM should compile as much information as possible about the company, including:

- Company names.
- Common addresses and locations.
- Common bond numbers.
- All the IR numbers that will make up the account.

(**Note:** Some companies will have multiple and perhaps unrelated names and IR numbers, and it may be necessary to contact the company to determine the relationships between names and IR numbers. This information will be finalized when communication with the account is established.)

The initial account definition should be provided to the HQ AM team. However, the ultimate account definition may or may not be limited to the initial list of IR numbers provided to the HQ AM team.

#### 2. Establishing Communication with the Account

Establishing effective communication with the account is vital for the success of the Account Management program. The following guidelines will assist the AM in initiating this process.

##### a. Introductory Letter

To open communication with the company, the AM must prepare an introductory letter to the company within 30 days of account selection and approval. For a national-level account, the letter is signed and mailed by HQ Commercial Compliance Division. For a port-level account, the Port Director or the APD-T signs the letter. See Attachment A for sample letters.

##### b. Follow-up Call

The AM should make a follow-up phone call to the company within 3 weeks of mailing the introductory letter. The purpose of the call is to introduce oneself as the AM and schedule a meeting to present the trade compliance process and Account Management concepts. If the account is scheduled for a FA or ICMP review, the Account Management initial meeting should be combined with the FA pre-conference or prior to the ICMP on-site review.

### 2. Establishing Communication with the Account (Continued)

#### c. Additional Follow-up for Reluctant Accounts

If the account is reluctant to participate, the AM should emphasize that the Account Management program is not voluntary and that the company will be considered an account for Customs purposes. The AM may send a follow-up letter explaining the account-based approach to Customs trade compliance goals. (See Attachment B for a sample letter.)

#### d. Account Questionnaire

The Account Questionnaire (see Attachment C) is used to gather information about the account's systems. General topics covered by the questionnaire, which should be customized for the specific account, include:

- General organizational information.
- Internal controls.
- Customs value information.

The questionnaire may be sent to the account prior to the initial meeting or provided at the time of the meeting.

If a FA has been scheduled or performed, the AM should use the questionnaire that is on file. The Regulatory Audit Trade Liaison (RATL) can be contacted for copies of answered questionnaires. A list of RATLs is available on the OST intranet site. Any unanswered, unasked, or incomplete questions may be addressed during the interview.

#### e. Initial Meeting

The purpose of the initial meeting is two-fold: (1) to present information about the program and (2) to obtain additional account information.

- **Presenting information:** The AM should explain the trade compliance process and Account Management concepts. Briefing aids (video and/or PowerPoint presentation) are available from the HQ AM team to assist in this explanation.
- **Obtaining account information:** Additional information needed to complete the account definition should be gathered at the initial meeting. Items such as the following, if applicable, should be discussed with the account:
  - Relationships between company names and IR numbers.

### e. Initial Meeting (Continued)

- Company structure: Does the company have divisions that are separate business entities? Does the company have separate Customs management departments?
- Business categories of the importer (e.g., bonded warehouse, manufacturer).
- Company locations, such as locations that store Customs records and the location that is responsible for internal controls and procedure manuals. Locations are defined as a physical address, fax number, and/or Internet address.
- Account Questionnaire (The questionnaire may be provided at this time or, if mailed in advance, the company's answers can be used as a springboard for discussion during the meeting. See Attachment C.)
- Primary and alternate points of contact. The point of contact must be a person authorized by the account to manage its relationship with Customs and who can authorize changes in its Customs processes.

**Note:** This list is not intended to be all-inclusive. Each AM is responsible for determining what topics need to be discussed to create a comprehensive picture of the account.

### 3. Creating a Full Account Definition

When sufficient information has been obtained, a full account definition should be created.

#### a. **Content.** Be sure the account definition includes the following information:

- Account name (common name used for that importer).
- IR name (name as it appears in the SRE screen in ACS).
- IR numbers that will make up the account (IR names and IR numbers must be linked).

(**Note:** Creation of the account definition is part of an evolutionary process of compiling information about the account. With additional research, this information will also become part of the account profile. It may be helpful, therefore, to review the account profile outline provided in Attachment D as a guide to the types of account information that will be needed.)

### 3. Creating a Full Account Definition (Continued)

- b. Considerations.** In defining the account structure, consider the following:
- Group together entities that share a common import oversight department. Also group together entities that share common internal controls, policies, and procedures for accounting systems, recordkeeping, and Customs-related processing.
  - Consider how Customs has traditionally viewed the company. Obtain the company's Dunn & Bradstreet report. If the port does not have access to the Internet, copies may be requested from the nearest Strategic Trade Center.
  - The AM must identify and understand Customs relationships with the various company entities. They may be identified through entry summaries, manifests, other documents, and direct verification with the account.
- c. Notification to HQ.** After the definition is determined, the HQ AM team should be notified of the full account definition for inclusion in TIR. If there is a FA or ICMP review, the AM must coordinate the account definition with the FA or ICMP team leader. This is a critical step because Customs follow-up actions to a FA may be to increase or reduce the number of Compliance Measurement exams. Furthermore, acceptance into the ICMP will also impact the number of Compliance Measurement exams to be made.
- d. Informing the account.** When the account definition has been determined, the AM should communicate that information to the account. In following up with the account, the AM should:
- Explain how the account definition was derived.
  - Encourage the account to consolidate and use as few IR numbers as possible to facilitate the analysis of the account and assist Customs in addressing the account in a uniform manner.
  - Ask the account to instruct its broker(s) to submit a Customs Form (CF) 5106 to eliminate duplicate and unused IR numbers.

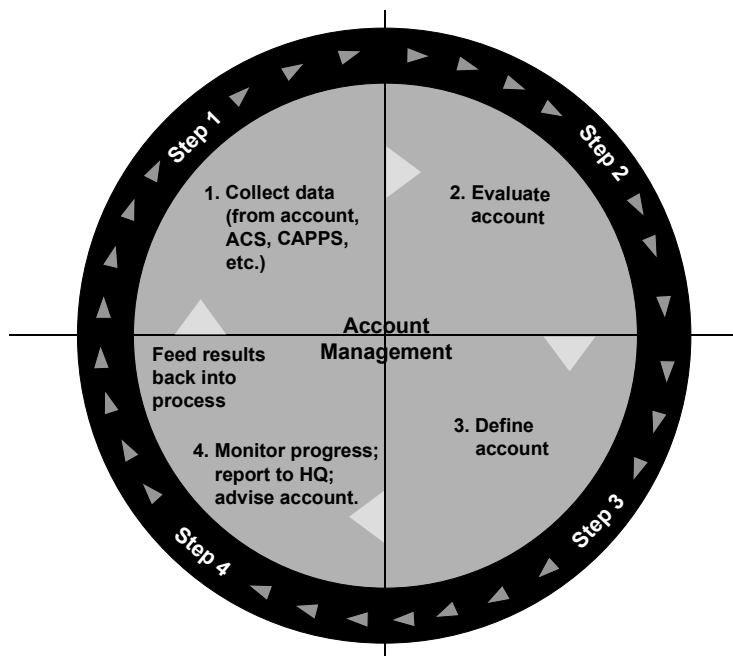
### D. Managing the Account

Management of an account involves the following activities:

- Developing an Account Profile
- Evaluating the Account
- Developing Action Plans to Improve Account Compliance
- Monitoring the Account
- Reporting Progress
- Maintaining Compliant Accounts

The Risk Management Process provides the framework for these activities, as shown in Figure 3-6. Because the Risk Management Process is fluid, sometimes completing a step will send you backward in the process rather than forward (e.g., the analysis in step 2 may send you back to step 1 to collect more data). The results of tracking and reporting are always fed back into the Risk Management Process.

**Figure 3-6. Managing the Account**



### D. Managing the Account (Continued)

#### 1. Developing an Account Profile

When the account has been defined, the AM will build on the account definition to develop an account profile. The account profile is a key document that allows the AM to begin narrowing its focus to address crucial compliance problems.

##### a. Content

The profile is an aggregation of raw data and the results of an analysis of that data as well as findings, conclusions, and recommendations. It includes (but is not limited to) such information as:

- The account's corporate structure, locations, and relationships to other companies.
- A detailed analysis of its importing history.
- Comparison to industry norms.
- Identification of possible compliance problems.

The profile should include any information that will enable the AM to assess the account's compliance, evaluate the account's internal control and classification systems, and identify major compliance and process problems. The Account Profile Outline in Attachment D provides guidance on the elements that should be included.

##### b. Profile Development

AMs are responsible for the profile. Analysis is the key issue for a useful profile. The AM will retrieve the data and do preliminary analysis. The AM can identify general areas where a change in importing trends may indicate potential violations. The AM should interpret data based on industry knowledge and commodity expertise.

##### c. Sources of Information

Information that was compiled for the account selection and definition provides a beginning for the profile. The AM will continue to build the profile as the account evaluation progresses.

#### 2. Evaluating the Account

The AM or AM team is responsible for conducting an account evaluation to identify major areas of risk (compliance and/or processing problems) to assist the account in developing corrective actions. The data gathered earlier (i.e., for the account profile) is the basis for this evaluation.

The AM should explain the purpose of the evaluation to the account, making it clear that the evaluation is not intended to determine the need for an investigation or an

audit. However, if egregious noncompliance or suspected fraud is discovered, it must be referred to the EET.

### a. **Scope of the Evaluation**

In conducting the evaluation, the AM will:

- Conduct a thorough analysis of the account profile data to identify account discrepancies and instances of noncompliance.
- Evaluate the account's internal control and classification systems to determine if there is a process in place by company managers and others to provide reasonable assurance that operations are effective and efficient, financial reporting is reliable, and laws and regulations are complied with. The AM might wish to consider requesting the expertise of other Customs disciplines such as Regulatory Auditors to evaluate the company's internal control systems.
- Evaluate the accounts classification systems.
- Identify major compliance and/or processing problems as well as trends and patterns that negatively affect compliance.
- Determine the scope of the identified problem areas.
- Discuss the evaluation findings with the account (which may in turn shed additional light on the identified problem areas).

### 2. Evaluating the Account (Continued)

#### b. Coordinating with Focused Assessment or ICMP

Special coordination is needed for accounts subject to a FA or ICMP. If a company is scheduled for a FA or is the subject of an ongoing FA, the FA team is responsible for assessing and evaluating the company's system of internal controls and classification systems. When there is a FA or the company is an assigned account, the AM will be a member of the FA team. The AM does not participate in the audit fieldwork aspect of the assessment unless the AM is also the IS assigned to the FA.

Similarly, if the company is scheduled for an ICMP review or is the subject of an ICMP review, the ICMP team is responsible for assessing and evaluating the company's system of internal controls. If the company is an assigned account, the AM will be a member of the ICMP team. The AM does not participate in the on-site review aspect unless he or she is also the IS assigned to the ICMP team.

#### c. Evaluating Internal Controls and Classification Systems

The account's procedures should be adequate to ensure that Customs transactions are in compliance with laws and regulations. In conducting this part of the evaluation, the AM should:

- Consult with the account to determine if it has binding rulings or internal advice decisions and if the account's classifications have been the subject of any court decision.
- Inquire about whom the account relies on for the classification of its merchandise.
- Review any information that the account provides its broker to facilitate the classification process, such as a classification database or engineering schematics.
- Inquire if the company claims drawback duties, and verify that the account maintains supporting drawback documentation.
- Determine if all dutiable costs are reported to Customs and that the value reported to Customs is the price paid or payable.
- Inquire if the company uses any special trade programs (e.g., GSP, NAFTA) and verify that the company maintains adequate supporting documentation to meet the program requirements.
- Obtain information gained from a FA or ICMP review to determine if there are any areas of concern.
- Evaluate the company's internal control systems. For this area, the AM might want to consider requesting assistance from Regulatory Auditors.



### D. Managing the Account (Continued)

#### 3. Developing Action Plans to Improve Compliance

The account action plan outlines the identified risks and the solutions that have been agreed to by Customs and the account to improve compliance. The action plan is a critical tool to assist in monitoring the progress of the account in achieving and maintaining compliance. It should be succinct but clearly specify the following:

- Goals
- Steps to reach those goals
- Responsibilities
- Due dates

##### a. Action Plan Development

The following guidelines will govern development of the account action plan:

- Action plan recommendations should be based on analysis of the account profile, CAPPs data, the FA, and the ICMP review.
- It is important for the AM to work closely with the account in developing the action plan. Both the account and the AM should take part in determining the causes of problems, identifying effective solutions (action items), and setting priorities and timelines. There may be instances where an account will disagree with recommended actions. In these cases, the rejected action items should be listed in the plan with an explanation of the reasons for rejection.
- The AM must ensure that the action plan reflects the Customs national trade strategy, trade priorities, and the CMC Trade Compliance and Enforcement Plans.
- Action items must be coordinated with other Customs entities (e.g., other affected ports, NIS, ITM, Regulatory Auditors) as appropriate, to ensure that all elements are included.
- The AM may assist in streamlining the account's internal operations and procedures that affect its Customs business. However, the AM should refrain from assuming a role synonymous with that of an outside consultant retained to assess needs and perform system design work.
- The required format and instructions for completing the action plan are provided in Attachment E.

##### b. Lack of Action Items

If an AM has difficulty identifying action items for the plan, a reevaluation of the company as an account should be considered.

### 3. Developing Action Plans to Improve Compliance (Continued)

#### c. Coordination with FA and ICMP

Action plans are required for all accounts. However, if a FA ties up the account's available resources as a result of its size and complexity, the action plan can be delayed until after the FA.

At the conclusion of the FA, the Compliance Improvement Plan (CIP) may become the action plan. The account may also have developed a CIP as part of the ICMP application or participation process. The AM should encourage the account to take corrective action on CIP items as soon as reasonably possible. If a company has been scheduled for a FA after becoming an account, the FA team and AM should join efforts to integrate the CIP and the action plan.

If a FA has not been scheduled or completed, the AM should work with the account to identify procedures and controls that may need improvement in preparation for the FA.

#### d. Plan Approval and Submittal

For port-level accounts, the final version of the action plan should be reviewed and approved by the AM team, the APD-T, and the account. For accounts at the national level, the action plan should be approved by the AM and the account.

The AM will forward a copy of the action plan to the following parties:

- Affected ports of entry.
- HQ AM team.
- Office of Strategic Trade (OST) international trade officer.
- Director of National Analysis Staff (NAS).

The affected ports of entry are responsible for ratifying action plan items that affect them by working closely with the lead port AM team.

### 4. Monitoring the Account

When the account action plan has been approved, it must be implemented. After the action plan is implemented, the AM is responsible for monitoring the account to ensure that the planned compliance improvements take place. The account should provide the AM with updates on the plan as problem areas are resolved.

As progress is tracked and reported, the results are fed back into the risk management cycle by sharing them with the account and making them available throughout the Customs network. The AM continues the process of collecting data and information, analyzing the data and assessing risk, prescribing action, and tracking and reporting progress.

### 4. Monitoring the Account (Continued)

#### a. Importance of Communication and Cooperation

Communication is key to the success of the Account Management program. It is important that the AM maintain an open and effective dialogue with the account to market trade compliance processes, exchange information, and offer and receive feedback on the successes of the account and the account program.

Account Management success also depends on the communication linkages that are established between ports, the NIS, and other Customs divisions with regard to the account. Information must flow both to and from the AM. Ports of entry should provide the AM with information on significant account issues, and the AM should keep all the stakeholders informed about the account.

The AM will establish and maintain cooperative relationships with other Customs divisions and key ports regarding the account. This includes:

- Establishing a network with Customs personnel at the account's major ports of entry.
- Developing contacts within the major program areas.
- Keeping the FA team leader advised of the account's CIP progress, distributing all progress reports, and notifying the FA team leader when the account is ready for the follow-up audit. This is a two-way communication process: the FA team leader should also keep the AM apprised of the status of the FA review. Similar communication should be maintained between the AM and the ICMP review team.

#### b. Account Monitoring Activities

During this phase of Account Management, the AM will conduct the following monitoring activities:

- **Track progress on action plan items.** The AM must monitor any corrective action that the account implements and add it to the account's progress report. Failure of the account to address action plan items will result in a referral to the EET.

Milestones, completion dates, and any other significant activity concerning the items should be recorded in a contact log or progress report. The contact log should include:

- Meeting dates
- Issues discussed
- Proposed remedies
- Follow-up dates
- Results

### b. Account Monitoring Activities (Continued)

The action plan is a “living” document, and new action items should be added as issues or risks are identified. The AM may provide interim updates to the plan as needed and must review the action plan with the account at least annually.

- **Monitor compliance.** The AM is responsible for monitoring the compliance of the account with the tools available at his or her location and identifying areas for improvement. This includes compiling discrepancy information and providing it to the account at least quarterly by means of the Account Compliance Report (see Attachment F).

An AM must review every finding that adversely affects the account’s compliance rate. Each of these discrepancies, both cargo and summary, must be verified, trends and patterns discerned, and corrective actions initiated. On occasions when incorrect summary findings are entered, agreement must be reached with the Customs officer (e.g., IS, Inspector) entering the findings as to the validity of the information. If the information is incorrect, the responsible officer will make the necessary changes. **Note:** Data integrity is crucial. Compliance Measurement findings entered incorrectly corrupt the integrity of the statistical data and the database and lead to inappropriate conclusions. The “Field Input Instructional Guidelines” provide instructions on making these corrections.

- **Monitor CIP issues.** The AM will monitor the account’s progress on issues raised in the CIP. When an account has resolved or shown improvement on an action item, the AM should contact the Customs network to report the progress.
- **Monitor issues and programs that affect the account.** The AM must maintain a current level of knowledge about issues and programs that affect the account, such as:
  - Trade issues
  - Shipping patterns
  - Prior disclosures
  - Reconciliation
  - Violation billing
  - Recordkeeping
  - Quota pre-processing
  - Remote location filing
  - Automated tools
  - Importer Compliance Monitoring Program (ICMP)
  - Drawback

Frequent review of the Administrative Bulletin Boards and the “What’s New” section of the Customs Web site and Infobase is required.

### b. Account Monitoring Activities (Continued)

- **Report Evaluation Results.** The AM should prepare an Account Compliance Report detailing the discrepancies committed by or on behalf of the account and discuss that report with the account. See Attachment F for Account Compliance Report guidelines. AM teams should contact the port mentors for further instructions on preparing the Compliance Report.

**Note:** Care must be taken to provide the account with information on entries and/or entry summaries *only* where the account is the importer of record. Refer to the Trade Secrets Act (18 USC 1905); the Freedom of Information Act (FOIA) (5 USC 552 (b)(4)); FOIA Directive 2120-009, dated 8-31-98.

- **Coordinate outreach and improvement activities with the account.** It is the responsibility of the AM to interest the account in increasing its compliance by providing compliance reports, identifying noncompliant trends, and providing recommendations to improve noncompliant areas. Emphasis should be placed on the account's responsibility for exercising reasonable care under the Mod Act. The following guidelines govern the AM's efforts in this area:
  - The AM should emphasize the benefits that accrue to accounts that have attained a low-risk compliance assessment designation. The AM should also refer to the low-risk directive issued by the Risk Management Division and suggest improvements that will assist the account in reaching this goal.
  - The AM should encourage the account's participation in Customs programs such as reconciliation, ICMP, and remote filing.
  - The AM should notify the account of outreach programs (e.g., commodity seminars, symposiums, and Customs publications) focused on topics to increase compliance and reduce costs to both Customs and the account.
  - After an action item has been implemented by the account, the AM will review the new procedures with the account. If there are problems, the AM may contact the ports for their suggestions on possible resolutions.

### b. Account Monitoring Activities (Continued)

- **Update account profile.** On a yearly basis, the AM will run data for the most recent Customs fiscal year and update the account profile.
- **Monitor business information.** The AM must continually monitor business information through newspapers and business weeklies. Keeping abreast of business news enables the AM to identify any business changes (e.g., mergers or acquisitions) that may affect the account. Chapter 4 provides additional information about this area of responsibility.

## 5. Reporting Progress

Account Management progress is reported by means of quarterly or monthly reports to Headquarters and regular Account Compliance Reports to the account.

### a. Account Compliance Reports

AMs use the Account Compliance Report to provide information to the account, including Compliance Measurement (CM) rates, other cargo exams non-CM, and document review discrepancy specifics. The report must be provided at least quarterly but may be issued more frequently (e.g., monthly) if the AM considers it necessary.

Attachment F provides instructions for preparing the Account Compliance Report and an example of a report.

## 6. Maintaining Compliant Accounts

### a. Maintenance Mode

After an account becomes highly compliant, it moves into maintenance mode. Maintenance mode is defined as the status attained by accounts that have reached or surpassed the industry's letter of law compliance rate, as stated in the annual Trade Compliance and Enforcement Strategy (TCES), and have successfully completed all action items.

### b. Maintenance Activities

- **Monitoring.** Accounts in maintenance mode should be monitored to ensure they maintain their compliance rate within industry standards. These companies will be reevaluated on a periodic basis to ensure their continued compliance. For more information on account risk adjustments, see Chapter 5.

AMs should also keep in regular contact with their Customs network and inform the network of any changes in importing patterns or activities, changes in the account's practices, or problem areas.

- **Communication with the account.** When an account reaches maintenance mode, the AM should contact the account only on a periodic or as-needed basis. Communication with the account should be seen as an opportunity to apprise them of new Customs programs and scheduled meetings or seminars that may be of interest to them.

The AM should also inquire about changes in the account's importing patterns and/or activities, relationships, or any recurrences of previous problems.

## Chapter 4

### Identifying and Responding to Business Changes

Changes in business-to-business (B2B) relationships or ownership of an account can affect how that account is viewed in the AM program. The following are among the types of business changes that may significantly impact accounts:

- Joint ventures
- Mergers
- Dissociations
- Breakups
- Spin-offs
- Acquisitions
- Alliances
- Dissolution of accounts

Based on these changes, an account may be reassigned or removed from the program. A major organizational development, however, does not always result in a broad impact on Customs operations. For example, while some mergers result in the demise of an account, others have virtually no impact on the Customs-related account activities. Similarly, parts of a company may spin off or in some way separate from the rest of the company. The new business entity may have its own Customs operations, or it could continue to rely on the Customs operations of its founding company. The AM must be aware that business changes can affect the compliance risk levels.

The AM uses the Trade Risk Management Process to monitor and analyze such events and take appropriate actions, as described below.

#### A. Collect Information

The AM should monitor the following sources for indications of business changes that may affect the account:

- **Customs resources.**
- **Account resources.** The most reliable source of information is the account itself. Maintaining frequent personal, telephone, or written communication with the account will alert the AM to forthcoming B2B changes.
- **Business news.** Other potential sources of information include current information on the company's Web site, business publications, news releases, and newspapers.



### B. Analyze and Share the Information

The AM should analyze all new information on B2B changes to determine if the changes have an impact on the account status. Every effort should be made to obtain specific details of B2B changes as soon as possible. Information to be analyzed may include:

- Import value.
- PFI importation.
- Overall rank and risk score of the new relationship. (**Please note:** This information may not be readily available.)

The AM should contact other AMs whose accounts are involved or affected by the changes. The HQ AM team may assist in determining the account status of other companies involved in the B2B change.

The AM should provide an analysis of changes to the other affected ports of entry. Examples of issues that may affect the ports of entry include:

- Increase or decrease in import volume or value.
- Switching of a significant number of entries from one port to another.
- Relocation of an account's manufacturing or administration facilities.
- Additions to existing facilities.

An abrupt transfer of Customs responsibilities to a different business entity may occur without a significant change in other aspects of the importation process. Sharing analyzed information with other affected ports enables effective assessments of changes on the account status and port activity. In addition, the information should be shared with Regulatory Audit for ICMP applicants/participants.

### C. Recommend Action

The affected AMs should make a joint decision regarding recommended actions and forward a written recommendation to the HQ AM team. The recommendation should clearly and concisely articulate the following:

- Business change that has occurred (e.g., the account no longer imports through the port, has moved to another port, is no longer in business, has merged with another company or account, or has been split into several entities).
- Recommended actions that should be taken on the reassignment or removal of the account.
- Rationale for the recommendations, including analytical data.

Recommendations that do not include a concise narrative and supporting data will be rejected and returned.

The HQ AM team will make the final decision, initiate the reassignment or removal of the affected accounts, and notify the affected AMs and ports. In addition, Regulatory Audit should be notified if the action affects an ICMP candidate.

## **Chapter 5**

### **Account Risk Adjustments and Reassignments**

#### **A. Account Risk Adjustments**

Trade is dynamic and demands that Customs reexamine the criteria used in the selection of PFIs on a 3-year cycle. The PFI review process ranks industry sectors with in-depth consideration of various trade, political, and economic factors. Account risk adjustments occur when there are industry shifts (e.g., expansions and fluctuations in the PFIs).

#### **B. Account Reassignments**

The HQ AM team is responsible for reassigning accounts. Accounts may be reassigned based on an analysis of importer information, also taking into consideration the port's resources and advice.

#### **C. Number of Accounts Per Port**

The account-ratio analysis is used to determine the total number of accounts a port will be assigned. The analysis is based solely on the number of ISs assigned to a port. Supervisory Import Specialists are not included in the count.



## **Attachment C Account Questionnaire**

To address compliance risks and develop a viable account action plan, the AM needs to gather and evaluate information about the account's systems. If an account is currently undergoing or has completed a FA, the information obtained from the questionnaire will be sufficient documentation to develop an action plan.

If an account is scheduled for a FA but has compliance issues they would like to have addressed, the AM should use a combination of an interview and the questionnaire to assist in the development of a plan to identify and address those issues. The AM should also check to see if the company is an ICMP applicant.

### **A. Sample Questionnaire—To Be Customized**

What follows is the basic sample questionnaire. The questionnaire is not intended to be used "as is." It is provided only as an example of the types of questions an account could be asked. The AM is responsible for customizing the questionnaire to meet the specific needs of the account. The AM should consult with the RATL for assistance in preparing the questionnaire.

### **B. When to Use the Questionnaire**

The questionnaire may be left with the account on the day of the initial interview, or it can be mailed or faxed to the account in advance. If prepared in advance, the replies to the questionnaire will provide the AM with account background before the initial visit. In addition, it will provide an opportunity to complete unanswered questions during the interview.

The questionnaire should be returned to the AM within 30 to 45 days from the date it was mailed or faxed. If not returned within this time, a follow-up phone call should be made to the account inquiring about the expected return date.

**U.S. Customs Service  
General Questionnaire or Account Management**

**(To Be Customized for the Account)**

**A. Organizational Information**

1. Provide the company's full name, headquarters address, and Internal Revenue Service identification number, as well as other names and identification numbers under which the company imports.
2. Provide the name, title, and telephone number of the official(s) preparing information for this questionnaire. Will this person be the U.S. Customs contact? If not, who? (Provide name, title, address, phone, and Internet address.)
3. Provide the name and title of company officers.
4. Describe the overall organization structure, including organization charts and similar information.
5. Provide general information about business operations, number of employees, location of facilities, products, divisions, and customers.
6. Provide information concerning the company's parent, sister, subsidiaries, and joint venture organizations and relationships.
7. Provide the names and addresses of any foreign-related companies.
8. Provide the names and addresses of brokers used by your company. Do you use any broker's bonds to import merchandise?
9. Provide the names and addresses of major foreign suppliers. (Ten percent of total entered value is considered major.)
10. Describe the disposition of imported products (manufacturing, resale, etc.).
11. Identify and explain situations in which the company exports merchandise from the United States. Is the company or any of its divisions involved in the drawback process?
12. Identify situations in which the company re-imports merchandise from the United States.

### B. Internal Controls

1. What is the company's fiscal year?
2. Does a specific division handle the Customs-related operations? Does the division have access to rulings, pre-classification, and internal advice issued by Customs? Provide the names and locator information for key individuals associated with Customs-related operations.
3. Provide formal policies and procedure manuals or other written directives related to the handling of Customs activities. If there are no formal written procedures, provide a written summary of the company's procedures for ensuring compliance with Customs laws, regulations, and rulings.
4. Are the financial records linked to Customs transactions by entry number, Customs invoice numbers, or other identifiers? Please explain.
5. Identify the source of records and information used to file a Customs entry. Explain how they are created, maintained, and transferred. Provide copies of any written operating procedures and internal controls over record production and retention. What is the usual period of record retention, and what storage media are used?
6. Using source records for support, provide a description and/or flowchart of the company's activities including general ledger account numbers for recording the acquisition of foreign merchandise in the following areas:
  - a) Purchase of foreign merchandise
  - b) Receipt of foreign merchandise
  - c) Recording in inventory
  - d) Payments made to foreign vendor
  - e) Distributions to customers
  - f) Export of merchandise, if applicable
7. Explain results of evaluations (internal or external) of the effectiveness of the company's system of internal controls with respect to Customs-related operations.
8. Identify drawback claims and how they are associated to import documents.

### c. Customs Value Information

1. Is the company related to any of the suppliers of imported merchandise? If yes, does your firm gain any financial or commercial advantage from the existence of this relationship?
2. Is the company an exclusive U.S. importer of merchandise from foreign suppliers? If yes, explain the circumstances of sale. Provide written agreement, if applicable. Does the company receive any special discounts (early payment, increase quantities, etc.)?
3. What methods of payment (e.g., letters of credit, wire transfers, checks) are used for foreign purchases? Are payments made in U.S. dollars or other currency? How frequently are payments made to foreign vendors?
4. Do you remit the full invoiced value for imported merchandise to the foreign supplier? What are the terms of payment? Are any additional remitted funds not reflected in the invoices used for Customs entry? Please provide proof of payment for the following import invoice numbers:  
  
(List several import invoice numbers taken from entry summaries reviewed)
5. Does the company provide any other material or financial assistance to any foreign suppliers? Identify general ledger accounts used to record these transactions. For example, does the company:
  - a) Supply production materials (fabric, component parts, etc.)?
  - b) Supply machinery to the overseas facility?
  - c) Provide designs or blueprints?
  - d) Pay for factory expenses?
  - e) Pay the salary of any person working in the overseas factory?
  - f) Provide research and development to produce products?
  - g) Lend funds to the foreign supplier?
  - h) Pay for acquisition of quota, visa, and licenses?
  - i) Pay for packing material and labor?
6. Explain how and when the company takes title to the imported merchandise.
7. Explain transportation procedures and responsibilities for foreign (including inland freight charges), international, and domestic transportation of merchandise from the foreign plant to the place of international shipment, to the port of importation, and to the final U.S. destination. Identify general ledger accounts used to record the various freight charges. Explain procedures to ensure that non-dutiable costs such as international freight and insurance are accurate and fully supported by documentation. Provide contractual agreements between the company and foreign suppliers with shippers or freight forwarders.

### **c. Customs Value Information (Continued)**

8. Identify situations in which the merchandise price from the foreign seller does not include all costs plus a profit.
9. Identify and explain retroactive price increases, rebates, allowances, or price adjustments (directly or indirectly from foreign exporters or sellers) for imported merchandise at the end of the accounting period or other times that are paid to or accrue to the company and/or the foreign supplier. Identify the general ledger accounts used to record these transactions.
10. Explain procedures for accounting of foreign currency fluctuations. Identify general ledger accounts used to record the fluctuations.
11. Identify and explain situations in which the foreign seller influences or controls the resale price of merchandise imported into the United States. Are the prices the company pays for imported merchandise subject to restrictions or conditions dictated by the foreign supplier?
12. Identify and explain situations in which the company uses the services of foreign selling agents. Explain procedures for declaring selling commissions on entries. Provide names and addresses of agents, agency agreements, and identify the general ledger accounts used to record commissions and related transactions.
13. Identify and explain situations in which royalties or license fees are paid for imported merchandise. Provide copies of the royalty or license agreements, and identify the general ledger accounts used to record these transactions.
14. Does the company have a transfer pricing agreement with the Internal Revenue Service? If so, please provide a copy of the agreement.



## **Attachment D Account Profile Outline**

This outline provides guidance on the elements that should be considered for inclusion in an account profile. The account profile is for **INTERNAL CUSTOMS USE ONLY**.

The narrative analytical profile will be prepared by the AM. When the primary source tool (e.g., TAP2000) is determined, training will be provided to all team members involved in the Account Management process.

### **A. Profile Format**

Creativity and initiative are very much a vital part of the profile development process. Graphics, charts, lists, etc., may be inserted, as appropriate, in the profile to convey information in the most concise and effective manner. However, emphasis should be given to using narrative to clarify and highlight significant issues. The sections regarding trade issues and company analysis should consist primarily of narrative.

### **B. Profile Elements**

The profile elements listed in the following outline are not exhaustive. Analysts may address each of these elements (even if only to note N/A) and are encouraged to include additional information when needed.

#### **I. PROFILE COVER SHEET**

Include:

- Name of Preparer
- Preparer's Telephone Number
- Date of Profile
- Account Name/Location
- Warning Statement

#### **II. INTRODUCTION**

Include:

- Timeframe (time period of data used)
  - Company business year identified for profile and assessment
  - Trend analysis of trade statistics for identified year plus two preceding business years
- Sources of Data (ABI and/or Census, other sources)
- IR/Consignee Number (to define Account/Division)

Also identify the sources of the data (e.g., TAP2000, Dataquery tables, census tapes, TECS, Internet) and note that the report contains analysis of trade issues identified by the AM, IS, and FAS.

### III. ACCOUNT INFORMATION

**Note:** The first step for the profile is to identify all IR numbers that will be identified as the account. If the vast majority of importations can be retrieved using one IR number, it is recommended that other IR number(s) be excluded. Accounts, however, may elect to use several IR numbers associated with subsidiaries or parent companies. Because names and numbers can be unrelated, the AM will have to research ACS files. Emphasis is placed on identifying all IR number(s) associated with the account as early as possible in the account selection. Delays in data retrieval will result if IR numbers are omitted during the account selection process.

#### A. Contacts

Include the following information for the primary and alternate points of contact:

1. Name
2. Title
3. Address
4. Phone/fax
5. E-mail address
6. Internet address

#### B. Date of Last Customs Audit

1. Date
2. Report number

#### C. Identifying Number(s)

1. IR numbers used to capture data
2. Other IR numbers
3. Dun & Bradstreet numbers
4. Other identifiers (e.g., Web site)

Also note what other IR numbers are on the bond. Mention in the report if other active IR numbers are found that are not in the database.

## **Attachment E: Account Profile Outline**

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### **D. Corporate History, Organization, and Financial Data**

Describe corporate history, structure, and subsidiaries. Potential sources include Dun & Bradstreet, Standard & Poors, the company's annual report, Internet, and Lexis-Nexus.

1. Dun & Bradstreet summary
2. Standard & Poors summary
3. Annual report summary
4. SEC 10-K (obtained at advance conference)
5. SEC 10-Q
6. Organization
  - CEO/President's name, title, address, phone/fax, e-mail address
  - Officers
  - Number of employees
  - Attorneys
  - Branches
  - Subsidiaries
  - Foreign affiliates
  - Relationships
  - Fiscal year ending date

### **E. Customs Program Participation**

Discuss program participation, including:

1. Electronic invoice process
2. Remote entries filed (where)
3. Importer activity summary statement
4. Recordkeeping certification
5. Line release
6. Automated export system
7. Reconciliation

## **IV. IMPORT ACTIVITY**

### **A. Bond Information**

1. Place of filing
2. Type and number
3. Surety name
4. Limits of liability

List active bonds. Note whether the importer bond is adequate (more than 10% of previous calendar year's duty, taxes, and fees) and if all IR numbers have a bond.

### B. Trade Statistics with Trend Analysis

**Note:** This section is critical for the development of a useful profile. Include 3 years of line, value, volume and duty by totals and percentages, and unit values, if applicable.

1. Top 1,000 ranking
2. PFI ranking
3. Sort by:
  - Value (with analysis)
  - HTSs (highlight PFIs)
  - Ports of entry
  - Brokers utilized
  - Filer code
  - Remote filer number
  - Entry types
  - Totals and percentages of entries filed remotely
  - Entries with liquidation extended (sorted by entry type and holding code)
  - Special trade programs
  - Countries of origin
  - Countries of export (consider a comparison of country of origin and country of export)
  - Manufacturer IDs (consider including related status; cross-check of D&B is suggested)

### C. Trade Issues — Company and Industry Analysis

(**Note:** Narrative is essential in this section. The AM interprets and summarizes the issues. Because the concerns that may surface will vary widely depending on the account and industry, it is not feasible to provide hard and fast guidelines. However, the following are examples of trade issues that may come to light from the analysis in the previous step.)

- Quota/Visa
- AD/CVD
- Revenue
- Value
- Transshipment
- Classification
- Trade statistics
- Drawback
- Other Government Agency requirements
- Special Trade Programs (trade agreements)
- Chapter 98
- Chapter 99
- Intellectual Property Rights
- Country of Origin Marking
- Health and Safety
- Embargoes and Sanctions

## Attachment E: Account Profile Outline

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### V. TARGETING ACTIVITY

Discuss: (1) the kinds of discrepancies found, (2) the reasons for the exams and reviews, (3) the existing cargo or summary criteria, and (4) how the foregoing affects imports at all ports of entry. Consider using Dataquery to research cargo and summary selectivity criteria.

#### A. Cargo Exam History

1. Number of exams
2. Number of discrepancies
3. Types of discrepancies
4. Discrepancy/exam ratio

#### B. Entry Summary History

1. Number of bypassed entries
2. Number of team review entries
3. Number of discrepancies
4. Types of discrepancies
5. ISDA results

#### C. Cargo and Entry Summary Compliance Measurement

1. Compliance Measurement rate
2. Number of exams
3. Number of discrepancies
4. Types of discrepancies
5. Discrepancy/exam ratio

### VI. VERIFY ACTIVITY

In addition to a composite description of the verify activities, describe what they revealed regarding the account's compliance.

- A. Lab reports
- B. Binding rulings
- C. CFs 6431
- D. Pre-Importation Reviews (PIRPs)
- E. Pre-classification
- F. CFs 28, CFs 29
- G. Internal advice decisions
- H. Significant Importation Reports (SIRs)
- I. Interventions
- J. Informed Compliance
- K. ACS System performance (including paperless rate)
- L. Prior audits
- M. NIS/FNIS/FIS assessments
- N. Jump team reports

### **VII. REVENUE ACTIVITY**

- A. Bills
- B. Refunds
- C. Voluntary Tenders/Prior Disclosures (Note: Many voluntary tenders are paid manually and are not recorded in ACS.)
- D. Methods of payment
- E. Debit vouchers
- F. Timely payments
- G. Sanctions
- H. Protests

### **VIII. ENFORCEMENT ACTIVITY**

### **IX. CONCLUSIONS**

Include a brief summary of significant issues identified in the body of the report, and recommendations for further action by the AM or AM team. This section will require a collaboration between the AM team and their Customs network to identify the most significant issues, and to develop meaningful recommendations for the next steps in the management of the port-level account.

- A. Findings
- B. Recommendations

### **X. APPENDICES**

- A. Itemization of Reference Materials (Background material held by ITS for the FA)
- B. Background material maintained by Regulatory Audit for FA and ICMP companies

# **Attachment E Action Plan Guidelines**

## **A. Content**

Action plans will vary in format, content, and complexity. However, the following key elements should generally be included in every action plan:

- Cover sheet
- Table of contents (optional for simple plans)
- Checklist
- Account background and structure
- Scope of the plan
- Project list

## **B. Cover Sheet**

The cover sheet will include Account information and Customs information, including the items listed below:

### **Account Information**

- Name
- Address
- Most significant IR number
- Point of contact (name, title, phone, address, e-mail)
- PFI or commodity

### **Customs Information**

- Account Manager (name, phone number)
- Lead port
- Date of the plan and period covered
- Status of FA (if applicable): New initiative/In progress/Completed
- CIP status (if applicable), and whether the CIP is the result of discrepancies or weaknesses of internal controls (attach a copy).
- Projected TCES compliance measurement (CM) goal for relevant PFI (if applicable)
- CAPPs CM rate for account (Total number of discrepant CM exams for all account IR numbers divided by the total number of CM exams performed on all IR numbers).
- Distribution of action plan (affected ports, HQ AM team, OST International Trade Officer, Director of NAS)

### **C. Table of Contents**

The table of contents is optional for simple plans. If the plan is more complex, the table of contents is required.

### **D. Checklist**

The checklist contains items of interest which merit frequent and regular attention by Customs, in two areas: compliance items and business items. Using the checklist guarantees that the AM examines the account for the listed items.

The action plan does not have to include all of the checklist items. If an item does not apply, the No or N/A box should be checked and a statement provided. Items that do apply will be addressed in the order they appear on the checklist. Other items may be added.



**Attachment F: Action Plan Guidelines**

**Checklist**

Those items that are marked “Yes” must be included in the body of the plan; those that are marked “No or N/A” must have a reason why the item is marked no or not applicable. Each item must either be marked a “Yes” or “No or N/A.”

|  | Yes                      | No or<br>N/A             |
|--|--------------------------|--------------------------|
| <b>1. Compliance Items</b>   |                          |                          |
| a. Classification  | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Valuation   | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Quota/Visa  | <input type="checkbox"/> | <input type="checkbox"/> |
| d. AD/CVD  | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Quantity  | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Special Trade Programs (NAFTA, GSP, etc.)                                 | <input type="checkbox"/> | <input type="checkbox"/> |
| g. Admissibility   | <input type="checkbox"/> | <input type="checkbox"/> |
| h. Invoice Requirements  | <input type="checkbox"/> | <input type="checkbox"/> |
| i. Internal Controls/Recordkeeping   | <input type="checkbox"/> | <input type="checkbox"/> |
| j. Other Government Agency Requirements                                      | <input type="checkbox"/> | <input type="checkbox"/> |
| k. Other* _____  | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>2. Business Items</b>   |                          |                          |
| a. ABI   | <input type="checkbox"/> | <input type="checkbox"/> |
| b. ACH   | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Remote Filing   | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Reconciliation  | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Manifests   | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Entry Filing Method (3461, 7501, paperless)                               | <input type="checkbox"/> | <input type="checkbox"/> |
| g. Other Automated Programs (drawback, protests, electronic invoicing, etc.) | <input type="checkbox"/> | <input type="checkbox"/> |
| h. Other* _____  | <input type="checkbox"/> | <input type="checkbox"/> |

**REASONS FOR ITEMS CHECKED “NO OR N/A”**

| Item | Reason |
|------|--------|
|      |        |
|      |        |

\*Additional items can be added by the AM.

### E. Account Background and Structure

Provide a brief description of the account's background and structure, including the following information:

- Company name.
- Date account was established. (If the account chooses not to meet with Customs, the account will be considered established on the date the AM first reviews the account's CAPPs data.)
- Nature of the business.
- Ranking by value.
- Actual value of imports and duties for the most recent fiscal year.
- General description of the primary commodities imported.
- Company's primary address.
- Related foreign plants.
- Countries of its chief non-related suppliers.
- Most frequently used ports of entry.
- Information regarding the relationships such as importer, exporter, broker, carrier, etc.
- Description of the structure. (State whether it is centrally controlled or consists of several autonomous divisions and whether Customs business is conducted centrally or from various divisions.)
- Description of the company's Customs operation.
- List of all IR numbers that define the account.

### F. Scope of the Plan

Provide a general description of the compliance and business objectives. Include how the noncompliance was discovered—for example, by compliance measurements, through voluntary disclosure, through the compliance assessment, or by the AM.

### G. Project List

The project list is the main part of the action plan—the plans for improvement. It must succinctly identify the following:

- Each project or action item. Both compliance items and business items should be included, as appropriate. (If the AM recommends actions and the account disagrees or disapproves, the items should nevertheless be listed in the body of the action plan with an explanation of the reasons for rejection.)
- The proposed plan for improvement of each item.
- The responsible parties.
- Due dates. The due dates must be in priority order from high to low. Mutually agreed-upon changes in priorities may occur.

The list should also include such items as:

- Major Customs programs in which the account may wish to participate.
- Other noncompliance-related issues the account may have with various ports of entries or Customs divisions.

### H. Signature

The AM should make every attempt to obtain the signature of a responsible corporate manager to approve or accept the action plan. If the account refuses to sign the plan, it still should be submitted to the account and the HQ AM team stating the reasons the account failed to sign the document.

## Attachment F Account Compliance Report

AMs will provide their accounts with compliance reports. Through these reports the AM can monitor the accounts' compliance on a regular basis and provide them with timely "informed compliance." Provide compliance reports at least quarterly, or more often if needed.

### A. Content

The compliance report should contain three parts:

- Compliance Measurement (CM) rates.
- Other Cargo Exams Non-CM.
- Document Reviewed Discrepancy Specifics.

#### CAUTION!

- **Delete any exam remarks that contain the name of a Customs employee or ultimate consignee.**
- Take care to provide the account with information on entries and/or entry summaries *only* where the account is the Importer of Record. The Trade Secrets Act (18 USC 1905); the Freedom of Information Act (FOIA) (5 USC 552 (b)(4)); FOIA Directive 2120-009, dated 8-31-98.
- **Include a reference to the ultimate consignee *only* if the ultimate consignee identification number (as defined by 19 CFR 24.5) is part of the account definition.** The report should not contain identification numbers unrelated to or undefined as part of the account.

A detailed page of pertinent line information should be included for each type of discrepancy.

The data may be extracted from any source available at port locations. Ports may request assistance in data extraction and report preparation from their assigned mentor. Contact the HQ AM team for a list of mentors and their port assignments.

## Attachment G: Account Compliance Report

### B. Format

There is no specified format. The report style can be changed to fit the needs of the account or the AM.

### C. Example

An example of an Account Compliance Report is provided below and on the following pages.

### Sample Account Compliance Report

#### GENERAL EXAM STATS – CAPPS

| <b>CM Rates</b>                   |                |                   |           |          |
|-----------------------------------|----------------|-------------------|-----------|----------|
| Importer                          | WT CM%         | Line Sig. CM Rate | Exams     | Discs.   |
| ZZ-413422100                      | 93.59%         | 100.00%           | 8         | 1        |
| ZZ-4134221BD                      | 72.94%         | 100.00%           | 11        | 3        |
| ZZ-4134221MT                      | 66.19%         | 95.13%            | 8         | 2        |
| ZZ-4134221NG                      | 100.00%        | 100.00%           | 18        | 0        |
| <b>TOTAL</b>                      | <b>85.83%</b>  | <b>98.74%</b>     | <b>45</b> | <b>6</b> |
| <b>OTHER CARGO EXAMS (NON CM)</b> |                |                   |           |          |
| Importer                          | Disc Rate      | Exams             | Discs.    |          |
| ZZ-4134221NG                      | 7.69%          | 26                | 2         |          |
| ZZ-4134221MT                      | 0.00%          | 189               | 0         |          |
| ZZ-4134221BD                      | 0.00%          | 2                 | 0         |          |
| ZZ-413422100                      | 0.00%          | 10                | 0         |          |
| <b>TOTAL</b>                      | <b>0.88%</b>   | <b>227</b>        | <b>2</b>  |          |
| <b>DOCUMENT REVIEWS</b>           |                |                   |           |          |
| Importer                          | Lines Reviewed | Discs.            |           |          |
| ZZ-4134221NG                      | 39             | 2                 |           |          |
| ZZ-413422100                      | 26             | 3                 |           |          |
| ZZ-4134221MT                      | 17             | 4                 |           |          |
| ZZ-4134221BD                      | 9              | 2                 |           |          |
| <b>TOTAL</b>                      | <b>91</b>      | <b>11</b>         |           |          |

**CM DISCREPANCIES BY LINE**

| ENTRY       | LINE # | DATE       | PORT  | HTS #      | MFG             | C/O | IMPORTER     | CONSIGNEE    | DISC TYPE |
|-------------|--------|------------|-------|------------|-----------------|-----|--------------|--------------|-----------|
| 10000000000 | 1      | 2/4/2000   | 10901 | 8525103035 | XOGENINS1611MIS | DE  | ZZ-4134221BD | ZZ-4134221BD | CLS       |
| 20000000000 | 1      | 6/29/2000  | 73001 | 8517501000 | TWGENINS232TAI  | TW  | ZZ-4134221BD | ZZ-4134221BD | MISC      |
| 30000000000 | 1      | 5/22/2000  | 41503 | 8525103015 | TWGENINS232TAI  | TW  | ZZ-4134221BD | ZZ-4134221BD | MIS DEL   |
| 40000000000 | 1      | 6/12/2000  | 72501 | 8525101000 | TWGENINS232TAI  | TW  | ZZ-4134221BD | ZZ-4134221BD | CLS       |
| 50000000000 | 1      | 11/26/1999 | 62301 | 3923400050 | MXEDE565MAT     | TW  | ZZ-4134221BD | ZZ-4134221BD | CLS       |
| 60000000000 | 7      | 2/1/2000   | 62301 | 8525103035 | MXEDE565MAT     | TW  | ZZ-4134221BD | ZZ-4134221BD | MISC      |

**OTHER CARGO EXAM DISCREPANCIES**

| ENTRY  | LINE #  | PORT | IMPORTER     | CONSIGNEE    | DATE      | HTS #      | C/O | MFG          | DISC TYPE |
|--|---|------|--------------|--------------|-----------|------------|-----|--------------|-----------|
| 70000000000  | 1   | 2604 | ZZ-4134221NG | ZZ-4134221NG | 2/11/2000 | 8504508000 | AF  | MXGENINS6NOG | MISC      |
| 80000000000  | 5   | 2604 | ZZ-4134221NG | ZZ-4134221NG | 2/11/2000 | 8532230020 | AF  | MXGENINS6NOG | MISC      |
| <b>REMARKS</b>   |   |      |              |              |           |            |     |              |           |
| 70000000000  | NON-TALIBAN CONTROLLED PROVIDENCE DOCUMENTED BY MANUFACTURER'S AFFIDAVIT C/O ISRAEL |      |              |              |           |            |     |              |           |
| 80000000000  | NON-TALIBAN CONTROLLED PROVIDENCE DOCUMENTED BY MANUFACTURER'S AFFIDAVIT C/O JAPAN  |      |              |              |           |            |     |              |           |
| * Note: Account Managers who want to provide the exam remarks to the company should make sure they are sanitized |   |      |              |              |           |            |     |              |           |

# Attachment G: Account Compliance Report

## ESFAS

| IMPORTER     | CONSIGNEE    | ENTRY      | C/O | LINE # | DISC TYPE | Refund | Recover    | Create_Date | RDP   |
|--------------|--------------|------------|-----|--------|-----------|--------|------------|-------------|-------|
| ZZ-4134221NG | ZZ-4134221NG | 9000000000 | KR  | 0001   | AD        | \$0.00 | \$8,831.00 | 21-Mar-00   | 62604 |
| ZZ-4134221NG | ZZ-4134221NG | 1100000000 | KR  | 0006   | CLA       | \$0.00 | \$0.00     | 24-Feb-00   | 62604 |
| ZZ-4134221MT | ZZ-4134221MT | 1200000000 | JP  | 0010   | CLE       | \$0.00 | \$0.00     | 08-Dec-99   | 62304 |
| ZZ-4134221MT | ZZ-4134221MT | 1300000000 | CN  | 0006   | CLA       | \$0.00 | \$0.00     | 23-Nov-99   | 62304 |
| ZZ-4134221MT | ZZ-4134221MT | 1400000000 | JP  | 0017   | CLE       | \$0.00 | \$0.00     | 20-Oct-99   | 62304 |
| ZZ-4134221MT | ZZ-4134221MT | 1500000000 | JP  | 0024   | CLE       | \$0.00 | \$0.00     | 13-Oct-99   | 62304 |
| ZZ-4134221BD | ZZ-4134221BD | 1600000000 | TW  | 0001   | CLA       | \$0.00 | \$189.00   | 12-Jun-00   | 72506 |
| ZZ-4134221BD | ZZ-4134221BD | 1700000000 | TW  | 0049   | AD        | \$0.00 | \$1,086.00 | 29-Oct-99   | 72506 |
| ZZ-413422100 | ZZ-413422100 | 1800000000 | JP  | 0001   | CLA, VAL  | \$0.00 | \$44.00    | 25-Jan-00   | 62304 |
| ZZ-413422100 | ZZ-413422100 | 1900000000 | PH  | 0001   | CLA       | \$0.00 | \$0.00     | 05-Apr-00   | 72506 |
| ZZ-413422100 | ZZ-413422100 | 2100000000 | KR  | 0001   | C/O, CLE  | \$0.00 | \$0.00     | 26-Oct-99   | 72506 |

| ENTRY      | Remarks  |
|------------|--|
| 9000000000 | DRAMS FROM KOREA ENTERED WITHOUT ANTIDUMPING DUTIES. INVOICE REVIEW. AD CASE A580812-002                                 |
| 1100000000 | CDROM DRIVE INCORRECTLY CLASSIFIED. LOR LESS THAN \$20. INVOICE REVIEW.  |
| 1200000000 | BROKER FAILED TO INCLUDE A DETAILED DESCRIPTION OF MDSE.   |
| 1300000000 | COMPUTER MOUSE MISCLASS; NO CHANGE IN REV  |
| 1400000000 | BROKER FAILED TO INCLUDE A DETAILED DESCRIPTION OF MDSE.   |
| 1500000000 | BROKER FAILED TO INCLUDE A DETAILED DESCRIPTION OF MDSE.   |
| 1600000000 | CARGO EXAM REVEALED THESE ARE DIGITAL CONVERTERS FOR CABLE TELEVISION.   |
| 1700000000 | THIS HAS ANTI-DUMPING DUTY AND SHOULD BE AN 03 TYPE ENTRY  |
| 1800000000 | RESPONSE CF 28 INDICATED MISCLASSVALUE.  |
| 1900000000 | ENTRY REJECTED BACK TO BROKER AS THE INVOICE ITEMS LISTED DID NOT HAVE A CLASS WITH THEM. 4/18/00                        |
| 2100000000 | ENTRY SUMMARY SUBMITTED WITH INCORRECT SUPPORTING DOCUMENTS. BROKER CLAIMED PUT WRONG INVOICE WITH CF7501 BY MISTAKE     |
|            | <b>* Note: Account Managers who want to provide the exam remarks to the company should make sure they are sanitized.</b> |