

Evolution of Customs Audits and the Customs-Trade Partnership Against Terrorism: ISA Members Beware!

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Since the advent of the Centers of Excellence and Expertise (CEE's), US Customs and Border Protection (CBP) has moved its audit function to the Centers and is focusing on single issue audits rather than the focused assessments previously conducted by regulatory audit.

Targeted single issue audits can be misleading. CBP typically sends an audit questionnaire covering potential issues of non-compliance. The questionnaires are more comprehensive than the CBP cover letter accompanying them. In addition, Importer Self-Assessment (ISA) participants, who are exempt from Focused Assessments, are not exempt from the single issue audits. ISA members and importers considering joining the program should consider whether the increased audit function obviates some of the benefits.

In addition, CBP has announced that in 2018 it will be integrating security and trade compliance and plans on merging ISA and the Customs-Trade Partnership Against Terrorism program by 2019. More on the merging of anti-terrorism initiatives and trade compliance to come.