



# United States International Trade Commission

## Strategic Plan

FY 2014–2018



tariff, if any, applied to imported goods. The Commission ensures that the tariff schedule is up-to-date and accurate, reflecting all implemented trade agreements, which in turn facilitates international trade by ensuring efficient clearance of goods through the nation's 329 ports of entry, enables the accurate collection of tariff revenues, and permits the collection and reporting of the nation's trade statistics. In a rapidly changing technology and product environment, Commission participation in the World Customs Organization and maintaining up-to-date classification systems serves to improve the quality of trade information. High quality trade information is a critical component of trade policy formation and analysis within the framework of a fair and rules-based global trading system. Such information also helps U.S. manufacturers to compete in the global economy.

In numerous trade-related acts, Congress has noted that the expansion of international trade is vital to national security and critical to the economic growth and strength of the United States. Congress has also identified, among its principal objectives for negotiations, the following areas in which the Commission's mission is to provide support to trade policymakers pursuing these objectives:<sup>1</sup>

- Expanding competitive market opportunities for U.S. exports and to obtain reciprocal tariff and non-tariff barrier elimination
- Reducing or eliminating barriers to international trade in services, including regulatory and other barriers
- Reducing or eliminating artificial or trade-distorting barriers to investment
- Promoting adequate and effective protection of intellectual property rights
- Ensuring current obligations, rules, disciplines and commitments under the WTO apply to E-commerce
- Reducing barriers to U.S. agricultural exports
- Dispute settlement and enforcement of trade remedy laws

These are all areas in which the Commission has developed substantial expertise so as to provide objective, accurate, leading edge insights for Congress and the Administration. The Commission's reports to Congress and the Administration provide essential information and reflect the Commission's expanding abilities to quantify the effects of policy changes on the U.S. economy as a whole, producers, consumers, employment, and wages.

The breadth of the Commission's statutory responsibilities in this dynamic setting provides it with great opportunities and challenges. Key statutory responsibilities are shown in figure 1. The Commission must continue to meet its responsibilities on significant matters affecting the U.S. economy and inform policymakers on increasingly complex issues. The Commission must also serve the public by ensuring the transparency of its rules and procedures and making available its reports and other information, as appropriate. These efforts align with and are reinforced by various government-wide initiatives and requirements. At the same time, the agency must balance its use of resources to meet its strategic goals with its need to apply resources to meet administrative challenges. The agency must adjust to tighter budgets, and changes in the labor market that pose challenges to recruiting staff with requisite technical skills. The agency must also comply with growing federal standards regarding financial management and reporting, human resource functions, and personal and physical security. Lastly, the agency must meet in an era of increasingly more stringent standards the challenges of developing and protecting enhanced information technology (IT) systems that provide better information and analysis while improving customer access and reducing overall costs.

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<sup>1</sup> Pub. L. 107-210.

## Mission

Consistent with its statutory mandate, the Commission makes determinations in proceedings involving imports claimed to injure a domestic industry or violate U.S. intellectual property rights; provides independent tariff, trade and competitiveness-related analysis and information; and maintains the U.S. tariff schedule.

## Vision

Independently and objectively investigate unfair trade complaints by providing impartial administration of relevant trade laws and succinct, analytically sound and legally correct decisions.

Enable informed policy decisions by providing Executive and Congressional customers accurate, timely, and insightful information and objective analysis of the evolving range of international trade matters through adaptive interdisciplinary industry, economic, legal, nomenclature, and regional expertise, utilizing enhanced skills and tools.

### VALUES

Independence  
Objectivity  
Accuracy  
Transparency  
Timeliness

### *And its people are:*

Expert  
Innovative  
Flexible

## 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, and thereby also serve U.S. industry, workers and the general public.

In developing this Strategic Plan, the Commission consulted with appropriate congressional committees and the U.S. Trade Representative. 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 engage 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. This stakeholder engagement and feedback is used to develop the Commission's strategic objectives and performance goals. Stakeholders have identified shorter response times, expanded research capacity and scope, expanded information needs, and improved information access as important.

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, such 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 soundness and timeliness of its investigations must be appropriately balanced.

The Commission will employ several strategies to continue to provide an expeditious, efficient, and technically sound investigative and decision-making process. First, it will ensure that Commission determinations are based on sufficient record evidence. It will focus on feedback both from the agency's decision-makers, as well as the reviewing courts and dispute resolution panels, and look for opportunities for improvements. Such improvements may include enhanced employee development efforts, for example. Second, the Commission will monitor its ability to continue to meet external deadlines. It is the Commission's express intent to deliver all import injury reports by the statutory deadline and all court documents by mandated deadlines. The Commission also intends to make tangible progress towards shortening the average length of section 337 investigations. After a period of careful study of available historical data, including leveraging the Commission's recent investment in a comprehensive case management database, the Commission will adopt processes designed to improve the efficient resolution of section 337 investigations. The Commission will assess the outcome, and take further actions consistent with the successful measures. The Commission's pursuit of this objective may be challenged by budgetary constraints and because the Commission cannot control the number, timing, or breadth of the investigation requests that it receives and must respond to by statute.

The agency's Commissioners are the ultimate decision-makers and finders of fact in its investigative proceedings. However, many offices throughout the agency make significant contributions to the conduct of expeditious, efficient, and technically sound investigations. In the case of section 337 investigations, which are conducted pursuant to the Administrative Procedure Act, its Administrative Law Judges preside over hearings, take evidence, and make initial determinations. Other notable contributing offices include the Office of the General Counsel, the Office of Operations and its constituent offices; Offices of the Commissioners; and the Office of the Secretary. The active and engaged efforts of the agency's staff are a necessary element of the Commission's efforts to fulfill its statutory obligations.

The Commission recognizes that the goal of complainants is to obtain exclusion orders in section 337 investigations. While CBP is responsible for enforcement at the borders, effective enforcement can be 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. First, 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 URAA implementing report.<sup>2</sup> The Commission will also complete ancillary proceedings within guidelines. The Commission will evaluate and improve the efficiency of key labor-intensive investigative processes (e.g., questionnaire data processing, collection of lost sales and lost revenue data). Finally, the Commission will continue to institute measures designed to limit the costs to parties of participating in its proceedings.

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<sup>2</sup> S. Rep. No. 103-412, at 119 (1994).

## **Strategic Goal 2**

### **Inform: Produce Objective, High-Quality, and Responsive Tariff, Trade, and Competitiveness-Related Analysis and Information**

Policymakers require high quality information to evaluate complex trade-offs between competing policy goals and to inform and support decision-making. To fulfill its mission, the Commission must independently provide the highest caliber of information and analysis to U.S. policymakers in a timely manner to assist them when they are securing benefits to the United States in trade negotiations and when they enact legislation or take other policy actions that affect the U.S. economy and industry competitiveness.

The Commission has numerous statutory responsibilities to provide advice, analysis, data and other information, and reports to the Congress, the President and USTR. In response to U.S. policymakers' requests, the Commission and its staff provide objective independent information and analysis on numerous topics, both through formal investigations and informal expert advice. The Commission's unique capability to collect, develop, and synthesize primary information and provide multidisciplinary analysis supports the development of well-informed trade policy. To ensure the development and maintenance of requisite technical expertise to fulfill its statutory requirements, the Commission also identifies priority research areas related to international trade, industry competitiveness, and the U.S. and global economies.

The Commission publishes and maintains the Harmonized Tariff Schedule of the United States (HTS), which serves as the basis for the collection of customs duties, the compilation of trade data, and the formulation of many trade actions. The Commission plays a significant role in the development of the international nomenclature for goods in trade and in drafting classification provisions at the national level. The Commission also guides the development of the statistical categories used to monitor trade. As a whole, the HTS is vital to U.S. businesses, government agencies, and others involved in trade that depend upon accurate, current tariff rates and useful trade data.

#### **STRATEGIC OBJECTIVE 2.1.**

##### **Timely: Deliver timely and accessible analysis and information**

The Commission recognizes the importance to policymakers of receiving timely, accessible information to inform their decision-making. The Commission's customers expect the agency to adhere to statutory deadlines and requested delivery dates. For information to be accessible, it must be presented clearly, easily located and obtained by interested individuals, and in compliance with relevant regulations.

Timely updates to the HTS provide critical product-specific information for the public and are an integral part of other government agencies' work, as well as enable the accurate collection of tariff revenues. As technology and the global commercial environment change, the Commission will need to provide information to users in different ways. The Commission intends to actively develop and implement changes to ensure that the tariff information is accessible and transparent, and reflects current international nomenclature, as well as accurate and relevant national legal and statistical information.

Although some requested reports and maintenance of the HTS are recurring obligations, the number and subject of most requests for analysis and information are unpredictable and reflect evolving national policy priorities. Consequently, the Commission employs several strategies to ensure timely delivery of requested products. Internal evaluations have pointed to the need to further develop information on the cost of conducting

or administrative requirements. Nevertheless, the changing nature of requests and emergence of new issues in international trade and industry competitiveness require a constant expansion of capabilities. The Commission must develop and maintain sufficient expertise to respond effectively to policymakers. This requires continuous acquisition of information, development of analytical tools such as economic models, and investment in human capital. In addition, the supply of certain expertise and the extended period it often takes to develop the requisite technical and experiential knowledge requires long-term planning, thoughtful investment, and effective employee recruitment and retention methods.

The Commission pursues a strategy of regular communication to gather information on customers' needs, to inform customers of its capabilities and to seek feedback on its work. The Commission can therefore ensure that customer quality-related expectations are met, anticipate policymakers' needs, and proactively develop expertise and tools to meet requests for assistance. Under the direction of the Commission, staff also seek feedback and work to identify ways to improve the technical and creative insights of analytical reports.

This Strategic Objective is also carried out by multifunctional teams drawn from across the Office of Operations. Other facilitating Commission offices include the Offices of External Relations, the Chief Information Officer and the General Counsel, as well as various administrative offices.

Over the course of this Plan, the Commission's long-term goals include:

- developing and improving agency capabilities to provide effective and responsive analysis, data, and nomenclature services
- continually improving the Commission's capability to address new issues in trade and industry competitiveness such as non-tariff measures (NTMs) applied to goods and services, supply chains, and intellectual property rights (IPR)

To achieve these goals, the Commission will consult frequently with its customers, regularly evaluate its economic and analytical capabilities to prioritize resources/efforts, and participate in international and other institutional efforts to identify and address trade-related measures such as NTMS and nomenclature.

## **Management Goal**

### **Achieve Agency-wide Efficiency and Effectiveness to Advance Agency Mission**

In order to deliver greater impact through increasing effectiveness and efficiency, the Commission has established a management goal and a set of management objectives. In addition, 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 underlines the Commission's commitment to continuous process improvement and support for the Commission's strategic goals and mission. The three management objectives support the Commission's management goal in order to advance the agency mission in an efficient and effective manner. The objectives align with three functional areas: human resources; budget, acquisitions, and finance; and IT. Collaborative in nature, the management goal captures shared responsibilities for agency excellence on behalf of all who rely on the Commission to be an efficient and effective guardian of its resources.

Over the course of this plan, the Commission plans to monitor the success of these strategies by setting measurable performance goals which will be tracked on an ongoing basis. These goals include, but are not limited to:

- Converting all human capital management paper processes to electronic processes and integrating existing electronic processes to increase efficiency and proactive customer service and decrease transaction times
- Ensuring that recruiting meets the 80 day end-to-end hiring timeline for relevant recruitment actions and customer service ratings within the Commission demonstrate broad satisfaction with the process

The support and collaboration of all functional areas is necessary to develop office specific recruiting, hiring, training, and retention plans.

## **MANAGEMENT OBJECTIVE M1.2.**

### **Money: Provide 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, while maintaining and delivering high-quality services. 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 and identifying 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. This management objective is built on the following delivery formula:

*Identification of Essential Needs + Acquisition of Right Contracts to Provide Best Value + Proper Accounting of Resources = Good Stewardship of Taxpayer Funds*

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, and incorporate the information in budget preparations 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 level and other government-wide financial management requirements could affect the implementation strategy for this objective.

Managers throughout the agency are key process participants in budgetary, financial, and procurement functions. Additionally, meeting the objective will only be possible through partnership with staff of the Office of the Chief Information Officer and Office of Chief Administrative Officer.

## **Cross-cutting Objectives**

The Commission set forth two cross-cutting objectives in its FY 2014–2018 Strategic Plan. Both support improvements in various aspects of the agency's operations.

### **CROSS-CUTTING OBJECTIVE 1 (C.1).**

#### **Use feedback to improve agency operations and enhance employee and customer satisfaction**

The Commission regularly seeks feedback from its customers and employees on specific aspects of its operations. The agency uses results from the Federal Employee Viewpoint Survey (FEVS) among other sources of information as input to prioritize improvements in the operations of the agency.

The Commission also seeks 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 for provision of information to the public. In addition, participants in the agency's various types of investigations increasingly make use of the Electronic Document Information System (EDIS)—a web application used both for submissions to the Commission and for information access. The Commission uses the feedback it receives to prioritize efforts to improve web-based content and the functionality of the systems accessed through it.

Performance goals that support this objective include continuously improving agency results as measured by the FEVS through FY 2018 and making improvements to the Commission's website and web applications that respond to user feedback and lead to higher user satisfaction.

### **Cross-Cutting Objective 2 (C.2).**

#### **Improve the resource and performance management capabilities of Commission managers**

The Commission has made great strides in improving the management of its administrative and program operations over the past decade. To continue this effort, the agency continues to incrementally automate and consolidate its financial, administrative, and operational information. Over the next five years, the Commission's goal is to improve the resource and performance management capabilities of agency managers by implementing an integrated enterprise management system to enhance overall agency efficiency and effectiveness.