

Importer Self-Assessment

ISA Program. The ISA program, launched in 2002, is a trade facilitation partnership program that reaches out to importers with the goal of evaluating and building importers' systems of internal controls while strengthening the lines of communication between the trade and CBP. The program was designed to act as a voluntary approach to trade compliance that is built on the knowledge, trust, and willingness to maintain an ongoing CBP/importer relationship. Through the ISA program, CBP partners with importers who can demonstrate their readiness to assume the responsibility to manage and monitor their compliance through self-assessment.

Requirements for Membership. To participate in the ISA program, an importer must be C-TPAT certified and a U.S. or Canada resident importer with at least 2 years of importing history with CBP. Applicants are required to submit a signed Memorandum of Understanding (MOU) in which the importer agrees to comply with the requirements of the program, documented policies and procedures for the company's import process, and an ISA Questionnaire and selftesting plan.

Program Benefits. Importers who gain ISA membership receive tangible benefits while allowing CBP to redirect valuable resources to focus on high-risk and unknown importers. Some of the benefits of ISA membership include expedited cargo release, Importer Trade Activity (ITRAC) Data free of charge, entries processed through the Centers of Excellence and Expertise, and removal from Regulatory Audit's audit pool; assigned a National Account Manager, and expedited cargo release.

ISA Today. As of May 2014, 298 importers have become ISA members representing 10 commodity industry groups. ISA members represent about 23% of the total import value and 11% of the total number of entries filed. The electronics industry represents the highest number of ISA members while the petroleum industry claims roughly 40% of the total ISA import value.

ISA Expansion. CBP is working on new initiatives to broaden the scope of the ISA program and provide additional value and benefits to its members. Some of these initiatives are as follows.

ISA-Product Safety. The ISA-Product Safety (ISA-PS) pilot, a partnership created among CBP, the Consumer Product Safety Commission (CPSC), and importers was announced via Federal Register Notice in October 2008. ISA-PS was designed to maintain a high level of product safety compliance and to achieve the goals of the Interagency Working Group on Import Safety through collaborative efforts to prevent unsafe imports. The application for ISA-PS is open to all importers who are participants in the ISA program.

Beyond the Border Action Plan. In February 2012, President Obama announced the Beyond the Border Action Plan, an initiative that supports an ongoing U.S. partnership with Canada to enhance security and accelerate the legitimate flow of people, goods, and services between the two countries. One feature of the action plan calls for the U.S. and Canada to adopt a common framework for their self-assessment programs that will align requirements and enhance member benefits to help trusted businesses move efficiently across the border.

ISA Pre-Certification. In April 2013, CBP launched a Broker ISA Pre-Certification (Broker ISAPC) pilot to test brokers' ability to be a force multiplier in the tradesecurity chain. ISAPC is targeted largely at small and medium sized importers, and it allows for brokers to serve as a link between potential ISA members and CBP. Under this pilot, the Accredited Broker will perform a comprehensive review of the ISA application package and evaluate the importer's ability to manage and monitor its compliance through risk-based self-testing before presenting the ISA candidate to CBP. Nine of the 22 customs brokers who applied were randomly selected to participate in the pilot.

Focused Assessment Transition to ISA. CBP is allowing companies that have successfully completed a CBP Focused Assessment Audit to join the ISA program without further review, provided they agree to fulfill the program requirements. A significant number of companies have transitioned into the ISA program under this initiative.