



U.S. International Trade Commission
OFFICE OF INSPECTOR GENERAL



STRATEGIC PLAN

Fiscal Years 2024 - 2028



September 2023

Message from the Inspector General

I am pleased to present the United States International Trade Commission (USITC), Office of Inspector General's (OIG) Five-Year Strategic Plan for Fiscal Years (FY) 2024-2028.¹ This Strategic Plan will guide the OIG's work as it carries out its responsibilities pursuant to the Inspector General Act of 1978, as amended,² and related authorities. As set forth in this document, our goals and objectives focus on effective and independent oversight, service to internal and external stakeholders, and maximizing the return on the public resources provided to our office and the USITC.

As the OIG enters this five-year period, we look forward to furthering the efficiency, effectiveness, and integrity of USITC programs and operations. The breadth of the USITC's international trade-related functions, including adjudication, research, analysis, and publication of information critical to stakeholders, presents prudent oversight opportunities that the OIG endeavors to pursue. In FY 2023, the OIG hired two additional auditors, increasing the size of the OIG for the first time in more than 10 years. These additional resources will allow us to have an operational succession plan and broaden our oversight of the USITC beyond mostly statutory work. Additionally, we will continue to leverage resources from the broader oversight community, including those of the Council of the Inspectors General on Integrity and Efficiency, as well as other individual Offices of Inspector General.

In developing this Strategic Plan, we considered the statutory authorities and professional standards that govern the OIG's work, the nature and direction of USITC programs and operations as reflected in key documents, including the USITC's *Strategic Plan, FY 2022-2026*, and input from senior officials at the USITC and external stakeholders, including Congressional committees of jurisdiction and the Government Accountability Office. I appreciate those individuals who provided their valuable time and input on the strategic direction of the OIG. Thank you.



Rashmi Bartlett
Inspector General

¹ This Strategic Plan was developed using the framework from the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Federal Offices of Inspector General* (August 2012), as well as the Government Performance and Results Act of 1993 (GPRA), the GPRA Modernization Act of 2010, and Office of Management and Budget guidance. This Strategic Plan supersedes and replaces the *Office of Inspector General Strategic Plan 2020-2025* (August 8, 2019).

² 5 U.S.C. §§ 401-424.

United States International Trade Commission

Office of Inspector General

Mission

To promote and preserve the efficiency, effectiveness, and integrity of the U.S. International Trade Commission.

Vision

To serve as trusted agents in driving positive change and promoting integrity in the programs and operations of the U.S. International Trade Commission.

Values

- **Integrity:** We hold each other and ourselves to the highest ethical standards.
- **Objectivity and Independence:** We conduct our work based on supportable facts without bias or undue influence.
- **Respect:** We treat each other and our stakeholders with consideration, professionalism, and dignity.
- **Excellence:** We are committed to achieving the highest quality in our work.
- **Collaboration and Teamwork:** Our success lies in working together and affording each team member the opportunity to contribute, learn, develop, and grow professionally.

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Overview

U.S. International Trade Commission

The United States International Trade Commission (USITC) is an independent, nonpartisan, quasi-judicial Federal agency established by Congress with a range of trade-related mandates, including to:

- adjudicate whether: (1) dumped or subsidized imports injure a domestic industry; (2) surges of imports injure a domestic industry; and (3) imports infringe a domestic intellectual property right or otherwise unfairly injure a domestic industry;
- provide independent, objective, and timely analysis of trade and competitiveness issues to the President and Congress; and
- maintain the Harmonized Tariff Schedule of the United States.

The USITC is led by six Commissioners (together, the “Commission”) who are nominated by the President and confirmed by the U.S. Senate. No more than three Commissioners may be of any one political party.

The USITC’s fiscal year (FY) 2023 budget justification identified 410 current permanent and term staff in FY 2022, with a target of 461 by the end of FY 2023. The staff consists of administrative law judges, attorneys, trade and nomenclature analysts, investigators, financial analysts, statisticians, economists, information technology specialists, and administrative support personnel. The USITC FY 2023 operating budget is \$122.4 million, including salaries and benefits. Included in that budget figure, in FY 2023, the Office of Inspector General (OIG) has a total operating budget of nearly \$1.6 million, including salaries and benefits for six full-time positions.

Office of Inspector General

The USITC’s OIG receives its legal authority from the Inspector General Act of 1978, as amended (Inspector General Act).³ The OIG is an independent office led by the Inspector General, who reports to and is under the general supervision of the Commission. The OIG provides objective oversight in furtherance of its mission is to promote and preserve the efficiency, effectiveness, and integrity of the USITC. The OIG generally plans and conducts its work based on statutory mandates, requests from USITC management officials, Congress, and other stakeholders, allegations received from USITC personnel and other sources, or the Inspector General’s initiative.

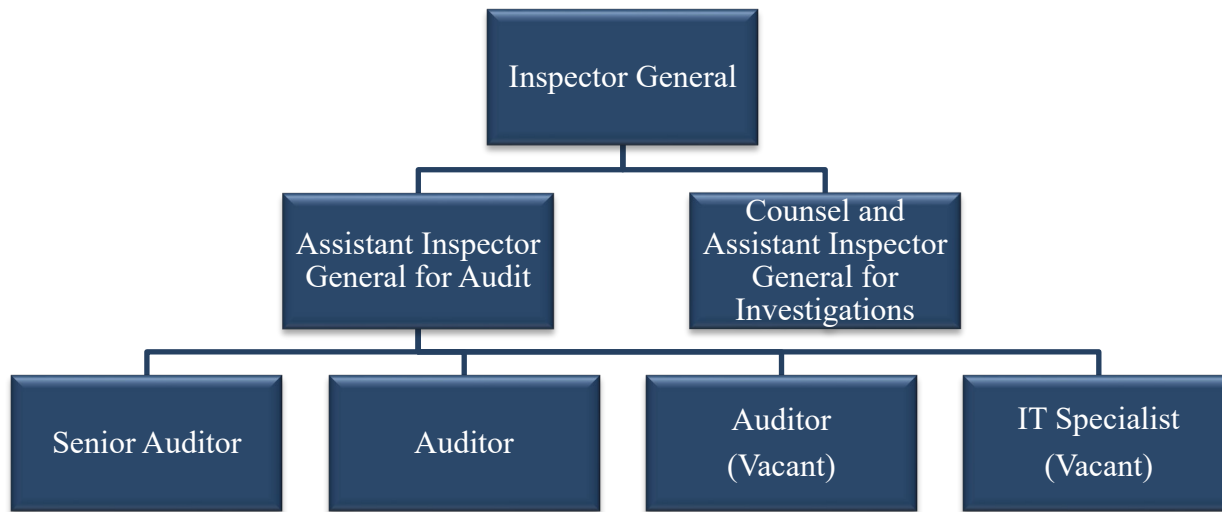
³ 5 U.S.C. §§ 401-424

Pursuant to the Inspector General Act, the Inspector General has specific duties and responsibilities, including to:

- Provide policy direction for and conduct, supervise, and coordinate audits and investigations relating to the programs and operations of the USITC;
- Review existing and proposed legislation and regulations relating to programs and operations of the USITC and make recommendations, including in semiannual reports, concerning the impact of the legislation and regulations on the economy and efficiency in the administration of programs and operations administered or financed by the USITC, or the prevention and detection of fraud and abuse in the programs and operations;
- Recommend policies for, and conduct, supervise, or coordinate other activities carried out or financed by, the USITC for the purpose of promoting economy and efficiency in the administration of, or preventing and detecting fraud and abuse in, its programs and operations;
- Recommend policies for the USITC, and conduct, supervise, or coordinate relationships between the USITC and other Federal agencies, State and local governmental agencies, and nongovernmental entities, with respect to (A) all matters relating to the promotion of economy and efficiency in the administration of, or the prevention and detection of fraud and abuse in, programs and operations administered or financed by the USITC, or (B) the identification and prosecution of participants in such fraud or abuse;
- Keep the Commission and Congress fully and currently informed, by means of semiannual reports and otherwise, concerning fraud and other serious problems, abuses, and deficiencies relating to the administration of programs and operations administered or financed by the USITC, recommend corrective action concerning the problems, abuses, and deficiencies, and report on the progress made in implementing the corrective action; and
- Report expeditiously to the Attorney General whenever the Inspector General has reasonable grounds to believe there has been a violation of Federal criminal law.

The Inspector General Act also grants several authorities to the Inspector General, including to have timely access to all USITC records, issue subpoenas for the production of documents, administer oaths when conducting interviews, make such investigations and reports relating to the administration of the programs and operations of the USITC as are, in the judgment of the Inspector General, necessary or desirable, and independently hire staff and enter into contracts.

OIG Organization Chart as of September 2023



Audits, Inspections, Evaluations, and Other Reviews

The OIG conducts audits and other reviews of the USITC's programs and operations to evaluate their economy, effectiveness, and efficiency. The OIG reports on problems and deficiencies in operations and progress made in implementing corrective actions. The OIG provides these reports to USITC management and Congress and posts the reports on the OIG's public website and Oversight.gov.

As of FY 2023, the OIG is required, by law, to conduct annual reviews regarding:

- Financial statements (Accountability of Tax Dollars Act of 2002);
- Information security (Federal Information Security Modernization Act of 2014);
- Management and performance challenges (Reports Consolidation Act of 2000);
- Improper payments (Payment Integrity Information Act of 2019), and
- Government charge cards (Government Charge Card Abuse Prevention Act of 2012).^{4,5}

In its Annual Audit Plan, the OIG identifies other areas for OIG work. The OIG conducts such discretionary audits and other reviews as resources permit.

In addition, the Government Accountability Office's (GAO) *Government Auditing Standards* require audit organizations that perform audits or attestation engagements to

⁴ In FY 2023, OIG was also required to perform an audit of the USITC's vehicle fleet management practices. This requirement was incorporated by reference in the Consolidated Appropriations Act, 2023, Pub. L. No. 117-328, 136 Stat. 4459, at Section 2 (incorporating Explanatory Statement). See 168 Cong. Rec. S7787, S7819 (daily ed. Dec. 20, 2022) (Explanatory Statement referencing Federal Vehicle Fleet Management provision).

⁵ OIG is also required to perform at least one review of the USITC's enhanced personnel security program after such program and related performance measures and standards are established pursuant to

5 U.S.C. § 11001.

undergo an external peer review every three years. The USITC OIG conducts peer reviews of other Offices of Inspector General based on a schedule established by the Council of the Inspectors General on Integrity and Efficiency (CIGIE).⁶

Investigations

The OIG conducts administrative, civil, and criminal investigations of alleged fraud, waste, abuse, misconduct, mismanagement, dangers to the public health and safety, and violations of law, in relation to USITC programs and operations. The OIG maintains a Hotline for USITC personnel and the public to submit complaints or other information. Complaints may be submitted anonymously. Additionally, the OIG will not disclose the identity of a complainant without the consent of the individual unless the Inspector General determines that such a disclosure is unavoidable during the course of the investigation. As appropriate, the OIG refers the results of its investigations to USITC management, the Department of Justice, the Office of Government Ethics, and/or other entities with jurisdiction.

Counsel

Pursuant to the Inspector General Act, the Inspector General must appoint a Counsel to the Inspector General, obtain the services of another Inspector General's counsel, or obtain the services of appropriate staff at CIGIE. The Counsel to the Inspector General provides legal advice and representation on issues arising during the course of OIG work, including investigations, audits, inspections, evaluations, and other reviews, as well as on internal administrative and management issues.

⁶ USITC OIG is scheduled to receive its next peer review in FY 2025.

Strategic Goal 1 – Oversight

Promote efficiency, effectiveness, and integrity in USITC programs and operations through robust, independent oversight, including audits, reviews, and investigations.

- Objective 1.1:** Employ a strategic, risk-based approach in identifying oversight priorities to focus OIG resources while accomplishing mandatory audit and reporting requirements.
- Objective 1.2:** Provide timely findings and actionable recommendations to improve the efficiency, effectiveness, and integrity of the USITC.
- Objective 1.3:** Conduct professional and timely investigations of alleged fraud, waste, abuse, and other misconduct concerning USITC programs and operations.

Strategies

- Conduct an annual planning process that prioritizes (1) mandatory work and (2) discretionary work concerning significant issues and management challenges.
- Communicate identified weaknesses and recommendations for improvement clearly and effectively.
- Leverage the use of independent professional accounting firms to complete mandatory and routine audits and special reviews to maximize the application of OIG resources.
- Establish agreements, as needed, with other agencies for detailees or audit, investigations, legal, and support services.
- Provide the USITC and the public with effective and efficient mechanisms to report fraud, waste, abuse, and other misconduct.
- Promptly investigate and issue reports on high-priority complaints and referrals.

Performance Goals

- Develop and communicate an annual audit plan.
- Meet all mandatory audit, review, and reporting requirements.
- Conduct discretionary audits and reviews on topics identified for their potential significance to USITC programs and operations.
- Recommendations issued by OIG staff are actionable and measurable.
- Prompt internal resolution or referral of investigation results to other units within the USITC, Department of Justice, and/or other entities as appropriate.

Strategic Goal 2 – Communication and Collaboration

Increase OIG mission impact through effective communication and collaboration.

Objective 2.1: Enhance communication with the USITC, Congress, the public, and other stakeholders to keep them informed and aware of the OIG's work.

Objective 2.2: Identify opportunities to collaborate with, contribute to, and utilize the broader oversight community.

Strategies

- Communicate the results of work to stakeholders in a timely manner.
- Conduct outreach to USITC staff, to include information on their right to report fraud, waste, abuse, and other misconduct and their protections from reprisal for doing so.
- Promptly respond to Congressional requests for information.
- Engage and promote CIGIE Inspector General community priorities.
- Sustain and expand partnerships with other oversight entities.

Performance Goals

- Audit reports are posted on Oversight.gov within three days of delivery to USITC management.
- Deliver the Semiannual Reports within the statutory reporting schedule.
- Provide periodic briefings and updates to the USITC senior management team.
- Provide periodic outreach sessions for USITC staff.
- Update and maintain the OIG's website.
- Actively participate in meetings, workgroups, surveys, and other CIGIE-sponsored activities.
- Utilize Inspector General community resources.
- Establish consistent coordination with the GAO.

Strategic Goal 3 – Strengthen OIG

Cultivate and retain an engaged, skilled, and high-performing workforce with the tools and training necessary to sustain OIG’s ability to fulfill its mission.

Objective 3.1: Embrace a culture of continuous professional development for all OIG staff.

Objective 3.2: Conduct human capital planning that maximizes OIG resources for effective oversight.

Objective 3.3: Ensure OIG maintains a rigorous program of internal control to comply with professional standards.

Strategies

- Recruit the best talent and provide robust cross-discipline training opportunities to all members of the OIG team.
- Ensure employees have the necessary knowledge, skills, and abilities to assume leadership roles and implement succession plans.
- Advance a fair, open, and cooperative working environment.
- Develop innovative and disciplined processes that comply with professional standards, maximize productivity, and leverage resources.
- Maintain internal quality assurance and review programs to ensure the reliability and credibility of OIG products.

Performance Goals

- Audit staff maintain continuing professional education credits, as required by the *Government Auditing Standards*.
- Successfully undergo a peer review every three years.
- Successfully undergo annual reviews of the OIG’s quality assurance program.
- OIG products comply with applicable professional standards, conform to the OIG’s established policies and procedures, are objective, timely, and useful, and are adequately supported.
- Establish a cycle to maintain updated OIG policies and procedures to effectively execute OIG duties across functions.
- Periodically assess alignment of staff and talent to effectively fulfill the mission.

Risks to OIG's Strategic Plan

A variety of risks potentially prevent the OIG's ability to attain its strategic goals:

- **Human capital** remains a critical factor for the OIG. Vacancies that are not promptly filled with qualified candidates may challenge the OIG's ability to deliver on its strategic goals, particularly given the specialized and singular nature of each position in this small OIG. In addition, OIG staff routinely perform collateral duties outside of their functional area of expertise, a requirement for us to be operational. The OIG also uses contractors, detailees, and interns where possible to address gaps in the interim and to address long-term needs. The timing of the budget cycle often causes a one-to-two-year delay between identifying a critical need, making a budget request, and obtaining funds.
- **Reliance on USITC administrative services**, particularly in the areas of procurement, human resources, and budget, can threaten OIG independence given that the OIG may review these USITC services and that the OIG's requests are prioritized relative to other USITC needs.
- **Potential financial challenges** include a reduction in appropriated funds due to unanticipated changes in Federal priorities and unforeseeable events, such as budget cuts or sequestration (OIG presently does not receive direct appropriations).
- **Changing priorities among stakeholders**, including Congress, the Commissioners, and senior USITC officials, may require OIG to adjust its own priorities and resources accordingly. For example, a new mandatory audit would require OIG to reassess its planned alignment of resources.

Strategic Planning Process

OIG's planning process includes assessing the nature, scope, and inherent risks of USITC programs and operations. This assessment is critical to establishing this Strategic Plan, as well as the OIG's annual performance and audit plans.

In preparing this Strategic Plan, the OIG reviewed a variety of USITC documents, including but not limited to the USITC Strategic Plan (FY 22-26), Annual Performance Plan (FY 22-23), Annual Performance Report (FY 21), Agency Financial Report (FY 22), Budget Justification (FY 23), and enterprise risk management system records (FY 23). The OIG considered its relevant documents and information, including but not limited to the OIG Strategic Plan (FY 20-25) (superseded and replaced by this Strategic Plan), Annual Audit Plan (FY 23), Top Management and Performance Challenges (FY 23), recent Semiannual Reports to Congress, past audit and review reports, investigatory trends, and OIG resources. The OIG also considered the work of external entities, including the CIGIE and the GAO.

Additionally, in preparing this Strategic Plan, the OIG solicited input from senior USITC officials, including the Designated Agency Ethics Official, and OIG staff. The OIG solicited input from external stakeholders, including Congress, the GAO, the Department of Justice, and the Office of the United States Trade Representative. OIG considered the public insights in transcripts from 2022 USITC roundtables on the distributional effects of trade and trade policy on U.S. workers. Finally, the OIG reviewed the strategic plans of other Offices of Inspector General to identify standard practices and innovative approaches.



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REPORT WASTE, FRAUD, ABUSE, OR MISMANAGEMENT

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