



New Customs Headquarters FTZ Compliance Review Procedure November 22, 2019

New Customs Headquarters Procedures for FTZ Compliance Reviews have been issued which significantly expands guidance to CBP officers nationwide conducting such reviews. It is confidential and not public information. We were informed it is 24 pages with 132 questions. While we have no detailed information, expect that the following subjects may be covered at CBP FTZ Compliance Reviews.

- ✓ Confirm FTZ Board Grant of Authority
- ✓ Review Foreign-Trade Zone Board Order/Scope of Authority (Description/HTS Number)/Restrictions
- ✓ Confirm Designated and Activated Acreage and Building Square Footage
- ✓ Review CBP Activation Approval Letters
- ✓ Confirm FTZ Operator Bond Adequacy
- ✓ Review FTZ Operations Manual is Current
- ✓ Review FTZ Administration/ Training/Audits
- ✓ Confirm Security Adequacy
- ✓ Confirm use of E-Verify for all Employees/Temporary Workers
- ✓ Confirm Current Yearly Blanket CBPF 216/ Individual 216s
- ✓ Confirm Annual Inventory/Cycle Counts
- ✓ Review Annual Reconciliation Report/Certification Letter
- ✓ Review Annual Systems Review Letter
- ✓ Review FTZ Board Annual Report
- ✓ Confirm Harbor Maintenance Fee Reporting and Payments
- ✓ Review CBP e-PTT/CBPF 7512 QP/WP In-Bond "Arrival"
- ✓ Confirm Standard Admissions Process
- ✓ Confirm Direct Delivery Process
- ✓ Confirm Zone-to-Zone Transfer Admissions and Documentation
- ✓ Confirm FTZ Admission Accuracy
- ✓ Confirm Census Reporting for 214As if Applicable
- ✓ Confirm AD/CVD/Trade Remedy Compliance
- ✓ Confirm Correct Trade Remedy PF Election Date - 214/Entry Use
- ✓ Review Inventory Controls and Recordkeeping Systems
- ✓ Review Foreign Status/Domestic Status Merchandise Reporting
- ✓ Confirm Scrap/Waste/Destruction Process
- ✓ Confirm Zone Status is Being Reported and Retained
- ✓ Review Customs Classification/Origin
- ✓ Review Customs Valuation
- ✓ Confirm PGA Reporting Compliance
- ✓ Confirm Local Control System
- ✓ Review Temporary Removals
- ✓ Confirm Zone-to-Zone Transfers
- ✓ Review Customs Entry Reporting Accuracy Processes and Records
- ✓ Confirm Export Reporting Processes and Records

We have a variety of programs to help clients prepare for the new FTZ Compliance Reviews, ranging from on-site reviews conducted by our staff to providing detailed guidance by phone, skype, and email. Contact [Marshall Miller](#), [Scott Taylor](#), [Linda King](#) or [Lori Hessler](#) with questions or for detailed assistance.

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