

September 17, 2025

Russell Vought  
Director  
Office of Management and Budget  
The White House  
1600 Pennsylvania Avenue NW  
Washington, D.C. 20500

Dear Director Vought,

The National Customs Brokers and Forwarders Association of America (NCBFAA) is concerned about the impact of a potential government shutdown on import/export trade processing – an important feature of President Trump’s America First Trade policy. NCBFAA represents customs brokers and freight forwarders, who are on the frontlines of import and export trade interacting with Customs and Border Protection (CBP) and the many Partner Government Agencies that safeguard our nation.

Safe and healthy trade supply chains are necessary to both the economic and physical security of our country. In the event of a government shutdown, we ask OMB to direct agencies to prioritize import and export processing in designating “excepted” or “essential” employee status. This will help to ensure that unsafe or illegal products are kept out of the U.S. At the same time, domestic manufacturers rely on efficient import supply chains for essential components and materials to maintain productivity. They also require smoothly functioning export processing to meet worldwide demand for their finished products.

That is why we need OMB to designate enough “excepted” employees in agencies to ensure that safe and effective import and export trade processing continues in the event of a prolonged government shutdown. More specifically, we hope you will urge agencies to:

- **Frontline and Support Staff:** For some agencies, such as the U.S. Department of Agriculture and the Fish & Wildlife Service, inspectors are user-fee funded and continue to operate during a shutdown. Frontline staff at the ports are indeed critical. But just as important are staff in regional offices and headquarters to conduct document reviews, backstop automated systems and processes, and respond to issues relating to shipment holds. In the last shutdown, we saw many problems at both headquarters and local ports, where lack of staff created congestion at the ports, costly demurrage for the trade and inefficiencies in sorting through compliant versus noncompliant shipments. We urge you to provide sufficient staff to support these critical import and export processing functions.
- **Agency Contacts:** Provide points of contact for U.S. importers, exporters and customs brokers during a government shutdown.
- **Website:** Agency websites have become a necessary lifeline for the business and trade

community. Not only does it provide valuable resources and automated compliance tools, agency websites allow the trade to apply for permits and conduct other essential business. In today's automated world, staff should be available to keep the website up and running.

- **CBP War Room Presence:** During the last shutdown in 2018/2019, CBP stood up a “war room” to monitor and resolve problems and maintain communication. We expect CBP will again stand up a “war room.” We ask OMB to urge all relevant PGAs to be present in the war room. This is important for a coordinated and effective government effort to meet the trade processing challenges of a shutdown.
- **CBP Trade Calls:** CBP also conducted regular calls with business and trade to report on developments as they occur and to learn of trouble spots from the private sector. We urge agency participation in these calls and a willingness to troubleshoot problems.
- **Outreach to Trade:** Rapid communication with the trade during a shutdown is essential. As a reminder, NCBFAA can reach thousands of customs brokers/forwarders within minutes to provide guidance or other useful information that will in turn be spread to hundreds of thousands of U.S. importers/exporters. Please utilize NCBFAA as a resource to spread the word.

In addition to CBP, agencies that play an especially important role in import and/or export processing include: the Food and Drug Administration, US Department of Agriculture (APHIS, AMS, FSIS), Fish & Wildlife Service, Drug Enforcement Administration, Bureau of Alcohol, Tobacco, Firearms, and Explosives, Alcohol and Tobacco Tax and Trade Bureau, National Marine Fisheries Service, Consumer Product Safety Commission, and Environmental Protection Agency.

We hope that a government shutdown can be averted. In the meantime, NCBFAA stands ready to work with OMB and the agencies if a government shutdown does occur. Please let us know how we can best help you.

Sincerely,



Jose D. Gonzalez  
President