



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



USITC Management and Performance Challenges

Fiscal Year 2026





UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

December 17, 2025

IG-XX-013
OIG-MR-26-01

Chair Karpel:

In accordance with the Reports Consolidation Act of 2000, the U.S. International Trade Commission (USITC or Commission), Office of Inspector General (OIG) identifies the most serious management and performance challenges facing the Commission and provides a brief assessment of the Commission's progress in addressing those challenges. This summary is known as the Top Management Challenges. By statute, this report is required to be included in the Commission's Agency Financial Report.

Congress left the determination and threshold of what constitutes a most serious management and performance challenge to the discretion of the Inspector General. The Government Performance and Results Modernization Act of 2010 identified major management challenges, such as programs or management functions that are vulnerable to waste, fraud, abuse, and mismanagement. A failure to perform well in these areas could seriously affect the Commission's ability to achieve its mission objectives. Each challenge area is related to the USITC's mission and reflects continuing vulnerabilities and emerging operational issues.

Management challenges were identified this year based on oversight work conducted by the OIG, knowledge of the Commission's programs and operations, the Commission's strategic plan, annual management plan, enterprise risk management assessments, statements of assurance, and observations and discussions with senior leaders.

For Fiscal Year 2026 (FY 2026), we have three top management and performance challenges:

- Internal Controls
- Data Management
- Human Capital Management

Internal Controls

The Government Accountability Office (GAO) publishes [*Standards for Internal Control in the Federal Government*](#) (The Green Book), which provides federal government managers with the criteria for designing, implementing, and operating an effective internal control system. It defines internal control as “a process effected by an entity’s oversight body, management, and other personnel, designed to provide reasonable assurance that the objectives of an entity will be achieved” and identifies five components for internal control:

1. Control Environment
2. Risk Assessment
3. Control Activities
4. Information and Communication
5. Monitoring

All five components must be properly designed and implemented for an effective internal control system. In addition, these components must work together in an integrated manner. The overall success of an internal control system relies on the organization's people, processes, and technology. The control environment is the keystone of an internal control system. The GAO’s Green Book states that one requirement of the control environment is for management to establish an organizational structure, assign responsibility, and delegate authority to meet the agency's objectives.

Central to the Commission’s internal controls are the agency’s internal rules. The Commission defines an internal rule as a formal rule that establishes or provides for internal governance, organizational structure, delegations, designations, and/or internal operating policies and procedures for the Commission and its subcomponents, including USITC offices, divisions within offices, and committees.

An inadequate system of internal rules has been identified as a deficiency since FY 2015. From FY 2015 to FY 2023, the system of internal rules was designated as a significant deficiency. In FY 2024, the significant deficiency was downgraded to a control deficiency because the Commission implemented corrective actions that strengthened the internal rules development and review process.

Challenges Identified in OIG Audit

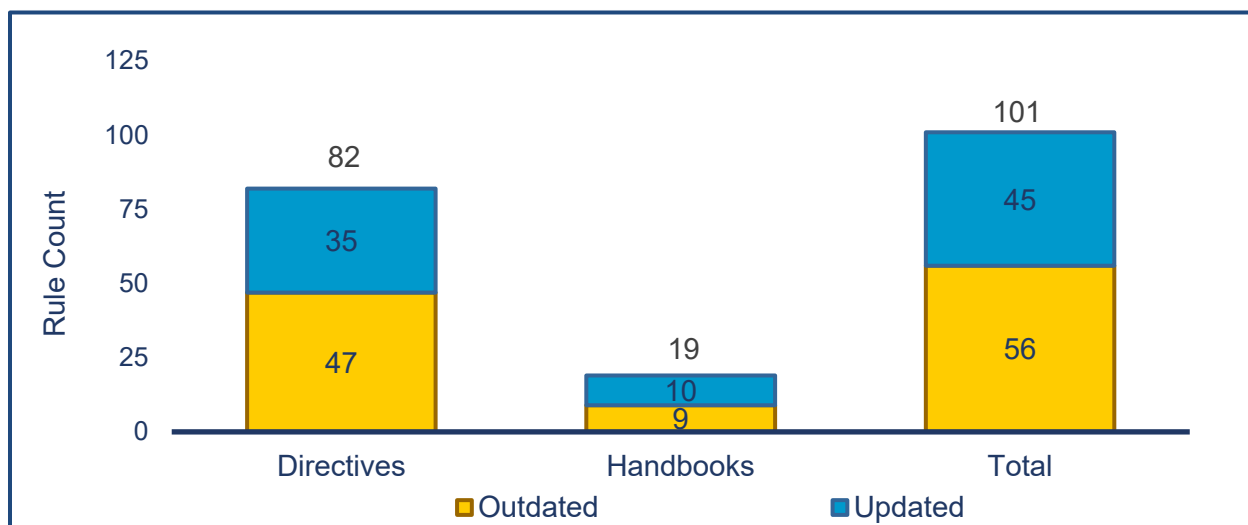
In the OIG’s June 2024 report, [*Audit of the USITC’s System of Internal Rules*](#), we made 13 recommendations to the Commission to improve the internal rules process. We found that the Commission’s internal rules were not being issued or updated in accordance with the Commission’s periodic review requirements, and the number of outdated rules was increasing. Moreover, the Commission had inadequate internal controls over its risk and prioritization processes. There were also insufficient resources to efficiently operate the internal rules process as designed. Several offices in the Commission faced challenges writing and

designating internal rules. The Commission’s electronic system for storing internal rules did not fully reflect the rules currently in operation, as canceled and superseded rules had been identified and were still listed alongside active ones.

Status of Outdated and Historical Directives and Handbooks

The Commission has historically tracked progress in managing the internal rules by counting the number of current directives, handbooks, and desk procedures. As of September 2025, the Commission maintained 82 directives and 19 handbooks. Desk procedures were reclassified this year and are no longer considered part of the internal rules tracking system. Figure 1 shows that 47 of the 82 directives and nine of the 19 handbooks were outdated, meaning their review dates had passed without the Commission completing a review or making necessary updates. In total, a majority of internal rules are still out of date.

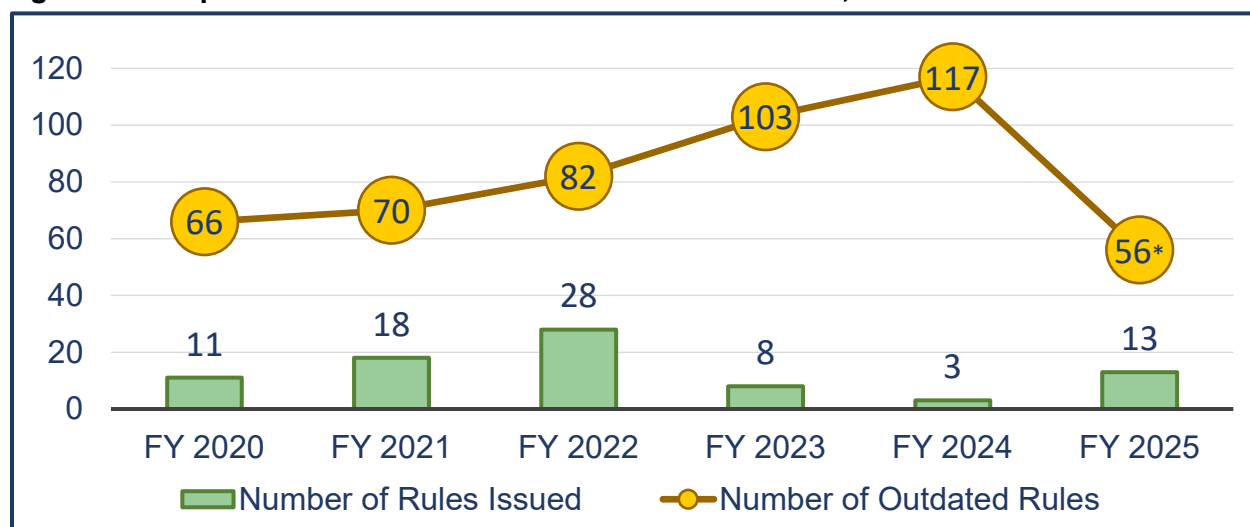
Figure 1. Outdated Internal Rules as of FY 2025



Source: OIG Analysis of USITC’s System of Internal Rules SharePoint Site, September 2025.

The Commission successfully reduced the number of outdated rules overall this year from the FY 2024 total of 117 to this year’s total of 56. As illustrated in Figure 2, the number of outdated rules rose each fiscal year through FY 2024. Although the count declined markedly in FY 2025, the full impact is more complicated because two thirds of the reduction in outdated rules resulted from removing desk procedures from the count. The remainder of the drop in out-of-date rules was achieved by USITC issuing or updating 13 rules and rescinding seven outdated rules.

Figure 2. Comparison of Issued and Outdated Internal Rules, FY 2020 to FY 2025



Source: OIG Analysis of USITC's System of Internal Rules SharePoint Site, September 2025.

*The FY 2025 decrease of 61 outdated internal rules is comprised of 41 desk procedures eliminated as an internal rule, 13 issued or updated rules, and 7 rescinded rules.

Improvement Efforts and Work Underway

The Office of Administrative Services (OAS) and the Internal Administration Committee (IAC)—supported by the Office of Chief Information Officer (OCIO)—launched a new system to track internal rule development, reducing administrative burden and improving visibility into bottlenecks. The Commission also implemented a rule certification application to streamline required certifications and provide Rule Owners with clear guidance and support.

In addition, OAS led updates to the IAC Charter, granting the Committee authority to rescind outdated rules. Once the revised Charter was issued, the IAC used this new authority to rescind more than 100 obsolete internal rules. In the Commission's September 30, 2025 statement of assurance, the OAS stated, "There remain several policy Directives in critical program areas that need to be revised and reissued, but progress in this area has increased during this fiscal year."

By the end of FY 2027, the Commission aims to eliminate the existing backlog of historical directives by issuing or rescinding four rules per quarter. The progress made by the Commission is promising. It is important that the Commission sustains its efforts to address the backlog of internal rules by FY 2027, while being mindful that the number of internal rules is not static, with new rules becoming outdated every year. Accordingly, the Commission needs to establish a pace that will allow it to issue new rules and complete timely reviews of newly outdated rules. Delays in updating the agency directives could result in ineffective internal controls and a lack of monitoring controls. While 55% of outdated internal rules remain to be addressed, employees are subject to incomplete or obsolete guidance, which could make it difficult to hold them accountable for understanding and performing internal controls and impair the ability of the Commission to operate efficiently and effectively.

Additional Internal Control Challenge Areas

In addition to delays in updating internal rules, the OIG—through its audits and reviews—found instances where controls existed but were not fully operational. In a recent review of the Commission’s contract file management system ([OIG-AR-25-08](#)), we identified areas where controls need to be strengthened or more efficient to ensure contract files documentation complies with the Federal Acquisition Regulation and agency-specific requirements, Contracting Officer’s Representatives (CORs) meet the appropriate training and certifications standards, and required contractor performance evaluations are completed consistently.

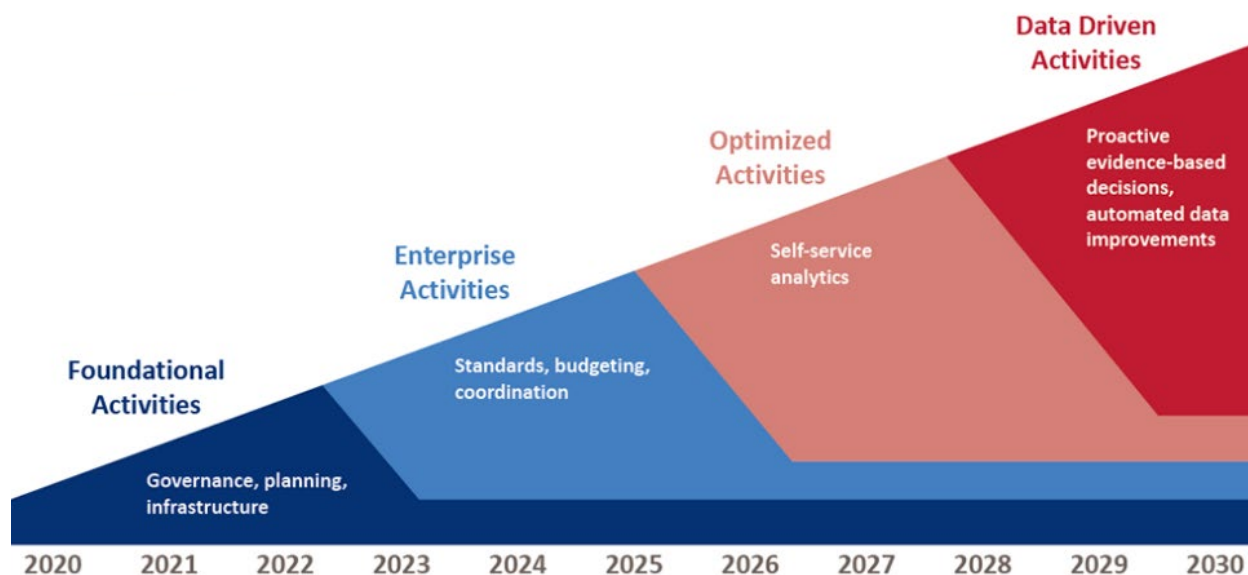
The FY 2024 financial statement audit found repeated issues with internal control deficiencies over payroll operating expenses. In response to the FY 2024 audit findings, the Commission issued Standard Operating Procedures for the Review of the Electronic Official Personnel Folder (eOPF) database, including sending a semi-annual notice to all USITC employees, reminding them to review their eOPF periodically to verify the completeness and accuracy of the information in the database. During FY 2025, the Office of Human Resources (OHR) conducted a comprehensive review of the retirement codes of all current USITC employees to verify that employees are enrolled in the correct retirement plan. Furthermore, OHR will begin a biannual review in the first quarter of FY 2026, during which a random sample of employee eOPF documents will be checked to confirm that required benefits documents are present and match the deductions shown on the employee’s earnings and leave statements.

In addition to the control deficiency in internal rules reported in the September 30 statement of assurance, the Commission also reports a control deficiency related to human capital management operations, which will be covered in the third management challenge. The control deficiency is based on findings from an April 2024 Office of Personnel Management (OPM) evaluation of USITC’s human capital programs. OPM recommended 19 required actions and 24 suggested actions. These recommendations aligned with the OIG’s concerns about the lack of operational monitoring controls discussed in previous management challenge reports.

Data Management

The White House Office of Management and Budget (OMB) issued a memorandum ([M-19-18](#)) outlining the Federal Data Strategy (FDS) in June 2019. The FDS provides a framework of operating principles and best practices to help agencies achieve a consistent data infrastructure and strong data governance over the next decade. This strategy is a government-wide vision for how agencies should manage and use federal data by 2030.

Figure 3. Federal Data Strategy 10-Year Vision



Source: <https://strategy.data.gov/2021/action-plan>, accessed November 2025.

Annual action plans are issued as part of the FDS that follow an incremental maturity ladder that generally moves from **Foundational Activities** of governance, planning, and infrastructure (2020–2022), to **Enterprise Activities** of standards, budgeting, and coordination (2023–2025), to **Optimized Activities** of self-service analytics (2026–2028), and finally, to **Data-Driven Activities** of proactive, evidence-based decisions and automated data improvements (2029 and forward) (see Figure 3). Agencies implement the FDS by meeting the required Action Steps in the yearly Action Plans following OMB guidance.

On January 15, 2025, the White House OMB issued a memorandum ([M-25-05](#)) outlining a systematic approach to open data that will better facilitate data access for evidence-building and will foster innovation in artificial intelligence and beyond, inform research, and promote government transparency and accountability, subject to appropriate safeguards for privacy, confidentiality, and security. Table 1 below shows the Commission's status of the eight initial actions to be taken by USITC.

Table 1. Commission's Compliance with M-25-05, as of September 2025

Requirement	Due Date	Completed
Contact information for the open data plan point of contact prominently displayed on the agency's website	7/15/2025	✓
Information Resource Management Strategic Plan updated with open data plan	7/15/2025	✓
Comprehensive data inventory data set listings updated to DCAT-US 3.0 updated schema	9/30/2026	In Progress
Comprehensive data inventory hosted publicly on the agency's website	9/30/2026	✓
All agency data assets represented in the comprehensive data inventory	9/30/2026	✓
Data assets meet open format requirements	9/30/2026	✓
Public data assets meet open Government data asset and open license requirements	9/30/2026	✓
Public engagement conducted for releasing public data assets	9/30/2026	✓

Source: USITC Data Management Information Provided to OIG, November 2025.

Data Management Responsibilities and Overview

The Commission's Chief Data Officer (CDO) is responsible for data governance and lifecycle data management. The CDO's portfolio of data work includes policies, guidelines, best practices, and an implementation approach. The work is aligned with the Commission's FY 2022–2026 Strategic Plan as well as federal data strategies and requirements, where applicable. In addition to the CDO, the Deputy Chief Data Officer (DCDO) contributes to the development, execution, and sustainment of a variety of agency data governance initiatives related to the Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act) and other pertinent laws, regulations, and agency policies. This includes ongoing efforts to strengthen the agency's data maturity, overall data literacy and acumen, and managing data asset documentation.

The Commission's federal data management process includes a broad range of functions, such as:

- Governing how data are used and accessed;
- Collecting, processing, validating, and storing data;
- Integrating different types of data from disparate sources, including structured and unstructured data;
- Ensuring data quality and availability, and
- Protecting and securing data and ensuring data privacy.

The Commission's FDS Activities

The Commission's work to date has focused on all four activities of the FDS, as shown in Table 2. The Commission has not established target completion dates for these activities.

Table 2. Federal Data Strategy Activities in Progress, as of September 2025

Activity	Status	Start Date	FDS Area(s)^
Documentation of core agency applications and administrative data systems	Thirty-one core assets have been documented, including 16 in FY 2025. Thirty-eight core assets remain to be documented.	2018	All
Data Governance Manual	IAC review completed. Data Governance Board (DGB) cleared IAC comments and returned the manual to the IAC.	2019	Foundational
Schedule of data systems to be documented	Each year, undocumented core assets are prioritized for documentation, and documented assets are reviewed.	2022	Foundational & Enterprise
Self-service analytics	Self-service analytics is always ongoing, as new ways for data to be used are continually discovered. Expect to complete active fact-finding investigations by year end.	2021	Optimized & Data Driven

Source: USITC Data Management Information Provided to OIG, November 2025.

Documentation Status

In 2022, the Commission established a goal to document core agency applications and administrative data systems within five years. The CDO considers a system documented when it has provided sufficient information to cover the types of information within each article¹

¹ The data management template contains each of these articles.

(process, security, data elements, data assurance). A simple asset can be fully documented in the data management plan template, whereas more complicated systems require multiple documents.² Of the 188 data assets, 43 have a standard operating procedure, 36 have a data glossary, and 38 have a draft or final data management plan.

The Commission's data systems are divided into two types: core and non-core assets. A **core** asset is a dataset that is the authoritative source of information. A **non-core** asset is a subset of data from an authoritative source used by an office for its own purpose.

As of September 2025, 69 core assets and 119 non-core assets have been identified. As shown in Table 3, there are 133 systems that have not been documented. Of those undocumented systems, 38 are core assets and 95 are non-core assets. For comparison, 31 or 45% of the core assets have been fully documented over seven years. Of the 31 core assets documented so far, 16 were documented in FY 2025. In 2024, the Commission indicated that the inventory and documentation would be completed in FY 2026.

Table 3. Status of the Commission's Documentation Efforts from FY 2018 to FY 2025

	Core Assets	Non-Core Assets	Total
Documented	31	24	55
Not Documented	38	95	133
Total	69	119	188

Source: USITC Data Management Information Provided to OIG, November 2025.

Progress and Changes

Agency data initiatives and increased meetings have occurred between data owners and the CDO and DCDO. This has resulted in an increased understanding of assets that should be included in the inventory of core agency applications and administrative data systems. The CDO and DCDO also work with data owners to ensure reliance on authoritative data sources, leveraging technology controls, and identifying business processes for data owners' data maintenance activities.

The financial systems were the priority for data management in FY 2025 due to the transition to Administrative Resource Center (ARC) and to make data more accessible. With the transition to ARC, the Office of the Chief Financial Officer (OCFO) was able to consolidate reports, enhance data quality, increase internal controls, and develop better reports for finance staff and managers' reporting needs. During FY 2025, the OCFO cleaned data and tested extraction from

² These other documents include a system description, a standard operating procedure, and a data glossary.

existing systems and integration into ARC. The OCFO also developed requirements for their reporting needs.

Existing and New Data Management Challenges

As the OIG reported in previous years, areas with gaps include:

- data management processes and governance that are not embedded into operational processes;
- establishment of expectations around data availability, maintenance, and performance, as well as the related policies and processes, and
- controls to ensure accountability for data quality.

The Data Governance Manual was started in 2019 but has yet to be issued, and there is currently no established milestone for completion. This manual is meant to provide procedures and internal controls to ensure the effective collection, management, compilation, and presentation of agency data; effective data governance; the transparency, accessibility, and release of agency data; appropriate controls and use of sensitive data; and the application of internal controls to ensure data quality and optimize and leverage the value of Commission data assets. The IAC provided comments for the DGB to address in July 2025. The DGB addressed the comments and returned the manual to the IAC for approval, but there is no projected timeline for issuance to the USITC. That the manual is still not issued after six years is concerning and delays this important information from being distributed to the Commission.

While the Commission has established performance goals, it lacks a plan and timeline to implement FDS activities that are relevant to the Commission. It is unclear if USITC has established the distinct activities it will complete in each phase of the FDS. Without such a plan, we cannot determine how far along the Commission with meeting the FDS nor what remains to be done. The FDS called for Foundational Activities to be largely complete by 2022. As the end of 2025, 55% of core assets still need to be documented, which we project will take at least another two years. There is no timeline or plan for when non-core assets will be documented. FDS stated that Foundational Activities were to be performed 2023-2025, with 2026-2028 to be years to focus on Optimized Activities.

As the OIG stated last year, we encourage the Commission to reassess its approach to FDS to determine if its processes and strategy will allow it to catch up on delayed FDS activities, so that it can work on Optimized Activities in 2026 and Data Driven Activities in 2029, as contemplated by the FDS. We hope that within the next year, the USITC will have a more detailed action plan with projected timelines for completion that reflects the resources available for data management. Our concern is that this endeavor is facing the types of delays and lack of clarity that we found previously with internal rules.

Human Capital Management

The Commission's FY 2022–2026 Strategic Plan emphasizes human capital management under Strategic Objective 3.1: Attract, develop, and retain a skilled, diverse, and versatile workforce. The Commission also acknowledges in its Strategic Plan that succession and training plans are needed to develop world-class technical, leadership, management, and communication skills.

The FY 2026 human capital management challenge has three essential elements: hiring, succession planning, and retention. Outside the USITC's control, three Commissioner vacancies and three current Commissioners on expired terms can create leadership uncertainty for senior officials and staff. The USITC's human resource function was evaluated by the OPM in FY 2024, and the Commission continued to make progress this year in addressing a list of required actions and recommendations.

Hiring

The Commission has experienced an increased workload in recent years. Filling vacant and new positions to meet the USITC's goals has been challenging for the Commission. In FY 2024, the Commission experienced delays due to the time it takes to onboard new employees. This year, the USITC's hiring was impacted by a government-wide federal civilian hiring freeze that was directed by the President on January 20, 2025, and which remained in effect for the entire fiscal year.

The Commission reported that for FY 2025, the average time-to-hire was lower than past years. Of note, the OPM's time-to-hire goal calculation changed in FY 2025 and is now based on a different end date parameter. The end date that OPM now uses, per [OPM's Merit Hiring Plan](#) memo issued on May 29, 2025, is the initial offer date. Using the prior calculation method, we were able to verify that the Commission's time-to-hire was reduced in FY 2025.

The Commission started FY 2025 with 425 permanent or term employees. Sixty-seven recruitment actions were processed during the year, including backfilling departures and retirements, plus temporary hires. The Commission made 37 external selections, converted 3 temporary positions, and made 7 internal selections for permanent and term appointments. However, there were 55 permanent and term appointment departures.

Table 4 summarizes the information on hiring and departure activities during FY 2025. There was a net loss of 15 employees in FY 2025, including two who accepted the deferred resignation program. Another seven employees who accepted the deferred resignation program will depart the Commission on December 31, 2025, further increasing the number of departures. Positions filled by the internal hires (7) did not impact the overall number of Commission staff.

Table 4. USITC Human Capital Activity During FY 2025

Activity	Number of Employees
Employees at the Beginning of FY 2025	425
Add: New Hires	40
Less: Departures/Turnover	55
Employees at the End of FY 2025	410

Source: USITC Human Resources, December 2025.

The Commission's extended hiring timeline could create challenges in securing top talent for the small agency, especially at the senior level, as candidates often pursue multiple opportunities. In FY 2024, the Commission started to follow a year-round hiring process that considers attrition and hiring times and began using a tracking tool to monitor hiring activities. With additional requirements for hiring in FY 2025 and the future, the Commission may need to place additional focus on recruiting for positions in hard-to-fill job series. Hiring is also challenging because some candidates seek roles that offer expanded telework or remote positions, which can put agencies requiring more in-office days at a competitive disadvantage.

Succession Planning

Succession planning is a proactive and systematic process where organizations identify those positions considered to be at the core of the organization – i.e., too critical to be left vacant or filled by any but the best-qualified persons – and then create a strategic plan to fill those positions. Under 5 U.S.C 412.101, agency heads are to establish “a comprehensive management succession program to provide training to employees to develop managers for the agency”.

The Commission's strategic plan noted “that over 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.” Currently, there are 56 employees who are eligible to retire, 19 less than last year. In five years, that number will grow to 103, or over 25% of the current workforce level. One of the Commission's five executives³ is eligible for retirement now, and one of the other four executives can retire by the end of FY 2030.

Due to the small size of the Commission, departures and vacancies at any level could have an impact. During our audit of the Commission's Contract File Management System, we found that nine of the 12 official contract files and all 12 COR and Project Officer contract files reviewed contained missing or incomplete documentation. Contract files with a complete acquisition

³ The Commission's five executive management team members are the Director of Operations, Chief Financial Officer, Chief Information Officer, Chief Administrative Officer, and General Counsel.

history and basis for actions and decisions are needed so that responsibilities can be efficiently transferred and properly assumed by new Contracting Officers or CORs.

Retirements in key positions pose a risk to staffing and knowledge transfer. Knowledge transfer is particularly challenging because specialized and executive-level positions can be difficult to fill. In addition, obtaining institutional expertise on how the Commission and trade programs operate can take time. Should an influx of new executive management occur within a short time frame, it will particularly impact the Commission's succession management.

The potential for significant change at the USITC is not limited to staff and the executive team. By statute, there are to be six presidentially appointed, Senate-confirmed Commissioners, and no more than three Commissioners can be from one political party. The Commissioners' terms are set at nine years and are staggered such that a different term expires every 18 months. Commissioners on expired terms may remain in their position until new Commissioners are nominated by the President and confirmed by the Senate. The USITC currently has three Commissioners, all of whom are on expired terms and three vacant Commissioner spots. The timing of nomination and confirmation of new Commissioners is outside of the agency's control. As of December 2025, there are no nominees for the expired or vacant Commissioner spots.

The Commission must prioritize human capital management to fulfill its mission, address staffing changes, and sustain a flexible, high performing, engaged workforce. A staffing plan was submitted to OPM in December 2025, and the Commission is operating under a continuing resolution until the end of January 2026. As a small agency, it is essential to continue cross-training key roles and developing talent to support an adaptable succession plan.

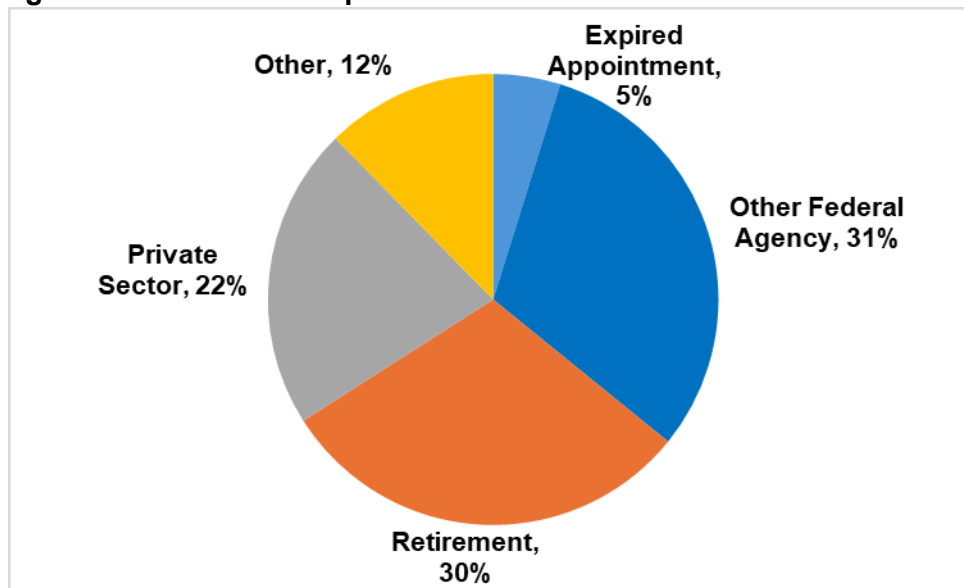
Retention

The OPM defines talent management as a system that promotes a high-performing workforce, identifies and closes skills gaps, and implements and maintains programs to attract, acquire, develop, promote, and retain quality and diverse talent. Retention strategies are ultimately an investment in employees that can not only lower turnover but also improve engagement and commonly include:

- Advancement opportunities
- Training and development
- Recognition/ rewards for performance
- Workplace flexibilities
- Work-life balance

Along with hiring and succession planning, the Commission should continuously assess the drivers of employee retention and refine its human capital strategy when warranted. In addition to retirement, an increasing workload with fewer schedule flexibilities impacted some of the departing staff at the Commission.

Figure 4. Reasons for Departure FY 2018 – FY 2025



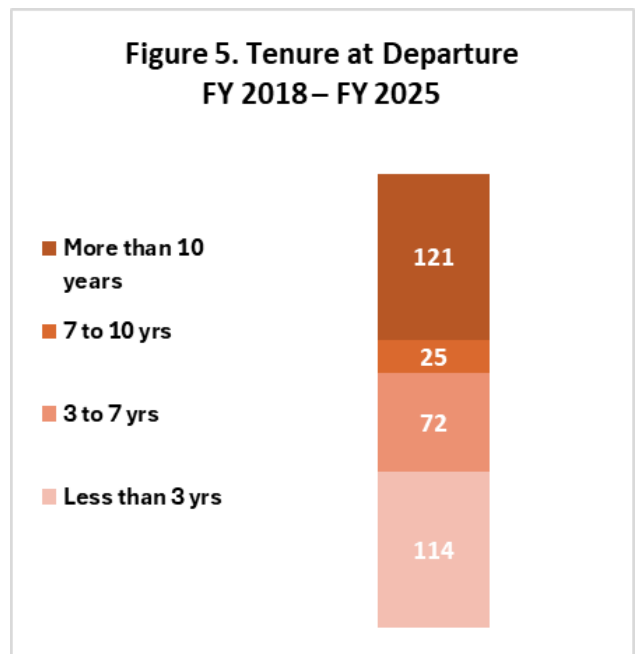
Source: USITC Human Resources, December 2025.

Between FY 2018 and FY 2025, 332 employees left the Commission. Seventy percent of former employees left the Commission for reasons other than retirement. As shown in Figure 4, the top three reasons over the last eight fiscal years for leaving USITC are for a position at a different federal agency (31%), retirement (30%), and a position in the private sector (22%). Peaks of attrition occurred in the first three years and after ten years of employment, as shown in Figure 5.

While retirement may play a role in the departures after ten years, many employees stayed at the agency for a shorter period before leaving. Between FY 2018 and FY 2025, over half of the turnover was among employees with less than seven years of tenure. During the period of FY 2018 through FY 2025, 121 out of 332 employees departed the Commission after more than ten years.

According to the Office of Human Resources, almost half of the departures in FY 2025 were at the GS-14, GS-15, ES, and EX levels, leaving the Commission vulnerable to losing critical mission area knowledge and supervisory expertise at the most senior levels of USITC. Additional analysis of why employees with a shorter tenure or at more senior levels leave the Commission will help the agency develop strategies to retain and build a skilled and knowledgeable workforce.

**Figure 5. Tenure at Departure
FY 2018 – FY 2025**



Source: USITC Human Resources, December 2025.

OAS started collecting data regarding departures through an OPM contract for new exit surveys in FY 2024. However, the contract ended in April 2025. OAS was able to collect from OPM data regarding USITC departures for FY 2025 up until the contract ended in the beginning of the third quarter. The results from the FY 2025 exit surveys completed show that retirement accounted for about 50-60% of the participants. There was an increase in the number of competitive exits due to pay, flexibility, and advancement during FY 2025.

OPM Evaluation of USITC's Human Resources

In April 2024, OPM completed a Human Capital Management Evaluation of the Commission. OPM found several shortcomings, including errors and deficiencies impacting the Office of Human Resources' ability to reconstruct recruitment actions, failure to conduct and document job analysis, and untimely issuance of notification letters and audits of certificates. OPM identified several instances of incorrect coding of appointment actions, improper maintenance of personnel records, and a lack of documentation, accountability, and oversight procedures. An additional concern cited by OPM was the lack of assessment and documentation of progress toward closing competency gaps to ensure mission success. OPM stated that many of the identified concerns can be mitigated by implementing an evaluation process, which would help USITC ensure its human resources programs run efficiently and identify root causes of issues negatively impacting the organization's performance in human resources. The Commission developed corrective action plans in response to each required and recommended action. The Commission has completed 18 of the 19 required actions, and 13 of the 24 recommended actions.

In the Commission's September 30, 2025 statement of assurance, OAS, under which the human resource division falls, was noted for a control deficiency in human capital operations stemming from OPM's 2024 report. OAS emphasized that additional controls in staffing and placement operations were developed and implemented since the start of FY 2025 to help ensure compliance with applicable statutory requirements related to the hiring process.

OAS also acknowledged that efforts to implement additional controls in human capital operations remain ongoing. If unaddressed or diminished, the errors and missteps identified by OPM's Human Capital Management Evaluation will impact the agency's overall ability to address recruitment, succession planning, and retirement challenges. Moreover, the areas where improvements are needed, if not properly addressed, can detract from human resources' focus on the larger strategic challenges the Commission faces.

Conclusion

The OIG monitors the Commission's efforts to address the management challenges we identify each year. Our monitoring includes following up on open recommendations and conducting related audits. For information on our ongoing and planned audit work, please see the [Fiscal Year 2026 Annual Audit Plan](#). If you have any questions or wish to discuss our views on the challenges in greater detail, please contact me at (202) 539-9462.



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