INSPECTOR GENERAL

IG-V-105

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, D.C. 20436

December 24, 1998

MEMORANDUM

TO: Director, Office of Operations

FROM: Inspector General

SUBJECT: Inspection Report No. 02-99, Followup Review of the Commission's Ability to Report on Performance Measurement Goals

We initiated this inspection in October 1998 to verify and validate selected data sources and information collection systems that support the Commission's fiscal year (FY) 1999 annual performance plan. We found considerable improvement over the form and content of the performance measurement goals contained in the 1997 Strategic Plan. The various office directors assigned responsibility for performance goals are collecting data or making plans for virtually all performance indicators. In a few instances, we found the data sources and information collection systems did not identify use by customers or critical dates needed to evaluate measurement of the performance goal. We also found a few instances where the performance goals and indicators could be clarified.

A draft inspection report was distributed to the Directors of the Offices of Operations (OP), Industries (IND), Investigations (INV), Information Systems (OIS), Unfair Import Investigations (OUII), Tariff Affairs and Trade Agreements (TATA), External Relations (ER), Secretary (SE), and General Counsel (OGC) on December 15, 1998, for review and comment. They made technical corrections and other comments which have been incorporated.

Scope

We interviewed all members of the Strategic Planning Committee concerning the revisions made to the 1997 Strategic Plan. We also interviewed the directors and staff in all offices with responsibility for the FY 1999 performance indicators and examined relevant documents maintained by these offices. We reviewed the Government Performance and Results Act of 1993 (the Results Act) and guidance from the Office of Management and Budget (OMB).

We also reviewed H.R. 2883, Government Performance and Results Act Technical Amendments of 1998, which was passed by the House on March 12, 1998. The Bill requires that inspector generals develop and implement a plan to review agency implementation of performance plans and results. The plan must include two elements. (1) Agency efforts to develop and use performance measures determining progress toward achieving performance goals and program outcomes. (2) Verification and validation of selected data sources and information collection and accounting systems. This review addressed these elements. Future reviews will include selecting specific performance indicators and confirming that supporting data exists for the information collection and accounting systems.

Background

The Results Act provided for government agencies to develop and submit a strategic plan to Congress by September 30, 1997, for the five-year period ending September 30, 2002. The strategic plans were to include objective, quantifiable performance measurement goals. No later that March 31, 2000, and annually thereafter, agencies are to prepare and submit a report on program performance for the previous FY. Accordingly, reporting on goals covers each year beginning October 1, 1998 (FY 1999).

Administrative Order 98-05, issued on March 5, 1998, officially designated the members of the Strategic Planning Committee. The members are the Directors of OP (Chairman), ER, IND, INV, and Administration, and the Secretary, the General Counsel, an Assistant General Counsel in OGC, and the Chief of Staff in the Office of the Chairman.

In FY 1998, OIG conducted an inspection of the performance measurement goals in the 1997 Strategic Plan (Inspection Report No. 01-98, Review of the Commission's Performance Measurement Goals, dated March 6, 1998). We found that some goals were not defined or expressed as tangible, measurable objectives. Responsibility for measuring the goals had not been clearly designated and, even when responsibility was accepted, office directors usually had not developed plans for collecting data. As a result of that inspection, the Commission revised the Strategic Plan. The number of critical success indicators was reduced from 16 to 15, and the number of strategic goals was reduced from 36 to 20. FY 1999 performance goals and indicators were developed for each strategic goal. The revised Plan for the five-year period ending September 30, 2003, was submitted to OMB on October 15, 1998.

Performance Measures

The Results Act provides that each plan establish performance goals and express such goals in an objective, quantifiable, and measurable form unless authorized to be in an alternative form. A performance goal is a tangible, measurable

objective against which actual achievement can be compared, including a goal expressed as a quantitative standard, value, or rate.

Our review of the revised performance measures found that most goals were translated into distinct, measurable indicators that could reasonably be accomplished in FY 1999. The office directors designated for performance indicators were aware of their responsibilities and either gathering data or planning on how to do so. In a few instances, we found data sources and information collection systems that either did not identify use of Commission resources by non-ITC customers, or did not identify critical dates needed to evaluate measurement of the performance goal. We also found some performance goals and indicators that could be clarified. Our findings are summarized in the attached schedule of FY 1999 performance data.

Use by customers. Multiple strategic goals refer to use by customers, usually Congress, USTR, peers, and public. However, the data sources and information systems do not always differentiate between use by customers and use by Commission employees, which significantly impairs the viability of the numbers to measure increased use by customers. Further, some data on customers was not by type of customer, which limits the ability to determine which customers are increasing use.

Operation No. 3 strategic goal 1(a) (i). IND is to track the level of visitors using reports on the ITC Internet site to measure use of ITC research capabilities/products by Congress and USTR, peers, and public. The numbers being tracked do not separate use by customer, and include use by ITC employees.

The IND Director said the statistics can be separated for ITC users, and some other types of users may be separated, although it may not be possible to identify USTR or Congress. IND will explore this issue further with OIS.

Operation No. 3 strategic goal 1(a) (ii). IND is to track the requests for copies of reports to measure use of ITC research capabilities/products by Congress and USTR, peers, and public. The numbers being tracked do not separate use by type of customer.

The IND Director said ITC requesters can be separated and a good approximation of various types of users, including Congress and USTR, Government agencies, and the public can be obtained by reviewing the actual requests. IND will explore this issue further with the Secretary and OIS.

Operation No. 4 strategic goal 1(a). OIS is to track use of trade data and nomenclature expertise by Congress and USTR, peers, and public.

The numbers tracked include the logins on the Data Web, logins and reports generated on the Trade Data Web, and logins on the Tariff Database. The number of logins on the Data Web is separated by user, including logins by on-site employees; logins by off-site employees (i.e. those working at home or on travel) are included in the "other" users group. The reports generated on the Trade Data Web and the Tariff Database do not differentiate between ITC employees and customers. Statistics collected since December 1997 indicate that approximately 45 percent of the logins to the Data Web site are by ITC users.

Timeliness. Multiple strategic goals refer to timeliness and compliance with administrative and statutory deadlines. Critical dates needed to evaluate measurement of the performance goal were not always provided in the information collection systems.

Operation No. 1 strategic goal 2(b). INV is to maintain a log of APO material and public versions of reports made available in accordance with established guidelines. The log includes the scheduled release dates for unspecified APO material and checkmarks to indicate that the material was sent to SE for release. SE notifies INV of the actual release date, but this date is not recorded or compared to the scheduled release date.

Operation No. 4 strategic goal 3(a). TATA is to track timeliness of completing work. The Bill Reports log does not include the date ITC received the request.

Clarification. Various elements of the plan need some sort of clarification for intent, actual practice, organization, and/or to eliminate duplication.

Operation No. 1 strategic goal 1(a). INV, GC and SE are to prepare update or status and evaluation reports on existing and new handbooks and other materials. The offices updated the Blue Book in accordance with the FY 1999 performance goal. They are evaluating the status of other materials but do not have plans for submitting reports on the periodic update of import injury trade materials.

Operation No. 1 strategic goal 2(b). INV is to maintain a log of APO material and public versions of reports made available in accordance with established guidelines. The "public versions of reports" was intended to be the release of public information to parties to an investigation, not the final report.

Operation No. 2 strategic goal 3(a)(ii). SE and OIS are to track time between filing and scanning ofsubmissions which are made accessible to the public via electronic and other means. The data collected does not

distinguish 337 documents, the focus of Operation No. 2, from other documents. The Secretary and OUII Director agreed this indicator was supposed to include all documents.

According to the OUII Director, when tracking the time between the filing and scanning of documents, the data is not broken down separately for section 337 filings as opposed to other filings. Given that section 337 filings comprise about one-half of all Commission filings (and are not treated differently from other filings for scanning purposes), it was felt that if the stated time frames were being met for all types of filings with the Commission, that would establish that section 337 filings were being scanned in a timely fashion.

Operation No. 2 strategic goal 3(a)(iii). The Document Imaging Oversight Committee (DIOC) is to track time between submission and scanning of section 337 evidentiary records which are made accessible to the public via electronic and other means. The Secretary, the DIOC Chair, is working with OIS to develop a data collection mechanism to track the time between the submission of section 337 evidentiary records to SE and scanning for all documents. Rather then the date the records were submitted to the Administrative Law Judge (ALJ), the final date of the hearing is going to be recorded.

Operation No. 3 strategic goal 1(a). Strategic Goal 1(a) is to obtain increased use of research capabilities/products by customers. Strategic Goal 2 (a) is to institute study initiatives in emerging areas/issues. The number of section 332 investigations initiated is a performance indicator for both goals, although 332 investigations are rarely self-initiated.

Also, the total workdays on quick responses to USTR and Congress is a performance indicator for both goals in Operation No. 3 on research programs and for a goal in Operation No. 5 on trade policy support. The quarterly report includes technical advice provided on an agency-wide basis. The specific information on use of research capabilities/products and participation in organizations could be extracted from the quarterly reports, but there are currently no plans to do so.

IND will pursue potentially eliminating indicator 2(a)(ii) in the next version of the performance plan. The IND Director discussed the "quick response" indicator with the ER Director, and they will attempt to split the workdays between Operations #3 and #5.

Operation No. 4 strategic goal 1(a). This goal requires OIS to track use of expertise by customers. The Director of OIS stated that this indicator is duplicative of next two indicators to track use of data by customers

and use of main library by customers. The statistics for the main library include substantial ITC use.

Operation No. 4 strategic goal 3(a). TATA is to track timeliness of completing work on or before deadlines. The TATA Director said there are no administrative, regulatory, or statutory deadlines for bill reports or 484 Committee actions.

Surveys. Four operations (Nos. 1, 2, 4, and 5) have goals that are going to use surveys to obtain customer feedback. ER and TATA are coordinating efforts in developing one surveyfor Operations No. 4 and 5 because of a shared customer base. There may be additional overlapping customer bases between ER, TATA, OUII, and INV. Full coordination between these offices at the survey design stage will ensure that customers are not asked to respond to multiple Commission surveys.

We suggest that the Director of Operations:

- Determine whether strategic goals for use by customer apply to the individual types of customers identified, or non-ITC use in general. Ensure data collection systems provide statistics excluding ITC use, and by type of user if appropriate;

- Ensure data collection systems include all necessary dates to measure timeliness; and

- In the next revision of the Strategic Plan, clarify wording that is misleading and placement of strategic goals that apply to all operations, and eliminate duplicate reporting of data.

Attachment

cc: Commission
Strategic Planning Committee
Office Directors

Attachment

USITC FY 1999 Performance Data

Guide to abbreviations used:

Abbreviations	Meanings
ALJ	Administrative Law Judge
APO	Administrative protective order
Blue Book	*Antidumping and Countervailing Duty Handbook*
DIOC	Document Imaging Oversight Committee
EDIS	Electronic Docket Information System
ER	Office of External Relations
GC	Office of the General Counsel
ID	Initial determination by an ALJ
IND	Office of Industries
INV	Office of Investigations
OIS	Office of Information Services
OUII	Office of Unfair Import Investigations
Red Book	*An Introduction to Administrative Protective Order Practice in Antidumping and Countervailing Duty Investigations*
SE	Office of the Secretary
TATA	Office of Tariff Affairs and Trade Agreements
TEO	Temporary exclusion order
URAA	Uruguay Round Agreements Act
USTR	United States Trade Representative

OPERATION NO. 1: Import Injury Investigations

Strategic Goals		FY 1999 Performance Goals	Performance Indicators	Data Sources and Information Collection Systems
1(a)	Periodically update existing handbooks and other materials, and evaluate need for and as necessary develop new materials.	Blue Book updated; INV/GC complete initial evaluation.	INV prepares update or status report, and evaluation report. GC prepares update or status report, and evaluation report. SE prepares update or status report, and evaluation report.	INV updated the BlueBook in October 1988. The generic questionnaire is being revised with a scheduled completion date of December 1998. Other materials will then be evaluated. INV intends to evaluate and update materials on an ongoing basis, but has no plans to prepare update, status, or evaluation reports. GC and SE participated in update of BlueBook and revision of questionnaire. The offices deferred to INV on submission of reports.
2(a)	Obtain feedback from users of the process on investigative procedures.	INV/GC conduct first user survey by 9/30/99.	INV compiles survey results. GC compiles survey results.	A joint effort by INV and GC to conduct survey is in initial planning stage, i.e. identifying users, methodology, and content. Survey will be completed and results compiled by September 30, 1999.
2(b)	Make available APO material and public versions of reports in accordance with established guidelines, modified as appropriate based on user feedback.	Same as strategic goal.	INV maintains log of releases.	INV maintains an "APO Tracking Log" of statutory date for release of APO material and a check mark to indicate materials were sent to SE. SE notifies INV of when APO materials are distributed and provides lists of parties receiving documents. The actual date is not recorded or compared to the guidelines of 7 to 30 days. Public versions of reports are not addressed because reference was intended to be the release of public information to parties in the investigation.

Strategic Goals		FY 1999 Performance Goals	Performance Indicators	Data Sources and Information Collection Systems
3(a)	Obtain feedback from Commissioners on the availability of data.	INV and GC poll Commissioners after each determination.	INV compiles poll results. GC compiles poll results.	INV has drafted a formal survey tool that may be used in addition to or in place of GC memoranda and would quantify responses. GC sends monthly memoranda to Commissioners soliciting feedback on the opinion writing process and, since October 1998, the adequacy of data collection. The memoranda identify all preliminary and final determinations made during the preceding month.
3(b)	Circulate draft staff reports to the investigative team for review; draft legal issues memoranda and draft opinions to the team for comment on factual accuracy and confidentiality.	Same as strategic goal.	INV tracks issuance of draft reports. GC tracks draft memoranda and draft opinions.	INV maintains a "Report and Determination Tracking Log" which includes columns to be checked when pre-hearing and staff reports are distributed to team members. Data is supported by documents in investigative files. GC has a "Legal Issues Memorandum and Opinion Tracking Log" which includes columns to be checked when draft memoranda and opinions are distributed to team members. Data is supported by documents in case files. The universe was defined by both offices as actions taken during the FY.
4(a)	Meet administrative deadlines for staff reports, legal issues memoranda, and draft opinions; meet statutory deadlines for determinations.	Same as strategic goal.	INV tracks deadlines and issuance dates for reports and determinations. GC tracks deadlines and issuance dates for memoranda and draft opinions.	INV maintains a "Report and Determination Tracking Log" with columns to record administrative and statutory deadlines and actual dates for pre-hearing and staff reports and determinations. Data backed up by administrative dates in action jackets, and actual dates in investigative files. GC has a "Legal Issues Memorandum and Opinion Tracking Log" which includes columns to record administrative deadlines and actual dates for legal issues memoranda and draft opinions. Data backed up by administrative deadlines in action jackets and actual dates in case files. The universe was defined by both offices as actions taken during the FY.

OPERATION NO. 2: Intellectual Property-Based Import Investigations

Strategic Goals	FY 1999 Performance Goals	Performance Indicators	Data Sources and Information Collection Systems
1(a) Meet statutory and key administrative deadlines.	Same as strategic goal.	OUII tracks: (i) Time between institution of investigation and filing of complaint.	OUII has a "Key Statutory and Administrative Deadlines in Section 337 Investigations" form to record date complaint filed with SE and date of Commission vote (for institution). The actual time from filing to institution, which cannot exceed 30 or 35 days by rule, is shown.
		(ii) Time between institution and setting of target dates.	The form also is used to record the date of the public notice (for institution) and when target dates are established. The actual time from institution to setting target dates, which is done in an action jacket and cannot exceed 45 days by statute, is shown. Data is supported by documents in OUII files.
		GC tracks: (iii) Time between ALJ's issuance of final ID and target date for issuance of final ID, and time between Commission's issuance of final determination and target date for completion of investigation.	GC has a "Key Statutory and Administrative Deadlines in Section 337 Investigations" form to record target date for issuance of final ID and date the ALJ issues the final ID. The log is also used to record the target completion date (Commission decision) and date issued (notice and/or order of final determination). Data is supported by documents in EDIS and GC files. The universe was defined by both offices as actions taken during the FY.
		(iv) In TEO proceedings, time between notice of institution, ID, and determination.	GC has a "Key Statutory and Administrative Deadlines in Section 337 Investigations" form to record dates the notice of institution is published in the Federal Register, the ALJ issues the temporary relief ID, and the notice and/or order of the Commission decision on temporary relief. The regulatory deadlines (70 or 120 days) and statutory deadlines (90 or 150 days) are footnoted, and complicated cases will be noted as such. Data is supported by documents in EDIS and GC.

Strategic Goals		FY 1999 Performance Goals	Performance Indicators	Data Sources and Information Collection Systems
1(b)	Conclude section 337 investigations in time frames that are consistent with the URAA.	OUII/GC compile data on length of: (a) investigations concluded during the 3 years before the URAA, and (b) investigations that were commenced during FY 1998 and 1999; decide whether to categorize investigations by type and compare on that basis.	For investigations in which Commission made final determinations on violation: OUII compiles data on length of investigations. GC compiles data on length of investigations.	OUII is researching information on investigations commenced (not concluded) from January 1, 1992 - December 31, 1994, the three years before URAA. OGC is researching information on investigations commenced in FY 1998, and is maintaining data for FY 1999. The publication in the Federal Register of the notice of institution will be used for beginning dates and the date of the notce and/or order of the Commission final determination will be used for the ending dates. The offices intend to compare actual times with URAA suggested time frames of 12 or 18 months. Information will be compiled by September 30, 1999. OUII is researching information on subject matter (e.g. patent claims or registered trade marks) to be used when deciding whether to categorize investigations by type.
1(c)	Reduce average time to conclude ancillary proceedings.	OUII compiles data on length of past ancillary proceedings (advisory opinion, modification and enforcement); GC on new proceedings.	OUII reports on comparison of lengths of proceedings. OGC reports on comparison of lengths of proceedings.	OUII has a "Section 337 Ancillary Proceedings" form to record data being collected on type of proceeding, date filed, and concluded (date of Commission vote) for FYs 1994 to 1998. OGC has a "Section 337 Ancillary Proceedings" form to record similar data on FY1999 ancillary proceedings. The universe was defined by OUII and GC as proceedings instituted by notice. Reports will be submitted at year-end.

Strategic Goals	FY 1999 Performance Goals	Performance Indicators	Data Sources and Information Collection Systems
2(a) Address reports of violations of remedial orders in a timely manner.	Same as strategic goal.	OUII tracks: (i) calls and letters re purported violations and responses thereto.	OUII has a "Reports of Possible Violations of Section 337 Remedial Orders and Responses Thereto" form to record date and nature of reports received in FY 1999, and ITC response. The responses include a wide variety of actions, such as ancillary proceedings. Data is supported by documents in OUII files.
		(ii) letters from Customs and resulting seizure and forfeiture notices.	OUII has never had any involvement with the issuance of seizure and forfeiture notices.
		GC tracks: (i) calls and letters re purported violations and responses thereto.	GC has a "Reports of Possible Violations of Section 337 Remedial Orders and Responses Thereto" form to record date and nature of reports received in FY 1999, and ITC response. The responses include a wide variety of actions, such as ancillary proceedings. Data is supported by documents in GC files. The GC and OUII forms will be compared at year-end.
		(ii) letters from Customs and resulting seizure and forfeiture notices.	GC has a "Seizure and Forfeiture Orders Issued by the Commission" form to record date letters are received from Customs in FY 1999, and when the seizure and forfeiture order is signed by the Secretary. Data is supported by documents in GC files.

Strategic Goals		FY 1999 Performance Goals	Performance Indicators	Data Sources and Information Collection Systems
2(b)	Establish mechanisms to insure the Commission has information regarding effectiveness of orders and uses that information to further enforcement objectives.	(i) OUII/GC develop and pre-test survey of complainants who obtained exclusion orders regarding whether subject imports have stopped.	(i) OUII reports on development and results of survey and on responses. GC reports on development and results of survey and on responses.	OUII and GC established a working group which is in the planning phase of the pre-test survey. The offices intend to complete the pre-test survey by September 30, 1999, and report on results.
		(ii) OUII/OGC form working group to develop and implement propo-sals to bolster enforcement.	(ii) OUII reports on working group proceedings. GC reports on working group proceedings.	Working group will address proposals after survey.

Strategic Goals		FY 1999 Performance Goals	Performance Indicators	Data Sources and Information Collection Systems
3(a)	Increase information accessible to the public via electronic and other means.	(i) OUII compiles inventory of information now on agency Web site, and adds list of exclusion orders.	(i) OUII reports on inventory.	OUII compiled an inventory of information on OUII section of Web site (2 documents) and is maintaining a list of items added in FY 1999. OUII is working with OIS to put the list of outstanding exclusion orders (47 as of December 1, 1998) with a link to each order on the Web site by March 1999.
		(ii) SE scans ⅔ of new filings into EDIS within 2 business days after filing, and ¾ within 4; periodically assesses update rate and impact of transition five-year ("sunset") review cases on rate.	(ii) SE tracks time between filing and scanning of submissions accepted for filing.	SE and OIS developed an automated program to count workdays for all documents scanned, not just section 337 documents. SE and OUII said the goal was intended to apply to all documents.
			OIS tracks time between filing and scanning of submissions accepted for filing.	SE has not established a schedule for periodic assessments.
		(iii) DIOC develops audit of process for updating evidentiary records and sets timeliness goals for FY 2000.	(iii) DIOC tracks time between submission and scanning of section 337 evidentiary records.	SE and OIS were developing a mechanism to track dates from conclusion of the ALJ hearing through entry into EDIS. The DIOC is developing a timeline in order to audit the process and set timeliness goals.

OPERATION NO. 3: Research Program

Strategic Goals	FY 1999 Performance Goals	Performance Indicators	Data Sources and Information Collection Systems
1(a) Obtain increased use of ITC research capabilities/products by customers: • Congress and USTR • Peers • Public.	IND determines baseline measurements for performance indicators.	IND tracks: (i) Level of visitors using reports on ITC Internet site.	IND obtains figures from OIS on the number of logins on the Commission Web site and the number of visits to 332 reports and the number of 332 reports down loaded. The report is not by type of customer and includes ITC use.
		(ii) Requests for copies of reports.	IND obtains a copy of requests by type of report (332, Summaries, IER, ITTR, and Research Studies) from SE. The report is not by type of customer and includes requests from ITC employees.
		(iii) Written comments from users.	IND is revising the survey form distributed with some 332 reports to be used selectively on future reports.
		(iv) Mentions in Congressional debates.	IND is coordinating with ER to procure an automated system review of Congressional Record to identify references to the Commission. ER expects to have the system by March 1999, and the review will be retroactive to October 1998.
		(v) Numbers of witnesses and Members of Congress testifying at section 332 hearings.	IND obtains witness lists from SE and is maintaining schedules on the numbers of total witnesses and members of Congress testifying at 332 hearings.
		(vi) Quick responses to USTR and Congress listed in Chairman's quarterly report.	IND obtains number of workdays (not responses) from the ER quarterly report. The report includes all assistance provided to USTR and Congress agency-wide.
		(vii) Number of requests for section 332 investigations.	IND is maintaining a schedule of the number of 332 investigations instituted by the Commission (by vote date).

Strategic Goals	FY 1999 Performance Goals	Performance Indicators	Data Sources and Information Collection Systems
2(a) Institute study initiatives in emerging areas/issues.	IND establishes, based on historical data, baseline number of initiatives instituted.	IND tracks numbers of : (i) Self-initiated research articles. (ii) Requests for section 332 investigations. (iii) Quick responses to USTR and Congress listed in Chairman's quarterly report.	IND is scheduling number of individual articles published in IERs, ITTRs, Summaries, and Staff Research papers. Same as response to Operation No. 3, Goal 1 (a)(vii). Same as response to Operation No. 3, Goal 1 (a)(vi).
3(a) Complete work on or before deadlines.	Same as strategic goal.	IND will track percent of section 332 reports to requesters on time.	IND developed statistics for FYs 1996, 1997 and 1998, and is maintaining a schedule for FY 1999. The actual due dates and delivery dates will be added. The universe includes all 332 reports with specific deadlines.

OPERATION NO. 4: Trade Information Services

Strategic Goals	FY 1999 Performance Goals	Performance Indicators	Data Sources and Information Collection Systems
1(a) Obtain increased use of ITC trade data and nomenclature expertise by customers: • Congress and USTR • Peers • Public	TATA/OIS establishes baseline measurements.	TATA tracks use of expertise by customers.	TATA has a file of 'Visitor Research Log' sheets that are completed by people using World Customs Organization (WCO) materials kept in TATA. TATA has not decided on how to tabulate data, i.e. per visitor or document.
		OIS tracks use of expertise by customers.	The OIS Director said the following two indicators track use of expertise.
		OIS tracks use of data by customers.	OIS developed a system for OP to track the logins on Data Web, logins and reports generated on the Trade Data Web, and logins on the Tariff Database. Initial logins to the Data Web are divided by type of users (Congress, USTR, Commerce, government, ITC and other). The numbers include ITC use, internal and external access, which is approximately 45% of total use.
		OIS tracks use of Main Library by customers.	OIS prepares weekly reports on user statistics such as non-ITC visitors, book circulation, reference questions answered, and Interlibrary loans. Book circulation is all ITC use and reference questions are mostly from ITC staff.
2(a) Obtain feedback through: • External Relations • Customer contacts/surveys.	TATA conducts first customer survey; ER establishes contact mechanisms.	TATA tabulates results of survey. ER tabulates results of contacts.	TATA and ER plan to conduct joint survey for Operations 4 and 5. The offices are in the initial planning stage, i.e. determining customers, survey tool, and content. Survey will be completed and results tabulated by September 30, 1999.

Strategic Goals	FY 1999 Performance Goals	Performance Indicators	Data Sources and Information Collection Systems
3(a) Complete work on or before deadlines.	Same as strategic goal.	TATA tracks timeliness.	TATA maintains a Bill Reports log, with various dates. The log does not include date ITC received letter. TATA also has a data file on 484 Committee actions which lists dates for receipt of the petition and effective date of change. The data file is currently not printable in a usable form. TATA said neither the Bill Reports nor the 484 Actions have any deadlines.

OPERATION NO. 5: Trade Policy Support

Strategic Goals	FY 1999 Performance Goals	Performance Indicators	Data Sources and Information Collection Systems
1(a) Regularly contribute technical advice in organizations where Commission participation is appropriate.	ER develops list of appropriate organizations and log to track participation.	ER collects and reports information on participation.	ER collects data on work days spent providing advice and assistance to USTR and Congress which is provided to the Chairman in a quarterly report. ER has a list of organizations in which the Commission participates; and is working with OP to identify organizations where a presence is needed.
2(a) Obtain feedback from USTR/Congress/other agencies and organizations and customer surveys.	ER conducts first user survey.	ER compiles survey results.	See response to Operation No. 4, Goal 2(a).