

## National Customs Brokers & Forwarders Association of America (NCBFAA)

<b>Meeting Title</b>	NCBFAA Meeting
<b>Date</b>	September 29, 2025
<b>Attendees</b>	<p><b>CPSC:</b> Jim Joholske Sabrina Keller Kat Rickerson John Blachere</p> <p><b>Guidehouse:</b> Jonathan Wolfish Kiara Ballard</p> <p><b>Excidion:</b> Brian Holsey</p> <p><b>NCBFAA:</b> Cindy Thomas Dana Pontia Randall, Steven Courtney Peterson Mike Lahar Monica DeMars Christine Sliwinski Michele Pearce</p>
<b>Purpose</b>	To discuss the NCBFAA's eFiling related questions.

Action Item(s) and Decision(s) Needed	Owner	Due Date
Share eFiling participation data with NCBFAA	EXIS	TBD
Distribute updated Harmonized Tariff Schedule (HTS) code list	EXIS	01/2026

### NCBFAA Meeting

***The meetings discussions centered on HTS code flagging, certification requirements, enforcement expectations, and support for NCBFAA and importers.***

Consumer Product Safety Commission (CPSC) clarified that over 9,000 HTS codes fall under its jurisdiction, the next iteration of the codes list will include flagged codes that are most likely to require a certificate. The updated HTS flagging list is expected by January 2026. NCBFAA emphasized the need for early access to this list to prepare their systems and software. CPSC reiterated that certification requirements have been in place since 2008, and importers are responsible for knowing whether their products require certification, regardless of HTS flag status.

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On certification support, CPSC noted that EXIS is not the lead office for certification guidance but pointed to resources like the Regulatory Robot, Small Business Ombudsman (SBO) tools, and CPSC's Business Guidance Library. NCBFAA expressed concern about what they perceive as the lack of importer outreach and the challenge of managing eFiling in a complex trade environment. CPSC acknowledged that some companies will wait until the last minute to comply, and brokers are often left without access to Certificates of Compliance (CoCs), making compliance verification difficult. NCBFAA requested continued Office Hours to support implementation, but CPSC stated that due to resource constraints, Office Hours will not continue into Fiscal Year 26.

NCBFAA proposed a soft rollout for temporary codes—similar to USDA Organics' approach—to help importers transition. CPSC agreed to take the idea back for internal discussion but clarified that the agency will not likely pivot from the current plan. NCBFAA also raised concerns about bundled products, such as toys, being covered under a single certificate when multiple certificates may be required. CPSC acknowledged the complexity and directed NCBFAA to its Testing and Certification webpage, noting that companies must understand applicable testing requirements. Noncompliance could occur at multiple levels: not eFiling at all, submitting incomplete data, or failing to test to all applicable standards.

CPSC and NCBFAA both expressed concern about low participation in the voluntary stage of eFiling. CPSC agreed to share limited participation data and encouraged NCBFAA to distribute newsletters and resources from the eFiling Document Library to their networks. The NCBFAA's October 29, 2025 webinar will be open to importers, and K. Rickerson will present on eFiling. Finally, in response to questions about a potential government shutdown, CPSC stated it is awaiting OMB approval of its lapse plan and will provide communications once finalized.