

CBP Broker Management Office Visits Preparation, Expectations, and Compliance Strategies



Josh Beker, Sr. Associate - Roberts and Kehagiaras LLP
&
Shelby Chinyere, Director of Customs Brokerage - Fracht Group
02/06/2026

February 6th, 2026 @ 11am - Track D - Museum Park



Objectives of Today's Session

Understand	Understand the role and purpose of BMO visits
Learn	Learn pre-visit preparation strategies
Know	Know what to expect during the visit
Learn	Learn how to manage post-visit actions
Strengthen	Strengthen long-term compliance



Understanding the Broker Management Office



Understanding the Broker Management Office



Central oversight for licensed customs brokers



Evaluates compliance programs and internal controls, such as policies and controls



Ensures supervision, recordkeeping, and data integrity



Coordinates with Centers of Excellence & Expertise



Why BMO Visits Matter



Increased broker accountability under 19 CFR Part 111



Key mechanism for CBP oversight



CBP's focus: accuracy, risk mitigation, informed compliance



Helps validate internal controls



Identifies systemic risks and trends



Enhances trust between broker and CBP



Understanding what Triggers a BMO Visit

Routine oversight cycle

Prior Compliance Issues Trade Community Complaints

Ethical Violations

Misrepresentation or misconduct

Risk-based triggers:

ACE anomalies

Audit findings

Repeated Errors on Entry Summaries

Frequent PSC (Post Summary Corrections) and/or late filings

Organizational changes:

Mergers

Permit changes

License transfers

Participation in Pilot Programs



Common CBP Focus Areas

POA management, verification, & importer due diligence

Classification consistency & valuation logic

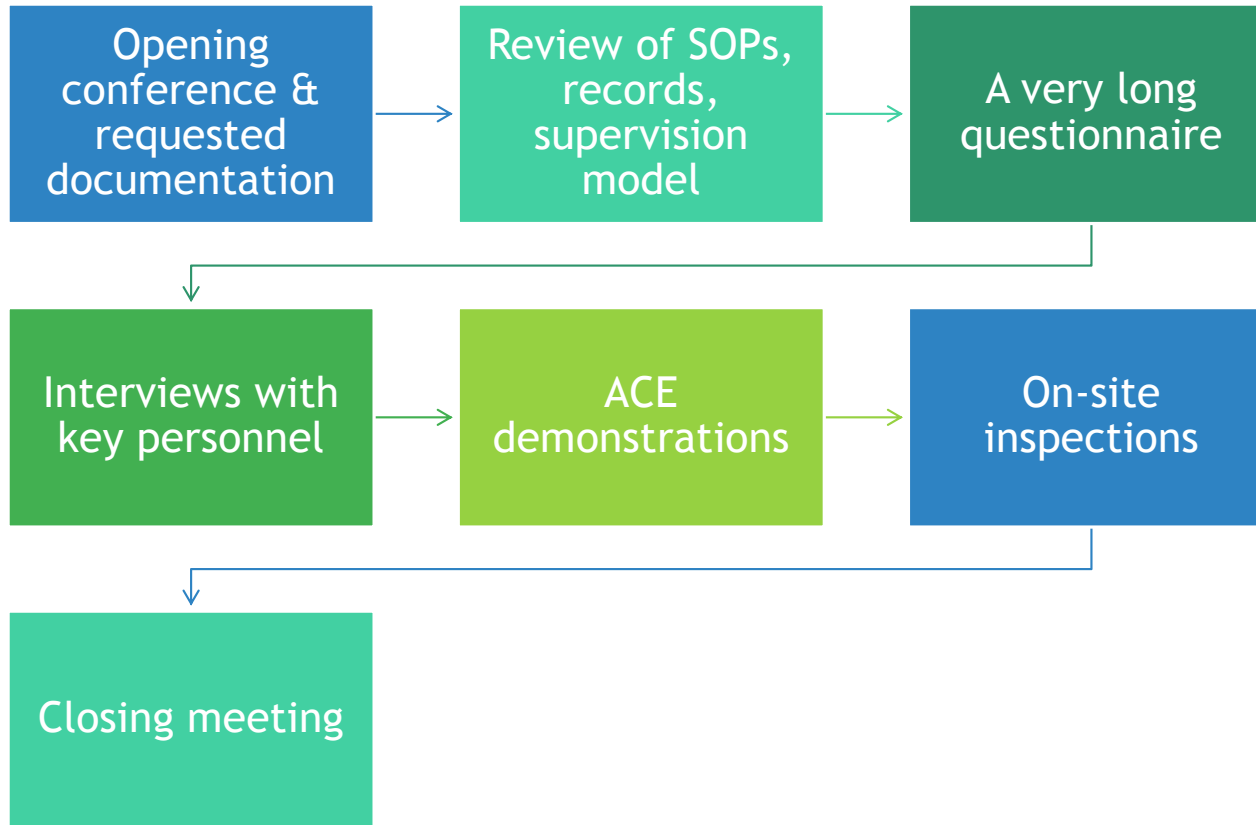
Training, supervision, and error correction controls

Recordkeeping and audit trail accessibility

Review of Supervision and Control processes



What Happens During the Visit



Best Practices During the Visit

Be on time and organized

Answer only what is asked

Take detailed notes

Provide documents promptly and neatly

If you don't know an answer, say: "Let me confirm that and get back to you."

Never speculate

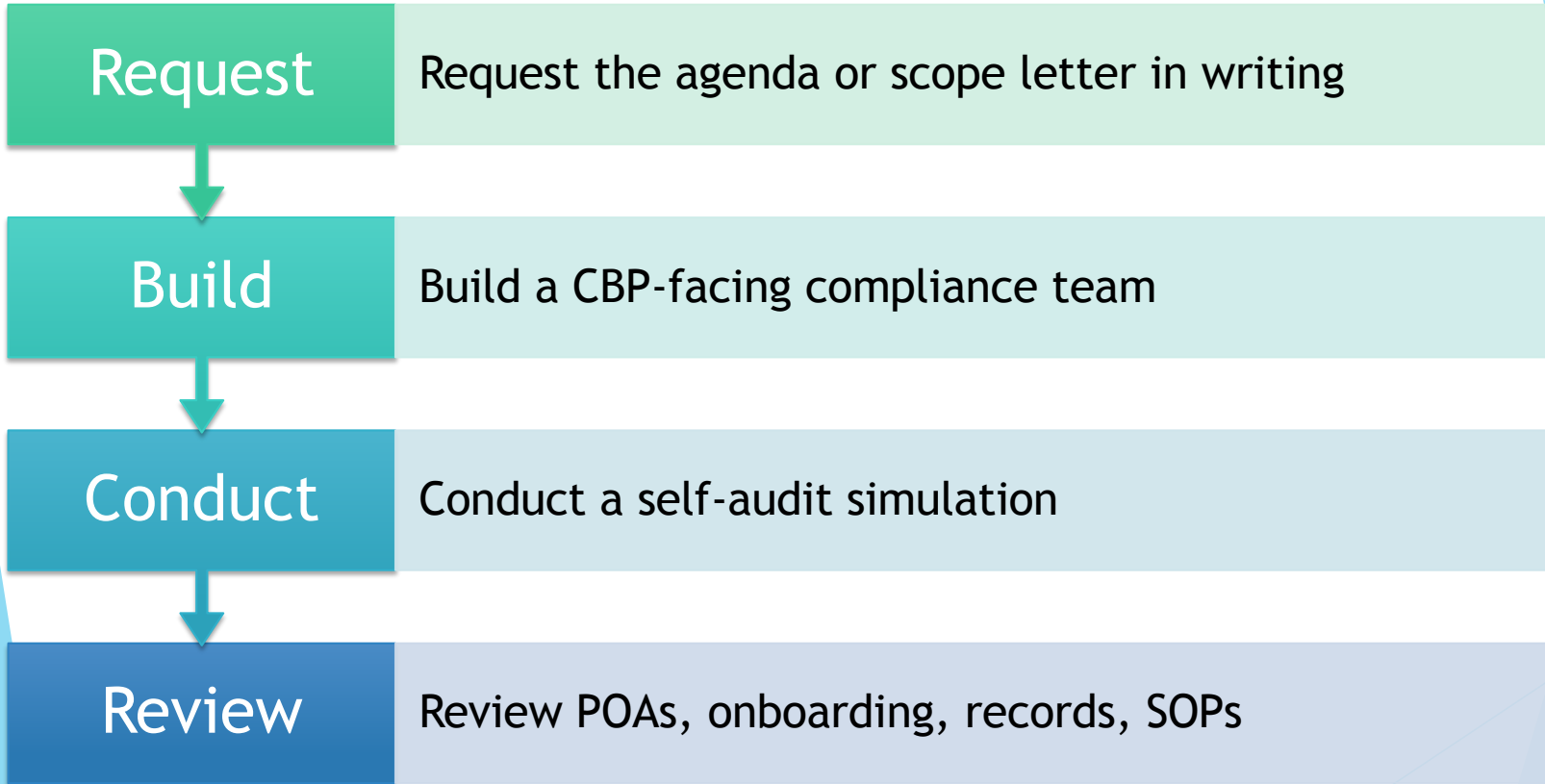
Track all documents provided to CBP





Preparing for the Visit

Preparing for the Visit: Internal Readiness



Pre-Visit Preparation: Build the Team



- ▶ Identify key internal stakeholders:
 - Import/Trade compliance manager
 - Customs broker liaison
 - Logistics/operations manager
 - Finance/AP (valuation & assists)
 - IT/records custodian
 - Legal or outside trade counsel (recommended)
- ▶ Designate a visit lead / point of contact
- ▶ Prepare subject-matter experts
- ▶ Brief operations, classification, and IT staff
- ▶ Prep leadership



Pre-Visit Preparation: Documentation Readiness

CBP will expect immediate access to records required under **19 CFR §163**. Be prepared to be able to retrieve documents from the last five years within 30 minutes.

Prepare yourself by:



Updating SOPs and policies



Demonstrate supervision processes



Review POAs, client onboarding files, and due diligence



Recordkeeping and auditability



Perform a self-audit



Pre-Visit Preparation: Documentation Readiness



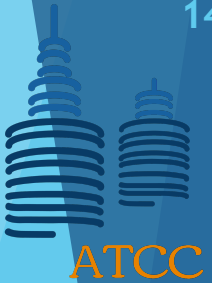
Entry Documentation

- CBP Form 7501
- Commercial invoices
- Packing lists
- Bills of lading/air waybills
- Arrival and delivery records
- Importer security filings (ISF)—if importer-controlled
- Importer/broker communications



Classification & Origin

- Binding ruling letters (1520(d), 177 rulings)
- Product specs, catalog sheets
- Country-of-origin and marking evidence
- FTA eligibility documentation (COOs, BOMs, RVC calculations)





Pre-Visit Preparation: Documentation Readiness

Broker Management Documents (if applicable)

- Broker POA
- Written instructions
- Broker management SOPs
- Annual broker reviews
- ACE account access controls

Pre-Visit Preparation: Self Audit



Recordkeeping Compliance

Ensure you meet the 5-year requirement.

Confirm retrieval time is under 30 minutes (CBP expects rapid access).



Entry Accuracy Checks

Audit a sample of entries:

- Classification accuracy
- Valuation (including assists, nondutiable charges)
- Country-of-origin
- Free trade program claims
- PGA declarations
- Use of reasonable care documentation



Pre-Visit Preparation: Self Audit

Broker Oversight

- Check that your staff follows your instructions.
- Ensure you've conducted and documented annual broker reviews.
- Verify ACE account access permissions.
- Check that employee lists are up to date

Internal Control Testing

- Make sure you have:
 - Written procedures
 - A post-summary correction process
 - A compliance monitoring system
 - Corrective action tracking



Pre-Visit Preparation: Self Audit

Physical Location

- Check your premises!
- Ensure data is kept in a secure location
- Access to data is properly restricted
- Physical area is clean and organized



Pre-Visit Preparation: Data & System Preparation



VALIDATE ACE
PORTAL DATA AND
FILER SETUP



CONFIRM
CYBERSECURITY
AND ACCESS
CONTROLS



PREPARE TECH
DEMONSTRATIONS
& SAMPLE ENTRY
WORKFLOWS



CONFIRM AUDIT
TRAILS AND
ACCESS
CONTROLS

The Visit



Day of BMO Visit Preparation: Facility and Staff Readiness

- ✓ Reserve a conference room
- ✓ Make sure you have functional AC and water
- ✓ Test ACE Portal access
- ✓ Have water, seating, and screen sharing ready
- ✓ Train staff to answer precisely
 - ▶ Do not volunteer extra information



Sample Questions

Sample Questions

Client Power of Attorneys

25. What are the procedures for client powers of attorney (POA) related to:
- Obtaining (fax, email, etc.)
 - Maintaining
 - Directly Executing
 - Validating
26. For clients referred by third parties (e.g., freight forwarders, logistic providers, and / or other brokers), how are POAs directly obtained from the client and how are the POAs executed (what is the language within)? Provide an example and appropriate support.
27. How does COMPANY ensure clients referred from third parties have direct communication with its brokerage? Explain procedures used by COMPANY if a freight forwarder / logistics provider / other broker attempts to prohibit direct contact with the client.
28. How does COMPANY execute and validate POAs for nonresident importers? How does COMPANY ensure direct communication with clients that are nonresident importers?



Sample Questions

Procedures Manual

47. Does COMPANY maintain a policy and procedures manual and / or standard operating procedures for customs operations?

() Yes () No

If yes, provide copies (preferably in electronic format).

48. How often are the policies and procedures manual and / or standard operating procedures updated?

49. How do employees access the policies and procedures manual and / or standard operating procedures?



Sample Questions

50. What are the procedures to ensure that the appropriate duties, taxes, and fees to CBP are paid in a timely manner? Please provide details on how the proper rates are identified and calculated.
51. For type 21/31 entries:
 - a. What are the procedures to ensure that entry inventory balance is being properly tracked to ensure that the appropriate duties, taxes, and fees to CBP are paid and to ensure that the entry is properly closed out?
 - b. Do you maintain any communication with the bonded warehouse throughout the entry process? If so, describe what communications and the purpose.
 - c. Do you regularly maintain communications with the importer to ensure that information on the entry accurate and up to date? If so, how often and what policies and procedures are in place to ensure that your information is accurate and up to date?
52. How do you identify if an entry is subject to additional duties such as section 232, section 301, etc.?
53. For tariffs potentially subject to antidumping/countervailing duty (AD/CVD), what are the procedures to verify whether the entry is subject to AD/CVD?
54. For in-bond shipments, what are the procedures to verify and maintain documentation that the merchandise was properly exported?
55. For monthly consolidated entries, what are the procedures to ensure they are properly identified and the fees are properly calculated and paid?
56. What are the policies and procedures related to verifying if the shipment is potentially subject to AD/CVD or FDA restrictions?



Sample Questions

Is there really a difference here, or is CBP being tricky with you?

Communication and Oversight

61. If COMPANY has multiple office locations, does each individual office have a full-time licensed broker on site?
() Yes () No
If no, how often do individual licensed brokers conduct visits of the other offices that do not have licensed brokers on staff?
62. Describe the procedures for employees to consult with licensed brokers.
63. How does COMPANY ensure there is a sufficient number of individually licensed brokers available to employees for consultation?
64. Describe the procedures or methods used to disseminate relevant customs information to employees (classification issues, etc.).
65. Describe the procedures for auditing and / or reviewing customs transactions handled by unlicensed employees.
66. What methods of oversight and monitoring does the brokerage's management use to ensure compliance with customs requirements?

Sample Questions

Is there really a difference here, or is CBP being tricky with you?

Supervision Plan

39. Provide a copy of COMPANY's most recent supervision plan¹ describing how responsible supervision and control is exercised over the customs business.
40. Has COMPANY had changes in its business operations or practices since the last supervision plan submitted to CBP?
() Yes () No
If yes, what are those changes and how do they impact the supervision plan?



Post Visit



Common Findings & Broker Pitfalls

Inconsistent classification decisions

Outdated, missing, or improperly verified POAs

Weak internal supervision

Lack of documented corrective actions

Disorganized records or system gaps

Outdated employee lists



Post-Visit Action Plan



Analyze CBP's feedback



Develop a Corrective Action Plan (CAP)



Update SOPs, training, and quality controls



Maintain communication with CBP



Long-Term Compliance Strategies

Continuous self-assessment & KPIs

Governance oversight (compliance committee)

Strengthen training and classification/valuation controls

Treat BMO as a long-term compliance partnership

Quarterly internal audits

Compliance governance committee

Data-driven quality metrics

Client risk ratings and onboarding checks



Key Takeaways & Closing



Prepare proactively, not reactively



Treat the visit as compliance partnership

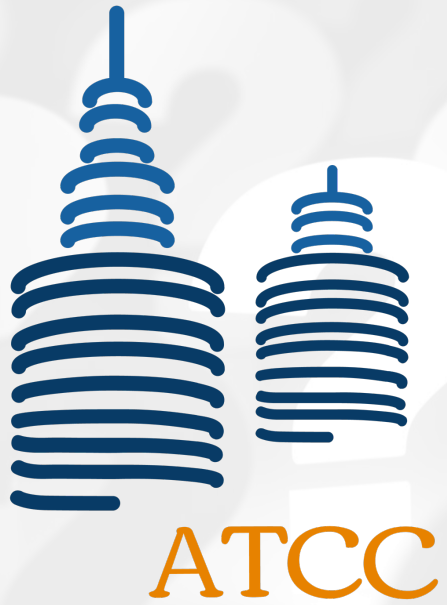


Strengthen systems, data, and supervision



Build a culture of transparency and accuracy





Questions?