

**Commercial Customs Operations Advisory Committee  
Secure Trade Lanes Subcommittee  
Centers Working Group  
Background Information**

**September 2024**

**COAC**

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**COMMERCIAL CUSTOMS OPERATIONS  
ADVISORY COMMITTEE**

**Commercial Customs Operations Advisory Committee (COAC)**  
**Secure Trade Lanes Subcommittee**  
**Centers Working Group**  
**Background Information**

The Centers of Excellence and Expertise (“Centers”) are industry-focused and account-based operational organizations processing post-release trade activities on behalf of US Customs and Border Protection (“CBP”). The concept of Centers was developed as a result of work by the COAC and was designed to promote a management by account framework and to facilitate more uniform processing of imports.

The Centers are organized around 10 key industry sectors and employees are located at various Ports of Entry across the United States. The Centers function as strategic and operational points of connectivity between the trade community and CBP. To this end, the Centers are comprised of divisional units that focus on one of the following strategic areas:

- **The Partnership Division** – which is designed to streamline trade facilitation efforts through partnership programs and increase industry-based knowledge through bi-directional education efforts.
- **The Validation and Compliance Division** – which is designed to validate risk factors within an industry sector and develop approaches to improve compliance.
- **Enforcement Division** – which is designed to develop and address risks through impactful national enforcement plans and strategies.

It has been 10 years since the Centers were established. CBP is reviewing the agency’s implementation of the Centers concept through the lens of lessons learned over the last decade. As a part of its review, CBP has partnered with the COAC through the Centers Working Group.

The Centers Working Group is made up of CBP Center Directors, CBP Field Directors, CBP Headquarters, importers, brokers, and other members of the trade. Given the scope of the review, the Centers Working Group has formulated three sub-working groups to allow for increased focus and engagement. The sub-working groups meet on their own and then report into the full Centers Working Group. The three sub-working groups are as follows:

- **Center Communications** – Co-Chaired by Serina Baker-Hill, Center Director - Automotive & Aerospace and COAC Member Cynthia Roller
- **Center Operations** - Co-Chaired by Lori Whitehurst, Director, Trade Operations Division, Cargo and Conveyance Security and COAC Member Heather Litman
- **Center Structure** - Co-Chaired by JoAnne Colonnello, Center Director - Pharmaceuticals and COAC Member Heather Litman

In its review, the Working Group identified a core issue that has focused its current recommendations - The models used to establish the Centers should be updated to enhance trade facilitation and allow CBP to effectively address current risks and priorities.

In the 10 years since the establishment of the Centers, the workload priorities and staffing needs of the agency have undergone transformative change. The models used to establish the Centers were created prior to the institution of new tariff programs such as the 201 safeguard duties, the Section 232 steel and aluminum duties, and the China Section 301 tariffs. Significantly, the data models predate the establishment of the Enforce and Protect Act, the Uyghur Forced Labor Prevention Act, the increase in antidumping and countervailing duty cases, and the unprecedented expansion of low value shipments. These changes, in addition to shifting enforcement priorities occasioned by the fentanyl crisis, have had an extraordinary impact on the Centers' operations.

With this as context, the following are the Centers Working Group's proposed recommendations for the September, 2024, COAC public meeting. These are preliminary recommendations to be viewed as part of a wholistic framework being considered by the working group. That framework is designed to increase consistency, transparency, and uniformity for importers assigned to the Centers ("Center members") regardless of their level of regular engagement with the agency and to ensure that CBP's enforcement priorities can be met now and into the future.