



United States International Trade Commission

Budget Justification

Executive Summary
Fiscal Year 2027



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Budget Highlights

Impact of Continued Funding at \$122 Million

For our FY 2023 appropriation, the Congress provided much-needed support with a \$12.4 million increase, bringing our FY 2023 appropriation to \$122.4 million. The additional funding enabled us to begin a long-overdue hiring initiative that aimed to provide staffing levels commensurate with record workload. Our staffing level (full-time equivalents, or FTEs) increased from the low 400s to 433 in FY 2025, when we again saw caseload surge to record highs for antidumping/countervailing duty (AD/CVD) petition filings and remain high in our other mission areas. We expect high AD/CVD caseload in FYs 2026 and 2027, with increases anticipated for new section 337 complaints and factfinding investigations and sustained high workload in the areas of tariff affairs and trade policy support.

Our FY 2026 budget request of \$134 million reflected the funding level necessary to meet our statutory mandates and address existing and projected workload. However, operating for a fourth consecutive year with a \$122 million appropriation in FY 2026 threatens that ability. The funding is insufficient to support our staffing needs. We project that with an appropriation of \$122 million in FY 2026, we can support a staffing level of 412 FTEs, while our projected workload requires an estimated 441 FTEs. The potential impacts of insufficient staffing levels will be felt across our mission areas and include:

- risk of missed AD/CVD deadlines and delay or lapses in relief for injured U.S. companies and workers
- delayed relief for domestic industries affected by intellectual property (IP) theft, patent infringement, and other unfair acts
- compromised ability to make timely Harmonized Tariff Schedule of the United States (HTS) revisions and further modernization of the HTS
- longer lead times or missed deadlines for delivery of 332 investigation reports and technical assistance to the U.S. Trade Representative (USTR) and Congress, reducing timeliness of requested information to trade policy makers
- reduced information and analysis and increased risk of inaccurate information in Commission investigations and reports.

FY 2027 Budget Request

For FY 2027, the Commission requests \$134 million to enforce U.S. trade laws to ensure that U.S. businesses and workers do not face

unfairly traded or injurious imports and can compete on a level playing field in the U.S. market; maintain and update the HTS to accurately reflect tariffs on imported goods; and provide objective, fact-based information on trade and U.S. competitiveness matters in the form of factfinding investigations or technical assistance at the request of the President, Congress, or USTR to support trade policy activities of the U.S. government.

The request is required to increase staffing levels after making significant human capital investments in FY 2024 and the first part of FY 2025 that cannot be sustained with a \$122 million FY 2026 appropriation. Our FY 2027 staffing goal is to attain a staffing level of 441 FTEs, the number needed to achieve our mission during a time of record workload, with manageable risk levels across all mission areas. As of late January 2026, we had 398 staff onboard, with vacancy rates as high as 20 percent in offices responsible for statutory workload. While we have recently resumed hiring and are striving to meet 412 FTEs for the fiscal year, this staffing level is still insufficient for our current workload.

The volume and complexity of our workload demand a challenging level of effort by our current number of staff and risks burnout and further attrition. Given this high volume of workload and current Commission staffing level, many Commission offices are facing a short-term inability to meet aspects of their mission or statutory requirements. Our hiring plan is focused on filling the most critical positions necessary to accomplish the Commission's mission and mitigate risks, as determined by a data-driven and risk-informed analysis performed by the Commission's Human Capital and Performance Management and Strategic Planning Committees.

The request also provides resources for IT investments needed to continuously advance the security and capabilities of our IT infrastructure, continue timely equipment lifecycle replacements, improve web-based applications, and maintain and optimize the newly re-engineered HTS system. The request also ensures the availability and accessibility of our public-facing IT systems, as well as ensuring they are compliant with mandated standards and best practices. Specific FY 2027 IT investments include replacement of end-of-life network equipment, the continuation of third-party cybersecurity assessments and testing, the migration of file shares to the cloud for redundancy, the integration of artificial intelligence (AI), and improved backup capabilities. Additionally, this request includes funds to continuously optimize and maintain virtual hearing capabilities used to provide a higher level of availability and accessibility to public and intra-governmental customers who use our facilities, such as the Office of the United States Trade Representative.

Workload Drivers

The Commission continues to experience sustained record levels of AD/CVD activity and a higher number of unfair import investigations as described below, and we have been devoting more resources to conducting or supporting other investigations and Administration initiatives. Due to recent increases in petition filings in import injury investigations coupled with low levels of terminated orders, the average number of instituted and completed investigations has almost doubled in the last decade with commensurate increases in monthly import injury activity levels. In FY 2025 the Commission recorded its highest-ever number of petition filings and final phase investigations. This workload is expected to remain at record levels due to sustained increases in original investigations as well as investigations returning for five-year reviews. Although AD/CVD investigations represent the bulk of import injury activity, the Commission handles all litigation-related activity stemming from these investigations, which this past year was higher than previous years, and intermittent global safeguard investigations, such as the quartz surface products safeguard investigation.

In FY 2025, the total active number of section 337 investigations increased over FY 2024, while the rolling 10-year average for new complaints continued its overall upward trend. The settlement rate in section 337 remained relatively low, so we expect the majority of current unfair import investigations to remain before the Commission for longer. In addition, from November 17, 2025, to January 30, 2026, 21 new complaints were filed resulting in 21 new complaints being instituted as of January 30. As of January 30, there are six complaints pending institution by the Commission and the private bar has shown that there is great interest in filing additional complaints. We expect the high number of overall active investigations to continue to increase in FYs 2026 and 2027, given the surge of new petitions in early FY 2026 and the low settlement rates.

At the same time, the increased complexity of trade policy support requests and factfinding investigations has required more research and resources. The increasing complexity of our technical assistance requests and our reports, such as *Greenhouse Gas Emissions in the Steel and Aluminum Industries* and the *USMCA Automotive Rules of Origin*, has increased requirements for innovative analysis and increased the number of staff and hours devoted to these activities. For example, hours spent per investigation have risen more than 40 percent over the past five years despite the number of factfinding investigations conducted having fluctuated year to year.

In addition, we have amended the HTS more often in recent years to incorporate changes brought about by Administration initiatives. Prior to FY 2018, we would typically publish the HTS two or three times per year. Since FY 2018, we have averaged 17 HTS publications per year. In FY 2025, we helped the Administration draft nomenclature for over 40 tariff actions and prepared and published the HTS 26 times. The amount and complexity of the tariff changes implemented with each HTS publication have also grown significantly, particularly in FY 2025. These tariff changes have prompted an unprecedented increase in HTS Help inquiries, receiving more than twice as many in FY 2025 (5,522) compared to FY 2024 (2,298). We anticipate the volume and complexity of tariff changes will continue to be a salient workload driver in FYs 2026 and 2027.

Program Overview

Antidumping/Countervailing Duty Investigations and Unfair Import Investigations (Section 337)

The Commission provides a venue for private sector firms and other qualifying entities to bring allegations of certain unfair or injurious trade practices involving imports before an independent, objective, and expert quasi-judicial governmental body. Our trade remedy investigations caseload continues to grow in volume and complexity. In FY 2024, the Commission experienced a surge in the number of AD/CVD petition filings, reaching its second-highest level in the last two decades, followed by another surge in FY 2025, reaching record-level filings. The caseload is expected to continue to remain elevated in FYs 2026 and 2027, driven by both original investigations (preliminary and final phases) and the structural increase in reviews of existing orders required every five years after imposition. In FY 2025, new unfair import (section 337) matters remained steady, consistent with the 10-year monthly average. We experienced a surge of complaints filed in the first quarter of FY 2026, which together with low settlement rates create the expectation of active investigations increasing somewhat in FYs 2026 and 2027.

AD/CVD Caseload is at Record High Levels

In FY 2025, we surpassed FY 2024 highs to reach a record level of petitions, which contributed to record-level institutions and active investigation levels. In FY 2025, 27 petitions were filed under Title VII of the Tariff Act of 1930. In FY 2025, more than one-half of the petitions involved imports from multiple countries. Domestic industries filing petitions in FY 2025 produced a range of products, including consumer/industrial goods, chemical, intermediate products, minerals, agricultural, and steel-related products.

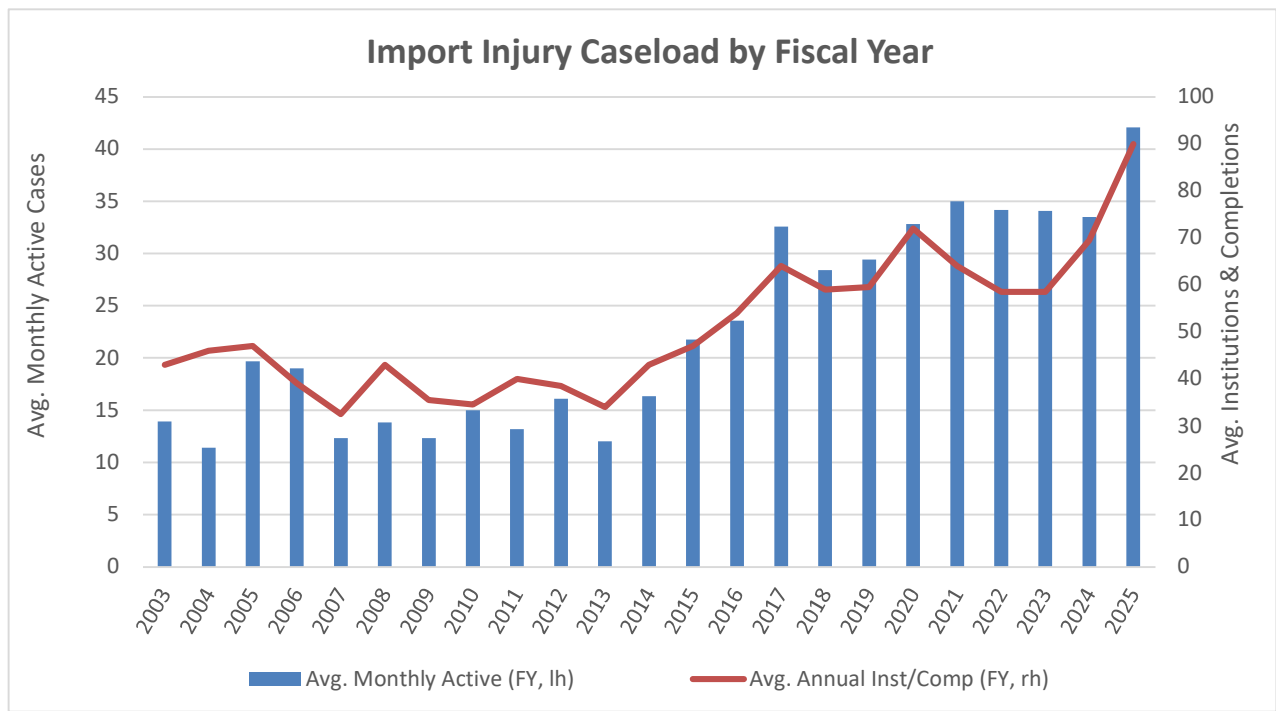
Most of the investigations covered consumer/industrial (8), chemical (7), and intermediate products (6). Additional investigations covered mineral, steel-related, and agricultural products (2 each). Some investigations were notable because of the size and/or complexity of the U.S. industry and market, including solar products, float glass, rebar, methylene diphenyl diisocyanate (MDI products), unwrought palladium, thermoformed molded fiber products, abrasive grains, and active anode material. In addition to new investigations, we instituted 34 reviews of existing AD/CVD orders in FY 2025 and anticipate instituting 45 in FY 2026 and 34 in FY 2027. While import injury review activity increased, safeguard activity is characterized by year-to-year fluctuation. In FY 2025, the Commission received one safeguard petition on quartz surface products and anticipates conducting an end-of-relief review for crystalline silicon photovoltaic cells and modules (solar products) and a mid-term review for fine denier polyester staple fibers in FY 2026. Overall, the Commission instituted 91 investigations and reviews and completed 89 investigations and reviews in FY 2025. Recent activity reflects a sustained increase in filing activity and continued increases in five-year review caseload. In FY 2026, we anticipate instituting 87 proceedings and completing 88. In FY 2027, we anticipate instituting 70 proceedings and completing 78. Though cyclical, the Commission's caseload is projected to remain at historically high levels. Whereas the 10-year average for institutions and completions was 40 during FYs 2002-11 and 53 during FYs 2012-21, the five-year average for FYs 2022-26 is 73 (an 82 percent increase over the first 10-year period and a 38 percent increase over the second).

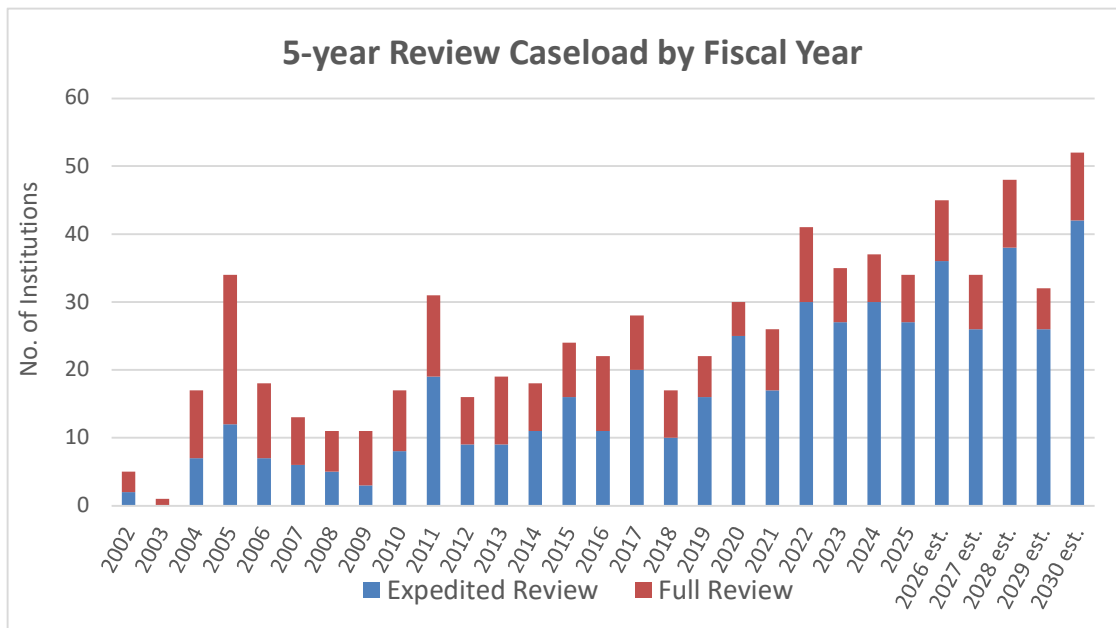
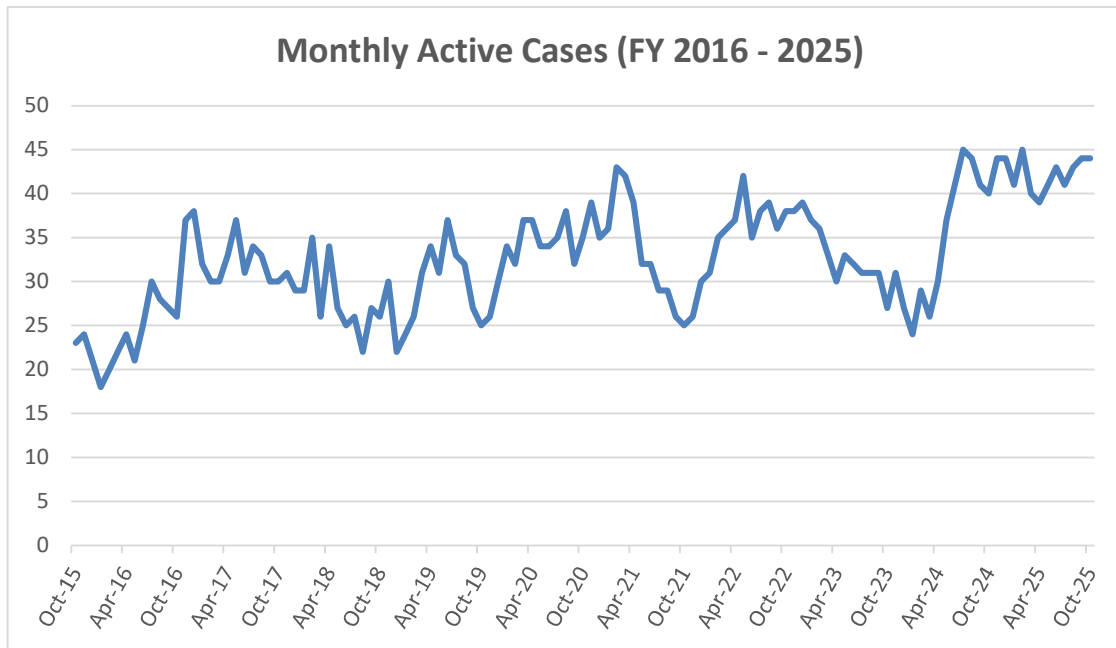
During FY 2025, we continued our efforts to increase the transparency of our proceedings and reduce the burden on participating parties, as well as increase investigative efficiency. We leveraged information from the Commission's Investigations Database System (IDS) to develop a report on five-year reviews. The report followed engagement and requests from external stakeholders and provides counsel representing U.S. industries and importers efficient and accurate information on scheduled reviews. In FY 2025, we continued to improve the functionality and utility of IDS and developed, tested, and implemented version 2 requirements.

Import Injury Investigations Caseload

Instituted and Completed Investigations

	Instituted							Completed						
	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Actual	FY 2026 Estimate	FY 2027 Estimate	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Actual	FY 2026 Estimate	FY 2027 Estimate
Preliminary Title VII	11	10	10	22	27	17	17	12	10	10	21	26	20	17
Final Title VII	23	14	6	13	30	23	17	25	13	9	10	22	27	19
Other	1	0	2	3	0	2	2	2	1	1	4	0	2	2
Full Review	9	11	8	7	3	9	8	5	6	11	9	6	7	9
Expedited Review	17	30	27	30	31	36	26	23	22	33	20	35	32	31
Total	61	65	53	75	91	87	70	67	52	64	64	89	88	78





Unfair Import Investigations Caseload Remains High

During FY 2025 the overall number of active 337 investigations rose by 10 percent. From November 17, 2025, to January 30, 2026, 21 new complaints were filed resulting in 21 new complaints being instituted as of January 30. As of January 30, there are six complaints pending institution by the Commission and the private bar has shown that there is great interest in filing additional complaints. As a result of the increasing number of complaints filed and the low settlement rate, we anticipate that there will likely be an increased number of active investigations in FY 2026 into FY 2027 and beyond.

Our proceedings provide for timely resolution of matters involving imported goods alleged to infringe U.S. IP rights and imports that are involved with other unfair acts or methods of competition, such as trade secret misappropriation, that harm domestic industries. Indeed, it has been reported that nearly a quarter of the patent trials in the United States occur at the Commission. Section 337 authorizes relief in the form of exclusion of infringing or otherwise unfairly traded imports at the border, as well as cease and desist orders that prohibit domestic marketing and sales of the unfairly traded imports. IP-intensive domestic industries that seek relief against unfair imports under section 337 account for a large number of high-wage jobs in U.S. industries that generate significant exports.

The range of technologies covered in these investigations is quite broad, encompassing, among other things, various electronic devices, pharmaceutical and medical devices, manufacturing and transportation-related products, and consumer goods such as eye cosmetics, hydroderm abrasion systems, storage containers, solar cells, flash spun non-woven materials, crafting machines, injection molding machines, ceiling fans, and furniture. Section 337 investigations typically involve allegations of patent infringement but may also involve other unfair acts such as trademark infringement, trade dress infringement, false advertising, and trade secret misappropriation, the latter of which is an area of heightened concern for U.S. companies and Congress.

Work is ongoing to ensure that section 337 investigations are completed expeditiously, in line with congressional intent. We continue to build and develop the necessary staff and resources to conduct evidentiary hearings in section 337 investigations, focusing on making the process more efficient and less costly for both litigants and the agency. We continue to optimize courtroom technologies facilitating better presentations of evidence and witnesses, allowing witnesses to appear remotely or in person, and supporting remote access to our proceedings when appropriate. We have also made improvements to our rules of procedure, procedural pilot programs, and continued investments in our Electronic Document Information System (EDIS). In FY 2026, we plan to implement electronic service of confidential documents through EDIS, and we plan to develop and launch the

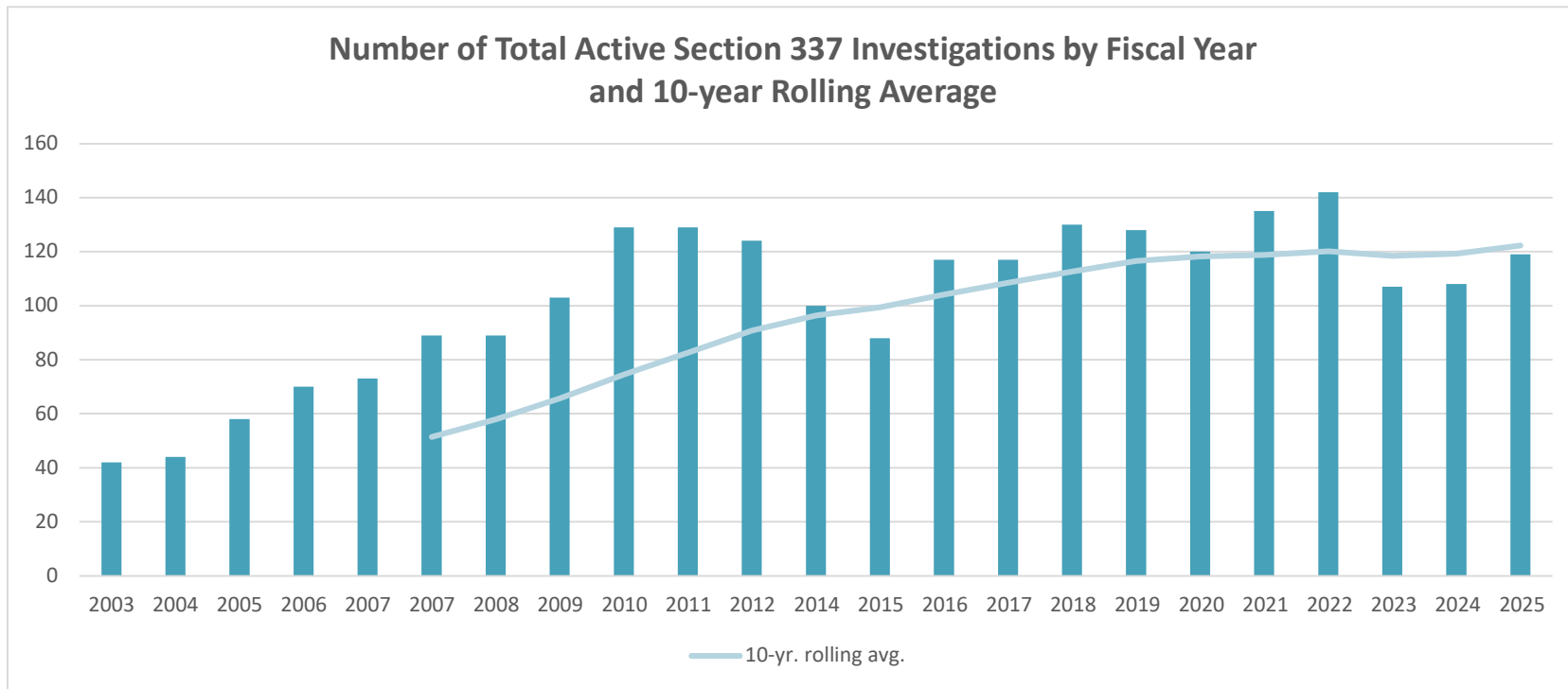
second version of the Investigations Database System. These technology projects necessitate an adequate level of funding to maintain these important spaces and technology systems that support the Commission’s mission.

Synergies between EDIS and IDS have helped us to better manage our large volume of investigation-related materials while making our investigative process more transparent. These systems also comply with government Open Data rules, furthering our efforts to make our data more accessible to and usable by other agencies and the public. Funding these types of improvements will help us to address the challenges of resolving section 337 matters expeditiously and will keep the public informed on these matters.

Unfair Import Investigations Caseload

Instituted and Completed Original and Ancillary Investigations

Status	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Actual	FY 2026 Estimate	FY 2027 Estimate
Instituted	82	71	55	61	57	65	65
Completed	64	90	60	46	69	60	60



Analysis and Information on Trade and Competitiveness

The Commission supplies the executive branch, Congress, and the public with objective analyses of significant trade issues. We provide industry and economic research, tariff and trade information, and trade policy support through factfinding investigations and technical assistance. Given our independent economic and trade expertise, we offer cutting-edge data and insights not available elsewhere that support the Administration and Congress in their development of U.S. trade policy. The caseload for factfinding dipped in FY 2025, but the number of requests for this type of analysis is projected to increase in FYs 2026 and 2027. This temporary dip in workload for factfinding investigations has allowed the Commission to flex its resources to support an increase in the number and complexity of technical assistance requests as well as an increase in workload in other mission areas. It has also allowed the Commission to expand capacity to develop new approaches to industry and economic analysis and improve its ability to be responsive to future requests of trade policy makers.

Congress and the Administration place a high value on our staff's ability to produce timely, objective, and independent information related to their most urgent issues. We draw heavily on staff in all agency program areas to respond to requests for trade policy support from Congress and the Administration. In FY 2025, we supplied responses on a broad array of issues and topics, such as supporting interagency working groups, digital services trade, analysis of tariff and non-tariff measures, assessments of remedies in safeguard investigations, and litigation support in international tribunals. Moreover, increased focus on how policies, regulations, and non-tariff measures applied to domestic markets can affect international trade and investment have required us to refocus our resources, apply new analytic techniques, and develop new trade-related databases. Our staff often provides support to policymakers developing new or revising existing trade programs and policies as well as negotiators working on proposed trade agreements or adjustments to existing agreements. We supply information, expertise, and software-based tools to support U.S. negotiating teams.

We Continue to Develop New Approaches in Our Industry and Economic Analyses

International trade touches nearly all sectors of the U.S. economy. We constantly develop and refine our capabilities to meet requests for increasingly complex analyses in emerging areas of international trade, trade policy, and competitiveness. We gather primary data to provide unique insights into emerging issues, assembling this information via a variety of instruments, including carefully crafted industry surveys.

We also continue to develop new methods to produce high-quality economic analysis to meet analytical priorities relevant to our requestors. During FY 2025, our priority effort for model innovation was improving modeling tools to quantify the effects of the economic impact of tariff and non-tariff measures. We also created new models to estimate the impact of trade and investment in industries such as motor vehicles, critical minerals, shipbuilding, and solar modules. Our work to develop and refine our capabilities is done both specifically in response to requests for 332 factfinding investigations, but also in anticipation of future requests so that the Commission has the expertise and the analytical tools ready to be responsive to requests from the Administration and Congress, often on short timelines. While the Commission's capacity building efforts are continuous, it is at times when requests for 332 investigations or technical assistance dip, that our staff are able to amplify their efforts to strengthen their capacity to address emerging areas of international trade and competitiveness of interest to policy makers through the development of new tools and expertise.

Our FY 2027 budget request will strengthen our ability to respond to specific requests and increase capacity in areas we have prioritized because of potential interest from the President and Congress. A few examples include:

- advancing our modeling capabilities, such as estimating the impact of tariffs and foreign nontariff barriers on specific industries and broader macroeconomic outcomes
- expanding analysis in areas such as the impact of global imbalances on U.S. industries and workers; trade diversion and transshipments; investment; and industry competitiveness
- risks and vulnerabilities in U.S. supply chains, including trade in critical minerals and materials, such as the impact of export bans or new suppliers of minerals and examination of linkages in supply of national security products
- deepening expertise on provisions in trade agreements and their effects on U.S. trade, industries, and workers
- generating, maintaining, and publishing analytical databases of trade, production, and investment to allow the rapid deployment of data to new requests
- technical support to policymakers during trade negotiations.

To effectively support the requests of trade policymakers, we must maintain a staff with expert knowledge and skills to provide relevant and timely insights on trade, investment, and the international competitiveness of U.S. companies in the global marketplace.

Industry and Economic Analysis Investigations Caseload

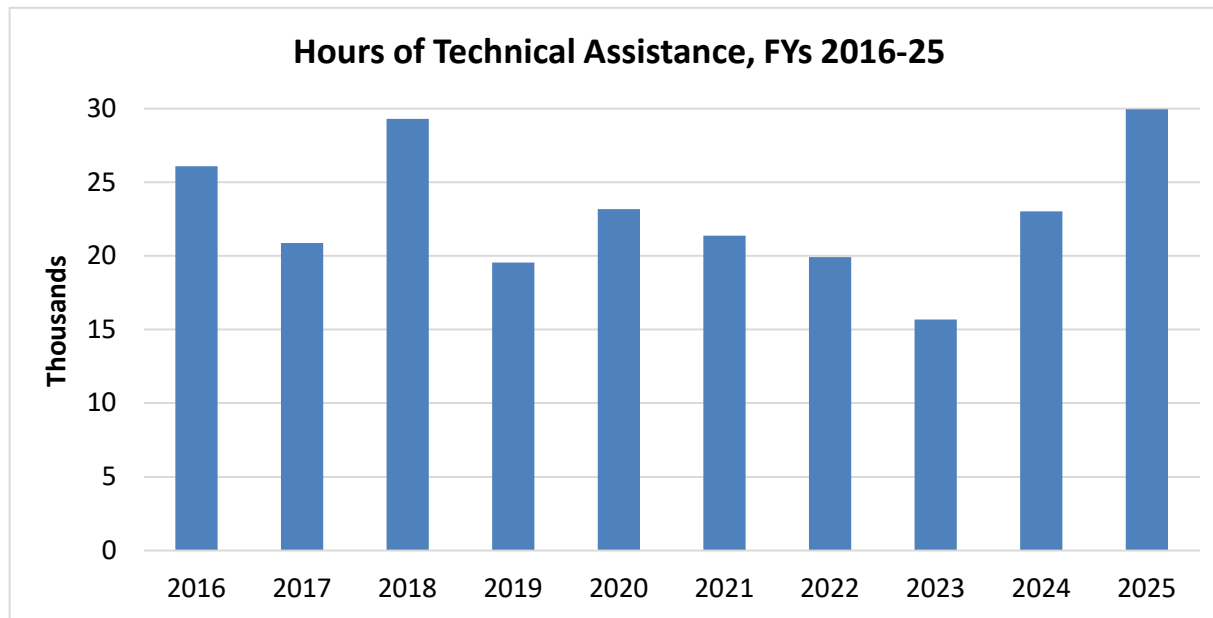
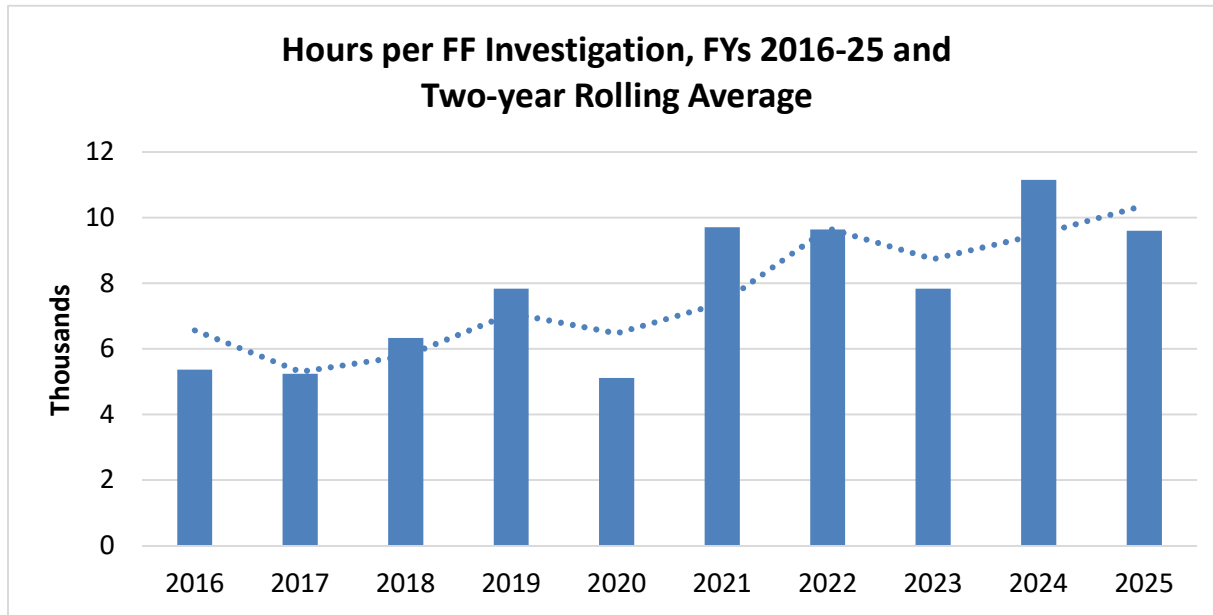
Instituted and Completed Investigations

	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Actual	FY 2026 Estimate	FY 2027 Estimate
Instituted	9	11	8	6	4	7	9
Completed	9	9	12	7	7	5	9

Note: Instituted and completed totals include both recurring and non-recurring reports.

Completed Technical Assistance Requests

	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Actual	FY 2026 Estimate	FY 2027 Estimate
Completed	133	143	114	113	120	120	120



The Harmonized Tariff Schedule Application Needs Technology and Process Improvements

Our work to maintain and update the HTS, as discussed above, also impacts the Administration, private parties, and other stakeholders. U.S. Customs and Border Protection (CBP) relies upon the HTS for collecting tariff revenues on imported goods. Private firms use the HTS to learn the duties that they will pay on imported goods. U.S. exporters and importers depend on our work in the World Customs Organization to ensure that international nomenclature is harmonized and considers U.S. stakeholder interests and changing patterns of trade. Compared to two or three publications containing HTS revisions in a typical year, in FY 2025, we prepared and published the HTS 26 times, including the annual Basic Edition in January 2025, and these publications grew in complexity and the number of tariff changes involved. Revisions were made to reflect trade actions with respect to, inter alia, imposition of duties to address the synthetic opioid (fentanyl) supply chain, reciprocal tariffs to rectify trade practices that contribute to U.S. goods trade deficits, suspension of de minimis duty treatment, modifications of section 232 duties on steel and aluminum products, imposition of section 232 duties on copper and copper derivative products and autos and auto parts, modifications to section 301 duties on articles of China resulting from USTR's four-year review of the section 301 investigation of China, granting exclusions to the section 301 duties on articles of China, as well as other conforming or technical amendments. As a result of the increased number and complexity of the aforementioned tariff changes, HTS Help inquiries more than doubled from 2,298 in FY 2024 to 5,522 FY 2025.

The HTS provides the foundation for the U.S. trade data maintained by the U.S. Census Bureau (Census), and it enables CBP to manage its trade and enforcement activities. We ensure that the HTS is both accurate and up to date so that it meets the demands for trade and tariff information from Census, CBP, U.S. exporters and importers, the Administration, and policymakers in Congress. Due to the size and openness of the U.S. economy and the volume of U.S. trade, the HTS is the most heavily used tariff schedule in the world. In FY 2025, the HTS application was accessed more than 16.7 million times, more than three times as many visits seen a decade earlier and a 67 percent increase over FY 2024. It is, therefore, critical that the HTS contain accurate and timely information in an accessible and navigable application. To this end, in FY 2024, we evaluated the effectiveness of the current application that supports the HTS and documented deficiencies. We concluded that, to most benefit the U.S. government and the private sector that rely upon the HTS, the current application requires a major upgrade and development effort. In FY 2025, we documented requirements for this upgrade, such that development of the upgraded system commenced in FY 2026. In documenting

requirements, we published a Federal Register Notice seeking public comment and held several listening sessions with key government partners such as House Ways and Means staff, USTR, CBP and Census. The development phase in FY 2026 will involve implementing the requirements and iterative testing of the new application with both internal and external stakeholders. This critical work requires significant resources—both information technology (IT) and subject matter experts. These are the same resources needed to maintain the current HTS, which entails not only updating information in the system, but also supplying expertise in national and international fora to ensure terminology is consistently used, and tariff actions are properly reflected, in the HTS. As the number of tariff-related actions increases in number or complexity in the next few years, the success of the needed upgrade to the HTS application will be at risk without a commensurate increase in IT and staff resources. In FY 2027, we expect follow-on enhancements and support requests as users become more familiar with the new system, which will be called the HTS System.

Number of Harmonized Tariff Schedule (HTS) Publications

Number of HTS Publications	FY 2019 Actual	FY 2020 Actual	FY 2021 Actual	FY 2022 Actual	FY 2023 Actual	FY 2024 Actual	FY 2025 Actual
	16	31	18	17	14	10	26

Information Technology Overview

The USITC advances its technical infrastructure and support by monitoring and maturing cybersecurity, infrastructure, and software development programs. This is achieved through the timely implementation of relevant guidance, technical advancements, and best business practices. We continue to enhance our cybersecurity program by staying current with mandates and directives, vigorously tracking and remediating vulnerabilities, and actively identifying and defending against threat and attack vectors utilizing in-house and third-party expertise. Life-cycle replacements of critical network and server infrastructure will continue in FY 2027, as we continuously replace legacy hardware with more efficient variants to not only improve performance and reliability but to also continue to reduce our footprint.

In FY 2027, we anticipate follow-on enhancements to the initial release of the completely reengineered HTS application which is scheduled for release by the end of FY 2026. This web-based application is the Commission's most accessed system, initiating over 16.7 million user sessions in FY 2025.

Also during FY 2027, we will continue strengthening our IT security posture by investing in new technologies, processes, and capabilities. In addition to the previously noted activities, planned improvements include the following:

- refining and maturing security tools
- modernizing the vulnerability management infrastructure
- implementing additional governance risk and compliance tools
- automating cloud compliance activities
- continuing data risk management using data classification schemes
- ongoing participation in the Cybersecurity and Infrastructure Security Agency's Continuous Diagnostics and Mitigation program
- continued use of bug bounty and penetration testing programs to validate and enhance security
- identifying, analyzing, and implementing AI opportunities to improve processes.

Remote and Cloud Computing

USITC maintains a secure and modern remote access solution, ensuring high availability and accessibility. By operating a remote datacenter with multiple service providers and a mix of cloud- and locally based technologies, USITC exceeds its availability metric across all core applications and systems. We will continue to evaluate the need for additional cloud compute capabilities to enhance redundancy and performance for remote and local users.

The Commission continues to implement non-proprietary development techniques and technologies to ensure flexibility and portability in cloud deployments, while maintaining the necessary levels of IT security. In FY 2027, we expect to continue utilizing a hybrid, cloud-based architecture to continuously improve the availability and accessibility of our systems, increase our redundancy, enhance security, and increase the portability of systems by reducing our dependence on physical datacenters.

Risk Management and Planning

We have a well-developed enterprise risk management (ERM) process to establish, maintain, monitor, evaluate, and report on agency risks. The process is led by the Director of the Office of Internal Control and Risk Management, who reports to the Chief Financial Officer. ERM is an integral part of all strategic planning, performance management, budget, IT, and human capital functions and activities. As part of this effort, we maintain an ERM database, which supports categorizing, documenting, and evaluating risks to the agency.

Management performs ongoing assessments to identify, manage, and update the risks in the ERM database. Our risk profile is developed from the database and ranks risks from an agency-wide perspective. The profile is discussed, prioritized, and reviewed by the Commission's Performance Management and Strategic Planning Committee. The primary purpose of the risk profile is to assess how the risks we face from operations, mission-support activities, and external factors influence our ability to meet the agency's mission and achieve its performance goals.

The Office of Management and Budget (OMB) provides agencies with guidance related to risk management in certain specialized areas, including cybersecurity. OMB directs agencies to assess their cybersecurity risk, to manage the cybersecurity component of enterprise risk, and to adopt the National Institute of Standards and Technology's Framework for Improving Critical Infrastructure Cybersecurity. The Commission manages risk in a way that is commensurate with the magnitude of the harm that would result from unauthorized access, use, disclosure, disruption, modification, or destruction of a federal information system or federal information. The Commission complies with all cybersecurity reporting requirements.

Each quarter, agency leaders and senior staff review progress on our strategic and management objectives and identify and discuss enterprise risks. These reviews, along with the evidence related to specific performance goals and associated risks identified by our managers, inform the development of our Annual Performance Plan and Congressional Budget Justification. We continue to evaluate and implement improvements in our planning and ERM processes to make more effective use of the data we collect.

Good Accounting Obligation in Government Act

The Good Accounting Obligation in Government Act requires each agency to include in its annual budget justification a report that lists each public recommendation issued by the Government Accountability Office (GAO) and the agency's Office of Inspector General (OIG) that has remained unimplemented for one year or more from the annual budget justification submission date. The Commission does not have any open GAO recommendations. The Commission also does not have any OIG recommendations that have been open for more than one year.

Publications Proposed for Elimination

The Commission has identified two publications that it has proposed for elimination or streamlining in response to requirements of the GPRM Modernization Act of 2010. Specifically, the Commission has requested elimination of the requirement found in 19 U.S.C. § 3204 to provide the *Andean Trade Preference Act: Impact on U.S. Industries and Consumers and on Drug Crop Eradication and Crop Substitution* report. The requirement is outdated because the President's authority to provide trade preferences under the Act expired in 2013 and has not been extended by Congress. Thus, none of the four eligible countries has participated in the program since 2013. As a result, there is no continued benefit to issuing the report.

Similarly, the Commission requested that Congress streamline the production of the HTS by eliminating the requirement at 19 U.S.C. § 3007(a) to print a hard copy of it. The statute requires the Commission to prepare a hard-copy version of the HTS (the current version exceeds 4,400 pages) and authorizes it to publish an electronic version. Users of the HTS rely almost exclusively on the electronic version. The requirement of a hard copy duplicates the electronic version. In addition, the hard-copy version becomes outdated soon after issuance due to the numerous modifications, and it therefore provides little benefit to the public.

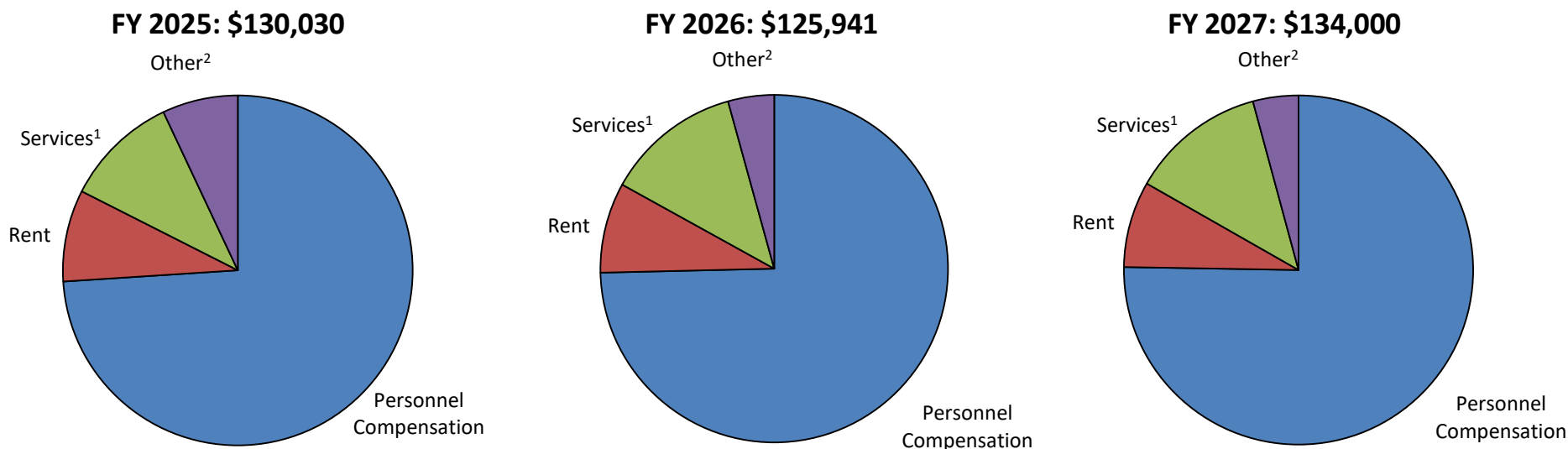
Preparing for Future of Work and Physical Space Reconfiguration





From late-FY 2024 to mid-FY 2025, the USITC coordinated with the General Services Administration (GSA) to assess the agency's office space needs and determine any potential to reduce its real estate footprint. This assessment led to the development of an updated micro program of requirements and housing plan based on the current GSA space standards, which could be utilized for either relocation or a reduction in office space within the Commission's current headquarters building.

To perform our statutory functions in support of the America First Trade Policy, the USITC requires many customized spaces within our headquarters building, including multiple courtrooms necessary for trials conducted by the Commission’s administrative law judges, a hearing room for Commission proceedings (also used by the Office of the U.S. Trade Representative), and a Sensitive Compartmented Information Facility. Spaces meeting these requirements are expensive and time-consuming to relocate or renovate within a building and market research has demonstrated, are typically not included in comparable commercial office space. The anticipated costs associated with reducing USITC’s real estate footprint to meet the current GSA space standards through either downsizing in the current location or relocating to a new building and adapting it to meet the customized spaces needed for the Commission to fulfill its mission would be significant and far exceed any short-term benefits of reduced rent payments under the current lease, which will expire in 2032. Therefore, USITC is not proposing to downsize in connection with its FY 2027 budget request.

Obligations: Comparison by Budget Object Classification, Fiscal Years 2025–27

(Dollar amounts in thousands)



CATEGORY OF OBLIGATION		FY 2025 Actual		FY 2026 Estimate		FY 2027 Request	
		Dollars	Percent of Total	Dollars	Percent of Total	Dollars	Percent of Total
Personnel Compensation		\$96,209	74.0%	\$93,993	74.6%	\$100,844	75.3%
Rent		11,009	8.5%	10,601	8.4%	10,703	8.0%
Services		13,739	10.5%	15,965	12.7%	16,829	12.5%
Other		9,073	7.0%	5,382	4.3%	5,624	4.2%
TOTAL		\$130,030	100.0%	\$125,941	100.0%	\$134,000	100.0%

Note: Dollars may not add due to rounding in this and subsequent charts.

¹Services include, but are not limited to, obligations for contractor staff (IT service desk, security guards, financial audits), software licenses, and equipment maintenance.

²“Other” includes budget object classes such as equipment, supplies, communications and equipment rental, travel, training, printing and reproduction, land and structures, postage and contractual mail, and transportation.

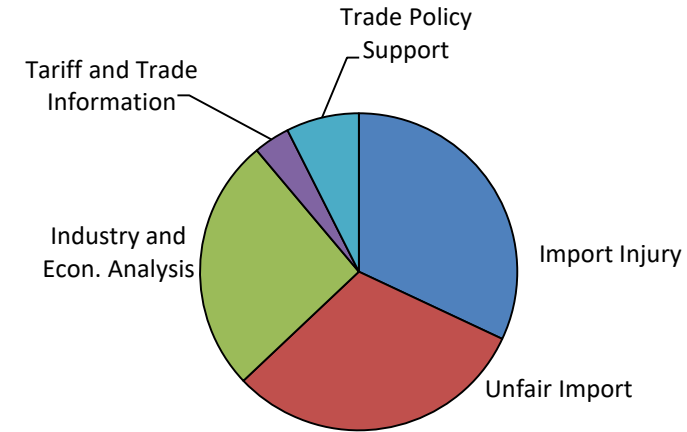
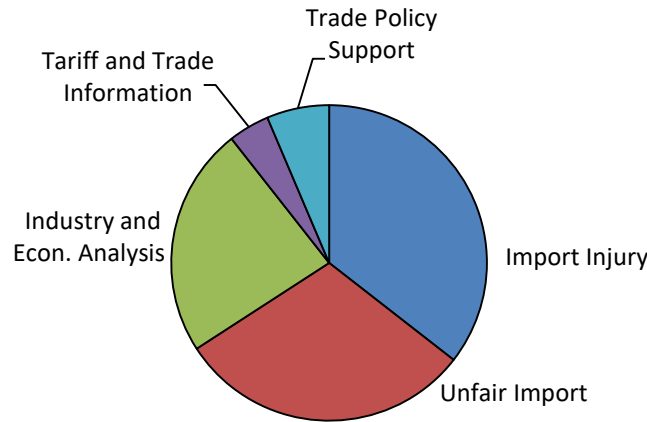
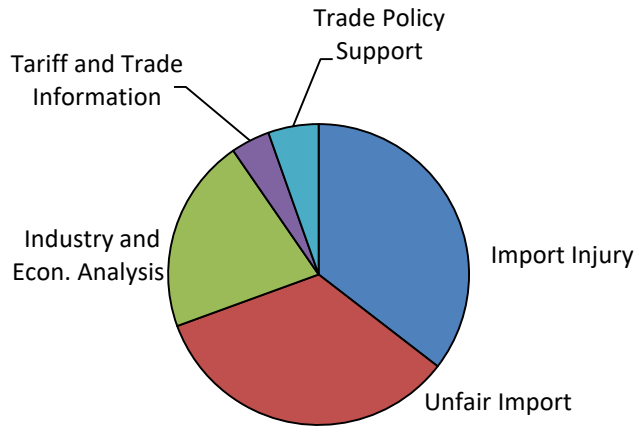
Obligations: Comparison by Strategic Goal, Fiscal Years 2025–27

(Dollar amounts in thousands)

FY 2025: \$130,030

FY 2026: \$125,941

FY 2027: \$134,000



CATEGORY OF OBLIGATION	FY 2025 Actual		FY 2026 Estimate		FY 2027 Request	
	Dollars	Percent of Total	Dollars	Percent of Total	Dollars	Percent of Total
Trade Remedy Investigations (Strategic Goal 1)						
Import Injury	\$46,101	35.5%	\$44,751	35.6%	\$42,823	32.0%
Unfair Import	44,206	34.0%	38,199	30.3%	41,546	31.0%
Analysis and Information on Trade and Competitiveness (Strategic Goal 2)						
Industry and Economic Analysis	27,238	20.9%	29,637	23.5%	34,729	25.9%
Tariff and Trade Information	5,440	4.2%	5,306	4.2%	4,981	3.7%
Trade Policy Support	7,045	5.4%	8,048	6.4%	9,921	7.4%
TOTAL	\$130,030	100.0%	\$125,941	100.0%	\$134,000	100.0%

Analysis of Change by Budget Object Classification, Fiscal Years 2025–27

(Dollar amounts in thousands)

	FY 2025 Actual	FY 2026 Estimate	FY 2027 Request	FY 2026–27 Change	Percentage Change
Personnel Obligations	\$96,209	\$93,993	\$100,844	\$6,851	7.3%
FTEs	433	412	441	29	7.0%
Non-personnel Obligations					
Rent	\$11,009	\$10,601	\$10,703	\$102	1.0%
Services	13,739	15,965	16,829	864	5.4%
Supplies	1,886	1,918	1,997	79	4.1%
Equipment	4,483	597	446	-151	-25.4%
Travel	148	250	361	111	44.5%
Training	316	375	501	126	33.6%
Communications and Equipment Rental	1,895	1,925	1,982	57	3.0%
Printing and Reproduction	321	286	298	12	4.1%
Official Reception and Representation	3	2	2	0	0.0%
All Other (Transportation, Postage, Land and Structures, Credit Card Rebates)	22	29	37	8	27.8%
Subtotal Non-personnel Obligations	\$33,821	\$31,948	\$33,156	\$1,208	3.8%
Total Obligations	\$130,030	\$125,941	\$134,000	\$8,059	6.4 %

Summary of Changes from the FY 2026 Estimate

(Dollar amounts in thousands)

Personnel Obligations

Personnel..... +\$6,851

Personnel obligations are expected to increase by about \$6.9 million. This funding is required to increase staffing levels after making significant human capital investments in FY 2024 and the first part of FY 2025 that cannot be sustained with a \$122 million FY 2026 appropriation. Our FY 2026 budget request of \$134 million reflected the funding level necessary to meet our statutory mandates and address existing and projected workload. However, operating for a fourth consecutive year with a \$122 million appropriation in FY 2026 threatens that ability. Our FY 2025 staffing level (full-time equivalents, or FTEs) was 433 but that number is projected to decrease to 412 in FY 2026. Our FY 2027 staffing goal is to attain a staffing level of 441 FTEs, the number of staff needed to achieve our mission during a time of record workload, with manageable risk levels across all mission areas. As of late January 2026, we had 398 staff onboard, with vacancy rates as high as 20 percent in offices responsible for statutory workload. While we have recently resumed hiring and are striving to meet 412 FTEs for the fiscal year, this staffing level is still insufficient for our current workload.

In FY 2024, the Commission experienced a surge in the number of AD/CVD petition filings, reaching its second-highest level in the last two decades, followed by another surge in FY 2025, reaching record-level filings. We are also experiencing an upward trend in AD/CVD five-year reviews. In FY 2025, we instituted 27 preliminary-phase investigations covering a wide variety of industries in the U.S. economy; more than one-half of the petitions involved imports from multiple countries. We anticipate instituting 17 preliminary-phase investigations in each of FYs 2026 and 2027. In addition to new investigations, we instituted 34 reviews of existing AD/CVD orders in FY 2025 and anticipate instituting 45 in FY 2026 and 34 in FY 2027. Though cyclical, the Commission’s caseload is projected to remain at historically high levels. Whereas the 10-year average for institutions and completions was 40 during FYs 2002-11 and 53 during FYs 2012-21, the five-year average for FYs 2022-26 is 73 (an 82 percent increase over the first 10-year period and a 38 percent increase over the second).

For over two decades, there has been an overall upward trend in the rolling 10-year average of new section 337 complaints filed year over year. In FY 2025, the number of active investigations increased. Based on current activity level, we expect an

increase in new filings in FYs 2026 and 2027. Additionally, in FYs 2026 and 2027 we expect the workload for technical assistance and factfinding investigations to increase over FY 2025, given the ongoing activity as of the first quarter of FY 2026 and the active trade policy agenda of the executive and legislative branches. Lastly, in addition to undertaking a needed upgrade to the HTS application, the number of tariff-related actions increased in number and complexity in FY 2025, increasing resources needed to maintain and update the HTS to reflect those actions. We expect this technical expertise to support tariff actions will continue to be in high demand in FYs 2026 and 2027.

This funding level will also cover the anticipated pay raise effective January 1, 2027, and pay for the normal cost of employee promotions, within-grade increases, and increased benefits.

Non-personnel Obligations

Rent..... +\$102

Rent obligations are expected to increase by \$102,000 due to annual operating cost increases contained in the building occupancy agreement.

Services..... +\$864

Services obligations are expected to increase by \$864,000 to accommodate inflationary increases in our service contracts and the anticipated cost to re-compete our software engineering contract, which supports maintenance and improvements to our web-based applications like the newly re-engineered HTS system.

Supplies..... +\$79

Supplies obligations are expected to increase by \$79,000, reflecting inflationary increases in the cost of data purchases that support our statutory investigations.

Equipment..... -\$151

Equipment obligations are expected to decrease by \$151,000 due to decreases in IT lifecycle equipment replacement.

Travel +\$111

Travel obligations are projected to increase by \$111,000 to sufficiently fund statutory investigations, anticipated studies, knowledge development in emerging trade issues and priority areas, representational travel to international organization meetings, litigation support, and multilateral and regional agreement negotiation support.

Training +\$126

Training obligations are expected to increase by \$126,000 to provide sufficient funding for developing and advancing staff skills and meeting the licensing, certification, and professional education requirements of existing and newly hired staff.

Communications and Equipment Rental +\$57

Communications and equipment rental obligations are expected to increase by \$57,000 because of inflationary cost increases built into our telecommunications contract.

Printing and Reproduction +\$12

Printing and reproduction obligations are expected to increase by \$12,000 because of Government Publishing Office requirements.

All Other (Transportation, Postage, Land and Structures, Credit Card Rebates) +\$8

Miscellaneous obligations are expected to increase slightly.

Net Non-personnel Obligations Changes..... +\$1,208

Total Adjustment to FY 2026 Estimate (\$125,941) +\$8,059

Total FY 2027 Budget Request..... \$134,000

The Commissioners

The USITC is headed by six commissioners, who are nominated by the President and confirmed by the U.S. Senate. Amy A. Karpel, a Democrat, is serving as Chair of the Commission, for a term ending June 16, 2026. A Vice Chair has not been nominated for the current term. Other commissioners currently serving are, in order of seniority, David S. Johanson, a Republican, and Jason E. Kearns, a Democrat.¹

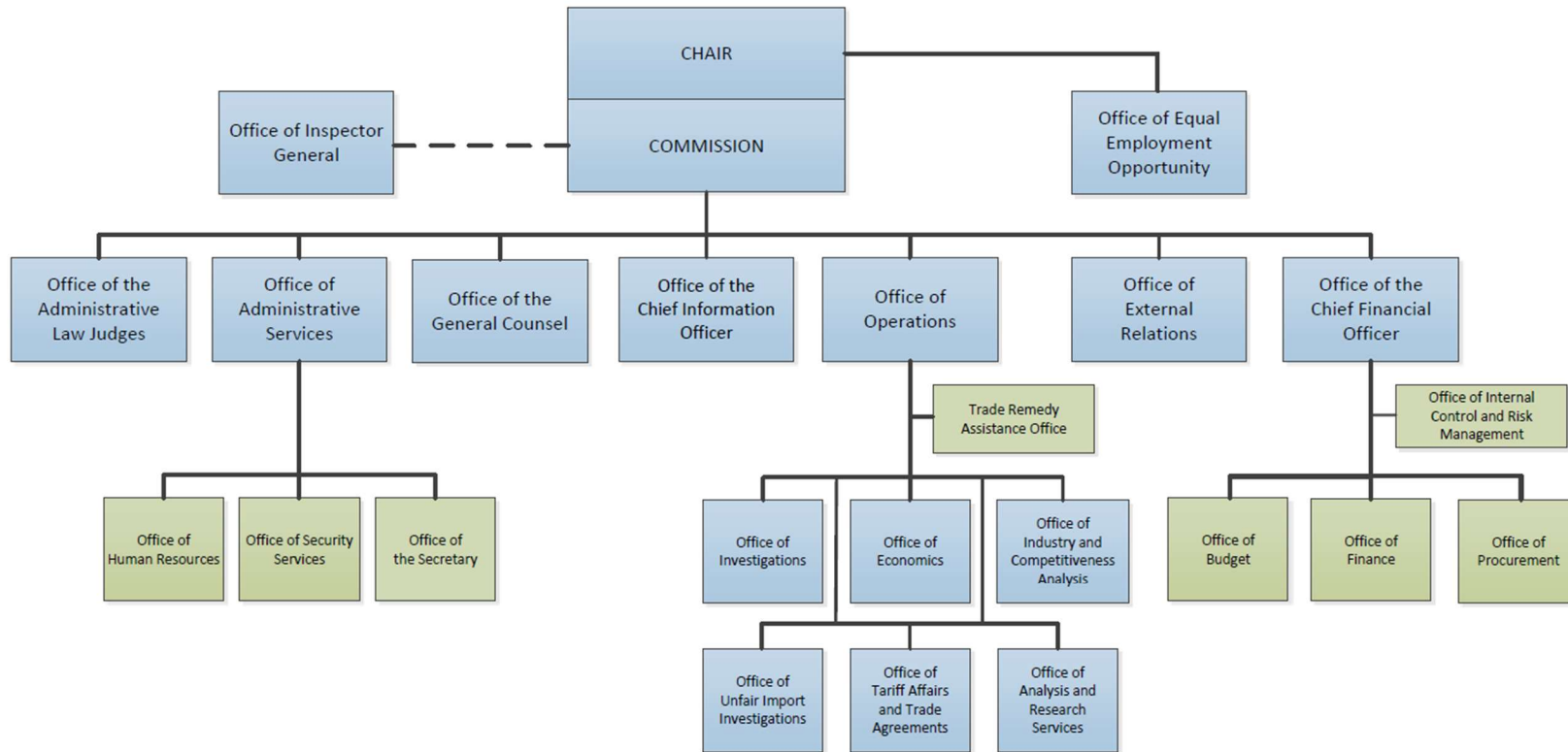
Each commissioner serves a term of nine years, unless appointed to fill an unexpired term. The terms are set by statute and are staggered such that a different term expires every 18 months.² A commissioner who has served for more than five years is ineligible for reappointment. A commissioner may, however, continue to serve after the expiration of his or her term until a successor is appointed and qualified. Congress's desire to create an independent and nonpartisan Commission is evident in the rules that dictate the composition of the Commission. No more than three commissioners may be members of the same political party. The Chair and the Vice Chair are designated by the President and serve for a statutory two-year term.³ The Chair may not be of the same political party as the preceding Chair, nor may the President designate two commissioners of the same political party to serve as the Chair and Vice Chair. Currently two Democrats and one Republican serve as commissioners.

¹ Currently, there are three vacancies.

² 19 U.S.C. § 1330.

³ If the President does not designate a Chair, the senior commissioner of the relevant political party serves as Chair, by operation of law.

U.S. International Trade Commission Office-level Organization Chart



Current Permanent and Term Hiring Plan and Onboard Staffing Levels

Office	Permanent and Term Positions		
	FY 2027 Hiring Plan	Onboard as of 1/28/26	Gap
Commissioners	32	19	13
External Relations	4	4	0
Inspector General	7	3	4
General Counsel	62	56	6
Administrative Law Judges	29	24	5
Equal Employment Opportunity	3	3	0
Chief Information Officer	38	34	4
Subtotal: Other Offices	175	143	32
Operations	10	10	0
Analysis and Research Services	25	23	2
Investigations	39	32	7
Unfair Import Investigations	28	23	5
Economics	42	35	7
Tariff Affairs and Trade Agreements	15	12	3
Industry and Competitiveness Analysis	73	61	12
Subtotal: Operations	232	196	36
Chief Financial Officer	4	4	0
Budget	3	3	0
Finance	6	4	2
Procurement	5	5	0
Internal Control & Risk Management	2	1	1
Subtotal: Chief Financial Officer	20	17	3
Administrative Services	9	7	2
Human Resources	12	14	-2
Secretary and Dockets	22	15	7
Security Services	7	6	1
Subtotal: Administrative Services	50	41	9
Commission Total Positions Prioritized for Hiring/Onboard Staff	477	398	79
Commission Total FTEs by FY*	441	412	29

* The number of FTEs supported by our FY 2027 budget request of \$134 million and our FY 2026 appropriation of \$122 million, respectively.

We are constantly evaluating our workload and aligning resources to meet emergent needs. In the short term, we may approve requests for an office to exceed its staffing allocation to meet workload challenges. If those workload challenges persist, we may make the adjustment permanent by shifting positions.



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