



### Why This Matters

The Customs-Trade Partnership Against Terrorism (C-TPAT) program was established in 2001 as a voluntary government-business initiative to build cooperative relationships that strengthen and improve the overall international supply chain security process. C-TPAT requires trade company participants to document and demonstrate their supply chain security procedures according to applicable U.S. Customs and Border Protection (CBP) supply chain security requirements. These security practices promote supply chain integrity and border security.

### DHS Response

CBP concurred with our recommendations. CBP stated that it has reviewed the C-TPAT program and is in the process of incorporating specific instructions into existing or new Standard Operating Procedures (SOPs) regarding the details and supporting documentation that must be included in the validation worksheet. Also, CBP stated that the agency will provide training to the C-TPAT staff on a regular and recurring basis as SOPs are updated, approved, and issued to the field.

### For Further Information:

Contact our Office of Public Affairs at (202)254-4100, or email us at [DHS-OIG.OfficePublicAffairs@dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@dhs.gov)

## Improvements Needed to Strengthen the C-TPAT Initial Validation Process for Highway Carriers

### What We Determined

C-TPAT Program's initial validation process does not always ensure that highway carriers' security practices meet minimum security requirements. Specifically, documentation maintained by the Supply Chain Security Specialists (SCSS) for the initial validation process for highway carriers did not always confirm the accuracy and effectiveness of security measures declared in a carrier's C-TPAT security profile. SCSS did not always follow SOPs and did not include adequate details in the validation worksheet, explaining how they verified evidence of implementation for critical business partner and conveyance security procedures. These conditions occurred because the C-TPAT SOP did not indicate what evidence should be maintained to support conclusions made by SCSS or where this evidence should be included in the C-TPAT Security Link Portal. The deficiencies that we identified in CBP's initial validation process have reduced the agency's ability to ensure that carriers' security practices promote supply chain integrity, and could expose CBP to increased risk of compromised border security.

### What We Recommend

We recommend that the Assistant Commissioner, Office of Field Operations:

- 1) Update the C-TPAT SCSS SOPs to explain what specific details should be included in the validation worksheet and how SCSSs should verify evidence of implementation for critical minimum security requirements.
- 2) Revise the "evidence of implementation" training to explain how SCSSs should verify evidence of implementation for critical minimum security requirements and what information they should document to support conclusions.
- 3) Ensure that SCSSs follow SOPs when conducting the initial validations of highway carriers or document reasons for deviations.