



Preparing for an FTZ Compliance Review?

Although CBP may inform you to arrange a compliance review, it is crucial to keep in mind that prior notification is not mandatory, and CBP can show up unannounced. Providing access to and furnishing requested documents is often a challenge for companies during their compliance review. Therefore, it is a recommended practice to keep an FTZ Compliance Binder with essential documents that CBP may need. Our team at FTI Consulting has created this checklist to help you streamline the process of maintaining your FTZ Compliance Binder, allowing you to concentrate 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 unless designation boundaries are modified with the FTZ Board. 19 CFR 146.7	Permanent
Designation Maps	As Needed	Only will be updated if changes to the activated area occurs. Activated boundary alterations must be approved by CBP. 19 CFR 146.7	Zone grantees or operators, and CBP, shall keep current layout drawings of approved sites as described in § 400.21(d)(5) , showing activated portions, and a file showing required activation approvals. The zone grantee shall furnish necessary maps to CBP. 15 CFR 400.51(b)
Activation Maps	As Needed	Any changes to the zone that are sent to CBP must be kept in this section.	Permanent

SECTION/TAB	FREQUENCY	NOTE	RETENTION
List of Key Employees	As Needed	CBP must be notified of Key Employee changes via an updated list and completed CBP Form 3078 (if a key employee is added). 19 CFR 146.7(g)	Permanent
FTZ Operator Bond	As Needed	Ensure that bond coverage is sufficient for revenue liability and monitor surety renewal/payment dates as needed. 19 CFR 146.6-7	If new bond is provided, replace with previous & update ICRS.
Blanket 216	Yearly	This document must be signed by CBP and the FTZ Operator each year. Ensure that the CBP Form 216 addresses all anticipated activity and that local CBP preferences for certain activities, such as destruction, are followed. 19 CFR 146.52	Recommended 5-year retention
Annual Reconciliation & Systems Review Letter	Yearly	Both must be completed each year and the certification letter must be provided to CBP. A copy of the most recent report and the certification letter should remain in the binder.	Recommended 5-year retention
Review Scope of Authorities (if applicable)	Yearly	Review approved scope of authority approved by the FTZ Board to ensure inputs, outputs and production activity are within your approved scope. 15 CFR 400.37 .	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](#).

Please note that this document was not designed to be 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.

NICK BAKER

Managing Director
+1 832 316 5790
nick.baker@fticonsulting.com

JAMES GROGAN

Managing Director
+1 512 922 4697
james.grogan@fticonsulting.com

MATT WILLIAMS

Senior Director
+1 240 736 4925
matt.williams@fticonsulting.com

ALISON JACOBS

Director
+1 312 759 8100
alison.jacobs@fticonsulting.com

COURTNEY STIERS

Director
+1 773 668 7878
courtney.stiers@fticonsulting.com

MIKE TRIVELLA

Director
+1 832 667 5246
mike.trivella@fticonsulting.com

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