

Achievement of Market-Friendly Initiatives and Results Program
(AMIR 2.0 Program)

Funded by
U.S. Agency for International Development

**Jordan National Customs
External and Internal Communications Baseline Assessment**

Final Report

Deliverable for PSPI Component, Workplan Activity No. 555.01
Consultancy Agreement No. 278-C-00-02-00210-00

March 2004

Jordan Customs Communications Baseline Assessment

This report was prepared by Barbara C. Zadina, in collaboration with Chemonics International Inc., prime contractor to the U.S. Agency for International Development for the AMIR Program in Jordan.

Data Page

Name of Component: Private Sector Policy Initiative (PSPI)

Author: Barbara C. Zadina

Practice Area: Trade and Investment

Service Offering: N/A

List of Key Words
Contained in Report: Customs, Communications, Issuance System, Knowledge
Management

Abstract

Jordan National Customs faces significant communications challenges. Internally, the Department must keep all Customs officials informed of the latest trade regulations and tariff structures. The department also needs to capture and share information among all Customs officials on illegal and dangerous trading activities.

The downstream issuance of information ensures that Customs officers have the most complete information on legal and administrative requirements to fulfill their duties in facilitating the flow of trade. The upstream gathering of information directly relates to internal workflow and the capacity of the newly created Intelligence Unit to collect data and track clearance activity for effective risk management.

At the same time, as trading volume increases, it becomes increasingly more critical for Jordan National Customs to provide reliable, timely information and services to the private sector to facilitate trade and contribute to Jordan's capacity to reap the economic benefits promised by these trade agreements. External communications are critical to achieving the department's goal of "informed compliance" by trading firms.

As a secondary priority, promoting the role and benefits of Jordan National Customs to the greater public contributes to reinforcing the Customs employee's pride in his work, which contributes to his motivation to work accurately and honestly. It also strengthens the trust of the private sector in the department's ability to fairly apply the law to honest companies, while enforcing the law and punishing illegal activity to deter potential violators.

Key Findings

Jordan National Customs needs a standard, written issuance system for the creation, documentation, storage and dissemination of information within the organization. Customs also needs a good performance assessment system, similar to that in the United States and Australia, to ensure proper implementation and accountability of employees in applying the system.

Jordan National Customs also needs to develop a comprehensive strategic communications plan that supports the overall goals of the department, sets priorities and budgets for activities, assigns responsibilities, and provides clear guidelines for the creation and dissemination of information materials and internal documentation. To facilitate this, the department should establish a Communications Directorate with central responsibility and authority to direct all communications activities.

Table of Contents

DATA PAGE.....	3
ABSTRACT	4
TABLE OF CONTENTS.....	5
EXECUTIVE SUMMARY	6
COMMUNICATIONS AT JORDAN NATIONAL CUSTOMS.....	7
I. INTRODUCTION	7
II. KEY GOALS AND OUTCOMES.....	9
IV. COMMUNICATIONS CAPACITY.....	13
A. <i>Internal Communications</i>	14
B. <i>External Communications</i>	15
V. INFORMATION FLOW.....	18
A. <i>Information Flow Charts</i>	18
B. <i>Downstream Issuance of Management Directives</i>	21
C. <i>Upstream Gathering of Information</i>	27
VI. CUSTOMS ISSUANCE SYSTEM.....	29
A. <i>Creation of Documents</i>	30
B. <i>Classification of Documents</i>	31
C. <i>Storage and Retrieval of Documents</i>	31
VII. EXTERNAL COMMUNICATIONS	33
A. <i>Communicating with Other Jordan Government Agencies</i>	33
B. <i>Marketing Jordan National Customs</i>	34
VIII. INTELLIGENCE COLLECTION.....	39
IX. FOLLOW-ON CONSULTANT WORK PLAN	41
A. <i>Customs Issuance System</i>	42
B. <i>Communications Strategy</i>	42
APPENDIX I: PEOPLE INTERVIEWED DURING THE CONSULTANCY	44
APPENDIX II: LIST OF PUBLICATIONS READ DURING THIS CONSULTANCY	45
APPENDIX III: HANDOUT -- JORDAN CUSTOMS DEPARTMENT INFORMATION FLOW	
ASSESSMENT	46
APPENDIX IV: HANDOUT -- CUSTOMS ISSUANCE SYSTEM OVERVIEW	49
APPENDIX V: CUSTOMS NEWS COVERAGE EXAMPLES.....	54

Executive Summary

The stated objective of this consultancy was to assess the external and internal communications strategies and capacities within the Jordan National Customs and provide recommendations for priority areas in the development of effective external and internal communications plans. Key findings of this report are:

- ? Jordan National Customs needs clear internal guidelines for the creation, storage, and sharing of information. The department also faces the significant internal communications challenge of informing all Customs employees of the latest trade regulations and tariff structures.
- ? The primary external communications challenge is to provide clear and comprehensive information and instructions to trading firms. The absence of detailed compliance information makes it difficult for businesses to comply with regulations, leading to mistakes and time-consuming delays in clearance processing.
- ? Jordan National Customs does not have a formal communications plan to comprehensively address the internal and external public communications needs of the department. There are no clear communications goals to tie in with the department's strategic plan other than vague objectives, and thus no specific activities identified to support Customs' operational strategy and goals.
- ? While the Customs Department lacks a comprehensive communications strategy, many communications activities take place throughout the organization. However, there is no single office with overall responsibility for coordinating all internal and external communications activities.
- ? A lack of document storage guidelines and a weak filing culture combine to prevent the capture and management of institutional knowledge. Also, there is no common issuance system to guide employees on policies, procedures, information, instructions, and guidelines relating to the organization.
- ? The capacity of the Intelligence Unit to perform its mission is seriously hampered by the absence of a clear customs issuance system.

Two separate follow-on consultancies are recommended:

1. Issuance System / Knowledge Management Expert – lead the creation of a Customs Issuance System.
2. Communications Specialist – assist in the development of a communications strategy that fully addresses the need to educate and train both Customs employees and private sector stakeholders on compliance regulations.

Communications at Jordan National Customs

I. Introduction

Jordan has a long history of serving as a crossroads for trade in the Middle East region. The British established the first customs office in Amman in 1922 to regulate the flow of goods and levy taxes on traders. Today's modern Jordan National Customs has grown to encompass 2,500 employees, with 500 employees in the Amman headquarters building and 2,000 employees working in the field at 35 Customs Centers across the Kingdom. At the international level, Jordan maintains a prominent role in the modern trading community by occupying one of six vice chairmanships of the World Customs Organization (WCO).

Such a large organization faces significant internal communications challenges to keep all Customs officials informed of the Kingdom's latest trade regulations and tariff structures. The department also needs to capture and share information among all Customs officials on illegal and dangerous trading activities in order to protect its borders and citizens.

At the same time, Jordan National Customs must take action to respond to increasing external communications challenges. Over the past few years, Jordan has significantly broadened its trading relationships around the world through numerous bilateral and multilateral trade agreements. These agreements have resulted in a sizeable expansion of trade for Jordan, substantially increasing the volume of goods crossing Jordan's borders.

As trading volume increases, it becomes increasingly more critical for Jordan National Customs to provide reliable, timely information and services to the private sector to facilitate trade and contribute to Jordan's capacity to reap the economic benefits promised by these trade agreements.

Consultancy Objective

The stated objective of this consultancy was to assess the external and internal communications strategies and capabilities within Jordan National Customs, and provide recommendations for priority areas in the development of effective external and internal communications plans.

The consultant focused on three main areas of communications:

Internal Communications – Assess and document the current process of information creation, storage, analysis, dissemination and sharing within Jordan National Customs.

External Communications – Assess and document the current process of sharing new compliance information and collecting intelligence from external direct stakeholders, including other Jordan government ministries and departments, international customs organizations, and the private sector trading community.

Public Marketing – Assess current efforts to market the successes and benefits of Jordan National Customs activities to external stakeholders and the general public.

Within this context, the consultant was asked to specifically address the following in the scope of work:

- ? Identify any existing communications strategy that exists within the strategic planning of Customs.
- ? Review the existing communications capacity of Customs. This to include the ability to effectively issue internal communications and external communications.
- ? Review the responsibility for external and internal communications within Customs.
- ? Identify the capacity within Customs and provide priority recommendations to assist National Customs in marketing itself to other Government agencies, international stakeholders and the private sector.
- ? Identify the capacity of Customs for the issuance of communications in a consistent and orderly manner while minimizing the issuance of conflicting correspondence.
- ? Identify and chart the information flows within Customs at the present time. This is to include the downstream issuance of management directives and the upstream gathering of information. A specific point to be covered is the capacity of Customs for the gathering of intelligence information for submission to the newly created Intelligence Unit and the dissemination of Intelligence Unit work products for effective risk management.
- ? Identify the current and planned issuance systems enabling the public sector to comply with legal and administrative requirements.
- ? Identify the current status of the networking capacity of Customs with other governmental stakeholders and identify impediments to effective two-way communications with other agencies.
- ? Prepare a work plan for a follow-up consultancy prioritizing from a best return on investment, capacity building technical assistance in the development of internal and external communications for Customs.

II. Key Goals and Outcomes

To understand the importance of this assessment, it is necessary to understand the role of communications within the context of the department's guiding mandate as a guardian of the Kingdom's borders and the facilitator of cross-border trade.

The top-line goal of assessing the communications flow at Jordan National Customs is to identify how communications can best support Customs in providing the highest quality of service to the import-export community, to ease the flow of trade and ultimately contribute to the growth of Jordan's economy. The public image of the Customs Department is a secondary concern that is automatically improved by achieving a high quality of service.

In examining both internal and external communications, one begins to understand that these are two interlinked yet very different issues with different challenges.

External Communications: Compliance Requires Information

External communications are critical to achieving the department's goal of "informed compliance" by trading firms. Under informed compliance, trading firms strive to meet all Customs regulations on their own in order to receive accelerated clearance of their shipments through the Customs system. The benefits of this are significant to both Customs and the private sector. Trading firms that meet informed compliance standards clear Customs automatically and avoid delays in getting their goods to market. The Customs Department is better able to manage the increasing volume of trade by freeing up its limited resources to deal with unknown, higher risk companies as a large percentage of trading firms with regular shipments achieve informed compliance and no longer require in-depth Customs processing.

Even without informed compliance, trading firms that fully understand the Customs requirements will be better able to meet those requirements, and thus facilitate faster, more efficient clearance of their goods. The primary external communications challenge, therefore, is to make sure that Jordan National Customs provides clear and comprehensive data and instructions to trading firms. The absence of detailed compliance information makes it difficult for businesses to comply with regulations, leading to mistakes and time-consuming delays in clearance processing. More importantly, incomplete understanding of the rules makes it difficult for businesses to ensure that they are treated fairly by Customs officers, opening the door to corruption in both parties.

The underlying premise of informed compliance is trust between the Customs Department and the private sector. Customs relies on trading companies to accurately and honestly complete documentation and adhere to regulations. But more importantly, and perhaps the greatest challenge for Jordan National Customs, is that trading companies must be confident that Customs officers are accurately and fairly applying Customs regulations to their shipments. This leads us to the internal communications objectives.

Internal Communications: Accuracy and Honesty

Internal communication tasks for this consultancy required assessing both the downstream issuance of management directives and the upstream gathering of information within the department. The downstream issuance of information ensures that Customs officers have the most complete information on legal and administrative requirements to fulfill their duties in facilitating the flow of trade. The upstream gathering of information directly relates to internal workflow and the capacity of the newly created Intelligence Unit to collect data and track clearance activity for effective risk management.

Both of these internal communications goals are actually elements of organizational process and knowledge management, which is different from communications in the traditional sense of identifying target audiences and various means of delivering information.

As noted above, informed compliance and efficient processing of Customs shipments relies on a relationship of trust between businesses and Customs officers. Not only must Customs trust businesses to fully comply with regulations once they have achieved “informed compliance” status, but businesses must trust the integrity of Customs officers to know the regulations and apply proper treatment to their shipments. One business owner interviewed for this report complained that, when there is confusion over regulations and the accurate fee under the Harmonized System of tariffs, it is often easier for both the trader and the Customs officer to simply agree on a payment that includes a bribe for the officer to achieve clearance of a shipment.

The internal communications tasks address both aspects of this problem. One is reminded of the Reagan-Gorbachev approach to arms control – “trust but verify”. Provide Customs officers with the information tools they require and trust them to do their job, but have the ability to monitor their actions and to enforce accuracy. Obviously, information flow is just a piece of the puzzle. Low salaries and civil service hiring policies also play a role in the job performance of Customs employees and their susceptibility to corruption. Still, select internal communications activities will assist employees in accomplishing their jobs and reward their performance, while enabling the due diligence to ensure that regulations are accurately applied across all levels of Customs activity.

Public Marketing: Pride in Work

Promoting the role and benefits of Jordan National Customs to the greater public contributes to reinforcing the Customs employee’s pride in his work, which contributes to his motivation to work accurately and honestly. It also strengthens the trust of the private sector in the department’s ability to fairly apply the law to honest companies, while enforcing the law and punishing illegal activity to deter potential violators.

III. Existing Communications Strategy

***TASK:** Identify any existing communications strategy currently within the strategic planning of Customs.*

Anyone doing business with Jordan National Customs would find it difficult to miss the Customs Web site address boldly posted above the main entrance to the Customs Department in downtown Amman. One is also likely to see a Customs vehicle clearly sporting the Web site address on its side as it weaves through busy traffic.

Such bold public markings might lead one to believe that the Web site promotion is part of a highly effective communications strategy executed by the Customs Department. Unfortunately, that assumption would be wrong. While Jordan National Customs has many communications initiatives underway in several areas, there is no single official, documented, comprehensive communications plan with time-bound activities and dedicated resources to tie the initiatives together.

Customs officials will tell you that in a culture built upon nearly 100 years of operations, every Customs employee knows the communications goals and procedures. They will point out that Jordanians have a culture of verbal communication. Even in the absence of a formally documented communications strategy and information system, almost every Customs officer has been told what their role is in the internal and external communications process and knows how to conform.

This may be true to some extent, but the fact remains that Jordan National Customs does not have a formal communications plan to comprehensively address the internal, external, and public communications needs of the department. There are no clear communications goals to tie in with the department's strategic plan other than vague objectives, and thus no specific activities identified to support Customs' operational strategy and goals. The activities that do take place happen in an *ad hoc* manner by numerous unrelated sections throughout the organization. These activities are described in relevant sections of this report, along with the people and directorates responsible for their implementation.

RECOMMENDATION: *Develop a comprehensive strategic communications plan that supports the overall goals of the Department, sets priorities and budgets for activities, assigns responsibilities, and provides clear guidelines for the creation and dissemination of information materials and internal documentation.*

Internal communications within Jordan National Customs should encompass the upstream and downstream flow of information throughout the organization, and written department-wide standards for documenting and storing information for easy access and retrieval. Later in this report we examine the activities currently underway at Customs to address specific elements of internal communications in the absence of an overall strategy.

Jordan Customs Communications Baseline Assessment

An external communications strategy and marketing plan for Customs exists, created by the Public Relations Advisor to the Director General. The Director General approved the external communications plan, but it was not included in the department's official 2004 Strategic Plan. In the absence of department-wide support for its implementation, the Public Relations office has not officially adopted the plan and instead implements *ad hoc* external communications activities, supplemented by one-off activities initiated by other sections within Customs.

Stated Communications Goals in 2004 Strategic Plan

The Planning and Organization directorate has developed an annual strategic plan for Jordan National Customs. While the plan does not specify a stand-alone communications strategy, the 2004 Strategic Plan includes several general communications-related goals in the context of the overall plan. However, the plan does not address how these goals should be achieved. The stated goals are as follows:

Internal Communications Goals

- ? Inform and educate Customs staff on new regulations, in order to:
 - ? Standardize Customs actions at all ports of entry
 - ? Increase private sector compliance
 - ? Increase tariff collections
 - ? Improve speed of processing imports and exports
 - ? Facilitate increased flow of trade across Jordan's borders
- ? Share data and lessons learned within the Customs Department, to facilitate:
 - ? Knowledge management within the department
 - ? Improved decision making
- ? Improve the standards of work of all Customs employees
- ? Increase morale and pride in work
- ? Introduce new communications technology into the process – i.e., intranet, databases

External Communications Goals

- ? Inform and educate import-export firms on new regulations and procedures to:
 - ? Achieve informed compliance
 - ? Facilitate increased flow of trade
- ? Share data and lessons learned with other Customs and international organizations
- ? Coordinate the exchange and sharing of intelligence data
- ? Inform the Jordanian public of Customs activities to:
 - ? Assist the recruitment of quality staff
 - ? Educate public on Customs' important role in protecting citizens
 - ? Educate public on Jordan Customs' leading status in region

IV. Communications Capacity

***TASK:** Review the existing communications capacity of Customs, including the ability to effectively issue internal communications and external communications.*

While Jordan National Customs lacks a comprehensive communications strategy, many communications activities take place throughout the organization. However, there is no single office with overall responsibility for coordinating all internal and external communications activities. In the absence of a lead communications section with a clear mandate, responsibilities for various communications activities are decentralized, and somewhat disjointed among several different sections within the department.

For example, the Information Technology Section manages online communications and has initiated several efforts to improve communications with both employees and private sector clients through a Web site and intranet. The Intelligence Directorate and the WCO Regional Representative communicate regularly with Customs and international trade organizations around the world. The Planning and Organization section has initiated the creation of several important publications, while the Public Relations office manages external communications efforts such as the private sector Partnership Council Committee and media relations.

Customs officials note that the department's participation in the AMIR Program's Center of Excellence program and efforts to win the King Abdullah Award (KAA) for quality in government service have had a positive impact on Customs communications both within the department and with other government ministries. Several meetings were held for Customs officers to explain the importance of the award and why the department was competing. A special newsletter on the department's progress in relation to the KAA is hand delivered to each Customs employee. They have printed ten editions of the newsletter in three months, and received positive feedback from employees. The Higher Committee on Knowledge Management was designed based on the criteria for the KAA, but the committee has not met yet.

Yet none of these communications efforts are coordinated, there is no strategy to integrate them into the overall Customs operational strategy and goals, and there is little understanding of how to leverage each activity for maximum benefit to the entire department.

***RECOMMENDATION:** Establish a Communications Directorate with central responsibility and authority to direct all communications activities, both internal and external, in a strategic, coordinated manner. This office would also have responsibility for working with other section directors to develop a coordinated communications strategy for the Department, as recommended above.*

A. Internal Communications

? Downstream internal communications are effective, but there is little upstream communications or knowledge management.

Customs has a solid capacity to issue communications within the organization. The majority of the 2,500 employees have computer access to internal email and the internet. A state-of-the-art satellite communications network links 25 of the Customs Centers around the country to headquarters via the Customs intranet, and the Director General can visibly check on each Customs Center using remote video cameras.

Downstream internal communications within Jordan National Customs are effectively handled by Dewan, the official Correspondence Section. As the central office responsible for processing all of Customs' incoming and outgoing correspondence, Dewan manages the tracking and distribution of documents to all internal Customs employees and sections. There are clear lines of authority regarding who can issue information through Dewan, and each Customs Center has a satellite Dewan office to ensure that field employees properly receive information from Customs Headquarters. The Dewan system is described in detail in the Information Flow section of this report.

The problem lies in what happens once the information is issued. A lack of document storage guidelines and a weak filing culture combine to turn downstream information recipients into somewhat of a black hole. Most directorates have developed some form of central filing system within their own administrative staff, but there is no common issuance system to guide employees in how to update or replace previous notifications. This problem – the need for a customs issuance system – is discussed in detail in the Information Flow section of this report.

Also, Customs does not make full use of its existing internal communications tools. The department intranet, which is intended to be a resource for employees to access information, is not kept sufficiently updated. In addition, the various databases used throughout the department do not cross reference, so there are unique data pockets that do not automatically combine to provide the bigger picture.

Most importantly, there is no established system for internal upstream communications. This means that information created or gained at the working level of Customs is not communicated upward through the organization, where it can provide guidance to others dealing with similar issues. Knowledge is lost in the absence of a clear issuance system to instruct employees on how to create documents, apply reference classification, track dissemination, and store documents. Again, this issue is fully addressed in the Information Flow section of this report.

B. External Communications

- ? **External communications are limited, uncoordinated, and inconsistent in their effectiveness.**

To operate effectively, Jordan National Customs needs to openly share information with a variety of external stakeholders, including other Jordan government ministries and departments, international customs organizations, and the private sector. The department clearly has the potential to issue communications to these groups, as there currently are individual activities underway in several different directorates.

However, without a strategic plan and central Communications directorate, the current external communications are not consistent, limiting their effectiveness. No single office is tasked specifically with creating standard informational materials or maintaining the public Web site or Customs intranet. Good ideas executed in one section are not shared and replicated throughout the Customs organization.

Public Relations Office

The Public Relations Advisor reports directly to the Director General of Customs, and requires his approval for all activities. He manages a staff of four people, and is considered part of the Director General's office. The Public Relations team is focused primarily on external communications, and has limited interaction with other department sections. They directly support the Director General by managing his travel arrangements and informational materials for his trips. The team also manages all arrangements for visiting delegations to Customs.

The Public Relations team is the Customs Department's main point of contact with the media. They manage interview scheduling and provide guidance and talking points to the Director General, who often appears on the "New Day" morning television and other news programs. They also create a daily media report for the Director General and respond to media stories on Customs issues as necessary.

The team creates and implements media campaigns to highlight information such as new border regulations, or to promote seizures and other enforcement actions. However, the level and frequency of this type of promotion is not very intensive, and must be increased to make a real impact in the media. This is discussed later in the External Communications section of this report.

The Public Relations office facilitates direct communications with the private sector through organizing the Partnership Council Committee, which includes the presidents of various chambers of industry and commerce, trade unions, and business associations from different sectors. The council has met twenty times in the three years since it was created, and is often consulted before new regulations are issued. The Partnership Council Committee is an extremely successful mechanism for communicating with this

Jordan Customs Communications Baseline Assessment

important group of Customs stakeholders, and is described in detail in the External Communications section.

Numerous training courses have been conducted for representatives of public as well as private sector organizations on use of the Automated System for Customs Data (ASYCUDA) System, which is a main source of information for declarants. External stakeholders are also kept informed through an emailing list that includes key businesses and the trade broker syndicates. However, there is no obvious sign-up mechanism for interested parties to request to be added to this distribution list, online or otherwise.

The Public Relations office contributes news updates to the public Web site that was created by the Information Technology Directorate. The Web site is an example of a potentially powerful communications tool that is not adequately maintained to achieve full effectiveness. The Web site was created with a great deal of useful information for visitors. It offers Customs laws and regulations, tariff tables, and other important data. Each Customs section or directorate has responsibility to update the relevant information on the Web site. However, no single communications office is tasked with comprehensive oversight and management of the Web site, so the information posted is outdated. Given the broad amount of topics covered on the site, a Web site committee should be considered with final responsibility for assuring correct and current information on all pages of the site.

Directorate of Planning and Organization

The Directorate of Planning and Organization has created numerous informational brochures, books, and other communications materials for Jordan National Customs, complementing the work of the Public Relations office. This is primarily the personal initiative of the Director of Planning and Organization, and not a formal function of the office.

The publications include a comprehensive directory for businesses on guidelines for shipping through the Amman Customs Center, the largest Customs center. The Planning Directorate worked with the Amman Customs Center to develop and print 500 copies of the directory, then sent a copy to each Customs center encouraging them to create a similar booklet in cooperation with the Planning directorate. At present, only the Queen Alia Airport Customs Center has followed up and is creating its own users manual.

Other publications created by the Planning directorate include:

- ? Customs Department Annual Reports – since 2003 in Arabic and English
- ? Guide to Standards and Quality – explains ISO, other standards
- ? Code of Conduct for Customs Employees – addresses values, duties and responsibilities for Customs employees
- ? Procedural Directory for Customs Directorates – provides forms for all transactions, including transit and clearance, temporary admissions, valuations, and financial transactions

Jordan Customs Communications Baseline Assessment

- ? 2003 Year of Total Quality Management for Customs Department – provides historical overview and org chart, overview of the training center, income and revenues, ASYCUDA description, and other department info
- ? World-Wide Customs Administrations Directory
- ? Customs Gazette magazine

The Planning Directorate is providing a valuable service to the department's communications efforts through publishing these materials. However, the quality of layout and printing is very basic, and there is no unifying visual brand to tie the materials to the Customs Department. Ideally, a central Communications Directorate would fill this role.

Information Technology Directorate

There is a new initiative to provide e-services on the Internet. Currently there are only a handful of forms online. Last year, the Information Technology Directorate launched a classified Temporary Admissions and Guarantees e-services site. They will soon add new e-services to the site, which are expected to increase the number of users to the thousands, requiring a server upgrade.

V. Information Flow

***TASK:** Review the responsibility for external and internal communications within Jordan National Customs.*

***TASK:** Identify and chart the information flows within Customs at the present time. This is to include the downstream issuance of management directives and the upstream gathering of information.*

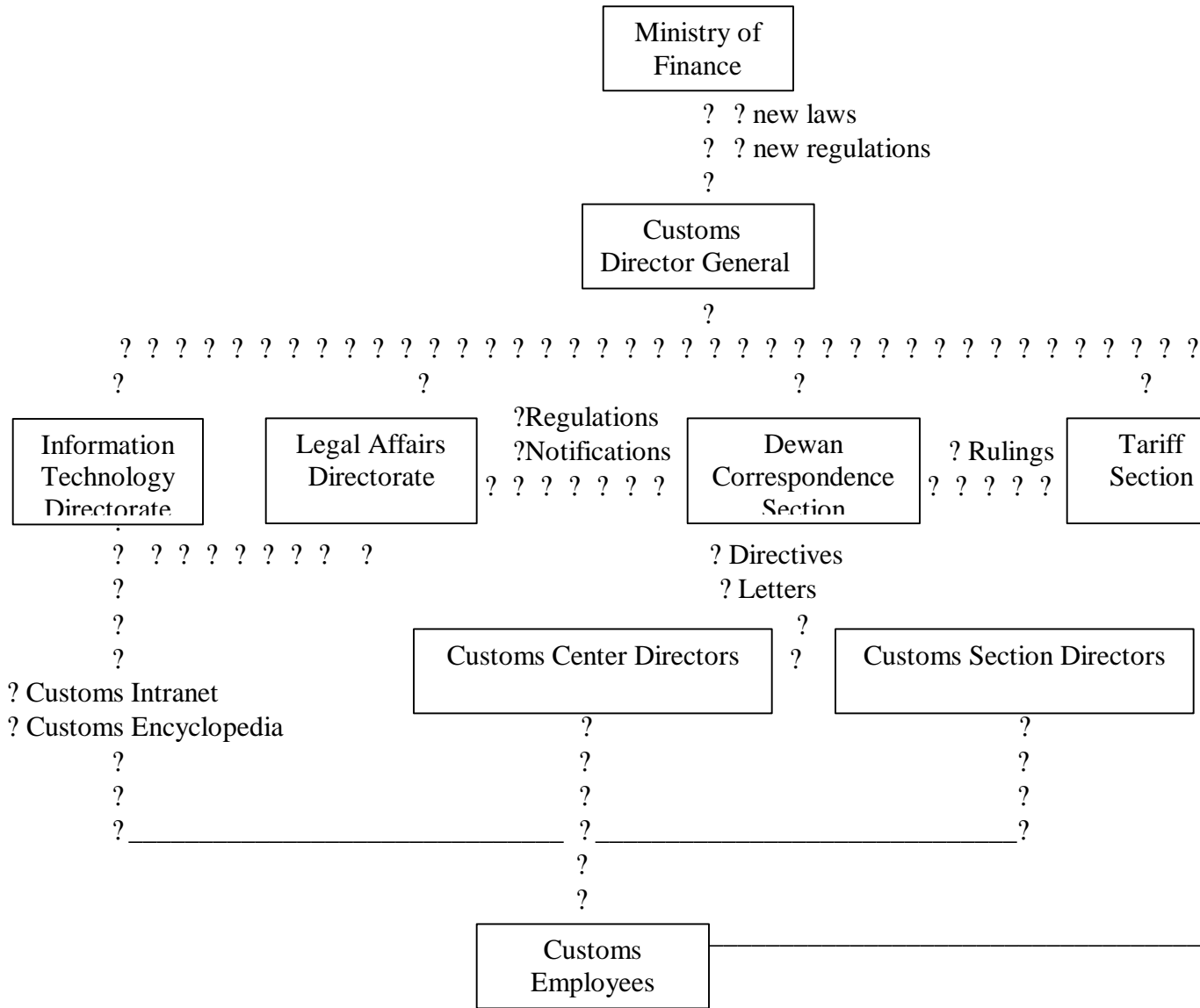
This section of the report outlines the originators of information within Jordan National Customs, and the path that information takes in moving through the Customs organization to end users. A later section of this report will address the method of documenting, tracking and storing information, better known as the Customs issuance system.

A. Information Flow Charts

See following pages.

Jordan Customs Communications Baseline Assessment

Information Flow Chart – Internal Customs



B. Downstream Issuance of Management Directives

general, there are four main types of information disseminated from Customs management down through the organization and on to external stakeholders:

- ? **Regulations** – Regulations are issued within two months of the issuance of a new Customs Law. They are drafted by the Customs Department, and must be signed by H.E. Minister of Finance. They may get amended, but this is not done very often; typically every 7-8 years cycle.
- ? **Official Notifications** – These are operational notices published by the relevant section directors within Customs, and authorized by the Legal Affairs Directorate before they are issued officially. Each is assigned a sequential serial number. There were 80 official notifications in 2003.
- ? **Regulatory Directives** – Instructions on how to perform work issued by directorates, these do not go through the legal department. Hundreds are issued each year and saved by Dewan, but no one is responsible for gathering and producing a central guide or manual for storage.
- ? **Letters and Notifications** – Informational only, these can include information from other Ministries and departments relevant to Customs work. There are thousands of official letters issued every year containing information on new policies, changes in regulations, and compliance information. Official letters are dispatched only to the concerned entity, and copies are sent to the relevant directorates for information and follow-up.

Dewan Correspondence Section

The Dewan Correspondence Section is responsible for the downstream issuance of all information from Customs management to employees and stakeholders. Dewan issues all correspondence, letters, notifications, and other communications, and is responsible for both internal and external dissemination.

Dewan is also the receiving point for communications from other government organizations. It records and documents all correspondence for the entire Customs Department. The Director General's office is the point of exit for Customs information to other government agencies and organizations.

Every Customs directorate sends information to Dewan to be archived and dispatched through the Dewan internal notification system to Customs Centers and section directors. The Directors receiving the dispatches then have responsibility for disseminating information to their section employees and ensuring implementation. There is a sign and understand policy related to the Code of Conduct, and on issues related to personal integrity such as password access to clearance systems.

Jordan Customs Communications Baseline Assessment

Dewan liaison officers at each Customs center download notifications from the online system and supply the information in hard copy to facility employees and brokers to ensure that they receive it. These Dewan offices also maintain an archive of paper versions of all communications that pass through their office. In this way, the archive serves as the central files for each Customs Center, open to all employees to request research assistance and copies of old documents.

However, there is no electronic central file on the Customs network with all Dewan communications. If a Customs official does not check email or receive a hard copy from Dewan, he may never see some new information.

***RECOMMENDATION:** Dewan should create and maintain an online database of all communications that move through the system, for searchable access of documents by all Customs employees. This will require all internal documents to be produced and stored in electronic format.*

Additionally, Dewan should work with each section to create standard distribution lists for information on specific customs topics, which employees can sign up to receive if they are not on the normal distribution.

Role of Information Technology

Technology plays a key role in the Customs Department flow of information. The Information Technology (IT) Directorate is responsible for technical operations of the Customs public Web site, the employee intranet, and the internal online communications network that connects all Customs Centers.

Officials estimate that 85 percent of Customs headquarters employees have access to computers and the internet, as well as 65 percent of employees at the 35 Customs Centers, mostly heads of sections. Seven hundred employees asked for a username in the month of September 2003 alone. With this increased dependence on computers, the use of email has dominated communications dissemination within the department, although some offices still print out paper copies of email messages for filing.

Employees can access personal employment data online, including paycheck information, training records, and several human resource (HR) forms. Customs management decided to cancel paper versions of this information and limit employees to online access as a way to require Customs employees to adopt the use of computers and the intranet.

Technology has increased knowledge sharing within Customs. Employees visit the intranet bulletin board to check if someone is online in a specific field of expertise, and available to answer a question. The Customs intranet has become an important source of information. A directive was issued that Customs officers should visit the Customs

Jordan Customs Communications Baseline Assessment

intranet daily for new information updates. However, the intranet is not always kept up to date, as there is no Communications office tasked to do so. Instead, updates are an *ad hoc* function filled by the IT Directorate, Planning Directorate, PR office and others. This leaves some obvious gaps in current data online.

The online Customs Encyclopedia on the intranet is the main information sharing mechanism within the Customs Department. Several officials referenced the Encyclopedia as a place to get accurate, uniform information on regulations, legal questions, manuals and other useful topics. As with the intranet and Web site, each directorate determines the information to post and update on their section, which means not all sections are maintained as well as others. However, the IT Director estimates that it solves 60 percent of the knowledge inquiries previously received from employees.

At the time of this consultancy, the Customs Encyclopedia had been online for two months. Yet there was no internal awareness campaign to let customs employees know of its existence and no presentations on how to use or benefit from it. The Encyclopedia is a great communications resource, but without an awareness campaign it is underutilized.

RECOMMENDATION: *Conduct an internal awareness campaign to teach all Customs employees about the existence, use and benefits of the Customs Encyclopedia online.*

Tariff Section

The Tariff Section monitors the application of the Harmonized System of tariffs at the Customs Centers, and settles tariff disputes with trading companies. Tariff disputes can stem from the misclassification of a good or the incorrect application of the Harmonized System to a shipment. There is an average of one tariff decision a month where a mistake is repeated at a Customs Center due to a misunderstanding of the rules.

In an effort to counter this, the Tariff Section Director seeks to promote sharing of information within the section. He believes that the accurate determination of tariff disputes requires the sharing of cumulative experiences among customs officers. Even the open seating setup of the office is meant to encourage the tariff officers to interact during the workday.

Once a difficult tariff ruling is made, the Tariff Section issues a directive in which the problem or issue is explained, so that all Customs employees can learn from the experience. For example, if certain items or goods are continuously misclassified, they will issue a directive on the proper classification and forward both a paper and electronic copy to Dewan for dissemination to appropriate employees. The tariff decisions are not currently searchable on the intranet, but they are indexed in the Tariff Office.

The application of the Harmonized System is often incorrect due to the fact that the system and supporting WCO regulations are in English, while many Jordanian customs officers are not fluent in the language. Jordan is currently one of five countries working

Jordan Customs Communications Baseline Assessment

on an Arabic language translation of the Harmonized System, together with Lebanon, Egypt, Tunisia and Saudi Arabia. This will help solve the language problem. The translation is scheduled for completion in December 2004.

In his nine years on the job, the Tariff Director estimates that in 70 percent of tariff disputes the Customs officer is correct, and the balance of the time the importer is correct and Customs is wrong. In certain rulings when Customs officials are not confident in their ability to make a decision, the Tariff Section will write to the Brussels WCO Office for an opinion. The Jordanian brokers cannot challenge these neutral decisions. Customs has made 151 inquiries to the WCO in eleven years. The WCO rulings are distributed to all tariff officers, so that they in effect learn the system from those who designed it.

The Tariff Director maintains his own database of WCO decisions, but it is not shared beyond the section so Customs officers at the Customs Centers do not have access to the decision information unless they maintain their own files. The WCO rulings in the database are in English, which would prevent the majority of customs officers from using the database even if it were available.

There are two other important databases that support the tariff decision process. In 1997 Jordan National Customs created a pre-entry rulings system whereby importers can get tariff rulings on goods before they arrive at the Customs port. For uniformity of rulings, a pre-entry rulings database was created. However, the current database does not have an efficient search capability to check previous rulings. In addition, the Tariff Committee formerly had a rulings database, but now notifications of the Committee rulings are simply sent out through Dewan. A new Tariff Committee rulings database is needed again so that all employees can search for rulings.

RECOMMENDATION: All Customs officers should have complete access to tariff decision history, to ensure proper application of tariffs to Jordanian customs clients. To achieve this, the WCO rulings database should be summarized in Arabic and turned into a searchable online database; the pre-entry rulings database should have a proper search capability; and the Tariff Committee rulings database should be reinstated.

Moreover, the rulings data base should be made readily available to the public to insure better initial declaration filings and transparency of rulings. In addition to classification rulings, valuation and origin rulings should be incorporated in the online database.

Customs Centers

The downstream flow of information at Customs Centers relies on the Dewan office at each center. The Dewan office classifies the incoming correspondence from Customs Headquarters, and delivers it to the Customs Center Director, who determines which person should receive a copy in the Customs Center. For example, agricultural issues go to the agricultural customs officer. On average, a Customs Center Director receives 20 to

Jordan Customs Communications Baseline Assessment

25 notices a day from the Dewan system, including directives and notifications from all other Ministries.

The Customs Center Director sees all incoming correspondence. The Dewan section prints out the incoming correspondence for the Director, who sometimes writes notes on how to implement information before it is passed on to the Customs officers at that center. Dewan then emails the correspondence to the selected officers and/or sections within the Customs Center. The Director will check with the head of a unit to follow up on how a directive has been implemented. For certain notifications, Customs officers must sign to acknowledge receipt of the information. Dewan then files all correspondence by serial number and topic at each Customs Center Dewan office.

The Amman Customs Center (ACC) has 70 clearing units. One clearance unit officer interviewed said he reads the Customs updates online on the intranet each day if possible, but no more than once a week. He prints out relevant notifications and regulations, and files them himself in a book for future reference. He knows that he can access them online if necessary. He also uses the valuation database to check valuations. This officer noted that he would like to have access to tariff classification of goods and procedures for customs clearance from the Kyoto accords, to help him in his work.

Complete and orderly files at each Customs Center depend upon the officer in charge of each tariff classification office. There is no standard filing structure or system of reference numbers for storing directives, regulations and other official documents. Each office creates its own system. This problem is discussed at length in the Issuance System section of this report.

There is an annual schedule of training available to Customs officers. In addition, if the Airport Customs Director perceives a weakness in a specific area, he will organize on-site training for officers. The Director also holds informal morning discussions with staff on any changes in regulations or other timely issues.

There have been 333 training courses on the ASYCUDA system offered over the past four and a half years, with 2,500 participants – both customs employees and private sector stakeholders. In addition, 54 manuals on technical and procedural issues of ASYCUDA have been published and issued.

Information Flow to Traders

Most Customs Centers use bulletin boards as a means to supply information to brokers and traders onsite. For example, the ACC has two bulletin boards, one specifically with information and instructions for brokers and one with information on the ASYCUDA system. There are also two television monitors in the main ACC waiting room. One monitor tells brokers the status of their shipment after it has been transferred into the clearing process, and whether it is in the red, yellow or green lane. The other monitor provides updates on new instructions and proclamations regarding the Customs process. The IT Director decides what to post on the monitor.

Jordan Customs Communications Baseline Assessment

The ACC also connects to its brokers electronically through a user id and password system, via a local area network within the building and by dial-up modem access from outside the building. Important notifications are sent through this network to brokers. The ACC has three server backups, and they create a backup tape each day that they send to Customs Headquarters of all communications.

The Airport Customs Center meets monthly with the clearance agencies and trading company representatives. During these meetings, Customs representatives tell the business representatives about new regulations and changes, and listen to their issues and problems. More information on this outreach to the business community is provided in the External Communications section of this report.

Legal Affairs Section

The Legal Affairs Section issues all documents of a legal nature, laws and amendments, drafts, and regulations. Not all legal opinions are disseminated to all Customs officials; an opinion for a specific request only goes back to the directorate that asked for the ruling, and it is their decision whether or not to distribute the opinion to other offices.

If the opinion has broad application, the Legal Affairs department will issue the notification as a proclamation with instructions on how to implement the decision. Proclamations go to all Customs offices through Dewan. The Legal Affairs Director will specify the offices that need to directly implement the opinion, to make sure they receive the proclamation.

Any Director can issue a proclamation on a topic within their section's focus, which is then submitted to Legal Affairs for clearance and passed on to the Director General for signature. A proclamation has implementing authority, meaning it requires Customs officials to implement the action or change. Legal decisions are more centralized since they need approvals and are not simply procedural.

All regulations are published in the Official Gazette that is printed and distributed by the Ministry of Finance, compiling new regulations from all ministries. The Official Gazette is published monthly, or following major government decisions. It contains all Cabinet decisions, and is sent to all government agencies. Customs Legal Affairs maintains a library of the Official Gazettes from 1940. Decisions in the Official Gazette are presented in a series of annual sequential numbers.

The Customs Encyclopedia online contains copies of all laws, regulations and legal decisions issued. Also, Legal Affairs has printed a booklet that was distributed to all Customs officers and sections, which covers the Customs Law, unification of taxes, temporary admissions, decisions based on Customs law, and other topics. A new booklet will be printed and distributed once the current series of amendments to the Customs Law are completed.

Jordan Customs Communications Baseline Assessment

Official communications from other ministries flow through official channels directly from the Director General's office through Dewan. Proposals from other ministries for amending laws come through the Director General's office for comment. New information on, for example, transportation changes received from the Ministry of Transportation are disseminated through the Dewan network to Customs Centers and inspectors.

The Legal Affairs team shares information within their section on their decisions, and holds meetings to discuss decisions, cases and outcomes so that all lawyers are current on legal matters.

C. Upstream Gathering of Information

Several officials interviewed for this report expressed concern that there is limited information flow upstream from the customs officers. They feel that information is only truly collected in individual cases such as in support of a court case. One official cited Australia Customs as a best practice example, where each officer continuously feeds information into a central database, and Southeast Asia where they promote knowledge sharing of casework by publishing information on the cases, filming the seizures and sharing lessons learned among all officers.

In Jordan, officials believe the typical customs officer does not share information with other officers on, for example, a newly uncovered smuggling method for fear he will not remain the star performer in identifying such cases in the future.

RECOMMENDATION: *Jordan National Customs needs to standardize reporting methods for all customs officers and link it to a performance reward system, to ensure the capture of upward information within the organization.*

Customs officers currently use the ASYCUDA and Single Admission Document databases to record clearance information. Each Clearing Unit officer enters a system ID number, so Customs can track who processed each shipment. The editing office at each Customs Center audits clearance documents regularly, and checks on the database whether there is a pattern of, for example, undervaluing goods. If so, they feed the information to the Risk Management office.

An interview was conducted with a case officer at the ACC who has worked for Jordan National Customs for 12 years. He enters case information into the online database, which is searchable by name, tax identification number, and other fields. He also enters a code for the reason a case has been referred for examination. Since the case database was established in July 2002, the case officer said that Customs has doubled the collection of fines.

The Airport Customs Center is unique in that the transactions they handle are lower weight, higher value goods. They tend to be perishable goods such as meat and fish, and

Jordan Customs Communications Baseline Assessment

medicines. Therefore there is a lot of pressure to clear the goods faster. Airport Customs is always looking for ways to speed up the clearance process. In this environment, they need to rely on post auditing to catch mistakes and improper activities. However, there is currently no post auditing; it is planned but has not been implemented.

In smuggling cases, a customs officer fills out a form, reports it to his supervisor, and then enters the case into a database. The case is then sent to the Risk Management Department and they follow up. The ACC handles on average three to five smuggling cases a day. The ACC also receives advance information from the border crossings on potential problems with shipments that are in transit to the ACC for processing. The officers at each Customs Center should report back to Risk Management on the activities of certain importers.

Customs Center directors are rarely brought together as a group to provide feedback to Headquarters on issues; it is usually done on an informal basis with one-on-one conversations. Directors feel that they have an open channel to the Director General if they need it, but there are no official mechanisms to collect information from Customs Center Directors and no official opportunities for Directors to share information and ideas among themselves. This limits knowledge sharing at the point-of-service level in Customs.

RECOMMENDATION: *There should be a mechanism established for regular meetings with all Customs Center Directors, where they can share ideas and information on problems and solutions.*

Information also needs to be collected and shared from other sources within the organization. Jordan National Customs delegations that travel abroad currently have no requirement to share information on whom they met, what they discussed and what was learned. There also needs to be some system for documenting best practices information on tariffs, supply chain, rules of origin, and other systems in Jordan, both for internal reference and to share with international organizations.

Many of these upstream communications problems are related to the lack of a comprehensive Customs issuance system. This issue is fully addressed in the following section of this report.

VI. Customs Issuance System

TASK: Identify the capacity of Customs for the issuance of communications in a consistent and orderly manner while minimizing the issuance of conflicting correspondence.

TASK: Identify the current and planned issuance systems enabling the public sector to comply with legal and administrative requirements.

Many Customs administrations around the world, including the U.S. Customs Service, employ a Customs issuance system to communicate policies, procedures, information, instructions, and guidelines relating to the organization and internal management of the department to the officers and employees who need them to perform their work. The system ensures clear communications and uniformity of information on procedures within the organization. It does not cover information that is directed to the public.

A Customs issuance system typically covers all policies and procedures issued by the Customs Department for internal management purposes that affect major organizational elements or groups of employees. It also includes a Subject Classification Scheme, which lists and codifies the main functional activities in the Customs Department through a numbering system in order to facilitate filing, retrieval, indexing and referencing information.

? Jordan National Customs currently has no standardized, criteria-based, enforced system for the creation, storage and dissemination of knowledge.

A basic classification numbering scheme was created and published by the Planning and Organization Directorate a year ago in a manual entitled “Correspondence Guidelines for the Customs Department for 2003”. While not as comprehensive as the U.S. Customs Service system, the booklet outlines a simplified classification scheme and documentation coding process for Jordan National Customs. The system provides basic codes to identify the sending and receiving office and the general topic of the correspondence, along with instructions on how to code documents when sending, receiving and filing them.

However, only section directors and the person responsible for each section’s correspondence received a copy of the manual. Most Customs employees interviewed were not aware of the classification guidelines booklet and don’t really understand the referencing system they see on documents, so it has been minimally implemented.

RECOMMENDATION: *Customs needs a standard, written issuance system for the creation, documentation, storage and dissemination of information within the organization. Customs also needs a good performance assessment system, similar to that in the United States and Australia, to ensure proper implementation and accountability of employees in applying the system.*

Jordan Customs Communications Baseline Assessment

As one employee noted, procedures set clear standards and criteria for the objective judgment of work. Not only do they prevent employees from doing whatever they want, but clear and simple procedures prevent corruption. An overburdened process forces people to seek shortcuts through corrupt means. A documented issuance system that defines the rules would be enforceable and punishable.

A. Creation of Documents

Despite the Guidelines described above, most Customs employees interviewed stated that there are no formal written guidelines for the creation of information. Instead, they note that instructions are learned from each other, verbally passed on to new employees. Every employee knows the standards for documents sent out from the department, but they are not written anywhere. Copies of old letters and documents serve as a form of templates for employees when creating a new document, thus there is some standardization, but this differs from section to section.

Some sections have developed forms to provide standardization of documentation. For example, the Intelligence Unit is working with the AMIR Program to create forms and decide whether to require hard copies or electronic copies as the standard. A section does not need approval for use of forms within an office or section, but forms related to cases and broader uses must be created by a committee. In an attempt to standardize the most common form, there are printed memo pads for department Internal Memos, but there is no indexing system for internal memos unless one leads to an official letter, and then it gets a reference number from Dewan.

- ? **Each directorate has its own system and forms for creating documents – they are not unified through Customs.**

With no official stated system, there are no penalties for creating, storing or indexing a document incorrectly so there is no accountability of Customs employees. Sometimes a typist types a letter of notification, prints the document for processing through the manual signature approval system, and deletes the electronic file, leaving no electronic document for archiving. Also, there are no instructions for what to do with documents when leaving a job, so an employee can walk out with all documentation or even simply throw it out. New employees are left to look through files on the bookcase to see what was left, and hope they find what they need for historical institutional knowledge.

There is a Customs procedures manual on institutional performance and criteria, written three years ago and recently updated, but it has not been officially adopted. The department developed new performance criteria, but the criteria indicators must now be put into application.

RECOMMENDATION: *Performance criteria should include standard operating procedures for information and document creation, as well as directives to use a central filing system on the Customs internal network for saving all documents in clearly named file folders to facilitate storage and retrieval.*

B. Classification of Documents

As described in the Information Flow section, the Dewan Correspondence Section acts as the central distribution and storage mechanism for the majority of Customs communications. Dewan currently employs a simple classification scheme for the documents it issues.

Proclamations and notifications receive serial numbers in sequential order beginning with the first issued in each new year. The indexing system also issues a number that identifies the directorate within Customs from where the document originated. One cannot tell from the numbering system what the document addresses, so Dewan also enters keywords, the name of the creator or author of the document, and a one-sentence summary. Documents are therefore searchable in the Dewan system by keyword and summary information in addition to the section, author and serial reference number.

There is no classification system for the sensitivity level of documents. Restricted or intelligence information is dealt with confidentially and communicated either verbally or in writing through letters delivered by hand in sealed envelopes.

For documents that do not pass through the Dewan system, it is left up to the originator whether and how to provide a reference number for the document. More often than not, the originating office just sends the document or memo on to the recipient with no tracking classification. Only about half of those interviewed for this report were familiar with the procedures manual that outlines the reference system Dewan uses to classify documents. As a result, there is little tracking of most internal documents. Many are not even saved; they are not shared, are not retrievable (for intelligence or other uses), and are often lost. As one official noted, it is difficult to transfer a classification and tracking system to an electronic version when the hard copy system is not strong.

Transit information is currently tracked through a manual signature approvals system. All signatures and transit history of approvals and notes are written directly in the margins on a document or memo as it progresses through the department clearance and dissemination process. To document this, paper copies are then scanned for electronic storage to show the physical signatures and notes written on them. Sometimes officials will even write on the back of the document, folding it over to show that there is something on the back side, but only the front of the document will be used in important cases to prevent fraud. This manual signature approvals system makes it difficult to track the transit of documents, and when scanned for archiving purposes they are not searchable.

C. Storage and Retrieval of Documents

The Central Archives within Dewan stores paper copies of all documents that flow through the Dewan system and Customs employees can request retrieval of these documents from Dewan. However, this manual process does not facilitate topical information searches, and employees note that sometimes Dewan cannot find a document. As the use of computers becomes more prevalent, Dewan also stores the

Jordan Customs Communications Baseline Assessment

electronic copies it has online, but the system is not accessible to customs employees, therefore there is no self-service for researching or accessing stored documents. Customs recently implemented a new policy of no longer issuing paper, so employees must now use the online intranet for internal communications. The switch to electronic documents will make it easier to search for documents in the future. An online archives library system is planned for 2004, which will also include the ability to track transit signatures (see comment on transit tracking in the Dissemination section below).

Archiving of information by department sections and individual employees is arbitrary. What is saved depends on the office director. There is no enforced standard filing structure to guide employees in storing official documents that do not move through the Dewan system, so each office creates its own system. Typically there are no stored copies of internal letters and memos within sections. For example, the Inspections Directorate and the Tariffs section each have their own record keeping system of documents and actions, but there is no standardized system. Some sections actually do employ the main guidelines in the manual issued by the Planning directorate.

The Legal Affairs Directorate stores all notifications, proclamations and legal opinions from 1997 to the present in a Legal Affairs central filing room, open for access to all Customs employees. Internal Legal Affairs memos are also kept in a section filing system. Documents are indexed by year and by topic, with a reference number, but the reference series is sequential like Dewan, with #1 starting the first document of the new year, thus there is no true classification system. One must look through all documents in a topic area to find something specific.

RECOMMENDATION: *A committee should compile the best practices already in use in Jordan and globally into the creation of a single Jordan Customs Issuance System. This system should be widely communicated through a strategic campaign to all Customs employees and clients. The Centers of Excellence team at Customs would be a logical choice for this task.*

VII. External Communications

TASK: Identify the current status of the networking capacity of Customs with other governmental stakeholders and identify impediments to effective two-way communications with other agencies.

TASK: Identify the capacity within Customs and provide priority recommendations to assist National Customs in marketing itself to other government agencies, international stakeholders and the private sector.

A. Communicating with Other Jordan Government Agencies

The Customs Department maintains close ties with all government stakeholders through regular meetings and direct contacts. However, better coordination is required to overcome the accumulated delays at the clearance and border offices. Customs communicates with other government agencies through the Ministry of Finance, unless the Ministry specifically delegates authority to the Director General of Customs. The agencies share information on regulations, valuations, training opportunities, and intelligence matters.

Through the King Abdullah Award preparations and the department's efforts in the Center of Excellence program, Jordan National Customs is learning to use tools to improve its correspondence and communications with other government agencies, such as the Ministries of Agriculture, Health, and Transportation. The department has designed a system for soliciting suggestions and complaints from the Customs community, to which they respond on a timely basis.

Under the Awards program, Customs created the Committee for the Improvement of Communications among government ministries and agencies, headed by a Counselor of H.E. King Abdullah. The Committee meets weekly or bi-weekly and is responsible for improving communications between the Customs Department and other agencies related to trade, to facilitate the government's ability to meet its national goals for trade-related economic growth. The AMIR Program sponsored two meetings of the Committee in January, at which they created a task force. During the next meeting they will draft a memo of mutual understanding between the government agencies involved to identify and formalize means of cooperation.

The department also needs to liaise with security forces on activities at border Customs Centers. Customs plans to sign an MOU with other security agencies to create a task force to develop strategy and direct decisions related to border security.

Since formal communications with other agencies are required to flow through the Ministry of Finance, it is important for the Customs Department to continue to find ways to share information and ideas at the working level with other government organizations, such as the KAA committee. The department should initiate working groups on areas of

Jordan Customs Communications Baseline Assessment

common interest between agencies to meet on a regular basis. Also, targeting mailing lists should be created and maintained for disseminating relevant Customs information to relevant employees at key agencies, rather than relying on the Official Gazette as the sole tool for informing other ministries of changes in Customs regulations.

B. Marketing Jordan National Customs

Several officials interviewed noted that the public image within the Kingdom of Jordan National Customs is weak. Visiting foreign delegations, high profile seizures and other noteworthy activities are not promoted sufficiently through media or television coverage. It is difficult to find videos, photos, brochures and other promotional material to use in presentations because there is no strategy to collect and document such information.

As a result, even the department's internal image has been negatively affected. One official noted with despair that while Customs officers work hard, he has seen officers take their patch off their uniform sleeve after work rather than wearing it home. The findings from an internal Customs knowledge management workshop held in September 2003 notes the need to improve the image of Customs and its employees, stating that a "certain part of the public might question the honesty and integrity of Customs officers...people need to be proud of working for Customs."

Over the years, there have been various directorates, sections, and individual advisors responsible for public relations for the department, depending on the organizational structure determined by the Director General. Yet as stated earlier in this report, there is no strategic approach to overall communications. The issue of public relations is not addressed in planning meetings where it should logically play a role, and there is no department-wide commitment to spend significant time or effort on improving the image of Customs. Even so, many officials realize the value and purpose of marketing the Customs Department, and have undertaken some important initiatives.

Jordan has endeavored to be a Customs trendsetter in the region. The Jordan delegate to the WCO is one of six vice chairmen in the world, giving the Kingdom major visibility with international trade organizations. Jordan National Customs is a regional model in its use of information technology, and its VSAT internal network is unique. Jordan's application of WTO definitions of value through its method of computing the valuation of goods, and the value database it maintains, is a regional best practice model. The Director General's office has received study tours from Egypt, Dubai, Syria, Lebanon, Tunisia, Kuwait and other countries. In 2001, Jordan National Customs won an award in Dubai for being the best Arab Government Administration.

On the national level, the department has two marketing successes that stand out. The first is the activity surrounding the Customs Department's nomination for the King Abdullah Award for quality in government service. The second is the establishment of the Partnership Council Committee with the private sector, which serves as the main point of contact with the business community.

Jordan Customs Communications Baseline Assessment

The King Abdullah Award nomination has placed Jordan National Customs in the spotlight with the Royal Palace and other government agencies. The department worked hard to swiftly implement many organizational improvements to qualify for the award, and it leveraged these efforts to improve its image through meetings, briefings, and a monthly newsletter that tracks the department's progress toward the award. It named 2003 as the Total Quality Management Year, which was reflected in the activities carried out in support of the nomination. To celebrate International Customs Day on June 26, Jordan National Customs will announce 2004 as the Knowledge Management Year.

The Partnership Council Committee was established three years ago as a direct outlet to let private sector stakeholders participate in the Customs process. The Council provides a forum for discussing issues and concerns related to Customs, and disseminating information to the business community. Customs often uses the Council to take the pulse of the trading community prior to major decisions. Meetings are attended by the Director General, various section heads and the directors of Customs Centers, as well as business representatives, brokers, investors, and the presidents of most unions, chambers of industry and business associations. One official estimates that 90 percent of the external Customs stakeholders are represented in the Partnership Council. Members include:

- ? Jordan Businessmen's Association
- ? Jordan Exporters Association
- ? Commerce Chambers Federation
- ? Clearing Agents Syndicate
- ? Auto Parts Traders Association
- ? Amman Chamber of Industry
- ? Irbid Chamber of Industry
- ? Zarqa Chamber of Industry
- ? Jordan Computer Association

Meetings are hosted on a rotating basis by member organizations. Participants receive notice one month in advance and are invited to submit agenda items. Issues include possible amendments on Customs laws, notification of proclamations related to or influencing the private sector, and any problems or cases that have relevance for entire business sectors. One business association president said he asks his members to submit topics for his representation, and sometimes a company will send a representative to the meeting to participate firsthand. Most problems are solved on the spot, or the Director General assigns follow-up to a section director. Minutes of the meeting are sent to all Council members, and there can be as many as 30 to 40 attendees at each meeting. The business association president feels it is one of the most efficient public-private models of cooperation in Jordan.

The Council has met 20 times during the past three years, and was often consulted before new regulations were issued. The Council was so successful in bridging the gap between the Customs Department and the private sector that the department has established similar councils at six major Customs Centers. The Airport Customs Center now holds monthly meetings with clearance agencies and trading company representatives. Customs

Jordan Customs Communications Baseline Assessment

recently held a series of regional meetings in Amman, and the Public Relations office conducted a media campaign to promote the meetings.

As Customs Centers become more involved with their stakeholders, their communications outreach is becoming more sophisticated. The Amman Customs Center worked with the Planning Directorate to develop a guidebook that outlines the procedures and regulations for companies doing business through the center. The guidebook serves as an example for other Customs Centers, and the Airport Customs Center is now creating a similar booklet detailing the import-export process at the airport. The Amman Customs Center is now developing a Web site solely for its facility. These activities all provide important avenues for positive communications with external stakeholders.

In other marketing activity, a Customs Gazette magazine is issued bi-monthly from the Planning Directorate to promote Customs activities to brokers, the trading community and the general public. Copies are sent to the business community and all government agencies. The Planning Directorate is also working on a film on Jordan National Customs, as well as on a book about the history of the department.

These activities are positive, but they should be reviewed in the context of a comprehensive communications strategy. The overriding goal of external communications activities should be to provide clear and complete information to external stakeholders to facilitate accurate understanding of regulations and the achievement by trading firms of informed compliance.

RECOMMENDATIONS:

These recommendations are for immediate consideration, in advance of the creation of a full Customs communications strategy and plan, which is the overall priority recommendation of this report.

Image of Customs

All Customs communications activities should reinforce the image of customs primarily as the facilitator of trade, not as a watchdog. The negative image that Customs currently maintains as an enforcer and fee collector must be transformed into a positive image of Customs as a guardian of public health and safety. Customs needs to enhance the positive aspects of its work. Custom Centers should also improve their physical image by cleaning up their facilities, both inside and in the truck shipment areas, and take steps to become more client-friendly by, for example, increasing parking areas.

Private Sector Outreach

Activities such as the Partnership Council meetings should be expanded and given greater promotion. In addition, Customs should consider creating a public-private committee to review the type and frequency of compliance problems and tariff dispute cases, to better understand the obstacles and misunderstandings between Customs and traders. This information could be used as the basis for training and the creation of information

Jordan Customs Communications Baseline Assessment

materials to address the gaps in private sector knowledge of Customs regulations and procedures.

Private Sector Newsletter

Currently, the minutes of the Partnership Council meetings are sent out to all attendees of the meetings. These minutes are a valuable source of information that should be expanded for greater dissemination. Rather than send them out as minutes, they should be used as the basis for a monthly newsletter that is disseminated to every Customs contact in the private sector stakeholder community. The newsletter should highlight the specific cases brought before the Council as case studies, focusing on the problems solved by Customs in each case and the lessons learned. This will leverage the value of the Council meetings to a greater audience. Unlike the Gazette, however, which is written for a very general audience, this newsletter would be targeted to the trading community with practical information.

Private Sector Roadshow

The Partnership Council success should be expanded by taking the Council on the road to Customs Centers outside of Amman, or to specific business trade organizations to meet with members. Currently, the Council includes representatives of these organizations, but it would be useful to offer a Council-like event to all members of each relevant organization, or to all traders at a remote border Customs Center.

Customs Hotline

The department should consider establishing a Customs Hotline to provide answers to specific inquiries from the trading community. The Hotline would be informative only, not a problem-solving mechanism, but providing personal assistance to businesses on understanding regulations specific to their shipments would ideally minimize problems at the Customs Centers.

Media outreach

Marketing of the Customs Department as far as seizures and enforcement actions are concerned must be significantly improved. The Public Relations office should be given full support and authority to develop relationship with key reporters and invite them regularly to attend mini-press conferences on major seizures and enforcement successes. The department should also consider filming seizures themselves to supply the footage to the media, as well as for their own documentary uses. In addition, a full media outreach plan should be developed to cultivate full-length news stories on the actions and benefits of the Customs Department. Sample story topics taken from real news articles in the U.S. media are provided in Appendix V.

Web site Promotion

While the Web site URL has been widely displayed, there has been no real campaign to promote the content and use of the Web site. The individual Customs Centers are currently responsible for spreading information about the site to clients. A full promotion campaign should be developed, with booklets that explain the value and content of the site, and presentations for business association members.

Customs Video

Jordan National Customs should consider developing a short video on the role and benefits of the Customs Department. The video could highlight business executives from trading firms discussing the value of their cooperation with Customs in facilitating their trading activities. Companies could request copies of the film on VCD to air to their employees, to educate them on the Customs Department. The film could also be shown on the monitors in the main halls of the Customs Centers. Note: The U.S. Customs Service has produced a similar video titled “America’s Frontline” as a 30-minute news program about the Customs and Border Protection (CBP) for employees. The main purpose of America's Frontline is to inform employees of programs and initiatives taking place throughout CBP.

VIII. Intelligence Collection

TASK: Identify the capacity of Customs for the gathering of intelligence information for submission to the newly created Intelligence Unit, and the dissemination of Intelligence Unit work products for effective risk management.

Intelligence work, by its very nature, requires information as the core input. At Jordan National Customs, the absence of a customs issuance system, document tracking capability, and clear requirements for the creation and storage of information all combine to make it very difficult for Customs Department officials to gather sufficient information from internal sources to fulfill its mission.

- ? The capacity of the Intelligence Unit to perform its mission is seriously hampered by the absence of a clear customs issuance system.**

The type of document likely to be useful to the Intelligence Unit is not an announcement issued through the Dewan system, which at least uses a basic classification scheme. Instead, intelligence investigations require the ability to search through internal memos and one-on-one communications between customs officers and brokers. As noted earlier in this report, these communications are neither created nor stored in any standardized manner. As a result, there is no paper trail for the intelligence unit to track and it is almost impossible to retrieve internal documents that are not shared within the organization, may not even be saved, and often are simply lost.

When the Intelligence Unit starts a corruption investigation, they have no way to start looking at past documents. There are no standard information sources to check in each case because documentation storage is not standardized across the department. They can only begin to watch a suspect and hope to discover evidence. For example, in one bribery case in court, intelligence officials referred to the dates of some letters and actions they uncovered, but they had no systematic evidence.

There are instances when the Intelligence Unit has sorted through cartons of documents that other offices throw out and found much information it could have used earlier in cases. Documents revealed names that appeared frequently in suspect cases, but the information was not readily available or searchable earlier when it was needed for prosecution.

Jordan National Customs seeks to cooperate with other Customs Administrations in international cases when requested. However, Jordan is only able to supply on average about 30 percent of the information they are asked for from other countries. The requested information should be standardized within the typical Customs administration, but in Jordan there are often no such records.

Jordan Customs Communications Baseline Assessment

Customs recently implemented a new policy of no longer issuing paper, requiring employees to use electronic means of creating and storing internal communications. An online archives library system is planned for 2004, which will also include the ability to track transit signatures. The switch to electronic documents will make it easier to search for documents in the future, but it is difficult to transfer a classification and tracking system to an electronic version when the hard copy system is not strong.

On a logistical level, the small staff size of the new Intelligence Unit limits the number of cases the Unit can work on at any time, particularly when each case is so labor intensive due to scarce electronic resources. The Unit is creating an intelligence database, but at present it is not relational to the new ASYCUDA system. There is no disposal system either, no burn bags or shredders, but in the absence of “classified” documents this is not an obvious issue now; it will be a problem once the Unit begins disseminating intelligence products throughout the organization.

IX. Follow-On Consultant Work Plan

TASK: Prepare a work plan for a follow-up consultancy prioritizing from a best return on investment, capacity building technical assistance in the development of internal and external communications for Customs.

As the Goals and Outcomes section of this report details, the overall mission of Jordan National Customs is to facilitate the flow of trade across Jordan's borders. The effective implementation of this requires open access to information and a thorough understanding of regulations by both Customs employees and the private sector trading community. It also requires an orderly and comprehensive system for the creation, storage, analysis, dissemination and sharing of information within the Customs Department to support both knowledge management and internal quality control and enforcement efforts.

Based on this assessment and the findings in this report, this consultant recommends two separate follow-on consultancies:

1. **Issuance System / Knowledge Management Expert** – lead the creation of a Customs Issuance System
2. **Communications Specialist** – assist in the development of a communications strategy that fully addresses the need to educate and train both Customs employees and private sector stakeholders on compliance regulations

The success of both consultancies, as well as the successful implementation of their work, requires the full commitment and support of the Director General of Jordan National Customs as well as the Minister of Finance.

A. Customs Issuance System

The priority consultancy is the issuance system expert. Without a proper Customs issuance system, Jordan National Customs is literally a sieve with information falling through the cracks on a daily basis. Until a comprehensive issuance system is fully developed and implemented, valuable institutional knowledge will be lost, documentation will be inconsistent, and the lack of an electronic “paper trail” will preclude internal compliance and enforcement efforts.

This consultant will perform the following tasks:

- ? Assist in the selection of a working committee from various Customs directorates; ideally the existing COE team would adopt the role of this committee
- ? Assist in the development of a work plan and timeline for the committee, including:
 - i. Review and understand elements of a Customs issuance system, using the U.S. Customs Service and other organizations as a model
 - ii. Review existing Correspondence Guidelines manual produced by the Planning and Organization Directorate
 - iii. Review the systems currently used within various directorates, including the Tariff Section, Legal Affairs Directorate, and Intelligence Unit
 - iv. Develop a comprehensive classification scheme
 - v. Develop guidelines for the creation of documents
 - vi. Develop guidelines for the dissemination of documents
 - vii. Develop a department central filing system and guidelines for the storage of documents
 - viii. Develop performance indicators to ensure employee responsibility for correct implementation of the Customs Issuance System
- ? Assist in the presentation of the system to upper management
- ? Assist in upper management understanding and review of the system
- ? Develop a plan for implementation, including extensive documentation and employee training

B. Communications Strategy

This consultant would expand on the findings of this report to assist the department in developing a comprehensive communications strategy that effectively ensures complete and ongoing access to the latest information on Customs regulations for both Customs officers and external private sector stakeholders including traders and brokers. The strategy should address:

General

- ? Creation of a central Communications Directorate
- ? Detailed internal and external communications goals of the department

Jordan Customs Communications Baseline Assessment

- ? Timeline and budget for activities
- ? Responsibilities of other Directorates to coordinate with Communications Directorate

Internal Communications

- ? Assessment of current information sources on Customs regulations available to Customs employees, including:
 - i. Customs Department intranet
 - ii. Dewan central files
 - iii. Internal publications and/or manuals
- ? Plan for the creation of information sources and materials moving forward
- ? Plan for timely updating of information sources and materials
- ? Plan for training Customs employees on proper application of regulations to their work
- ? Feedback mechanisms to capture questions and comments from employees for sharing with other Customs employees

External Communications

- ? Assessment of current information sources on Customs operations and regulations available to external stakeholders, including:
 - i. Customs Department Web site
 - ii. External publications and/or manuals
 - iii. Events and activities (i.e. Partnership Council Committee)
- ? Plan for the creation of information sources and materials moving forward
- ? Plan for timely updating of information sources and materials
- ? Outreach plan for training business community on proper documentation and application of regulations to their shipments
- ? Activities to develop and maintain positive working relationships with private sector stakeholders
- ? Feedback mechanisms to capture questions and complaints of trading community for ongoing improvement of Customs service
- ? Media outreach plan

Appendix I: People Interviewed During the Consultancy

1. Walter Hekala, Manager, Customs Reform & Modernization Subcomponent, Private Sector Policy Initiative (PSPI), AMIR Program
2. Andrew Ford, IT Consultant, PSPI, AMIR Program
3. Jamal Olaimat, Customs Specialist, Customs Reform & Modernization Subcomponent, PSPI, AMIR Program
4. Marwan Gharaibeh, Director of Planning and Organization, Jordan National Customs
5. Mohammad Obeidat, Head of International Cooperation Section, Jordan National Customs
6. Tayseer Shboul, Director, Intelligence Unit, Jordan National Customs
7. Somaya Al-Wahoush, Information Technology Director, Jordan National Customs
8. Head, Legal Affairs, Jordan National Customs
9. Emad Arslan, Head of Tariff Section, Jordan National Customs
10. Mahmoud Wafa, Director, Office of the Regional Representative of WCO for North Africa, Near and Middle East Region, Jordan National Customs
11. Khalid Rababa, Assistant to the Director General for Public Relations, Jordan National Customs
12. Director, Correspondence Section (Dewan), Jordan National Customs
13. Deputy Director, Correspondence Section (Dewan), Jordan National Customs
14. Ahmad El-Faouri, Director, Amman Customs Warehouse
15. Khaldoon, IT Director, Amman Customs Warehouse
16. Customs Inspector, Amman Customs Warehouse
17. Case Officer, Amman Customs Warehouse
18. Director, Queen Alia Airport Customs Center
19. Damen Fawwaz, Customs Assistant Manager, Queen Alia Airport Customs Center
20. Halim Abu Rahmeh, Managing Director, Jordan Exporters Association

Appendix II: List of Publications Read During this Consultancy

1. Jordan National Customs Department Strategic Plan: 2004-2006
2. Correspondence Guidelines for the Customs Department for 2003, Planning and Organization Directorate and Administration Directorate, Jordan National Customs
3. U.S. Customs Service Strategic Plan, Fiscal Years 2000-2005
4. Development and Integration of Customs Reform and Modernization within Jordan 2002, Final Report, February 2003. Prepared for AMIR Program by Glenn Wood.
5. Development of Border Risk Management, Intelligence & Risk Management Capabilities, Final Report, January 2003. Prepared for AMIR Program by John Knott, John Howard and Michael Krstic.
6. Border Risk Management, Final Report, October 2003. Prepared for AMIR program by John Howard.
7. Jordan Customs – IT Governance, Strategic Planning, Intelligence, Risk Management and Competence-Based Human Resources Tracking System, Draft Report, November 2003. Prepared for AMIR Program by Andrew Ford and Lubomir Dvorsky.
8. Intelligence and Information Management in Jordan Customs: Intelligence Modeling, Draft Report, December 2003. Prepared for AMIR Program by Michael Krstic.
9. Development and Integration of Customs Reform and Modernisation within Jordan 2002, Revised Final Report, March 2003. Prepared for AMIR Program by Glenn Wood.
10. Knowledge Management Workshops in Amman – Findings, September 2003. Prepared for AMIR Program by Lubomir Dvorsky.

Appendix III: Handout -- Jordan Customs Department Information Flow Assessment

Goals:

1. To assess and document the current process of information creation, storage, analysis, dissemination and sharing within the Customs Department.
2. To assess and document the current process of sharing new compliance information and collecting intelligence from external stakeholders.
3. To assess the current efforts to market the successes and benefits of Customs Department activities to external stakeholders and the general public.

Interview Questions:

Path of New Information – Internal

- ? Is there an established internal communications strategy for the Dept?
- ? What type of information is/needs to be communicated to employees?
- ? Who issues new directives?
- ? What is the frequency/volume of new directives?
- ? What is the information flow, both downward and upstream? (Chart it)
 - o Specifically, how is intelligence gathered?
- ? How do you ensure uniformity of new information dissemination?
- ? Is there ever conflicting correspondence? How is it handled?
- ? What means are used to disseminate info?
 - o Electronic – how many employees have email? Use software? Use a computer?
 - o Fax – how displayed and stored?
 - o Paper – how displayed and stored?
 - o Spoken word – how documented?
- ? How are communications delegated – who has authority to issue changes throughout the organization?
- ? Who can employees check with to confirm new info? How are employees informed who it is?
- ? How do you ensure that changes are implemented and new regulations followed?
- ? Are there penalties for employees who do not implement changes correctly/right away?
- ? Is training available for employees on how to implement new directives? Other information resources?
- ? Is there a “sign and understand” policy for critical changes that requires employees to sign an affidavit that they understand and will implement changes?

Jordan Customs Communications Baseline Assessment

Customs Intranet

- ? What are the actions available on the intranet?
- ? How many users per day/month logged in?
- ? Who were greatest users (frequency) by department?
- ? What % of paperwork now conducted paperless on intranet? Are there short term goals for usage?

Path of New Information – External

- ? Is there an established external communications strategy for the Dept?
- ? What type of information is/needs to be communicated to external stakeholders?
- ? Who issues new regulations/compliance information to:
 - o Import-export private firms
 - o Other Government of Jordan agencies
 - o Other country Customs organizations and international stakeholders
- ? What is the frequency/volume of new regulations/compliance information?
- ? What is the information flow, both downward and upstream? (Chart it)
- ? How closely does the Dept. network with other Govt. stakeholders? What, if any, are the impediments?
- ? What means are used to disseminate info?
 - o Electronic
 - o Fax
 - o Paper
 - o Spoken word
- ? How do you ensure uniformity of new information dissemination?
- ? Who can external stakeholders check with to confirm new info? How are they informed who it is?
- ? Is training available for businesses on how to comply with new regulations? Other information resources?
- ? Is there a “notice and comment” system in place to inform external stakeholders of impending changes, and invite their comment and feedback?

Customs Issuance System

- ? An issuance system provides specific guidelines to all employees on how to write, issue and record all correspondence and documentation within the Dept.
- ? Is there a Customs issuance system for documentation? Is it codified? Where?
 - o Online
 - o On computer disk
 - o In one complete document
 - o In several individual documents

Jordan Customs Communications Baseline Assessment

Marketing Customs

- ? Is there an established marketing strategy for the Dept?
- ? How does Customs market itself as an organization?
 - o Seizures and enforcement actions
 - o Budget needs
- ? Who are the targets for external marketing? i.e., other government agencies, private sector, general public
- ? Do Customs officials understand the value/purpose of marketing Customs, and their role in this process?
- ? What are Customs' budget sources? Is there an established outreach program to budget sources? Are people assigned within Customs to track budget changes and communicate accomplishments/needs to the budget sources?
- ? Are members of Parliament in the border districts informed of successes to protect their border areas? Are they enlisted as advocates for a strong Customs budget?

Appendix IV: Handout-- Customs Issuance System Overview

The purpose of a Customs issuance system (CIS) is to communicate policies, procedures, information, instructions, and guidelines relating to the organization and internal management of the Customs Department and to the officers and employees who need them in the performance of their work.

Scope of the CIS

The Customs Issuance System covers all policies and procedures issued by the Customs Department for internal management purposes that affect major organizational elements or groups of employees. The CIS also covers informational material with widespread interest. The CIS does **not** cover policies, procedures or informational material that is directed to the public.

Structure of the CIS

The CIS is composed of two basic components:

- ? Policies and Procedures Manual (P&PM) – contains most of Customs’ internal operating instructions
- ? Other series of Issuances – these complement the manual

The P&PM is divided into five Parts that correspond to the major functional activities of the Customs Department:

- ? Part I – Management
- ? Part II – Staff
- ? Part III – Operations
- ? Part IV – Enforcement
- ? Part V – Administration

Each part of the P&PM is subdivided into Chapters, Subchapters, and Sections for the purpose of grouping related functional materials. A list of these functions by subject classification is provided in an appendix of the P&PM.

The P&PM embraces several issuance series that contain the permanent policies and procedures of Customs. In addition to the P&PM are other series of issuances that serve special purposes.

Issuance Series

The CIS comprises the following series of issuances:

a. Policies and Procedures Manual (P&PM)

- 1) Policy Statements
- 2) Customs Directives
- 3) Handbooks
- 4) Temporary Directives
- 5) Regional and District Issuances

b. Other Issuances

- 1) Legal Determinations
- 2) Copyrights, Trademarks and Patents
- 3) Information Notices
- 4) Change Documents

Policy Statements

Policy Statements contains the fundamental principles and objectives of the Customs Service and are prescribed by the Commissioner and the Regional Commissioners. Regional Commissioners issue policy statements that affect their areas of responsibility only.

Policy statements remain in effect until rescinded or superseded. Policy statements are numbered first according to the part, chapter, subchapter, or section of the P&PM to which they pertain, and second by serial sequence. For example: 2100-06 means the sixth Policy statement on topic 2100-Management Support. Customs Headquarters Policy Statements are printed on light blue paper and are filed in a separate binder entitled “Policies of the Customs Department” in numerical order.

Customs Directives

The majority of the P&PM is Customs Directives. They contain the permanent procedures, instructions, and guidelines required for Customs operations. Other issuances serve to supplement or complement Customs Directives.

Directives remain in effect until they are rescinded or superseded, and are printed on white paper and shall be filed in the P&PM binders. They are numbered by the part, chapter, subchapter, or section to which they pertain and then by serial sequence. Customs Directives issued by Customs Headquarters shall be signed at the Assistant Commissioner level or higher. Directives that establish new

Jordan Customs Communications Baseline Assessment

programs or major procedures or cut across major organizational lines should be prepared for the Commissioner's signature.

Handbooks

Handbooks, as a separate series of issuances, are issued in the following instances:

- 1) When specialized or detailed instructions are needed for a particular group of employees;
- 2) When it is desirable to provide suggested guidelines or techniques to assist special groups or employees in dealing with problems encountered in their work; or
- 3) When the nature of the instructions or guidelines is such that a specialized format different from Customs Directives is desirable.

Handbooks remain in effect until rescinded or superseded. Handbooks are numbered first according to the chapter, part, subchapter, or section in the P&PM to which they pertain, and second by serial sequence. Handbooks issued by Customs Headquarters shall be governed by the same signing instructions as Customs Directives.

Temporary Directives

Temporary directives are used for the following reasons:

- 1) To publish instructions or procedures of a temporary nature, or
- 2) When it is desirable to provide for a trial period for testing the practicality and effectiveness of new procedures.

A temporary directive remains in effect until its expiration date, which shall be no more than one year from its issue date. Temporary directives are numbered first by part, chapter, subchapter, or section to which they pertain, and secondly by serial sequence. Temporary directives are printed on white paper and are filed the same as Customs directives, in the P&PM. Temporary directives issued by Customs Headquarters shall be governed by the same signing instructions as Customs directives.

Note: Other issuances have similar instructions.

Preparation and Publication

Originating Office

- 1) Select the type of issuance required: Policy statement, Customs directive, Information notice, etc.

Jordan Customs Communications Baseline Assessment

- 2) Determine the subject classification assign the appropriate number.
- 3) Prepare the issuance in the proper format, to include:
 - a. Proper series of paper
 - b. Subject classification number
 - c. Originating office symbol
 - d. Distribution
 - e. Purpose
 - f. Background information (when appropriate)
 - g. Action (procedural material)
 - h. Responsibilities (who is responsible for the management and execution of the policy or procedure)
 - i. Filing instructions
 - j. Superseded or rescinded material
 - k. Attachments (when appropriate)
 - l. Signature block
 - m. Control copy on yellow tissue
- 4) Determine what clearances need to be made.
- 5) Route the completed package to reviewers and the Paperwork Management Office

Reviewers

Signify approval by initialing the appropriate block on the control slip. Signify disagreement or comment by attaching comments to the package.

Paperwork Management Staff

- 1) Review all documents prior to signature for compliance with prescribed policies and procedures. If necessary, return documents to originating office for corrections.
- 2) Keep a record of proposed issuances.
- 3) Route to signing official.
- 4) After Signature, date the issuance and control copies, and assign appropriate control number; enter this information in the appropriate logs.
- 5) Prepare Customs Form for Printing and Distribution Service Request, and request that Office of Data Systems provide the Printing and Distribution Branch with appropriate mailing labels for each issuance.
- 6) Return the control copy and case file to the originator.

Note: There are separate instructions for the Printing and Distribution Branch. A Distribution System is also detailed, with responsibilities assigned for filing and maintenance of master files, working files, reference files, and records disposal.

Subject Classification Scheme

The Subject Classification Scheme is a compilation and codification of functional subject matter that lists main functional activities in the Customs Department. It provides a standard system for arranging material within the P&PM and enables the user to easily locate material on a specific subject. The Scheme is assigned a numbering system that facilitates filing, retrieval, indexing, and referencing.

Appendix V: Customs News Coverage Examples



Gut Reaction

A Customs Officer's Instinct Paid Off

By Linton Weeks
Washington Post Staff Writer
Tuesday, February 3, 2004; Page C01

Jose E. Melendez-Perez, the customs and border protection officer at the Orlando airport who blocked an al Qaeda operative from coming into this country, knows that eerie feeling.

You can call it intuition. A premonition. A hunch. It's the tingly, back-of-the-neck hair-raising sensation that something is not quite copacetic. You've felt it, haven't you?

Melendez-Perez became an overnight Department of Homeland Security hero when he testified before the National Commission on Terrorist Attacks Upon the United States last week. He told the commission about the events of that August 2001 day -- just a month before the Sept. 11 attack -- when he encountered Mohamed al Qahtani, who officials say may have been planning to participate in a terrorist attack.

When al Qahtani "looked at me," Melendez-Perez, 58, testified, "I felt bone-chilling cold effect -- the bottom line, he gave me the chills."

In a telephone interview yesterday, Melendez-Perez said, "When I first saw the individual, he just gave me something like a challenging type of look. When I called him into the secondary room, with his body language, I have never seen anyone with that kind of attitude."

Impeccably dressed in a long-sleeve shirt and black trousers, al Qahtani had the bearing of a military man, Melendez-Perez said. "He kept staring into my eyes and pointing his finger."

The immigration official knew something was wrong. He testified that a co-worker warned him against refusing entrance to a citizen of Saudi Arabia. "My answer was, 'You know, I have to do my job and I cannot use nationality as a guidance how to do or conduct my interview or take care of my business,' " Melendez-Perez said.

Customs officers receive months of training, which includes tips on how to watch the behavior and body language of incoming travelers for signs of potential trouble. "Some officers are better at it than others," says Bill Anthony, a U.S. Customs and Border Protection spokesman. Melendez-Perez, he adds, is obviously super-astute.

Jordan Customs Communications Baseline Assessment

U.S. officials are still trying to sort out whether al Qahtani was involved in any way in plans for the Sept. 11 attacks. According to the 9/11 commission, "evidence strongly suggests" that Mohamed Atta, believed to be the leader of the hijackers, was waiting at the airport for al Qahtani.

Melendez-Perez had a sixth sense about al Qahtani. A Saudi national who had flown in on a Virgin Atlantic flight from London, al Qahtani told one customs officer that he did not speak English. He was taken to another room where he met with the secondary inspection officer on duty that day -- Melendez-Perez.

Melendez-Perez testified that al Qahtani's papers seemed to be genuine. But his story made no sense. He was traveling on a one-way ticket. He said he was vacationing in the United States for six days, but he was going to be spending half that time waiting for a friend, who perhaps was going to provide him with a return ticket. He did not seem to have sufficient funds to stay in the country for six days and then return home.

Melendez-Perez passed all the information on to his supervisor. Al Qahtani was put on a plane to return to Dubai. He later was taken prisoner in Afghanistan or Pakistan, officials have said, and is now detained at the U.S. naval prison at Guantanamo Bay, Cuba.

"You would have to be present to understand what I'm trying to explain," Melendez-Perez told the commission.

At his job for a dozen years, Melendez-Perez has dealt with all kinds of people from around the globe. The Orlando airport is, after all, the gateway to Disney World. Melendez-Perez said he has turned people away before, but he has never had such a strong feeling about someone.

That feeling in one's bones, according to Ronald Rensink, can be mapped.

An associate professor in psychology and computer science at the University of British Columbia, Rensink calls visual sensing without seeing "mindsight." He discovered the phenomenon when he was testing how quickly people can detect a visual change.

In the experiment, he showed participants a picture of something, such as an airplane, and then showed them the same picture a few seconds later, sometimes with one object slightly altered, such as one of the jet engines missing. He flickered the photos back and forth, placing a gray field between them for a moment or two each time. When some participants asked if they should signal when they felt there was a change or should they wait until they actually *saw* the change, Rensink realized he was on to something.

About one-third of those tested were really adept at sensing -- even before seeing -- that the photo had changed, he said.

It is not some sort of supernatural sensory perception, Rensink is quick to point out. "It is completely natural."

Jordan Customs Communications Baseline Assessment

And do personal experiences and prejudices play into our hunches? Yes and no, Rensink says. Personal experience plays a role. But we also receive cues "that we would not consciously see."

He speaks of the "zombie within," the unconscious systems -- respiratory, muscular, neural -- that allow you to drive for 30 minutes without being fully aware that so much time has passed. The zombie "has got its own learning system going on."

If something anomalous occurs, you can sometimes sense it before you actually see it.

In that way, customs and border protection agents can observe lots of people filing by and then zero in on someone who looks off-kilter.

It's a gut feeling.

Everyone has the ability to sense something without seeing it, says Edward J. Green, who teaches psychology at the University of Tennessee at Chattanooga. Green has written about and researched extensively what he calls the anomalous experience. People like Melendez-Perez who sense that something is wrong and go with their instinct, he says, "are more open to it than others."

Green says many of the people who have the ability to sense something outside of the ordinary don't believe they have it. "And if you don't believe you have it," he adds, "it won't happen."

© 2004 The Washington Post Company



Huge caches of drugs, cash seized at borders last year

By Jerry Seper

THE WASHINGTON TIMES

Published January 18, 2004

More than 2.2 million pounds of illicit drugs worth \$11 billion were seized last year by U.S. Customs and Border Protection officers, who also confiscated \$52 million in cash at the nation's seaports and land borders, CBP Commissioner Robert C. Bonner said yesterday.

"As our nation's first line of defense against the terrorist threat, CBP is addressing its greatest priority mission, keeping terrorists and terrorist weapons out of our country," Mr. Bonner said. "However, the traditional missions ... continue and are an important part of what we do, day in and day out, to secure America's borders and protect Americans from harm.

"There is no doubt that illegal drug trafficking is a serious threat to our country's security, and we are committed to do everything possible to disrupt this dangerous criminal enterprise," he said.

Mr. Bonner said CBP officers processed more than 401 million people last year, along with 109 million cars and 20 million commercial trucks and cargo containers -- all subjected to increased questioning and inspection.

According to records, the officers made 17,716 marijuana seizures for 2.1 million pounds; 2,255 cocaine seizures for 90,305 pounds; 772 heroin seizures for 3,875 pounds; and 375 methamphetamine seizures for 3,134 pounds. There also were 1,337 currency seizures, totaling \$52 million.

Mr. Bonner said that while it is not a crime to carry more than \$10,000, it is a federal offense not to declare currency or monetary instruments totaling \$10,000 or more to a CBP inspector upon entry or exit from the United States. Failure to do so, he said, can result in seizure of the currency or arrest.

Some of last year's record seizures, according to the records:

- The Bridge of the Americas in El Paso, Texas. Inspectors seized 10,101 pounds of marijuana worth \$10 million hidden in a truck hauling artificial Christmas trees.

Jordan Customs Communications Baseline Assessment

- Laredo, Texas, port of entry. Inspectors and canine enforcement officers seized the largest marijuana load in the history of the port, a total of 9,331 pounds valued at \$9.3 million discovered in a truck hauling a shipment of glass.

- A south Texas checkpoint. Border Patrol agents discovered 4,520 pounds of marijuana worth \$3.6 million and 360 pounds of cocaine worth \$11 million hidden in a truck filled with sand.

- Sumas, Wash., port of entry. Inspectors seized 1,435 pounds of marijuana, worth \$3.5 million, from a double tractor-trailer.

CBP, an agency within the Department of Homeland Security, also collected \$24.7 billion in duties and importation fees during 2003 at the nation's seaports and border crossings, nearly \$1 billion more than 2002's total of \$23.8 billion.

As a source of revenue for the federal government, CBP ranks second only to the Internal Revenue Service.

Mr. Bonner said the value of imports to the United States during 2003 was \$1.2 trillion, an increase over 2002's \$1.1 trillion total.

He also said the total volume of international traffic processed by CBP for 2003 was 11.1 million truck containers with a value of \$3.5 billion, 2.4 million rail containers worth \$10.8 billion, and 9 million sea containers with a value of \$344 billion.

Import data also showed that Canada was the top trading partner of the United States with 15 percent of the total value of imports during 2003. China was second with 11.5 percent, and Mexico third with 10.6 percent, he said.

Copyright © 2004 News World Communications, Inc. All rights reserved.

Today's Trucking

FDA and CBP announce transitional compliance policy on food imports

WASHINGTON, (Dec. 17, 2003) -- The U.S. Food and Drug Administration (FDA) and the U.S. Bureau of Customs and Border Protection (CBP) has issued a compliance policy guide for enforcing and achieving compliance with the requirements of the interim final rule for submitting prior notice for food imported or offered for import into the United States.

The policy guide deals with the enforcement of the Bioterrorism Act's requirement, which became effective on December 12, 2003, that FDA receive a prior notification (two hours for trucks) of all human and animal food from any company that holds, handles or packs food en route to the U.S.

Last week Today's Trucking reported a last minute change by the agency concerning the registration part of the rule.

While carriers hauling food cargo between two points will still have to register their terminals with the FDA, they are now excused from registering equipment like trucks and trailers. However, companies that process or sort food en route, such as some logistics or LTL operations, must still register their equipment.

The FDA also reiterated its plan to delay enforcement of the pre-note rule until March 12, using the time to remind and educate carriers and shippers of the rule's specifics, and to allow companies to become familiar with new electronic line release systems needed to comply with the regulation.

U.S. Customs' own pre-note policy takes effect on Jan. 5, 2004.

Jordan Customs Communications Baseline Assessment

The policy guides can be read at:

<http://www.fda.gov/bbs/topics/NEWS/2003/NEW00995.html>

<http://www.cfsan.fda.gov/~pn/cpgpn.html>

© 2004 New Communications Group.
All Rights Reserved.



No baloney: Some Mexican foods illegal in U.S.

GABRIELA RICO

As far as officers at U.S. ports of entry are concerned, bologna from Mexico has a unique spelling: i-l-l-e-g-a-l.

Yesterday, Customs and Border Protection officers at the Paso del Norte port of entry in El Paso, Texas, seized 756 pounds of smuggled bologna packaged in 81 rolls.

With the upcoming holiday season, officers are hoping this incident will remind travelers that they must check before bringing food into the United States.

"It got a lot of chuckles, but it is a serious subject," said Roger Maier, spokesman for Customs and Border Protection. "There are consumption and safety issues."

Swine-related diseases in Mexico include hog cholera and classic swine fever, he said.

"The upcoming holiday season has historically been a time when many individuals attempt to smuggle prohibited food items from Mexico to family and friends in the United States," Maier said. "Other smugglers are driven by the profit motive."

The bologna rolls, which cost about \$7 in Mexico, can net \$21 in Arizona and up to \$60 the farther north they get, he said.

The bologna-smuggling suspect, driving a Chevrolet S-10 extended-cab pickup truck, had removed the back seat in order to "stack the bologna rolls like firewood," Maier said.

The unidentified driver, from Juarez, Mexico, faces civil penalties of at least \$1,000 and lost his border crossing card, Maier said.

A list of food items that may not be imported is available at any U.S. port of entry, Maier said.