OFFICE OF INSPECTOR GENERAL

EVALUATION OF THE U.S. INTERNATIONAL TRADE COMMISSION'S DISCRETIONARY DOCUMENT AND MAIL DISTRIBUTION PROGRAM

Audit Report
OIG-AR-01-04

May 26, 2004

INSPECTOR GENERAL

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, D.C. 20436

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MEMORANDUM

TO: THE COMMISSION

We hereby submit Audit Report No. OIG-AR-01-04, Evaluation of the U.S. International Trade Commission's Discretionary Document and Mail Distribution Program. We performed this audit to determine if the Commission effectively processed discretionary mail and made publicly available information accessible on its Web site.

We found the Commission processed outgoing and returned mail as intended and tracked expended costs. Action should be taken, however, to enhance access to and delivery of discretionary documents. We made six recommendations to (1) increase the use of information technology at the Commission, (2) encourage customers to obtain publicly available information through the Web or a CD-ROM, and (3) enhance information technology procedures. The Commission concurred with our findings and recommendations.

We appreciate the courtesies and cooperation provided to our auditors during this audit.

Kenneth F. Clarke
Inspector General

CC: Cynthia Johnson
Office Directors
Cotton & Company LLP

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I. SUMMARY OF RESULTS

The Commission processed outgoing and returned mail as intended and tracked expended costs. However, the Commission can enhance access to and delivery of its discretionary[1] documents, as well as improve the internal efficiency and effectiveness of document and mail distribution, by completing formal plans and policies to ensure information technology tools are implemented and used. First, given that the Commission established a Web team and hired a Webmaster approximately 1 month before the start of this audit, it is important to have a completed and approved plan of action with milestones to support and account for the their efforts. Second, although the Commission encouraged use of electronic documents in place of paper documents for distribution, official guidance on the format (i.e., paper or CD-ROM[2]) was needed. Third, while the Commission's annual Budget Justifications discussed its desire to automate the investigation questionnaire (IQ) process, the Commission did not have a *system development life cycle*[3] (SDLC) to ensure the IQ System's development or implementation.

Additionally, the Commission lacked a sufficient process to encourage customers to request products in less expensive formats and track customers' preferred product formats. Also, the Commission did not encourage its program offices to submit electronic formatted documents to the Office of Publishing or use existing technology to make products easier for customers to find on the Internet.

We made six recommendations to enhance access to and delivery of the Commission's discretionary documents. The Commission agreed with the findings and recommendations, and management's complete response is presented as Appendix A of this report.

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[1] For purposes of this report, reports and publications that are available to the public will be referred to as *discretionary* documents.

[2] Compact Disc-Read Only Memory (CD-ROM) is a device that can hold a considerable volume of electronic information.

[3] SDLC is the process of developing information systems through investigation, analysis, design, implementation and maintenance. It is comprised of multiple steps:

- The software concept - identifies and defines a need for the new system
- A requirements analysis - analyzes the information needs of the end users
- The architectural design - creates a blueprint for the design with the necessary specifications for the hardware, software, people and data resources
- Coding and debugging - creates and programs the final system
- System testing - evaluates the system's actual functionality in relation to expected or intended functionality.

II. BACKGROUND

The Commission is an independent, nonpartisan, quasi-judicial federal agency that provides trade expertise to both the legislative and executive branches of government, determines the impact of imports on U.S. industries, and directs actions against certain unfair trade practices, such as patent, trademark, and copyright infringement. Its mission is to: (1) administer U.S. trade remedy laws within its mandate in a fair and objective manner; (2) provide the President, the United States Trade Representative (USTR), and Congress with independent, quality analysis, information, and support on matters of tariffs and international trade and competitiveness; and (3) maintain the Harmonized Tariff Schedule of the United States. In so doing, the Commission contributes to the development and implementation of sound and informed U.S. trade policy.

The Commission's work involves receipt, production, dissemination, and storage of large quantities of information. A great deal of information is generated during the course of the Commission's investigations and adjudication of cases. A considerable amount of trade-related information also is generated by the Commission's extensive research program. Much of this information is available to the public and provided on the Commission's Web site www.usitc.gov.

Today responsibility for every aspect of the discretionary document and mail distribution program rests either with the Director of Administration or the Chief Information Officer; both positions are held by the same person. Historically, U.S. International Trade Commission Directive 3350.1 delegated to the Director, Office of Administration (OA), overall responsibility for mail standards and procedures. Directive 1005.3 assigned the Office of the Secretary—now under the Office of the Chief Information Officer (OCIO)—responsibility for disseminating publications and other documents, and maintaining a mailing list of customers who requested receiving all future reports or publications by a specific topic as well as Congress and libraries. Directive 3201.0 provided publishing guidelines and assigned the Office of Publishing—also under OCIO—responsibility for supporting program offices and producing publications in paper format and electronic versions of certain reports and for providing the files to the Office of Information Services—again under OCIO—for posting on the Web. Publishing also produces discretionary documents in CD-ROM format for mailing.

After the Office of the Secretary approves a request for printing and mailing (ITC Form 120: Printing Work Request), it is forwarded to Publishing for action. The Office of Facilities Management—under OA—works with the U.S. Postal Service (USPS) to identify the most economical mode and class of mailing and oversees the mailroom contract services. This contractor follows the guidance provided in Directive 3350.1. Additionally, the Office of Facilities Management tracks mail costs for USPS and overnight delivery. In FY 2003, the Commission obligated: $62,088 for commercial overnight mail service, primarily used by the Office of Investigations for delivery of

questionnaires, and $73,202 for USPS, primarily used by the Offices of Publishing and the Secretary for delivering discretionary and other investigative documents.

In 2001, the President initiated several government reform efforts, collectively known as the President's Management Agenda (PMA), to make the federal government more results-oriented, efficient and citizen-centered. One element of the PMA was Expanding Electronic Government, or "E-Gov." This effort was intended to make better use of information technology (IT) investments to eliminate wasteful federal spending, reduce government's paperwork burden on citizens and businesses, and improve government response time to citizens from weeks down to minutes. A key goal was for citizens to be able to access government services and information when using the Internet. The E-Government Act of 2002 (Public Law 107-347) further enhanced the management and promotion of electronic government services and processes by establishing a broad framework of measures that require using Internet-based information technology to enhance citizen access to government information and services.

The Office of Management and Budget's (OMB) Implementation Guidance for the E-Government Act of 2002–Memorandum M-03-18 dated August 1, 2003–provided guidance on specific actions for agencies to take to improve the IT programs' effectiveness and efficiency in delivering services to citizens.

III. OBJECTIVE

This independent evaluation was conducted to assess whether the Commission:

1. Made publicly available, or discretionary, information accessible on its Web site.

2. Took action to promote Web site retrieval of such information vs. paper processing.

3. Met its customer needs by ensuring that discretionary information was well organized and accessible.

4. Contracted mail service operated as intended.

IV. METHODOLOGY AND SCOPE

We engaged Cotton & Company LLP to assist in conducting this evaluation. Fieldwork took place between October 2003 and February 2004. We evaluated the Commission's policies, procedures, and practices supporting distribution of publicly available information and investigation questionnaires. Our evaluation included the Office of the Secretary's customer mailing list procedures and practices for distribution of the discretionary reports. The audit also covered the procedures and practices used by the:

Office of Publishing to make public documents available in paper and electronic formats; and Office of Facilities Management to manage the mail costs and the mail program including oversight of the mailroom contractor's mail handling processes for outgoing and returned mail.

We evaluated the Office of Chief Information Officer's (OCIO) policies, procedures, and practices used to promote collection and dissemination of information electronically both internally and externally. We evaluated OCIO policies, procedures, and practices to:

- Develop, implement, and maintain the Commission's Web site.
- Work with other governmental agencies in linking and promoting the Commission's Web site.
- Use Web site search engines to promote efficient use of the Web site and increase customer satisfaction.

Finally, we evaluated the Office of Investigations' procedures and practices for mailing investigation questionnaires using overnight and priority mail services as well as potential future plans to automate the questionnaires for electronic transmission in lieu of traditional mail services.

We conducted this audit in accordance with *Government Auditing Standards* pertaining to Performance Audits, 2003 Revision, as amended, promulgated by the Comptroller General of the United States.

V. RESULTS

A. Effective Handling of Outgoing and Returned Mail

The Office of Facilities Management, within the Office of Administration, effectively provided oversight of the mail room contractor and gathered essential information concerning the volume, postage cost and policies on the mail standards and procedures. Furthermore, the contracted mail service activities met the contract's deliverables and statement of work.

The contractor selected the most economical means for processing out-going mail while originating offices determined and prescribed the use of specialty mail services such as overnight delivery and certified mail. Based on interviews with the Office of Investigations—the principal user of overnight mail—the office justified overnight mail service due to time-sensitive material and a business need to ensure receipt of material.

When an article was returned, the contractor who managed the mail room forwarded the article back to the originating office. The Commission's Correspondence Manual stated that the return address, along with the originator's office symbol, must appear on all envelopes and address labels. Therefore, for the documents included in this review, the contractor routinely forwarded all returned discretionary documents to one individual in the Office of the Secretary and returned investigation questionnaires to one individual in the Office of Investigations. Documents returned to the Office of the Secretary resulted in removal from their automated mailing list system. For returned investigation questionnaires, the one person tasked with handling them attempted either to find the correct address, make the correction, and re-send the item or to give it to the originating Investigator.

Since the Commission or the mail room contractor did not maintain a record of returned mail, the volume, frequency, or disposition of returned mail could not be quantified. The customer's correct mailing address is critical to the Commission in meeting its mandatory investigation deadline involving questionnaires requiring a response from the customers within 14 days of mailing. Furthermore, the Commission incurs an additional cost of $8 from the overnight delivery company for their attempt to correct the address and forward an investigation questionnaire. During the month of June 2003, the overnight carrier charged the Commission $1,775.41 for delivering 351 packages for an average cost of $5.06. The Commission incurred an additional charge of $64.00 for 8 incorrectly addressed packages.

B. Further Use of Information Technology Could Reduce Processing and Delivery Costs and Enhance Service to the Public

The Commission's successful efforts to enhance access to and delivery of its discretionary documents, as well as to improve internal efficiency and effectiveness of document and mail distribution, included:

- Posting the Harmonized Tariff Schedule of the United States Annotated (HTSA) on its Web site with a link to the Government Printing Office for obtaining HTS information in paper and CD-ROM.
- Encouraging the Commission's managers to offer documents to the public in the less costly CD-ROM format rather than paper.
- Establishing a Web team, including hiring a Webmaster, to improve the internal and external Web site in order to enhance access and provide better service to the Commission's customers and personnel.

Section 5122 of the Clinger Cohen Act[4] requires agencies to design and implement a process for maximizing the value and assessing and managing the risks of the IT acquisitions. Paragraph (6) of Section 5122 requires developing the means for providing senior management personnel timely information regarding the progress of an investment in an information system, including a system of milestones for measuring progress, on an independently verifiable basis, in terms of cost, capability of the system to meet specified requirements, timeliness, and quality.

By completing formal plans and policies to ensure IT tools are implemented and used, the Commission would be better prepared to meet future customer needs and reduce costs associated with old ways of delivering discretionary documents and mail. Areas requiring additional action include: approving the Web team's plan and completing guidance to maintain a quality Web site; completing the Commission's policy on providing discretionary documents in CD-ROM and paper formats; and assessing the cost and benefit of automating the investigation questionnaire.

Planning the Web Site

The Commission, having established a Web team and hired a Webmaster, had not completed and approved a plan of action with milestones to support and account for their efforts. In 2003, the CIO established a Web team and hired a Webmaster to improve the internal and external Web site—www.usitc.gov—in order to enhance access and provide better service to the Commission's customers and personnel. Based on interviews with

[4] Clinger-Cohen Act of 1996 (formerly called Information Technology Management Reform Act), Division E, National Defense Authorization Act for FY 1996 (Public Law 104-106, February 10, 1996) took effect August 8, 1996.

the Webmaster, briefings provided to senior officials by the Webmaster on current and planned actions, and analysis of the Web site, the team's projected efforts likely will better serve the Commission's customers. However, a completed and approved plan of action with milestones would ensure that both the Commission and the team have a shared understanding of what is to be accomplished and when.

The Commission's WEBTrend[5] data revealed that the Web site's users had experienced difficulty locating documents and maneuvering. During the audit, the Web team addressed these and other concerns by drafting a plan to improve the Web site and completing a survey of internal managers to obtain user needs and suggestions. Also, they added on the Web site an alert that the site was being redesigned and provided an area where customers could submit suggestions. Further, the Webmaster stated that the team had begun reviewing WEBTrend data. Finally, as we completed the audit, the Web team had designed a preliminary mock-up of the opening Web page, now displaying the Commission's data by topic. This new display should provide quicker, easier and more intuitive navigation for customers.

The National Institute of Standards and Technology has developed standards for implementing and maintaining Web site operations. Special Publication 800-44 Guidelines for Securing Public Web Servers is designed to assist organizations in installing, configuring, and maintaining secure public Web sites. This document provides a wide range of guidance and requirements for developing formal procedures and practices to ensure data integrity and reliability of information posted to Web sites and for maintaining the site security.

While the above actions demonstrated the Commission's commitment towards using electronic means to better serve its customers, an approved plan of action with milestones was needed to ensure continued success. Realistic milestones are particularly important because the Web team was also responsible for maintaining the current Web site. Also, approved guidance should be developed that assigns responsibilities and procedures to ensure the Web site is maintained.

Offering Electronic Documents

Although the Commission had encouraged use of electronic documents in place of paper documents, it had not issued official guidance on the format (i.e., paper or CD-ROM) to be distributed for final reports and publications. From October 2002 through February 2004, the Commission saved more than $47,000[6] because the Director of Publishing decided to promote distribution of discretionary documents in CD-ROM. For Section

[5] WEBTrend is an automated tool which reports Web visitor behavior.

[6] During this time period, the Office of Publishing prepared 49,219 reports and publications for mailing—4,406 in CD-ROM and the remaining 44,813 in paper.

332 investigation reports[7], Publishing released 77 percent in CD-ROM with no customer complaints. Publishing worked with originating offices to determine which recipients should receive CD-ROMs—especially for high visibility subjects such as steel. Paper was generally restricted to the requestor of the report, Congress, libraries and internal offices in the Commission. By issuing official guidance, Publishing can codify a good initiative and ensure that Commission employees have a clear understanding of what is expected of them. This guidance should not prohibit the public from obtaining requested paper copies.

The cost to produce and mail a CD-ROM is substantially less than a paper document. As shown in Table 1, the Commission's cost to prepare and mail an average 150-page document in paper format is five times greater than a CD-ROM.

TABLE 1. PREPARATION AND MAILING COST OF AN AVERAGE 150-PAGE DOCUMENT

Cost Category	Paper Document	CD-ROM	Posting Document to Web Site
Labor	$6.67	$1.85	$1.85
Paper	$1.80	$0.00	$0.00
Mailing (USPS)	$4.75	$0.60	$0.00
Total	**$13.22**	**$2.45**	**$1.85**

The Commission incurs an initial report preparation cost no matter the format; however, the costs shown in Table 1 are the estimated additional labor and material costs associated with the specific media. Although not specifically required by the Commission's Directives, the Office of External Relations asks that all publicly available documents be ready in all three formats prior to notifying customers of their availability.

Section 3506(h) of Title 44, United States Code, directed agencies to establish goals for improving the efficiency and effectiveness of agency operations and, as appropriate, the delivery of services to the public through the effective use of information technology.

U.S. International Trade Commission Directive 3201.0 provided guidelines for composing and publishing publications and assigned Publishing responsibility for producing electronic versions of reports and for providing the files to the Office of Information Services for posting on the Web. Publishing also was responsible for producing and maintaining written guidance on the general policy and procedures for documents prepared for final formatting and for printing publications in both paper and

[7] Under section 332 of the Tariff Act of 1930 (19 U.S.C. § 1332), the Commission conducts investigations on matters pertaining to the customs laws of the United States, foreign competition with domestic industries, and international trade relations.

electronic formats. However, Publishing had not issued official guidance on the format (i.e., paper or CD-ROM) to be distributed for final reports and publications.

Assessing the Investigation Questionnaire Process

While the Commission's annual Budget Justifications discussed its desire to automate the investigation questionnaire (IQ) process, the Commission did not have a strategy or plan for its automation. Without determining that an IQ System was needed or what it might entail, each year beginning in FY 2002 the Commission included the cost to design and develop an automated IQ System in its Budget Justifications. However, for more than 3 years, the Commission took no further action to develop the IQ system, instead applying funds to complete previously initiated IT projects. Absent a strategy or plan for how to implement the IQ System in light of other IT project priorities, the Commission could not ensure that the promised IQ System will be developed.

Import injury investigations require collection via questionnaires and analysis of large amounts of corporate financial and operating data. Currently the Commission meets these demands through labor-intensive processes that design, mail out and receive questionnaires back; then input, correct, tabulate, review, and analyze the data and narrative information in customized importer and producer questionnaires. Accuracy and speed of this activity are critical to the quality and credibility of the Commission's work.

In October 2000, the Commission advised OMB of its plan to automate the investigation questionnaires as one of the Commission's priority Government Paperwork Elimination Act projects[8]. The Commission represented in its Budget that the IQ System could speed questionnaire handling, data manipulation, and report-generating activities. Investigators and economists would then have additional time to prepare the staff investigative report and to engage fuller analysis of issues raised by parties and Commissioners. It would also provide for electronic completion and filing of questionnaires by companies involved in Commission cases.

According to the FY 2003 and FY 2004 Budget Justifications, the Commission stated: "The IQ system would provide an option for electronic completion and filing of questionnaires by companies involved in Commission cases, thus potentially reducing the estimated $11 million per year in information maintenance and reporting burden on the public ..." Costs listed and the Commission's comments provided in the Budget Justifications are presented in Table 2.

[8] In response to the Government Paperwork Elimination Act, the Commission provided OMB with a description of the Commission's and public's responsibilities and work requirements used to process the investigative questionnaires in paper format.

TABLE 2. BUDGET JUSTIFICATIONS FOR THE IQ SYSTEM

FY	AMOUNT	COMMENT
2002	$500,000	To develop the IQ System
2003	$800,000	Defer further development of the IQ System until FY 2003 due to a higher priority IT project
2004	$1 million	To develop the IQ System
2005	$100,000 per year	For IQ System requirements development and analysis

While the Commission's annual Budget Justifications discussed its desire to automate the investigation questionnaire process, the Commission did not follow the SDLC process to guide management in acquiring, developing and maintaining the IQ System. Section 5122 of the Clinger Cohen Act requires agencies to develop the means for selecting IT investments based on criteria to be applied in considering whether to undertake a particular investment in information systems. The developed means should include criteria related to the quantitatively expressed projected net, risk-adjusted return on investment and specific quantitative and qualitative criteria for comparing and prioritizing alternative information systems investment projects. Further, agencies are required to identify for a proposed investment the quantifiable measurements for determining the net benefits and risks of the investment.

According to the Director of the Office of Investigations, investigative questionnaires were produced in Word Perfect and sent via FedEx to individuals to ensure timely receipt and response. Respondents provided their email addresses and phone numbers so that they could be asked follow-up questions. An investigator questioned whether automation was feasible because each investigation is unique, and recipients of the questionnaire may not have Internet access.

The CIO said the Commission likely will not evaluate whether to automate the questionnaire in the next year because all available resources will be needed to handle the Commission's expected increase in the sunset review[9] work load. For fiscal years 2004 and 2005, the Commission estimated conducting 21 and 46 sunset reviews, respectively versus the actual number of reviews conducted in fiscal years 2001 through 2003 were 2, 5, and 1.

[9] In a sunset review, the Commission evaluates whether material injury to a U.S. industry would likely continue, or recur, if the antidumping/countervailing duty (AD/CVD) order is revoked. Such review must be conducted on every AD/CVD order every 5 years.

In light of doubts and delays concerning the IQ System as well as insufficient data available on its potential cost or savings, the Commission should follow the SDLC process to assess the project's viability. Accordingly, the assessment should include Clinger Cohen requirements to compare the benefits and return on investment of competing IT projects in order to properly set the IQ System's priority. A decision should be made whether the IQ System will improve the program's effectiveness and efficiency in conducting the investigations while reducing the paperwork and burden on businesses required to complete the questionnaires.

Recommendation 1
The CIO should ensure the Web site team has: (a) an approved strategy and a detailed project plan with projected completion dates for enhancing the Web site based on the Commission's staff and customer input; and (b) procedures to maintain the Web site, including monitoring customer usage and satisfaction with the Web site and making the necessary adjustments to address user friendliness and user maneuverability through the Web site.

Management Response
The CIO concurred with the recommendation. During the first 6 months of the Web team's creation in mid 2003, the team used a comprehensive fact finding approach to identify and outline the challenges facing ITC's Web. As a result of this effort, the team has developed a project plan that addresses the major deficiencies of the ITC Web site and adopts many "best practices" for Web site management. The project plan will be submitted to the CIO for approval. Written procedures for maintaining the Web site will be completed by the Web team and will address monitoring customer usage, satisfaction and user friendliness. Completion Date: September 30, 2004

OIG Comment
When accomplished, the above actions will satisfy this recommendation.

Recommendation 2
The Director of Publishing should issue official guidance on the format (i.e., paper or CD-ROM) to be distributed for final reports and publications by type of customer (e.g., Congress, libraries, law firms).

Management Response
The Director of Publishing will prepare official guidance for the Chairman's approval, through an Administrative Order, that establishes a policy on the format for distribution of final reports and official publications to customers. Completion Date: August 30, 2004

OIG Comment
When accomplished, the above actions will satisfy this recommendation.

Recommendation 3
The CIO should assess the IQ System's cost in terms of its benefit to the Commission and the public, and determine its priority and schedule for development in lieu of other IT projects. If the IQ System is approved, the CIO should develop an SDLC to minimize potential future delays.

Management Response
The CIO concurred with the intent of the recommendation. The Office of the CIO will ensure that the proposed IQ System project follows the SDLC discipline. Following the SDLC process, the proposed IQ System project will have an updated needs assessment and resource identification by which the Chairman will approve or disapprove further commitment to this project. The decision to proceed with this project will come through the SDLC process, not before. Completion Date: March 1, 2005

OIG Comment
When accomplished, the above actions will satisfy this recommendation.

C. Need to Encourage Customer Use of Electronic Media

The Commission lacked a sufficient process to encourage customers to request products in less expensive formats and to account for customers' preferred product formats. This year, the Office of the Secretary's annual address verification letter asked customers to include in their reply the report format—paper, CD-ROM, or Web site—they preferred. However, customers were not advised that the electronic formats are delivered more timely and at less cost to the government. Also, because the Commission did not account for the customers' expressed preferences in a centralized mailing list, opportunities likely were lost to provide the more timely and less costly electronic formats.

The annual verification letter contained the following footnote:

> The U.S. International Trade Commission (USITC) is interested in your voluntary comments (burden less than 10 minutes) to help assess the value and quality of our reports, and to assist in improving future products. Which format is most useful for you?
>
> _____CD-ROM _____Hardcopy _____USITC Internet site

The annual letter would be a more effective opportunity for encouraging electronic reports if it informed customers that receiving paper reports takes 2-to-4 *weeks* as compared with CD-ROMs that take 2-to-4 *days*, and Web site reports that may be downloaded in a matter of minutes. The letter could be enhanced by requesting the email address of each customer to notify them of the availability of recently released reports, as well as maintain a current list of customers interested in Commission business. The

notification could contain an embedded link to direct the customer to the Commission's Web site for easy downloading.

In the spirit of E-Gov, agencies were directed to identify and establish a broad framework of measures that require using Internet-based information technology to enhance citizen access to government information and services and to improve the program's effectiveness and efficiency in delivering services to citizens.

The Commission has seen a steady growth in the customers' preference for obtaining information directly from the Commission's Web site or electronically. In FY 2003, although the Commission mailed approximately 20,000 publications mostly in paper format, it provided over 300,000 reports downloaded by customers visiting its Web site.

The Office of the Secretary had no formal plan or process to act on the customers' desired format responses. The Office of the Secretary maintained an automated system which recorded customer name, address, and requested report(s). However, this system did not have the capability to record the desired format.

The Commission could save an estimated 80 percent or more of current costs if customers would accept discretionary documents in electronic format. In FY 2003, had the 20,000 publications that cost $264,400 to produce and mail as paper been prepared and mailed instead on CD-ROMs, the estimated cost would have been $49,000. Had the same documents been downloaded from the Web site, production and mail costs would have been essentially eliminated.

Recommendation 4
The Secretary should enhance the report distribution procedures by consolidating its mailing lists into one list and recording and tracking in its mailing lists the customers' desired type of report and desired medium (i.e., paper, CD-ROM, and Web site).

Additionally, the annual verification letter should be revised to specifically request:

- The customer's email address for communicating and sending notices to the customer.
- The customer's report medium preference along with a short description of the delivery time for each type, including the immediate availability of the report and other information from the Commission's Web site.
- An explanation of how the customer would be alerted of the publication's availability.

Management Response
The Secretary concurred with the intent of the recommendation. The Office of the Secretary will conduct a requirements analysis of a fully comprehensive approach to maintaining a database of mailing list recipients. The requirements analysis process will identify the need to comprehensively address all mailing list needs of the Office of the

Secretary. The decision on whether, how, and when to proceed will be made only after this analysis and a cost benefit analysis have been completed.

The Office of the Secretary will update the annual verification letter to include request for email addresses, preferred medium, and an explanation of Commission notification procedures.

Completion Date: May 31, 2005

OIG Comment
When accomplished, the above actions will satisfy this recommendation.

D. Need to Enhance IT Procedures To Streamline Document Processing and Ensure Internet Searches Retrieve Commission Products

Further opportunities exist to streamline document processing and better serve customers searching for the Commission's products. Although Commission offices are not required to provide documents in electronic format to the Office of Publishing for publication, most products arrive in Publishing in time-consuming paper format. Also, the Commission can make better use of existing technology to make products easier for customers to find on the Commission's Web site.

Creating Web Acceptable Documents

Commission offices were not required to provide documents in electronic format to the Office of Publishing for publication, and approximately 70 percent of Publishing's workload received from internal sources was in paper format. For example, although the Office of Investigations had its own scanners, Investigations provided its reports to Publishing entirely in paper for Publishing to scan the reports including exhibits and attachments.

The Commission has an opportunity to reduce processing costs by encouraging offices to scan the additional documents when feasible and, at a minimum, provide Publishing with existing electronic documents along with instructions to scan and add the additional documents. When a paper document was received, Publishing had to scan the document in order to create a CD-ROM or prepare it for posting to the Web. Depending on the document's size and complexity, Publishing spent approximately 1 hour scanning it and reviewing the quality in electronic format. By comparison, Publishing could review an electronic document in 5 to 10 minutes before it could be posted to the Web.

Commission Directive 3201.0 assigned responsibility to the Office of Publishing for producing electronic versions of reports and providing the files to the Office of Information Services—another OCIO office—for posting on the Web site. Office

directors are responsible for ensuring that materials to be processed meet the established preparation standards for the selected mode of production.

Posting Documents to the Web site

As discussed above (see page 5), the Commission established a Web team and hired a Webmaster but had not completed and approved a plan of action with milestones to support and account for their efforts. Absent written procedures for maintaining the Web site, the Commission used inconsistent techniques in posting documents to the Web.

The Commission generally used META tags[10] when posting a document to the Web. META tags assist several of the leading commercial Internet search engines using "search robots" to locate and record documents based on the META tag content headers. While properly optimized META tags greatly enhance the ability of the leading search engines to locate a Web site, the Commission's META tags were applied inconsistently and not always formatted properly. Consequently, Commission publications and reports less readily were identified when using a public search engine such as Google. Our Web search of "Anti-Dumping" using Google found no mention of the Commission in the first 100 sites listed. Our search of "steel investigations" listed the Commission's Web site sixth.

Properly implemented META tags include placing descriptions and keywords in the META tag title headers of Web site pages. The "title" and "description" META tags are important to write effectively since several major search engines use them in their indices. However, not all search engines use this tag—Altavista does, but Excite does not, for example. Therefore, the Commission's challenge is to identify the public search engines most likely to be used and apply the method they use to bring the Commission's work to the forefront.

Although META tags are one technique to increase the visibility of the Commission's Web site, other techniques are also suggested by the World Wide Web Consortium (W3C). W3C's site at www.searchenginewatch.com provides suggestions for posting documents to the Web site that can improve the search engine results. Also, the General Service Administration's Office of Electronic Government provides assistance and guidance to federal agencies in developing, maintaining, and enhancing their Web sites. At www.estrategy.gov, within the Web Best Practices Guidelines, they provide a useful guide titled Research-Based Web Design and Usability Guidelines to assist agencies in increasing the public's use of the Web site.

[10] A tag is a command inserted in a document that specifies how the document, or a portion of the document, should be formatted. A META tag provides information such as who created the Web page, how often it is updated, what the page is about, and which keywords represent the page's content. Many search engines use this information when building their indices.

Recommendation 5
The Director, Office of Publishing should encourage program offices to provide Publishing with available electronic formatted discretionary documents.

Management Response
The Director, Office of Publishing will meet with designees from the program office to further encourage the submission of electronic content to Publishing for production. The Director, Office of Publishing will also provide to the program offices documented guidance on how, and in what formats, to submit electronic content to the production staff.

Completion Date: September 30, 2004

OIG Comment
When accomplished, the above actions will satisfy this recommendation.

Recommendation 6
The CIO should: (a) develop procedures for posting documents on the Web site in order to improve the visibility of the Commission's Web site and documents by public search engines, (b) assign responsibility for ensuring the procedures are followed, and (c) develop Web site procedures to periodically assess the effectiveness and ease of identifying the Commission's work when using public search engines.

Management Response
The CIO concurred with the intent of the recommendation. A strategic plan has been developed and approved by the CIO to increase ITC's placement in relevant commercial search engines. The plan will be implemented as part of the Web site redesign project.

All Web related activities reside in the Office of the CIO, who has the final responsibility for ensuring that all IT policies and procedures are followed. Procedures for assessing Commission search engine placement strategy will be implemented according to the project plan approved by the CIO.

Completion Date: November 30, 2004

OIG Comment
When accomplished, the above actions will satisfy this recommendation.

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, D.C. 20436

May 10, 2004 CIO-BB-003

TO: Inspector General

FROM: Stephen A. McLaughlin
Chief Information Officer

SUBJECT: Draft Audit Report: Evaluation of the U.S. International Trade Commission's Discretionary Document and Mail Distribution Program

Thank you for the opportunity to review and comment on the subject draft report addressing the Commission's discretionary document and mail distribution program. As noted in the report, the Commission has made significant strides in improving the efficient and effective distribution of documents and publications through the use of information technology. We will continue to address this issue as an ongoing priority for the Commission.

Recommendation 1

The CIO should ensure the Web site team has: (a) an approved strategy and a detailed project plan with projected completion dates for enhancing the Web site based on the Commission's staff and customer input; and (b) procedures to maintain the Web site, including monitoring customer usage and satisfaction with the Web site and making the necessary adjustments to address user friendliness and user maneuverability through the Web site.

Commission Response:

During the first 6 months of the Web team's creation in mid 2003, and in tandem with maintaining current operations of the web site, the team used a comprehensive fact finding approach to identify and outline the challenges facing ITC's web presence. As a result of this effort, the team has developed a project plan that addresses the major deficiencies of the ITC web site and adopts many "best practices" for web site management. The project plan will be submitted to the CIO for approval. Written procedures for maintaining the web site will be completed by the Web team and will address monitoring customer usage, satisfaction and user friendliness.

Completion Date: September 30, 2004

Recommendation 2

The Director of Publishing should issue official guidance on the format (i.e. paper or CD-ROM) to be distributed for final reports and publications by type of customer (e.g., Congress, libraries, law firms).

Commission Response:

The Director of Publishing will prepare official guidance for the Chairman's approval, through an Administrative Order, that establishes a policy on the format for distribution of final reports and official publications to customers.

Completion Date: August 30, 2004

Recommendation 3

The CIO should assess the IQ System's cost in terms of its benefits to the Commission and the public, and determine its priority and schedule for development in lieu of other IT projects. If the IQ System is approved the CIO should develop an SDLC to minimize potential future delays.

Commission Response:

The Commission agrees with the intent of this recommendation, although not with the approach. The Office of the Chief Information Officer will ensure that the proposed IQ System project follows the Systems Development Life Cycle (SDLC) discipline. Following the SDLC process, the proposed IQ System project will have an updated needs assessment and resource identification by which the Chairman will approve or disapprove of further commitment to this project. The decision to proceed with this project will come through the SDLC process, not before.

Completion Date: March 1, 2005

Recommendation 4

The Secretary should enhance the report distribution procedure by consolidating its mailing lists into one list and recording and tracking in its mailing lists the customers' desired type of report and desired medium (i.e. paper, CD-ROM, and web site).

Additionally, the annual verification letter should be revised to specifically request:

- The customers' email address for communicating and sending notices to the customer

- The customer's report medium preference along with a short description of the delivery time for each type, including the immediate availability of the report and other information form the Commission' Web site.

- An explanation of how the customers would be alerted of the publications' availability.

Commission Response:

The Office of the Secretary will conduct a requirements analysis of a fully comprehensive approach to maintaining a database of mailing list recipients. The requirements analysis process will identify the need to comprehensively address all mailing list needs of the Office of the Secretary. The decision on whether, how, and when to proceed will be made only after this analysis and a cost benefit analysis have been completed.

The Office of the Secretary will update the annual verification letter to include request for email addresses, preferred medium, and an explanation of Commission notification procedures.

Completion Date: May 31, 2005

Recommendation 5

The Director, Office of Publishing should encourage program officers to provide Publishing with available electronic formatted discretionary documents.

Commission Response:

The Director, Office of Publishing will meet with designees from the program office to further encourage the submission of electronic content to Publishing for

production. The Director, Office of Publishing will also provide to the program offices documented guidance on how, and in what formats, to submit electronic content to the production staff.

Completion Date: September 30, 2004

Recommendation 6

The CIO should: (a) develop procedures on the Web site in order to improve the visibility of the Commission' Web site and documents by public search engines, (b) assign responsibility for ensuring the procedures are followed, and (c) develop Web site procedures to periodically assess the effectiveness and ease of identifying the Commission' work when using public search engines.

Commission Response:

As discussed above in our response to Recommendation 1, a strategic plan has been developed and approved by the CIO to increase ITC's placement in relevant commercial search engines. The plan will be implemented as part of the Web site redesign project.

All Web related activities reside in the Office of the Chief Information Officer, who has the final responsibility for ensuring that all IT policies and procedures are followed. Procedures for assessing Commission search engine placement strategy will be implemented according to the project plan approved by the CIO.

Completion Date: November 30, 2004

Approve: ✓ Disapprove: _____

Chairman, Deanna Tanner Okun

5/10/04
Date

cc: Office of Administration
Office of Facilities