

# Frequently Asked Questions (FAQ)

## Introduction

This FAQ document was created from questions posed to the Agricultural Risk Management (ARM) Program Support team, the APHIS Core Message Set team, and the Offshore Greenhouse Certification Program (OGCP) team. Questions were placed into this FAQ document for all PIS staff to receive answers to compiled questions. This document will be revisited and updated as needed.

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## PIS Operational Questions

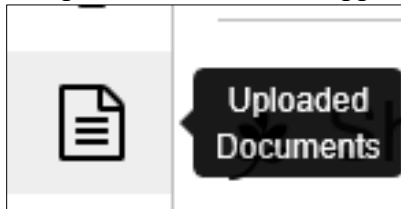
1. How do we proceed with an inspection if a broker opts out of electronic filing?
  - a. PIS staff should continue to follow the procedures currently used at their locations if a broker opts out of electronic filing.
2. Will we know the Customs Entry Number (CEN) beforehand?
  - a. Because ARM auto-create records, trade must provide the PIS staff with the Customs Entry Number beforehand to find a record in ARM.
3. Will there be additional ARM training before the core message set implementation date (January 25, 2021)?
  - a. At this time, there is no additional ARM webinars planned. For PIS staff who missed the webinars or those in need of a refresher on how to create an ARM record using a Customs Entry Number when entries are filed with the APHIS core message set, the webinar was recorded. The recording is available in the ARM help section under the webinars heading.
  - b. The ARM user guide is also available in the ARM help section on how to load the APHIS core message set.

4. Do we print out the ARM record to bring with us to the inspection? Paperless doesn't seem like an option for PIS operations. How are PIS operations going paperless, if we still need paper documents to do the data entry?
  - a. Most shipments are already paperless as the documents are usually sent by emails from brokers ahead of arriving shipments for us to begin our pre-inspection work. If the broker/importer files electronically and uploads the same "document package" using Document Imaging System (DIS), ARM will have those same documents attached which can be retrieved when the new ARM record is created using the Customs Entry Number.
  - b. The APHIS core message set which is used to create ARM records electronically does not mean a paperless operation must be in place. A locally made decision to print out an ARM record or (other documentation) to assist with an inspection still allows the entry process to remain paperless for the filer.
5. Who places the hold(s), i.e. 2H hold? Who will authorize in-bond movement to the PIS? Who will notify the airlines that the shipment can proceed to the PIS?
  - a. CBP places 2H holds and 2I releases and currently authorizes in-bond movement and allows movement of cargo from airline warehouses.
  - b. The Entry Status messaging will send Hold Intact and other messages to the filers when they submit an entry for a propagative material.
6. Do we deny inspections if a shipment is not filed using APHIS core message set?
  - a. Although using APHIS Core Message set when filing an electronic entry in Automated Commercial Environment (ACE) will be required starting January 2021, brokers can opt out of filing shipments electronically and instead make a paper entry.
  - b. Opting out means trade does not have to file the APHIS core message set. A broker or importer who wishes not to file their entry electronically may instead present the necessary shipment documentation as per normal (traditional) means as they do so today.
7. Do we release the shipment if the data entered is incomplete or incorrect?
  - a. No, if the data entry is not correct or incomplete, then reaching out to trade and brokers to correct the entry before the message set is loaded and an ARM record created is recommended.
  - b. The shipment can only be released once it has cleared the data entry verification and inspection process of PIS clearance.
8. Will the brokers be able to see any red asterisks (\*) that are seen in ARM, and then make adjustments?
  - a. The brokers do not have access to ARM or use ARM for filing APHIS core message set, so they will not see the red asterisks. Brokers use Automated Broker Interface (ABI) to file entries, but they will get a message anytime they submit an entry with errors or invalid data.
  - b. If you need to load an entry, it is a best practice to review the entry for errors prior to

- creating an ARM record and if any errors are noticed, contact the broker, and ask them to correct the identified errors.
- c. After loading the entry, if errors are found ARM users will need to correct the errors.
  - d. Remember, brokers may also be new to this requirement and may have some data entry issues to work out on their end. We expect PIS employees to use their excellent communication skills and established relationships with their brokers during this transition period to help them adjust to the new data requirements.

## Documentation Questions

9. When documents are submitted with entries via Document Imaging System (DIS), does ARM retrieve them as one large document or individual documents?
- a. It will depend on how each filer categorizes each document using the rules and instructions available to them for sending to us via DIS. ARM will receive the documents, accordingly, for ARM users to access them.
  - b. When documents are filed after an entry has been loaded in ARM, the documents for the specific ARM record appears in the uploaded document section in ARM.



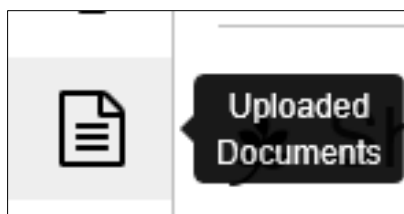
10. Will PIS's continue to get the original paperwork from CBP?
- a. Original paperwork may continue to be presented with shipments and will continue through most of this year (2020) until trade becomes more familiar with the core message set filing requirements and utilizes the Document Imaging System (DIS) system for submitting shipment documentation or until it becomes mandatory (expected January 2021).
  - b. The Message set will replace paper documents, such as invoices, packing lists, permits, and notice of arrival, except government-to-government documents (phytosanitary certificates and CITES), with the data filed by brokers/self-filers and matched against the phytosanitary certificate and inspection.
  - c. If the documents available in ARM are different than similar documents that accompanied the shipment (e.g. bill of lading, air way bill do not match or the packaging lists do not match), then something is wrong and you'll need to sort it out with the broker or broker representative to ensure the correct set of documents accurately describe the contents of the shipment.
11. How can we verify that the information is correct that was filed if we don't have any paperwork to compare it to? What documentation will the inspector have in hand to visually verify that the shipment is the shipment to be inspected and that it is complete?

- a. Any documents trade uploaded into Document Imaging System (DIS) is shown in the ARM generated forms section. PIS staff can use those documents to verify what is filed in the entry.
  - b. Government-to-Government documents such as the phytosanitary certificates, and/or CITES certificates will still be required in paper form and reviewed for authenticity.
  - c. For your purposes, verification of information refers to determining if the information was entered complete and correct in order to facilitate its loading. For instance, verify the weights were entered with the correct units of measure. Once PIS staff loads the entry into ARM, the data can be verified against the inspection of the cargo.
12. Legally, can we require trade to enter documents into Document Imaging System (DIS) that we need to verify the entry?
- a. APHIS inspectors have the right to require any documentation (required by the CFRs/manuals) necessary to determine the validity of a shipment. Additional documentation should be requested when an inspector is concerned about the information provided in the APHIS core message set. PIS staff should be messaging to trade what documents will be needed in DIS for inspections.
13. If trade files using message set, should PIS staff still keep paper records after the inspection is complete?
- a. Records such as shipment documentation received shortly before, or at the time of, the inspection should continue to be kept in accordance with the guidance in the PIS Manual.

### **ARM Application Questions**

14. Can we reject the APHIS core message set in ARM? After the APHIS Core Message Set is loaded using the Customs Entry Number, can it be corrected in ARM?
- a. Currently, PIS staff are not able to reject APHIS core message sets filed in ARM.
  - b. A Request Correction functionality was implemented that allows PIS staff to message back to trade for any corrections or changes needed to file APHIS Core Message Set.
  - c. If PIS staff is loading a Customs Entry Number and notice errors in the APHIS core message set, it is recommended they reach out to trade to get errors corrected before creating a record in ARM.
15. Once the APHIS core message set is loaded in ARM, will PIS staff see the red asterisk notification (\*) only for OGCP shipments, or for all shipments?
- a. Red asterisks occur in ARM when a field is missing required information that was loaded using the APHIS core message. This applies for all shipments that are created using the APHIS core message set, including the OGCP program shipments.
16. Is there going to be a final validated list of commodity names in ARM?
- a. The National Identification Services (NIS) has generated a plant taxa list of propagative material genus, and subspecies names. This list does not represent commodities that may or may not be admissible, but merely provides the acceptable spellings for genus, species, subspecies.
  - b. The Propagative Material Validation Name list is available to the public on the APHIS Core Message set website.  
<https://www.aphis.usda.gov/aphis/ourfocus/importexport/ace/datatables/arm-list>

17. Routinely ARM is slow or down. What is the backup plan?
- If you notice that ARM is slow or appears to be down, please report incident to the ARM help desk using [ARM-Helpdesk@usda.gov](mailto:ARM-Helpdesk@usda.gov), so application issues can be addressed as quickly as possible to prevent any operational impacts.
  - If ARM is down for a prolonged period reach out to the importer and request that all entry documents needed for clearing the shipment are provided to the PIS.
18. Do we change the commodity information on the commodity page or the inspection results page?
- The commodity information should be updated from the commodity page in ARM.
  - The units of measure for commodities can be updated on the commodity page. However, if PIS staff want to update the units of measure for all commodities, it is more efficient to update that information on the inspection results page. Also, they can update the propagative material type, quantity, and units of measure on the RBS page.
19. Where can PIS staff find the Document Imaging System (DIS) documents in ARM?
- The DIS documents can be found in the Uploaded Documents folder within the ARM record. In case the DIS documents aren't found, the brokers/importers need to contact the ACE Message Set Help Desk ARM Help Desk ([ace.itds@usda.gov](mailto:ace.itds@usda.gov)).



20. Can the customs entry number (CEN) confirmation screen that pops up in ARM be made bigger, since it is hard to see the data in that tiny window?
- A larger CEN pop-up screen is planned as part of a future ARM enhancement.
21. When trade is given the “may proceed”, can we go back and edit the ARM record?
- ARM allows the user to edit ARM records that have been closed after inspection. But ARM won't change the “May Proceed” message. If the edit to the record affects the “May Proceed” the user will need to notify Trade outside of the ARM application.

### Message Set Questions

22. Will the APHIS core message set need to be filed for small lots of seeds and express carrier (e.g. DHL, FedEx, UPS) shipments?
- Express carriers such as DHL and FedEx act as the brokers, so the APHIS core message set will need to be filed. Keep in mind that the de minimis shipments are exempt, they can file an entry but are not required.
  - USPS mail is exempt from requiring the APHIS core message set to be filed.
23. What incentive do the brokers have to enter "good" information?
- Entering correct electronic data will expedite the PIS inspection process and reduce the amount of time PIS staff will spend correcting data entry.
  - There is a future enhancement planned to build electronic communication to trade to

inform them that corrections are needed.

## **Offshore Greenhouse Certification Questions**

24. Will the broker notify the PIS when a shipment is coming from an approved OGCP facility?
  - a. Trade must provide the PIS staff with the customs entry number (CEN) to find a record in ARM. As a courtesy, they could alert the PIS staff that the shipment is coming from an OGCP facility, however, the certified facility number will appear on the phytosanitary certificate.
  - b. The offshore certified facility number will appear on the phytosanitary certificate and can be compared against the OGCP approved facility list (Appendix 2 of the OGCP Framework).
  
25. What happens if trade says the shipment belongs to the OGCP, but trade has not filed the APHIS Core Message Set before the shipment arrives?
  - a. All OGCP shipments must have APHIS core message set data filed before it arrives at the port for inspection. The OGCP staff is currently working with trade to ensure they can file APHIS core message set for their imports.
  
26. What disposition code should be used for OGCP shipments that are not selected for inspection?
  - a. The disposition code for the OGCP is IRMR unless another type of action is taken on the shipment.
  - b. The CCNA disposition code is not for use by PIS operations and will be removed from ARM drop down menu.
  
27. Does trade receive a message from ARM that an inspection is not required on a shipment from the OGCP Program? Or does the PIS staff have to let them know?
  - a. No, PIS staff will have to let trade know for the time being.
  
28. What happens when a PIS receives a commingled shipment (e.g. unrooted and rooted cuttings)? Also, what happens when a PIS receives a shipment with cuttings from both an OGCP facility and a facility not in OGCP?
  - a. Mixed or commingled shipments are not eligible for OGCP.
  - b. Unrooted cuttings are the only type of propagative material type that is allowed for entry under the OGCP.
  - c. Only shipments from certified facilities are eligible for the program (i.e. reduced frequency of inspection).