



United States International Trade Commission

Strategic Plan

FY 2018–2022



About Us

The U.S. International Trade Commission (USITC or Commission) is an independent, nonpartisan, quasi-judicial federal agency established by Congress with a range of trade-related mandates. The Commission:

- adjudicates whether: (1) dumped or subsidized imports injure a domestic industry; (2) surges of fairly traded imports injure a domestic industry; and (3) imports infringe a domestic intellectual property right or otherwise unfairly injure a domestic industry;
- provides independent, objective, and timely analysis of trade and competitiveness issues to the President, the U.S. Trade Representative (USTR), and Congress; and
- maintains the Harmonized Tariff Schedule of the United States.

The USITC is headed by six Commissioners who are nominated by the President and confirmed by the U.S. Senate. The Commissioners' terms are set at nine years by statute and are staggered such that a different term expires every 18 months. However, a Commissioner may serve until he/she is replaced. As such, a Commissioner may begin serving after the nine-year term has begun and may continue to serve after the term has expired.

The Commission's structure supports its responsibility to render unbiased determinations and objective, balanced, fact-based analysis. No more than three Commissioners may be members of the same political party. The Chairman and the Vice Chairman are designated by the President and serve for a statutory two-year term in those roles. The Chairman may not be of the same political party as the preceding Chairman, nor may the President designate two Commissioners of the same political party to serve as the Chairman and Vice Chairman.

To support its mission, the USITC maintains a professional staff of trade and nomenclature analysts, investigators, financial analysts, statisticians, attorneys, economists, information technology specialists, and administrative support personnel. The diverse and inclusive staff, who typically work in multidisciplinary teams, are experts in their respective mission areas and flexible enough to adapt to evolving workload challenges throughout the agency.

This document sets forth the strategic goals and objectives that will underpin the Commission's work over the next five years. As the Commission enters its second century, we will continue to provide high-quality, leading-edge analysis of international trade issues to the President and the Congress, and to remain a highly regarded forum for the adjudication of intellectual property and trade disputes.

Overview

International trade and investment increasingly shape the U.S. and global economies. Trade in goods and services and foreign investment affect U.S. firms, workers, and consumers. As tariff rates have fallen over time, nontariff measures and other policies have become more prominent, influencing the level and composition of U.S. investment and trade. In addition, changes in technology have allowed firms to adjust their supply chains in the United States and globally to improve competitiveness. Besides affecting the overall economy, trade and investment policy changes have had significant local impacts on industries and workers.

The International Trade Commission pursues its mission in three areas of U.S. international trade: adjudication, research and analysis, and maintaining the Harmonized Tariff Schedule.

Adjudication

The Commission has specific responsibilities in the adjudication and enforcement of U.S. trade laws. As the influence of trade in the U.S. and global economies has grown, the role we play in applying these laws to allegations of unfair and/or injurious trade practices involving imports has remained a mechanism on which U.S. firms can rely to ensure foreign firms are competing fairly. Our provision of sound and timely import injury determinations is critical to maintaining the confidence of U.S. companies and workers in a fair and impartial international trading system. We provide objective, transparent adjudication of alleged unfair import claims such as antidumping and countervailing duty (AD/CVD) complaints, intellectual property disputes, and other unfair practice claims. Our thorough investigation into and timely resolution of complaints concerning unfair acts in import trade and injury from increased imports can be of paramount economic importance to U.S. industries. We provide support to U.S. Customs and Border Protection (CBP), as needed, to enable effective enforcement of AD/CVD and exclusion orders.



Research and Analysis

By law, the Commission plays an important role in analyzing how changes in U.S. and foreign trade and trade-related policies affect U.S. economic growth, employment, and competitiveness. As an independent, nonpartisan agency, we fulfill our mandate to provide the House Committee on Ways and Means, the Senate.



Committee on Finance, the President, and, by delegation, the U.S Trade Representative (USTR) with independent, objective, and timely analysis on many, often critical, trade issues. We continue to develop and hone substantive expertise so that we can supply accurate, leading-edge insights to Congress and the Administration. Our reports reflect our expanding abilities to analyze and explain the effects of policy changes on producers, workers, consumers, and the U.S. economy as a whole.

Maintaining the Harmonized Trade Schedule

Since its founding in 1916, the Commission has had a major role in maintaining and analyzing the nation’s tariff schedule. Since 1988, we have been responsible for maintaining the official legal document that specifies the tariffs, if any, that apply to all imported goods. We ensure that the tariff schedule is up to date and accurate, reflecting all implemented trade agreements. We also chair the interagency Committee for Statistical Annotation of the Tariff Schedules. These efforts facilitate international trade by contributing to efficient clearance of goods through the nation’s 328 ports of entry, enabling the accurate collection of tariff revenues, and permitting the collection and reporting of the nation’s trade statistics. In an environment of rapidly changing technology and products, our representation of the United States at the World Customs Organization and our timely maintenance of the U.S. tariff schedule serve to improve the quality of trade information and ensure that the nomenclature (or classification) system serves the interests of U.S. firms.



Our statutory responsibilities present both great opportunities and significant challenges. Key statutory responsibilities are shown in box 1.1.

Box 1.1 Key statutory responsibilities**Tariff Act of 1930**

The Commission and the U.S. Department of Commerce (Commerce) are responsible for conducting antidumping (AD) and countervailing duty (CVD) (subsidy) investigations and five-year (sunset) reviews. Commerce determines whether specific imports are dumped or subsidized, and if so, the margin of dumping or amount of subsidy. The Commission determines whether a U.S. industry is materially injured or threatened with material injury by reason of the imports under investigation. If both Commerce and the Commission reach affirmative final determinations, Commerce will issue an antidumping duty order to offset the dumping or a countervailing duty order to offset the subsidy. (See Title VII, Tariff Act of 1930, 19 U.S.C. 1671 et seq.)

The Commission investigates unfair methods of competition and unfair acts involving imported articles, including infringement of U.S. patents, trademarks, and copyrights. If a violation is found, the Commission may issue a remedial order, typically an exclusion order, directing U.S. Customs and Border Protection (CBP) to prohibit the importation of infringing articles. (See section 337, Tariff Act of 1930, 19 U.S.C. 1337)

Under section 332, the Commission investigates a wide variety of trade matters. Upon request from the House Committee on Ways and Means, the Senate Committee on Finance, or the President, and, by delegation, the U.S. Trade Representative (USTR), or upon its own motion, the Commission conducts fact-finding investigations and prepares reports on matters involving tariffs or international trade. (See section 332, Tariff Act of 1930, 19 U.S.C. 1332)

The Commission also cooperates with the Secretary of the Treasury and the Secretary of Commerce to establish statistical subdivisions of the Harmonized Tariff Schedule (HTS) for articles imported into the United States and seeks to ensure that these statistical subdivisions are compatible with domestic statistical programs. (See section 484(f), Tariff Act of 1930, 19 U.S.C. 1484(f))

Trade Act of 1974

The Commission advises the President as to the probable economic effect on domestic industries and consumers of modification of duties and other barriers to trade that may be considered for inclusion in any proposed trade agreement with foreign countries. (See section 131, Trade Act of 1974, 19 U.S.C. 2151)

At times, certain articles may be designated as eligible for duty-free treatment when imported from designated developing countries. The Commission advises the President as to the probable economic effect on the domestic industry and on consumers of such designations. (See sections 131 and 503, Trade Act of 1974, 19 U.S.C. 2151, 2163)

The Commission conducts “safeguard” investigations under section 202 of the Trade Act of 1974 concerning whether an article is being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or the threat thereof, to the domestic industry producing a like or directly competitive article. (See 19 U.S.C 2252)

Omnibus Trade and Competitiveness Act of 1988

The Commission is responsible for compiling and publishing the HTS and for keeping it under review. The Commission is also responsible for recommending to the President modifications it considers necessary or appropriate to conform the HTS with amendments to the HS Convention, to ensure that the HTS is kept up to date, and to relieve unnecessary administrative burdens. (See section 1205, Omnibus Trade and Competitiveness Act of 1988, 19 U.S.C. 3005)

Along with the Departments of Treasury and Commerce, the Commission is responsible for representing the U.S. government concerning the activities of the Customs Cooperation Council (now the World Customs Organization Council, or WCO) relating to the Harmonized System (HS) Convention covering the international classification of traded goods. We also work with the Departments of Treasury and Commerce to formulate U.S. government positions on technical and procedural issues relating to the Convention. (See section 1210, Omnibus Trade and Competitiveness Act of 1988, 19 U.S.C. 3010)

Bipartisan Congressional Trade Priorities and Accountability Act of 2015

Under the Bipartisan Congressional Trade Priorities and Accountability Act of 2015, the Commission provides the President and the Congress with reports that assess the likely impact of trade agreements entered into with foreign countries. These reports assess an agreement’s impact on the U.S. economy as a whole, on specific sectors of the economy, and on the interests of U.S. consumers. (See section 105(c), Bipartisan Congressional Trade Priorities and Accountability Act of 2015, 19 U.S.C. 4204)

American Manufacturing Competitiveness Act of 2016

The AMCA directed the Commission to create a system and processes to allow entities to request temporary duty suspensions or reductions and to provide for public comment on these requests. The Commission, with input from the Department of Commerce and other executive branch agencies, is required to review these requests and provide preliminary and final reports to the Congress recommending what action should be taken on these petitions.

Mission

Investigate and make determinations in proceedings involving imports claimed to injure a domestic industry or violate U.S. intellectual property rights; provide independent analysis and information on tariffs, trade and competitiveness; and maintain the U.S. tariff schedule.

Vision and Values

Excellence

The Commission employs its expertise and innovative methods to investigate trade complaints and provide accurate, timely, and objective insights into important matters of international trade. To develop this expertise, Commission staff regularly refine their advanced skills and remain on the forefront of research and analysis into trade and competitiveness-related industry, economic, legal, and nomenclature issues.

Integrity

The Commission independently and objectively conducts investigations and analysis on trade matters. It also provides impartial, expeditious, and transparent administration of relevant trade laws as well as analytically and legally sound decisions.

Respect

The Commission strives to leverage its diverse and inclusive workforce by promoting a culture of respect. This culture supports a flexible and open working environment in which individuals and their multidimensional perspectives are welcomed to contribute to the Commission's work.

Stakeholder Engagement

The Commission has identified two mission-related strategic goals, as discussed below. These goals reflect the interests of its principal customers: the President, the USTR, and Congress, as well as U.S. industry, workers, and the general public.

In developing this Strategic Plan, the Commission consulted with appropriate congressional committees and the USTR. The Commission also posted the draft Strategic Plan on its website for public comment.

The Commission regularly, both formally and informally, provides outreach and solicits feedback from its key stakeholders. The Commission uses formal feedback tools such as *Federal Register* notices and surveys to solicit performance assessments and process suggestions from external customers and private parties. Commission staff also engages stakeholders at key points during the process of developing requested analysis and information, per agency protocols. Information received from stakeholders is regularly reviewed and integrated as necessary into process and communication improvement efforts. Regular stakeholder engagement is also used to identify emerging areas of interest to Commission customers and the public.

Strategic Goal 1

Investigate and Decide: Make Sound, Objective, and Timely Determinations in Trade Remedy Proceedings

Given the importance of international trade to the U.S. economy, Commission determinations in its investigative proceedings regarding alleged unfair imports can have significant impacts on competitive conditions, profitability, and employment in affected U.S. industries. The Commission’s investigations often involve products that are critical to U.S. productivity, innovation, and competitiveness, and businesses may make important decisions as a result of Commission determinations. These investigations are generally commenced through the filing of a petition or complaint by private sector firms operating in the United States, though petitions may also be filed by an “interested party” such as a business or trade association or labor union.

The Commission is responsible for administering and applying U.S. laws concerning allegations of subsidized and dumped imports that injure a domestic industry, surges of imports that allegedly injure a domestic industry, and imports that allegedly infringe domestic intellectual property rights or are otherwise unfairly imported. U.S. laws, court decisions, and U.S. international obligations require the Commission to reach its determinations based on transparent procedures and a well-developed record. The Commission, and Administrative Law Judges in unfair import investigations under section 337 (which are often intellectual property-based), must consistently engage in thorough investigation and sound fact-finding. The record in each investigation must be examined in an objective manner, and the resulting determinations must be well-reasoned, timely, and consistent with the law.

Timeliness is an important requirement in the Commission’s investigations. Import injury investigations (i.e. AD/CVD and global safeguard) operate on statutorily defined timetables with determination deadlines that the Commission must meet. Congress has directed that section 337 investigations be resolved “at the earliest practicable time after the date of publication of the notice of such investigation.” The Commission’s ability to render decisions in a timely manner is challenged by the increasing complexity of its investigations, the variable and increased case load, and resource constraints. The Commission must balance within available resources the competing goals of timeliness, due process, and thorough determinations.

Increased transparency underpins the Commission’s reputation as an objective and unbiased adjudicator of import injury and unfair import complaints. In its efforts to provide greater transparency, the Commission developed and implemented a public searchable database that compiles and tracks information concerning 337 investigations. The Commission is in the process of extending this effort to encompass import injury investigations.

Strategic Objective 1.1

Reliable Process: Conduct expeditious and sound investigative proceedings

Providing expeditious, thorough, and independent investigations and decision-making is critical to retaining confidence in Commission proceedings. Parties to Commission investigative proceedings often represent a broad array of interests, and investigations involve many different industries and product markets. From single inventors (as in some section 337 investigations) and corporations with revenues of less than one million dollars, to the largest multi-national corporations and unions representing thousands of workers, parties to Commission proceedings benefit from reliable processes that ensure fair and timely decisions, consistent with applicable U.S. laws.

The Commission's governing statutes set specific deadlines for determinations in import injury investigations and require that section 337 investigations be resolved as expeditiously as possible. Timely decisions are critical to participants because legal uncertainties also create business uncertainties. Moreover, timeliness concerns are particularly acute in investigations concerning rapidly evolving technologies that can make the products at issue obsolete in a few years. The Commission recognizes that the thoroughness and timeliness of its investigations must be appropriately balanced.

The Commission will employ several strategies to continue providing an expeditious, efficient, and technically sound investigative and decision-making process. It will ensure that Commission determinations are based on a sufficient record of evidence. It will focus on feedback both from the agency's decision-makers, as well as the reviewing courts, stakeholders, and dispute resolution panels, and look for opportunities for improvements. The Commission will monitor its ability to continue meeting statutory and external deadlines. The Commission will continue delivering all import injury reports by the statutory deadline and all court documents by mandated deadlines. The Commission also intends to continue seeking to shorten the average length of section 337 investigations. Through a process of review of historical data and consultations with stakeholders, the Commission continues to refine its processes to improve the efficient resolution of section 337 investigations. The Commission will assess the outcome of these improvements, and take further actions consistent its assessments. The Commission's pursuit of this objective may be challenged by budgetary and human capital constraints and because the Commission cannot control the number, timing, breadth, or complexity of the investigations that it must conduct by statute.

The agency's Commissioners are the ultimate decision-makers and finders of fact in its investigative proceedings. In the case of section 337 investigations, which are conducted

pursuant to the Administrative Procedure Act, Administrative Law Judges preside over hearings, take evidence, and make initial determinations. The active and engaged efforts of the agency's staff are necessary to make expeditious, efficient, and technically sound decisions. Attorneys, and, on occasion, economists and industry analysts, contribute to section 337 investigations. Import injury investigations typically are staffed with a multidisciplinary team of investigators, economists, industry and financial analysts, statisticians, and attorneys.

The Commission is active in ensuring that exclusion orders issued in section 337 investigations are effective. While Customs and Border Protection (CBP) is responsible for enforcement at the borders, effective enforcement is enhanced by cooperation between the Commission and CBP. Therefore, the Commission will continue to engage with CBP to promote its effective enforcement of the Commission's orders.

Over the next several years, the Commission will focus on the following long-term performance goals to support this strategic objective. The Commission will institute measures designed to improve the timeliness of section 337 investigations and reduce the length of these investigations (which are concluded on the merits) to timeframes consistent with the Uruguay Round Agreements Act (URAA) implementing report.¹ The Commission will also complete post-order ancillary proceedings within guidelines and assess the timeliness of advisory and modification proceedings under a Commission pilot program. The Commission will evaluate and continue to improve the efficiency of key labor-intensive investigative processes (e.g., questionnaire data processing). Finally, the Commission will continue to identify and institute measures designed to limit the costs and burdens to parties of participating in its proceedings.

Strategic Objective 1.2

Clear Proceedings: Promote transparency and understanding of investigative proceedings

Public access to agency information and processes promotes transparency and stakeholder understanding of Commission proceedings. Stakeholders in import injury and section 337 investigations benefit from greater access to information that is relevant to Commission decision-making. The Commission views stakeholders broadly to include parties to an investigation, their business partners, other market participants, the general public, other federal agencies, Congress, and foreign governments.

Section 337 investigations are generally governed by the Administrative Procedure Act, which incorporates the concepts of due process, notice, and the opportunity to be heard. Similarly, import injury investigations require public notice and, in most cases, public staff conferences and/or hearings, and result in the publication of determinations, Commission opinions, and

¹ S. Rep. No. 103-412, at 119 (1994).

public staff reports. Continued transparency of the Commission's investigations and procedures will facilitate private sector utilization of these statutory provisions.

The Commission will continually seek to promote greater transparency and understanding of its investigations by ensuring that accurate public information is easily accessible as soon as practicable. This will be accomplished by improving access to public versions of relevant Commission documents and statistical information, conducting public outreach, and ensuring that other non-agency officials remain knowledgeable about its investigative processes and procedures. The active and engaged efforts of the agency's staff are a necessary element of the Commission's obligations to fulfill its statutory requirements. The aim of providing complete information in a timely manner, however, must be balanced against the legal requirement to protect confidential unclassified information from disclosure. Such protection is also necessary to ensure that individuals and entities are willing to provide the information needed to build a full record in future investigations.

Staff from across the agency contribute to this objective. The two greatest challenges are budgetary constraints that affect investments in improved IT and recruiting and retaining highly skilled staff.

Over the next several years the Commission will pursue a long-term performance goal that seeks to leverage existing and developing technologies to improve the flow of information to interested parties and the public. Activities such as the completion of comprehensive databases on import injury investigation information and further enhancing public access to information available to the public on the agency's website pertaining to section 337 investigations will promote both transparency and a greater understanding of Commission activities.

Strategic Goal 2

Inform: Provide Independent, Objective, and Timely Analysis and Information on Tariffs, Trade, and Competitiveness

Policymakers require high quality information on a timely basis to inform and support decision-making. To fulfill its mission, the Commission must provide the highest caliber of objective information and analysis to U.S. policymakers in a timely manner. Achieving this goal assists our customers with decisions related to trade negotiations, enacting legislation, or taking other policy actions that affect competitiveness of U.S. industries and the overall U.S. economy.

The Commission provides objective and independent advice, analysis, data, and other information to the Congress, the President, and USTR. It does this under its statutory responsibilities and in response to formal and informal requests. The Commission's specialized ability to collect, develop, and synthesize primary data and information and provide multidisciplinary analysis supports the development of well-informed trade policy. To continually strengthen its technical expertise, the Commission also identifies priority research areas related to new developments in trade, industry competitiveness, and the U.S. and global economies.

Also under its statutory mandate, the Commission publishes and maintains the Harmonized Tariff Schedule of the United States (HTS), which serves as the legal basis for the collection of customs duties and the compilation of trade data. The HTS is vital to U.S. businesses, government agencies, and others involved in trade.

Strategic Objective 2.1

Innovation: Improve analysis and information

In recent years, policymakers have been faced with new and increasingly complex trade and competitiveness-related issues. To better understand and address these issues, policymakers continue to turn to the Commission for high-quality, objective, and useful information and analysis. The Commission often receives requests on emerging trade issues or issues on which there is limited publicly available data. Recent customer requests have covered a broad range of issues such as: (1) effects of trade agreements on the U.S. economy; (2) global value chains; (3) development and competitive positions of digital industries; (4) broadening global role of services and intangible goods; and (5) effect of non-tariff measures on U.S. industry competitiveness. Over the next five years, we expect similarly diverse requests for analysis. Meeting our customers' needs requires the Commission to continually innovate and improve its information collection processes and analytic methods. Commission research efforts must respond to and anticipate customer priorities, emerging trade and industry issues, and shifting

public policy goals. These research efforts motivate ongoing development and refinement of economic models, databases, analytical skills, and industry expertise.

The Commission's analysis of industry competitiveness has expanded with new responsibilities for evaluating miscellaneous tariff bill (MTB) petitions and making recommendations to Congress under the American Manufacturing Competitiveness Act of 2016 (AMCA). To fulfill its obligations under the AMCA, the Commission developed internal processes, issued interim rules, and built a web portal to ease manufacturing companies' ability to submit, and facilitate Commission work on, MTB petitions. The Commission will evaluate and improve its MTB business process in preparation for the next round of petitions, scheduled to take place in 2019–20.

The HTS provides critical product-specific information for the public, and serves as an integral part of other government agencies' work, enabling the accurate collection of tariff revenues and data on trade flows. The Commission plays a significant role in maintaining and updating the HTS and the international Harmonized System (HS) nomenclature for traded goods, and in drafting classification provisions at the national level. The Commission also guides the development of the statistical categories used to monitor trade. The Commission plans to continue its efforts to improve the accessibility and functionality of the online HTS for its users.

Although the Commission's statutory information and analysis workload is unpredictable and varies in scope and complexity, the Commission must develop and maintain expertise to respond quickly and effectively to policymakers. To do this, the Commission will prioritize strategic investment in, and flexible application of, human capital and technology and will acquire information and develop analytic tools based on its analysis of anticipated trade and policy priorities. The Commission will also continue to meet its workload challenges by deploying multidisciplinary teams drawn from across the Commission, leveraging their diverse skills, expertise, and innovative approaches to problem solving.

The Commission's long-term performance goals that support the objective of improved information and analysis include:

- innovating and improving analytic methods
- developing and maintaining expertise to respond effectively to policymakers

Strategic Objective 2.2

Communication: Engage and respond to Inform and support decision-making on U.S. trade matters

Regular engagement with our customers and stakeholders supports effective use of our resources and informs prioritization of our efforts. The Commission regularly communicates with its statutory customers (Senate Committee on Finance, House Committee on Ways and Means, and USTR) to understand their requirements. The Commission uses this engagement to obtain feedback on the quality of its work, develop expertise and tools to meet requests for assistance, and address and anticipate policymakers' needs.

Likewise, the Commission regularly engages with other U.S. and international external experts to stay at the forefront of research into important trade-related matters. For example, the Commission hosts roundtables at which industry representatives, academics, and government officials discuss and share information on emerging trade issues such as digital trade. The Commission has also been very active in advancing global supply chain research in collaboration with national and international partners. The Commission also works with other federal agencies and represents the United States at the World Customs Organization to ensure that the Harmonized Tariff Schedule (HTS) is aligned with the international Harmonized System.

The Commission continues to use IT to improve its ability to present information that is clear, searchable, and easy to navigate. Commission initiatives include the expanded use of interactive graphics and other ways of improving the accessibility of data in Commission reports. The Commission is also exploring ways to modernize the electronic publication of its reports to maintain user-friendliness for general readers while making the data more accessible for technical users. The Commission will also continue to modernize the DataWeb tool to improve the functionality of this publicly available trade data system.

Enhancing the functionality of the HTS continues to be a major focus of the Commission. The HTS provides critical product-specific information to traders, producers, exporters, importers, other government agencies and the public. Timely updates and improved functionality to the HTS enable the accurate collection of tariff revenues. Over the next four years, the Commission plans to improve functionality by upgrading the HTS search tool to improve its efficiency and effectiveness for its users.

In response to the AMCA, the Commission developed a web portal for the submission of petitions for temporary duty suspensions or reductions and for public comments on these petitions. During FY 2018, the Commission will seek feedback from its customers, other agencies, and the public on the 2016-17 MTB cycle and will use this feedback to improve

transparency, public communication, and the web portal functionality for the next MTB petition cycle in 2019-2020.

Staff across the agency contribute to this strategic objective. Two challenges to meeting the objective are budgetary constraints and increases in statutory workload, both of which can lead to delays.

The Commission's long-term performance goals that support the above-described communication objective include:

- Maintaining and enhancing relationships with its statutory customers to anticipate their needs and build the expertise and tools required to meet statutory mandates and requests for assistance
- Identifying opportunities for collaboration and information-sharing with U.S. and international external experts to stay at the forefront of current and emerging trade and industry matters
- Developing and adopting innovative IT approaches to disseminate Commission work products in a manner that is technologically up-to-date and in demand by our users
- Assessing and improving the technology, processes, and communication tools developed in response to new MTB statutory responsibilities
- Continuing to improve the capabilities of HTS Search and the HTS data management system

Management Goal

Manage: Efficiently and Effectively Advance the Agency’s Mission

Effective and efficient management increases the agency’s ability to meet its mission and better leverage all of its assets to achieve its strategic goals. To improve effectiveness and efficiency in all mission activities, the Commission has established a management goal and a set of management objectives. Additionally, each year the Commission’s Performance Plan addresses the major management challenges identified by the agency’s Inspector General in his most recent semiannual report to Congress.

The management goal underpins the Commission’s commitment to continuous process improvement and support for the Commission’s strategic goals and mission. The Commission has established four management objectives in support of the management goal. The objectives align with four functional areas: human resources; budget, acquisitions, and finance; IT; and operational effectiveness. The management goal promotes collaboration and shared responsibility.

Management Objective M1.1

People: Attract and develop a skilled, diverse, and flexible workforce

The Commission’s workforce is integral to mission accomplishment. The Commission’s mission is entirely accomplished by and dependent on its people. The diversity, expertise, and flexibility of the Commission’s workforce drive its ability to meet customer needs, leverage opportunities, and address challenges through creativity, innovation, and collaboration.

During the next five years, a substantial portion of the agency’s workforce will be eligible to retire. Approximately ten percent of the agency’s workforce turns over every year. In recent years, the agency’s overall workload has grown in terms of quantity and complexity putting additional strains on the agency’s workforce. To accomplish its mission, the Commission requires staff with highly specialized knowledge in areas including trade analysis; nomenclature systems; analytic methods; and government policies, laws, and regulations affecting trade. Commission staff must also be flexible and adaptable, with the ability to perform in different roles to meet fluctuations in the composition and volume of workload. To support the agency’s strategic and management goals the Commission will focus on efficient and effective recruitment of diverse and flexible human capital. The Commission will also need robust succession planning and training in the necessary workforce skills that develop exceptionally competent and engaged managers, team leaders, and staff. Finally, in an environment of increasing management and reporting requirements and the prospect of new statutory

obligations, it is critical to implement accurate, innovative, and efficient human capital management systems and processes that help support the agency's strategic goals.

This Human Capital objective ensures that the Commission attracts, develops, motivates, and retains an exceptionally skilled and diverse workforce. The support and collaboration of all functional areas is necessary to develop recruiting, hiring, training, retention, and succession plans. When considering strategies to carry out this objective, the Commission faces internal and external challenges that shape the business environment in which the Commission carries out its mission. These challenges include budget constraints, government-wide constraints on hiring, and difficulty in attracting qualified candidates in specific occupations. These challenges pose a risk to mission accomplishment and require the development and implementation of targeted strategies, including:

- Evaluation of the Commission's short term and long term human capital needs and implementation of processes that will enable the Commission to quickly recruit, develop, and retain an exceptionally qualified, flexible, and diverse workforce best able to support the Commission's strategic goals
- Development of recruiting, succession, and training plans that focus on developing world-class technical, leadership, management, and communication skills

A more diverse and inclusive culture encourages collaboration, flexibility, and a work environment where individuals are respected and employees are able to contribute to their full potential. As such, the Commission is determined to expand employee engagement and leadership, and training initiatives that recognize the value of a full range of views and talents. Through the hiring and training processes, management will develop strategies and processes to continue to foster a culture of diversity and inclusion. Long term goals that contribute to this objective include:

- Improving training and development opportunities for staff throughout the Commission to foster an inclusive workplace
- Increasing stakeholder satisfaction with recruitment and retention efforts

Management Objective M1.2

Money: Ensure good stewardship of taxpayer funds

The Commission must make effective use of limited resources to carry out its strategic goals. The Commission recognizes that sound and effective management of the budgetary, acquisition, and financial processes is essential to that effort. Stewardship of appropriated funds and financial oversight are fundamental to establish the accountability and transparency that taxpayers demand and the President has directed Federal agencies to improve. Although always a top priority of the agency, careful management of taxpayer funds is even more important under current budget constraints.

In order to accomplish this objective, the Commission will continue to improve the areas of formulating and executing the agency's budget, directing acquisition activities, managing accounting operations, improving internal controls, improving internal rules, and identifying and taking into account organizational risks. This management objective will promote consistency and integrity throughout the organization as the Commission must make effective and efficient use of limited resources.

It is only possible to achieve this management objective through the support and collaboration of all functional areas entrusted to use public funds. The key strategies to implement this objective include:

- Evaluate the need for resources across agency activities, align funds to strategic goals and objectives through analysis and prioritization of risks, and incorporate the information in budget preparation and execution
- Evaluate acquisition requests for alignment with the budget information and provide timely, accurate, and best value support
- Enhance the proper accounting of agency resources through improvement of financial internal controls and processes

Changes in funding levels and other government-wide financial management requirements could affect the implementation strategy for this objective.

Ensuring good stewardship of taxpayer funds is a shared responsibility, spread throughout all offices in the Commission. Meeting this objective will take partnership between management and staff to ensure that every asset, from the ordinary to the complex, is used efficiently and effectively to fully support the other objectives outlined in this Strategic Plan.

A long-term performance goal in support of this objective is to maintain an annual unqualified financial audit opinion. This goal ensures the Commission's funding is fiscally monitored and

accurately reported. The financial statement audit determines whether the financial statements are presented fairly in conformance with generally accepted accounting principles, internal controls over financial reporting and compliance with laws and regulations. This performance goal demonstrates the Commission's commitment to ensure good stewardship of taxpayer funds.

Management Objective M1.3

Technology: Identify, deliver, and secure reliable enterprise information systems

High performing IT services are critical to accomplishing the agency's mission. To support the Commission and government-wide goals and objectives, the Commission will continue to provide technology, security, infrastructure, planning, consulting, acquisition, implementation, testing, and ongoing technical support for IT services.

The Commission will use human capital to focus on technology leadership, strategy, and project/vendor management. It will ensure that all IT activities align appropriately with priorities, strategic goals, and strategic objectives, both Commission- and government-wide. It will communicate within the agency regarding IT activities and initiatives. Contracts will be managed consistently and aligned with IT initiatives and performance-based contracting will be utilized where appropriate. Finally, the agency will continuously advance communication, coordination, and service delivery to external and internal stakeholders.

The key strategies to implement this objective include:

- Implementing IT solutions and programs that align with and support the Commission's business environment, policy goals, and statutory requirements. This will be accomplished by providing structured management of information repositories in order to improve the integrity, delivery, and usability of data; ensuring high availability of all network services; and upgrading the Commission's technical architecture to support the automation of business processes to improve efficiency and productivity.
- Continuously evolving its risk-based information security program in order to protect information assets entrusted to the Commission. The agency's technical architecture will be managed to balance and optimize performance, security, availability, and accessibility.
- Enhancing the overall management of IT service delivery. This strategy will be addressed by communication with stakeholders regarding strengthening IT controls through effective policies and procedures and improved transparency in budgeting for IT resources.

To monitor the success of these strategies, measurable performance goals will be established and tracked. These goals include:

- Ensuring a robust security posture by successfully developing capabilities consistent with government-wide cybersecurity priorities
- Improving the delivery of IT solutions to better support Commission users
- Using cloud services where feasible to reduce infrastructure resource requirements, increase flexibility to scale solutions, and expand solution options for Commission users

Management Objective M1.4

Operational Effectiveness: Evaluate and improve processes and communications

Improving the Commission’s operational effectiveness depends on continually improving our business processes to deliver better results. To accomplish this, managers lead and control the activities within the agency, and continually measure and improve the processes for which they are responsible.

To make progress on this objective, the Commission will continue to conduct internal evaluations of its processes and use its ERM process to prioritize areas for improvement. The agency will also focus efforts to more effectively manage agency-wide policy development and continue to invest in and modernize its IT infrastructure and management systems. The Commission recognizes that resource constraints, unexpected external requirements, and other priorities may slow efforts to fully accomplish all of its planned initiatives in the near future. However, we believe that recent developments—in particular expanded IT capabilities both within and outside of the OCIO, and increased managerial focus on this and related issues—may mitigate these constraints.

In recent years the Commission has made significant improvements in the management of its administrative and program operations. Over the next four years, our goal is to enhance overall efficiency and effectiveness by improving resource and performance management information and identifying activities that can be more efficiently conducted using electronic processes. We have made, and continue to make, incremental improvements in our ability to capture and report financial and operational data that meets the needs of our managers.

The Commission will also focus on further integrating ERM into its strategic planning, performance management, and budget processes. The agency will continue its efforts to modernize its administrative policies and procedures, guidance, and other administrative materials related to the activities of the agency to reduce resources required to maintain this information and improve its accessibility. The Commission is also committed to maintaining a safe and secure operating environment for all its employees and will ensure that employees have the appropriate clearances to perform their duties.

The Commission will continue to use feedback from the public on the functionality and usefulness of information it provides through its website and web applications. Increasingly, the website is the primary vehicle to provide information to the public. In addition, participants in the agency's various types of investigations increasingly make use of web applications such as the Electronic Document Information System (EDIS), which is used both for submissions to the Commission and for information access. The Commission will use the feedback it receives to improve the content and functionality of its web-based systems.



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