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## UNITED STATES INTERNATIONAL TRADE COMMISSION

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WASHINGTON, DC 20436

### **BACKGROUND**

This document contains the United States International Trade Commission's (USITC) analysis of its Fiscal Year 2013 service contract inventory in response to Section 743 of Division C of the Fiscal Year (FY) 2010 Consolidated Appropriations Act, P.L. 111-117. The requirement is for FAIR Act agencies to prepare an annual inventory of their service contracts and to analyze the inventory to determine if the mix of Federal employees and contractors is effective or if rebalancing may be required.

### **SCOPE**

Pursuant to the December 19, 2011 Memorandum and guidance provided by the Office of Federal Procurement Policy (OFPP), the USITC selected special interest functions in its conduct of an analysis of its FY 2014 service contract inventory. A special interest function is defined as one that requires increased management attention due to a heightened risk of workforce imbalance. USITC evaluated the use of contract versus government employees for those identified special interest functions.

### **A. Special Interest Functions Studied by USITC**

The USITC planned for and analyzed the following Product Service Code (PSC) functions from its Fiscal Year 2013 service contracts inventory:

<b>PSC</b>	<b>Description</b>	<b>Amount Obligated</b>
D321	IT and Telecom- IT Help Desk	\$1,383,030.40
R604	Support -Administrative: Mailing/Distribution	\$ 589,539.80

### **B. Methodology Used to Support USITC's Analysis of FY 2013 Service Contracts**

The analysis of USITC's FY 2013 service contracts was performed by the Director of Procurement. Data was obtained from the Federal Procurement Data System-Next Generation ([www.FPDS.gov](http://www.FPDS.gov)) for obligations exceeding \$25,000. The inventory included purchase orders, delivery orders, task orders, and contracts.

**C. Agency Findings**

Pursuant to OFPP’s memoranda, USITC made the following findings as a result of its analysis:

1. USITC awarded no personal services contracts in Fiscal Year 2013.
2. USITC closely monitors functions that are closely associated with inherently governmental functions.
3. USITC is not using contractor employees to perform inherently governmental functions. USITC acquisition staff is properly trained and able to identify inherently governmental functions as those functions relate to contractor work.
4. USITC monitors contractor work to ensure that the work does not expand during performance to become inherently governmental.
5. USITC does not use contract employees to perform critical functions that could affect the ability of USITC to maintain control of its mission and operations.
6. USITC has allocated resources to manage and oversee its contracts effectively. USITC’s policies and procedures provide for oversight of contract administration.

**D. Summary / Action Taken**

Overall, the USITC maintains a balance between contract and government employees. USITC trains its acquisition staff to award and administer its service contracts properly. The USITC closely monitors its service contracts with oversight provided by contracting officers, contracting officer’s representatives, and program officials. Although no actions were taken as a direct result of this review, nor is any action planned, USITC is committed to maintaining excellence in its service contracting efforts.

**E. Planned Analysis for Fiscal Year 2014**

As requested by the Office of Federal Procurement Policy’s (OFPP) memorandum dated December 19, 2011, the USITC has selected the following Product Service Codes from its FY 2014 inventory.

<b>PSC</b>	<b>Description</b>	<b>Action Obligation</b>
D302	IT and Telecom - Systems Development	\$1,997,866.44
D321	IT and Telecom – Help Desk	\$1,387,404.80
R431	Support: Professional, Human Resources	\$311,989.32

**USITC POINT OF CONTACT**

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