



Partner Accreditor for CBP's Customs Brokers
Continuing Education Program

Continuing Education Priorities For International Trade Professionals & Licensed Customs Brokers



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www.ncbfaa.org/education

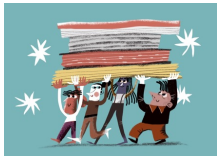
Continuing Education Priorities

Discussion Topics:

- **What's Old is New**
- **Why Now?**
- **Who is Impacted?**
- **New Responsibilities**
- **Licensed Customs Broker Requirements**
- **CBP Partner Accreditor Responsibilities**
- **Educational Provider Responsibilities**

What's Old is New

Continuing education for professionals is not a new concept...



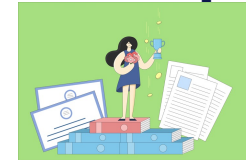
International Trade Professionals

Cross-border trade is supported by professionals with different credentials



Dynamic, Complex Environment

The cost of noncompliance is a significant risk



Trade Credentials

(LCB, CCS, CES, CZS, etc.)

Credentials demonstrate a level of skill or knowledge needed to perform a specific type of job



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Why Now?

○ PART 111—CUSTOMS BROKERS

Authority: 19 U.S.C. 66, 1202 (General Note 3(j), Harmonized Tariff Schedule of the United States), 1624; 1641.

Section 111.2 also issued under 19 U.S.C. 1484, 1498;

Section 111.96 also issued under 19 U.S.C. 58c, 31 U.S.C. 9701.

Source: T.D. 00-17, 65 FR 13891, Mar. 15, 2000, unless otherwise noted.

○ Subpart F—Continuing Education Requirements for Individual Brokers

Source: CBP Dec. 23-04, 88 FR 41258, June 23, 2023, unless otherwise noted.

○ § 111.101 Scope.

This subpart sets forth regulations providing for a continuing education requirement for individual brokers and the framework for administering this requirement. The continuing broker education requirement is for individual brokers, in order to maintain sufficient knowledge of customs and related laws, regulations, and

CBP Licensed Customs Broker

- Regulation more than 10 years in the making
- Championed by LCBs themselves
- Another step toward being recognized as a vital profession
- Continued education has nexus to compliance

Who is Impacted?

Not just licensed customs brokers...

**All
International
Trade
Professionals**



**Trade
Educational
Providers**



**Accreditors
of content**



New Responsibilities

Accreditor: determines if the educational activity qualifies for Broker CE credit
Educator: owns and submits the educational activity being considered for accreditation
Broker: is the individual possessing a Customs Broker license responsible for participating in activities



	Accreditor	Educator	Broker
Certifies activities that meet Broker CE criteria	<input checked="" type="checkbox"/>		
Creates and maintains unique identifier numbers for activities <small>*Maintain records for audit purposes*</small>	<input checked="" type="checkbox"/>		
Distributes Broker CE accreditation unique identification numbers, seals, and/or markings	<input checked="" type="checkbox"/>		
Publishes list of educators with accredited activities (Requires educator approval)	<input checked="" type="checkbox"/>		
Promotes activities		<input checked="" type="checkbox"/>	
Informs accreditor of content and structure changes		<input checked="" type="checkbox"/>	
Provides documentation and unique identifier numbers to Brokers <small>*Tracks activity attendance, completion, and other event records for audit purposes*</small>		<input checked="" type="checkbox"/>	
Maintains documentation proving completion of each activity		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Licensed Customs Broker Requirements

...in order to maintain sufficient knowledge of customs and related laws, regulations, and procedures...and all other appropriate matters necessary to render valuable service to importers and drawback claimants.

LCBs must complete at least 36* CE credits of qualifying continuing broker education.

*The 2027 Triennial Status Report (TSR) will require only 20 CE credits effective January 1, 2025 through January 31, 2027.

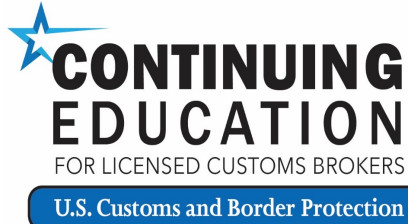
Exception:

- **LCB voluntarily suspends license; OR**
- **LCB has not held license for an entire triennial period.**

...Must report and certify compliance with LCB continuing education (CE) requirement upon submitting the Triennial Status Report (TSR)

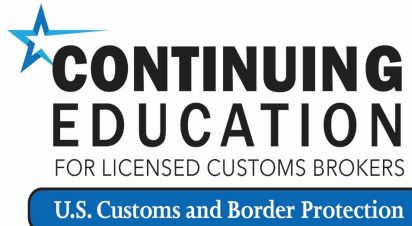
*****Important to keep your email address up to date when submitting TSR.*****

Licensed Customs Broker Requirements

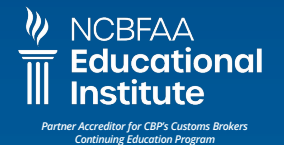


- ❖ **Industry or trade-related conferences, seminars, webinars, and workshops (including recordings) led by an instructor, discussion leader, or speaker**
- ❖ **Conferences, symposiums, or conventions**
- ❖ **Online, self-administered courses (also known as asynchronous)**
- ❖ **Company trainings (internally developed or offered by an outside vendor)**
- ❖ **Port tours**
- ❖ **Trade days sponsored by local associations**

Licensed Customs Broker Requirements



Diversify your sources of continuing education!

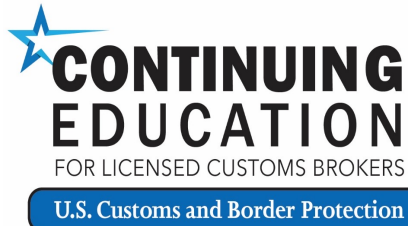


Licensed Customs Broker Requirements



- ❖ **Government-led meetings (i.e., FACA Committees, CCOAC, ITAC, TSN, regularly scheduled Trade Meetings)**
- ❖ **Reading or authoring trade subject matter such as trade publications**
- ❖ **Individual professional development activities and events**
- ❖ **Social events (sports outings, networking receptions, etc.)**
- ❖ **Courses administered by an established academic institution and offered as part of their curriculum**
- ❖ **Sales or marketing content, activities, or events**
- ❖ **LCB Prep courses are not eligible for LCB CE credit.**

Licensed Customs Broker Requirements



NOTE: Special Allowance

An individual broker may claim 0.5 credits for each full 30 minutes spent:

- ❖ **Presenting subject matter as an instructor, discussion leader, or speaker**
- ❖ **Regardless of the duration of a single presentation, a maximum of one continuing education credit may be claimed preparing subject matter for that presentation.**
- ❖ **A maximum of 12 CE credits per TSR can be earned this way.**

Licensed Customs Broker Requirements

Failure to report and certify compliance with the continuing broker education requirement as part of the submission of the TSR?

CBP will notify the LCB of failure to report and certify. The notification will be sent to the LCB's address in CBP's records. The LCB must, on or before 30 calendar days either:

- (1) Submit a corrected status report that reflects the individual broker's compliance with the continuing broker education requirement, if the LCB completed the required number of CE credits but failed to report and certify compliance properly; **OR**
- (2) Complete the required number of CE credits of qualifying continuing broker education and submit a corrected TSR if the individual broker had not completed the required number of CE credits at the time the TSR was due.

Licensed Customs Broker Requirements

Failure to take corrective action within 30 calendar days from notification issuance date will result in:

Step 1 –

- **Suspension of license**

Failure to take corrective action within 120 calendar days from date of suspension issuance will result in:

Step 2 –

- **Revocation without prejudice to the filing of an application for a new license if requirement is not met within 120 days of suspension order date.**

Licensed Customs Broker Requirements

Following a period of voluntary suspension (§111.52):



The number of continuing education credits that a LCB must complete by the end of the triennial period during which the reinstatement of the license occurred will be calculated on a prorated basis of one CE credit for each complete remaining month until the end of the triennial period.

Accreditor Responsibilities

CBP Selected Partner Accreditors

Accreditors have the primary responsibility for accepting, reviewing, and making a determination on the worthiness of activities offered by the private sector submitted for potential CE credit.

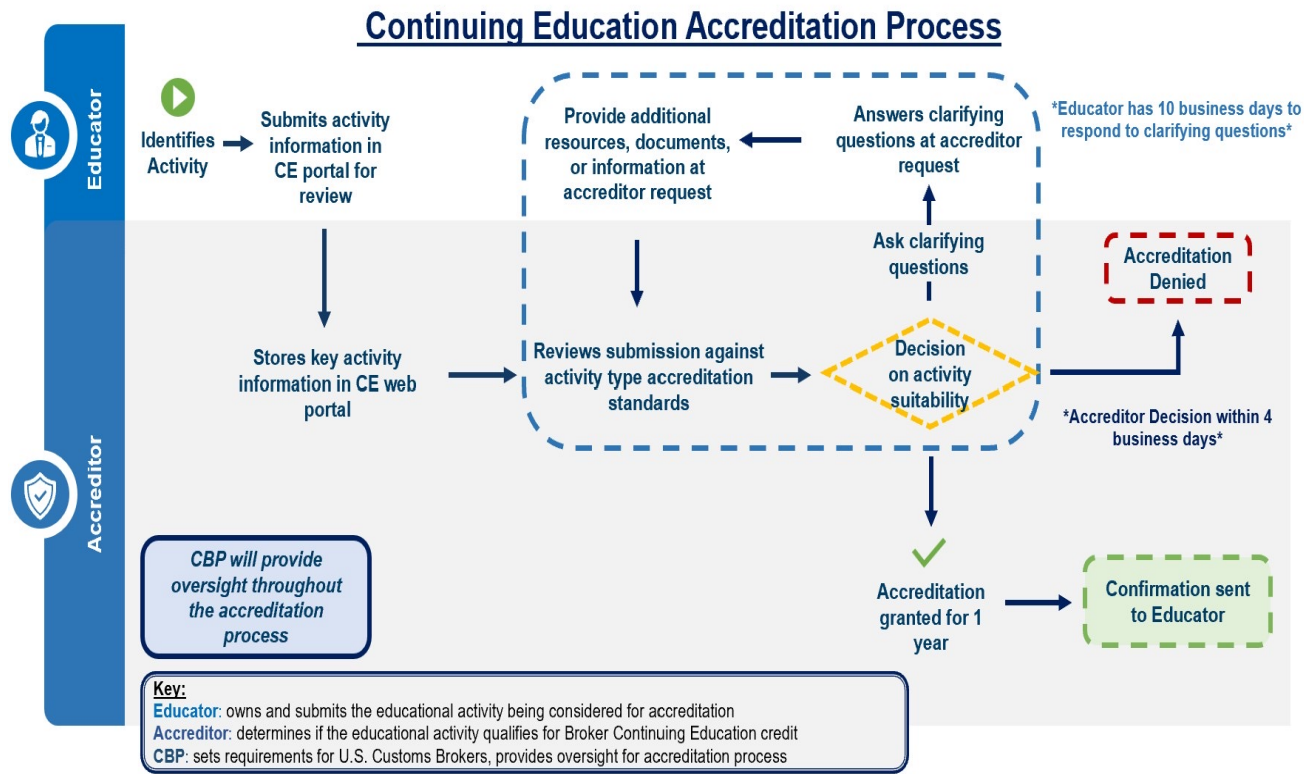
- Treated as government contractors; however, without compensation offered by CBP for the service.
- 3-year contract; CBP will reopen request for proposals

Accreditor Responsibilities

Each activity must align to at least one of the eligibility criteria for LCB CE accreditation:

- ✓ The activity promotes an understanding of the laws and regulations governing CBP or enforced by CBP, including relevant laws and regulations of CBP's partner government agencies.
- ✓ The activity contributes directly to CBP's trade priorities, programs, policies, and/or business practices.
- ✓ The activity provides understanding of U.S. imports and exports.
- ✓ The activity conveys information intended to increase and improve U.S. trade compliance and enhance risk management.
- ✓ Accreditors may not accredit their own content for LCB CE credit.

Accreditor Responsibilities



Accreditor Responsibilities

Calculating Credits

→ Accredited activities will be assigned based on the activity's length, in increments of no less than 0.5 hours.

→ For seminars, conferences, etc. with an agenda, accreditor will add up all eligible items in the agenda, in minutes, then divide by 60, and round to the nearest 0.5-hour increment within 10 minutes.

Example:
Total 825 minutes ÷ 60 = 13.75 hrs
13.5 CE credits will be awarded

Total 835 minutes ÷ 60 = 13.92 hrs
14 CE credits will be awarded

→ For online, self-administered courses, accreditors will use the Continuing Education Unit standard calculation, where 10 hours equals 1 credit hour. This methodology was created by the International Accreditors for Continuing Education and Training in 1970, and it has become the industry standard for calculating self-administered continuing education hours.

Educational Provider Responsibilities

The accreditation is effective for 1 calendar year from the date of approval. Educational providers must:

- ✓ Follow all instructions on using the “unique identifier” code correctly.
- ✓ Keep accreditation messages received from the accreditor.
- ✓ Issue a “certificate of completion” that includes the unique identifier code and date of completion (can be electronic), per CBP recommendation.
- ✓ Generally, responsible for advertising your activities. (Not a responsibility of the accreditor)
- ✓ Inform accreditor of content and structure changes of content.

CBP's Responsibilities

CBP is overseeing the LCB Continuing Education Program.

- ✓ CBP will assign education credits similarly to the accreditors for its own eligible continuing education activities.
- ✓ CBP's Continuing Education Team will coordinate internal Field Office hosted eligible activities.
- ✓ CBP's Continuing Education Team will coordinate with Partner Government Agencies to assign continuing education credits.
- ✓ CBP will promote Federal government activities on the [Continuing Education page of CBP.gov](#).

Recordkeeping

Under §111.102 (2) (d), the individual licensed customs broker “must retain the following information and documentation pertaining to the qualifying education completed during a triennial period for a period of three years following the submission of the status report...”:

➔ Licensed Customs Broker

- The title of the qualifying continuing broker education attended;
- The name of the provider or host of the qualifying continuing broker education;
- The date(s) attended;
- The number of continuing education credits accrued;
- The location of the qualifying continuing broker education; and,
- Any documentation received from the provider or host of the qualifying continuing broker education that evidences the individual broker's registration for, attendance at, completion of, or other activity bearing upon the individual broker's participation in and completion of the qualifying continuing broker education.

NOTE: Upon CBP's request, the individual broker must make available to CBP the above information and documentation on or before 30 calendar days from the date of receipt of CBP's request.

Recordkeeping

→ Accreditor

- The title of the qualifying continuing broker education accredited;
- The name of the provider or host of the qualifying continuing broker education;
- The date(s), if applicable;
- The number of continuing education credits awarded;
- The location of the qualifying continuing broker education; and
- Additional pdf documents submitted by the educational provider.
- Submission records received by accreditor must be retained for a period of 6 years.

Recordkeeping

➔ Educational Provider

- **Maintain their submission documentation return messages from the accreditors for 6 years.**
- **Maintain records of registration information and/or take attendance when activity occurs and keep this information for 6 years.**



Questions?

Are you a NEI Certified Customs Specialist, Master Customs Specialist, Certified Export Specialist, or Master Export Specialist designee?

- ❖ **The NEI as aligned its CE criteria with the LCB criteria because it just makes sense!**
- ❖ **The renewal period for all designees is also aligned to a February 1 renewal date.**

THANK YOU!



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Visit our website



www.ncbfaa.org/education