



**U.S. International Trade Commission  
OFFICE OF INSPECTOR GENERAL**



# **Management Letter - Action is Needed to Improve Awareness of Outside Employment Activities**



THE INSPECTOR GENERAL



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## UNITED STATES INTERNATIONAL TRADE COMMISSION

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WASHINGTON, DC 20436

August 18, 2025

IG-XX-007  
OIG-ML-25-07

Chair Karpel:

During ongoing work in the Office of Inspector General, it has come to our attention that the Commission does not have a policy or regulation for all employees to disclose and obtain approval for outside employment. Employees who join the USITC do not have a process to report outside employment to a supervisor. Currently, only senior executives and other employees required by the nature of their position to file Office of Government Ethics (OGE) financial disclosure reports (OGE Form 450 or OGE Form 278) disclose outside employment, and the level of information provided varies based on filing category.

A formal requirement to report outside employment is a prudent step that many federal agencies take to prevent and detect conflicts of interest. At the USITC, there is no general obligation for employees to inform supervisors of outside employment. Supervisors are not involved in reviewing or approving financial disclosure forms, so they would not be aware of outside employment activities reported to the ethics office unless an employee disclosed the information voluntarily. As a result, the Commission may be unaware of conflicts of interest and at risk of not identifying employment misconduct.

In addition to ethical conflicts, having a policy or regulation for all staff on reporting outside employment would also help discourage or prevent legal issues that may arise from an employee

having outside employment that is inconsistent or overlaps with the employee's duties and time and attendance requirements of their position.<sup>i</sup> Due to the sensitive nature of the work the USITC performs, I believe that the Commission should consider requiring all employees to report outside employment so that the USITC can identify and address any conflicts of interest in fact or appearance. It would also reinforce the employee's obligation not to have outside employment that conflicts with their position at the USITC and serve as a reminder that employees are to provide good faith service during official duty time.

Sincerely,



Rashmi Bartlett  
Inspector General

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<sup>i</sup> See for example the recent press release from DOJ dealing with this issue: [District of Columbia - Former HUD Emplo... - United States Department of Justice](#)





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Office of Inspector General  
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