

Are you prepared for an FTZ Compliance Review?

While CBP may notify you to schedule a compliance review, it is important to remember that prior notification is not a requirement and CBP can arrive at any time. Access to and provision of requested documents are often a hurdle for companies during their compliance review. Therefore, it is a best practice to maintain an FTZ Compliance Binder containing key documents that CBP may request. Our team at FTI Consulting has prepared this checklist to ease the burden of maintaining your FTZ Compliance Binder, so that you can focus on more strategic priorities.

SECTION/TAB	FREQUENCY	NOTE	RETENTION
Procedures Manual	As Needed	Ensure changes are updated on a controlled change log	Permanent, pages changed can be replaced and discarded
Designation Documentation	None	This document should not change. 19 CFR 146.7	Permanent
Site Maps	As Needed	Only will be updated if changes to the activated area occurs. This needs to be approved by CBP before being put into place. 19 CFR 146.7	Old versions must be retained for 5 years from time of change, unless otherwise specified by CBP.
Activation & Site Map	As Needed	Any changes to the zone that are sent to CBP must be kept in this section.	Permanent
Key Employee	As Needed	CBP must be notified of Key Employee changes via an updated list and completed 3078 (if a key employee is added). 19 CFR 146.7(g)	Must retain for 5 years in binder
Operators Bond	As Needed	Changes only occur if a new bond is issued. Make sure to monitor the surety's date range some put a must renew by date. 19 CFR 146.6-7	If new bond is provided, replace with previous & update ICRS. Must retain previous for 5 years in binder
Blanket 216	Yearly	This document must be signed by CBP and the FTZ Operator each year. 19 CFR 146.52	Must retain for 5 years in binder
Annual Reconciliation & Systems Review	Yearly	This must be completed and set by FTZ Administrator each year to CBP. A copy of the letter should remain in the binder.	Must retain for 5 years in binder
Review Scope of Authorities (if applicable)	Yearly	Review approved scope of authority approved by the FTZ Board to ensure components are within scope.	Permanent with updates as needed

For any questions or concerns please do not hesitate to reach out to the FTI Consulting Team or find more information [here](#).

This is not a comprehensive list and should only be used as a guide to begin the review process. Please review additional requirements with local CBP and Grantees to ensure all end of year activities are completed.

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