Customs Trade Partnership Against Terrorism
Trade Compliance Program
Program Requirements
December 2025

This document includes four categories of requirements: general program requirements, prerequisite requirements, application requirements, and ongoing participation requirements.

First Category of Requirements: General Program Requirements

1. General Program Requirements

ID	Requirement	Implementation and Guidance
1.1	Comply with all applicable CBP laws and regulations.	The first step to compliance with CBP laws and regulations is knowledge of the laws and regulations. Knowledge can be accomplished internally through training and/or hiring of experienced personnel or through external resources (outside counsel, consultants, etc.).
1.2	Comply with all program requirements, including the forced labor requirements added August 1, 2022, in a timely fashion.	
1.3	Maintain an audit trail from financial records to CBP declarations.	An importer should be able to trace any payment back to the purchase (good or service) that the payment applies to, and to an entry summary should the payment relate to imported goods. The expectation is that a Trade Compliance applicant/partner is conducting a review of payments to confirm that all appropriate payments have been declared to CBP.
1.4	Maintain a compliance department that oversees CBP compliance with federal regulatory laws, regulations, and policy/guidelines.	The compliance department should include personnel that are knowledgeable about trade compliance or should have access to external resources that are knowledgeable about trade compliance.
1.5	Maintain an internal control system, including documented internal control procedures that reflect current processes.	An internal control system is a system of processes created with the intent to achieve compliance. Our primary focus for trade compliance is the accuracy of the data entered onto the CBP Form 7501 (entry

	Trade Compliance participants must maintain an internal control system that demonstrates the accuracy of CBP transactions with two specific processes: 1. Internal controls designed to ensure compliance in import transactions, and 2. An audit trail from accounting records and payments to entry records or an alternate system that ensures accurate values are reported to CBP.	summary). The internal control system should include processes designed to ensure accurate value, classification, country of origin, quantity, trade agreement claims, trade preference program usage, antidumping and countervailing duties, trade remedies, quota, 9801 claims, 9802 claims, etc. The internal control system should also address intellectual property rights, training, communication, and broker management/monitoring.
1.6	Track duties, fees, and import activity to ensure bond sufficiency.	
1.7	Maintain a Tier II (validated) or Tier III (exceeding) partnership in the Customs Trade Partnership Against Terrorism (CTPAT) Security program in good standing.	
1.8	Act as positive ambassadors of the Trade Compliance Program within the trade community.	

Second Category of Requirements: Prerequisite Requirements

2. Prerequisite Requirements

ID	Requirement	Implementation and Guidance
2.1	Be a Tier II (validated) or Tier III (exceeding) partner of the CTPAT Security Program and in good standing.	
2.2	Be a United States importer, or a non-resident Canadian importer, who maintains an importer of record (IOR) number(s) located and physically managed in the United States.	The compliance department personnel should be in the United States.

2.3	Have an active import history of 2 years or longer for all IOR numbers applying to the program.	
2.4	Maintain evidence of no financial debt to CBP (for which the party has exhausted all administrative and judicial remedies for relief, a final judgment or administrative disposition has been rendered, and the final bill or debt remains unpaid at the time of initial application or annual renewal).	
2.5	Meet the eligibility requirements laid out in the Trade Compliance Eligibility Questions (see Appendix A of the Trade Compliance Handbook).	The applicant must be able to answer "yes" to all eligibility questions to proceed with the application process. If any of the answers are currently "no", the applicant has identified an area that needs to be improved upon within the organization before the applicant can move forward.
2.6	Have a compliance department that oversees CBP compliance with federal regulatory laws, regulations, and policy/guidelines.	The compliance department should include personnel that are knowledgeable about trade compliance or should have access to external resources that are knowledgeable about trade compliance.

Third Category of Requirements: Application Requirements

3. Application Requirements

ID	Requirement	Implementation and Guidance
3.1	Complete a Memorandum of Understanding (MOU) (see Appendix C of the Trade Compliance Handbook for the Trade Compliance MOU).	The MOU outlines importer and CBP responsibilities and identifies the company entities covered by the MOU. Importers with multiple divisions may submit one MOU for all eligible entities.
3.2	Complete a Trade Compliance questionnaire (see Appendix B of the Trade Compliance Handbook for a preview of the Trade Compliance Application Questions). **Required Attachment**: Company organizational chart that includes all members of the compliance	The Trade Compliance questionnaire includes the questions and attachments that are required to apply for the program. Responses should include applicable references and/or inclusions for each of the IORs that are being submitted as part of the application. For example, if two IOR numbers are selected and each IOR number represents a division with different self-testing plans, each self-testing plan must be provided with the application.

	department or division and to whom they report. Corrections submitted annually, as applicable. **Recommended Attachment**: Curriculum vitae (CV) or professional biography of the customs operations compliance staff that are assigned the internal role of trade compliance management demonstrating in-house experience and expertise.	Complete responses to all questionnaire questions and upload all required attachments for the application. The questionnaire and accompanying documentation are required to determine if the importer has documented and implemented internal controls over its CBP-related processes. The questions are available for review in advance in Appendix B of the Trade Compliance Handbook. Unsupported responses will cause unnecessary delays with the Trade Compliance application package.
3.3	Implement a compliance training program for internal/external parties. **Required Attachment**: Evidence of the training program	A training program for internal parties would include training for compliance department personnel, as well as training of personnel in import-related departments. A training program for external parties would include training to suppliers and/or service providers.
3.4	Establish, document, and implement a comprehensive system of internal controls over applicable trade areas, including the prevention of forced labor in the supply chain, and make appropriate adjustments to internal controls when appropriate. **Required Attachment**: Written documentation outlining these controls (internal control manual and all desktop procedures)	To develop a system of internal control, an importer must first identify the trade areas that are applicable to its import transactions. Some trade areas like value, classification, and country of origin are applicable to every import transaction, but other trade areas to consider include trade agreements, trade preference programs, antidumping and countervailing duties, intellectual property rights, trade remedies, quota, 9801, 9802, quantity, etc. Once the applicable trade areas are identified, the importer must design processes for each of these areas to ensure that the information submitted to CBP on CBP Form 7501 (entry summary) is accurate and complete. These processes collectively make up the internal control system. Internal controls must be documented, logical, comprehensive, and likely to prevent or detect noncompliance in the identified risk area. The design of internal controls cannot be assessed through the evaluation of individual controls in isolation. Rather, controls are assessed as a group by: 1. Obtaining an understanding of the processes and flow of information through the entry process; 2. Determining what can go wrong within the entry process;

		3. Determining whether the controls are sufficient to address the instances of what can go wrong within the entry process; and 4. Evaluating questionnaire responses and supporting policies and procedures. The Trade Compliance team then assesses the applicant's readiness for the program based on an expectation about the operating effectiveness of the internal controls derived from an evaluation of their design. An importer should also create step by step instructions for these processes, also known as desktop procedures. Applicants provide an overview of all processes during the application review meeting.
3.5	Design and execute an annual self-testing plan in response to identified risks and implement corrective action in response to errors and internal control weaknesses. Further guidance regarding a self-testing plan may be found in Appendix D of the Trade Compliance Handbook. **Required Attachment**: Self-testing plan	Partners must conduct an annual risk assessment to identify risks to compliance with CBP laws and regulations. Applicants provide an overview of the self-testing plan during the application review meeting. Partners may be asked to discuss their self-testing at an annual review meeting with their National Account Manager.
3.6	Forced labor – Code of Conduct: Partners must create a code of conduct statement that represents their position against the use of forced labor within any part of their supply chain. Partners must have policies and procedures in place that operationalize the code of conduct, as well as evidence of those policies' implementation. The code of conduct statement must be included in the company's social compliance program that focuses on forced labor, as outlined in the CTPAT Security Minimum Security Criteria.	

	Provide required documentation: The code of conduct statement must be uploaded to the Trade Compliance online portal Document Library and published publicly by the partner.	
3.7	Forced labor – Evidence of Implementation: Partners must provide CBP with evidence of implementation of their social compliance program (as required by CTPAT Security Minimum Security Criteria). As part of the social compliance program, partners must be able to identify the parts of their supply chain most at risk and provide CBP with this information, if requested. **Provide required documentation:** Evidence of implementation of the social compliance program must be uploaded to the Trade Compliance online portal Document Library. Examples of evidence include (but are not limited to) unredacted audits of high-risk supply chains related to forced labor, internal training programs for employees on identifying signs of forced labor, and mechanisms taken to show the supply chain is completely free of the use of forced labor.	
3.8	Forced labor – Risk Based Business Mapping: Conduct risk-based analysis of supply chain partners that outlines the supply chains in their entirety and includes regions, suppliers, and other factors that the importer feels pose the most risk for forced labor to ensure the supply chain is free from the use of forced labor.	Importers are required to determine within their organization what imports are considered high risk to their business model but should take into consideration information that CBP provides publicly on CBP.gov. A commitment to business mapping should be included in the Code of Conduct demonstrating support of efforts to end the use of forced labor.

		Documentation must be made available: While no attachments are required for the application, CBP may request unredacted proof of supply chain mapping, regarding a particular supply chain, if at any time CBP determines the information is needed.
3.9	Forced labor – Due Diligence and Training: Partners must provide training about the social compliance program requirements to their suppliers that identifies the specific risks and helps identify and prevent forced labor in the supply chain. **Documentation must be made available**: Proof of training must be available to CBP upon request.	The training should exemplify the company's position against forced labor as stated in their code of conduct. Training requirements are determined by the partner but must ensure that the supplier's business model and code of conduct represent they will not partner with businesses that use forced labor.
3.10	Forced labor – Remediation Plan: Partners must maintain a remediation plan for their organization, in the event forced labor is identified in their supply chains and provide this information to CBP, upon request. **Documentation must be made available**: Must be available to CBP upon request.	This plan must include the process for disclosing the identification to CBP and outline the necessary steps for the organization's employees and suppliers to correct the issue.
3.11	Forced labor – Shared Best Practices and Path Forward: Partners will share best practices with the Trade Compliance Program, as appropriate, to help mitigate the risk of forced labor.	

Fourth Category of Requirements: Ongoing Participation Requirements

4. Ongoing Participation Requirements

ID	Requirement	Implementation and Guidance
4.1	Provide trade-related updates to your National Account Manager as needed to enable their ability to manage the account.	Participants must provide written notification following any significant change to their Trade Compliance Program or operations.

4.2	Notify CBP of major organizational changes as soon as possible via email (CTPATTradeCompliance@cbp.dhs.gov) and submit a new organizational chart through the Trade Compliance Portal.	
4.3	Make appropriate disclosures to CBP (such as post summary corrections and prior disclosures).	
4.4	Submit an annual notification letter (ANL) to CBP to reaffirm the participant's continuation in meeting the program's requirements through the Trade Compliance Portal, notify CBP of major organizational changes, communicate changes in import activity and internal control procedures, and summarize risk assessment and self-testing results.	Participants must provide written notification annually to show that they are continuing to meet the requirements of the Trade Compliance Program. ANLs are due every year upon the anniversary date of which the company was approved for the Trade Compliance Program. The portal allows the ANL to be submitted up to a month prior to the anniversary date. The ANL should be submitted to CBP within 30 days of the applicant's acceptance anniversary. Importers will use the Trade Compliance Portal to submit their ANL information. This date is reflected in the Trade Compliance Portal under the account overview section. The information submitted in the ANL is captured in six categories and must be submitted through the Trade Compliance Portal: 1. Company information: organizational and/or personnel changes; 2. Import activity changes; 3. Internal control adjustments and changes; 4. Risk assessment results; 5. Periodic testing results; and 6. Post summary corrections and/or disclosures. Provide a company officer's signature on the ANL (the company's officer, as identified in the CTPAT portal, must be logged into the Trade Compliance portal to submit the ANL).

		Provide current contact's name, title, telephone number, and email address in ANL response (paragraph 4). Provide details on changes in commodities imported, CBP trade programs utilized (trade agreements), brokers, etc. If there have been no changes, state that. For a complete guide to the ANL process, including guidance on questions and required responses, see Appendix E of the Trade Compliance Handbook, as well as the new Trade Compliance Portal Manual, which can be found in the CTPAT portal and on www.cbp.gov. Requests for extensions for the ANL due date must be submitted in advance of the due date to CTPATTradeCompliance@cbp.dhs.gov with a copy to the importer's assigned National Account Manager. The request must include the amount of time being requested and a valid reason as to why the extension is needed. Extensions are not guaranteed and are considered on a case-by-case basis.
4.5	Submit a Trade Compliance MOU annually in the portal.	Provide a company officer's signature on the Trade Compliance MOU annually in the portal.
4.6	Retain self-testing results and supporting records for 3 years.	