



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



# **SEMIANNUAL REPORT TO CONGRESS**

**April 1, 2025 - September 30, 2025**





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## UNITED STATES INTERNATIONAL TRADE COMMISSION

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WASHINGTON, DC 20436

December 9, 2025

IG-XX-012

Commissioners:

I am pleased to present this Semiannual Report for the period of April 1, 2025, to September 30, 2025. This report summarizes the major activities and accomplishments of the Office of Inspector General (OIG) of the U.S. International Trade Commission (USITC or Commission), and its submission is in accordance with the Inspector General Act of 1978, as amended. Section 5 of the Inspector General Act requires that the Commission transmit this report to the appropriate committees or subcommittees of Congress within 30 days of receipt.

During this semiannual period, the OIG completed four reports: (1) a review of the Commission's compliance with the Payment Integrity Improvement Act of 2019, (2) a management letter on Commission awareness of outside employment activities, (3) an audit of the USITC's contract file management system, and (4) the Fiscal Year 2025 Federal Information Security Modernization Act (FISMA) Audit. We issued six recommendations to promote the efficiency, effectiveness, and integrity of the Commission's operations.

In the next reporting period, the OIG will primarily focus on statutorily mandated audit work. The OIG's [Fiscal Year 2026 Annual Audit Plan](#) contains a list of potential discretionary audit topics. In addition, the annual plan includes a list of reserve audits and reviews we would like to conduct if additional resources become available.

As a small office, we are focused on our statutory responsibilities and conducting our work in the most cost-efficient and effective way possible, while maintaining our independence. We completed our transition to the Commission's information technology services and implemented a new audit software system that will streamline and automate the audit process, enhance collaboration, and make it easier to document compliance with professional standards.

# U.S. International Trade Commission

## Inspector General Semiannual Report

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Our office continues to be affected by staff turnover and unfilled vacancies. We are operating more than 40% below our authorized staff level. The OIG has three vacant positions—the Counsel to the Inspector General/Assistant Inspector General for Investigations (AIGI), an auditor, and an IT specialist.

The Counsel/AIGI position is critical because no one in our office is an attorney or has an investigative background who could step into the role. Attempts to obtain a resource from other OIGs have been unsuccessful, as other offices are similarly short-staffed. We entered into a memorandum of understanding with the Denali Commission Office of Inspector General to provide limited legal assistance to our office. However, until the Counsel/AIGI position is permanently filled, almost all statutorily required legal, investigative, and law enforcement-related activities are on hold.

I appreciate the Commission's support in our efforts to provide independent oversight of the USITC's programs and operations. We look forward to working closely with the Commission and Congress to promote integrity and increase efficiency and effectiveness.

Sincerely,

A handwritten signature in blue ink that reads "Rashmi Bartlett". The signature is fluid and cursive, with "Rashmi" on the top line and "Bartlett" on the bottom line.

Rashmi Bartlett  
Inspector General



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## UNITED STATES INTERNATIONAL TRADE COMMISSION

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WASHINGTON, DC 20436

January 9, 2026

### **Message from the Chair**

In accordance with the Inspector General Act of 1978, as amended, 5 U.S.C. App. 3 (IG Act), the U.S. International Trade Commission (“USITC,” or “Commission”) hereby transmits the USITC Inspector General Semiannual Report for the six-month period ending September 30, 2025.

The Commission appreciates the Inspector General’s continuing efforts to ensure the effectiveness, efficiency, and integrity of the Commission’s operations. Our agency has benefitted greatly from the Inspector General’s analysis of our operations. The Office of Inspector General continually provides valuable assistance to the Commission and its staff throughout the year.

The Semiannual Report identifies the agency’s top management and performance challenges from the Inspector General’s perspective. The Commission agrees with the Inspector General’s assessment of these challenges. The Commission appreciates the significant efforts made by Commission staff to address these challenges.

### **Actions Taken on IG Recommendations from Prior Year Reports**

The Commission has closed out all management decisions made in response to reports issued by the Inspector General during prior years.<sup>1</sup>

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<sup>1</sup> See Table C of Appendix A: Chair’s Statistical Tables.

We have attached the statistical tables required under the IG Act as Appendix A to this report.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Karpel".

Amy A. Karpel  
Chair

# U.S. International Trade Commission

## Inspector General Semiannual Report

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# U.S. International Trade Commission

## Inspector General Semiannual Report

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Table 1: Reporting Requirements Index

| <b>IG Act Reference</b>    | <b>Reporting Requirements</b>  | <b>Page</b> |
|----------------------------|--|-------------|
| Section 404(a)(2)          | Review of legislation and regulations  | 6           |
| Section 405(a)(1)          | Significant problems, abuses, and deficiencies relating to the administration of programs and operations   | None        |
| Section 405(a)(2)          | Recommendations with respect to significant problems, abuses, or deficiencies  | None        |
| Section 405(a)(3)          | Significant recommendations included in previous reports on which corrective action has not been taken (Table 3)   | 2           |
| Section 405(a)(4)          | Matters referred to prosecutive authorities (Table 5)  | 5           |
| Section 405(a)(5)          | Summary of instances where information was refused   | None        |
| Section 405(a)(6)          | Listing of reports by subject matter (Table 4)   | 3           |
| Section 405(a)(7)          | Summary of significant reports (Table 4)   | 3           |
| Section 405(a)(8)          | Statistical table – Reports with questioned costs (Table 4)  | 3           |
| Section 405(a)(9)          | Statistical table – Recommendations that funds be put to better use (Table 4)  | 3           |
| Section 405(a)(10)         | Summary of each audit, inspection, and evaluation report issued before this reporting period for which no management decision was made by end of the reporting period, no establishment comment was returned within 60 days; or for those with any outstanding unimplemented recommendations, including the potential aggregate cost savings (Table 3) | 2           |
| Section 405(a)(11)         | Description and explanation of significant revised management decisions  | None        |
| Section 405(a)(12)         | Significant management decisions with which the Inspector General disagrees  | None        |
| Section 405(a)(13)         | Information under section 804(b) of the Federal Financial Management Improvement Act of 1996   | 3           |
| Section 405(a)(14)(15)(16) | Peer review activity on OIG and Peer review activity by OIG on another OIG   | 4           |
| Section 405(a)(17)         | Statistical Table – Investigative Reports / Summary of Investigative Activity for the Reporting Period of April 1, 2025, to September 30, 2025 (Table 5)   | 5           |
| Section 405(a)(18)         | Description of metrics used for developing the data for the statistical table under Section 5(a)(17) (Table 5)   | 5           |
| Section 405(a)(19)         | Report on each investigation involving a senior Government employee where allegations of misconduct were substantiated   | 5           |
| Section 405(a)(20)         | Description of whistleblower retaliation   | 5           |
| Section 405(a)(21)         | Description of any attempt by establishment to interfere with the independence including budget constraints, resisted to or objected to oversight, delayed access to information   | 6           |
| Section 405(a)(22)         | Description of particular circumstances of each inspection, evaluation, and audit conducted that is closed and was not disclosed to the public; and investigation conducted by the Office involving a senior Government employee that is closed and was not disclosed to the public  | 6           |
| PL117-348<br>§ 122(e)      | Table 6: Anti-Trafficking-In-Persons Activity  | 6           |

# U.S. International Trade Commission

## Inspector General Semiannual Report

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### Office of Inspector General

The U.S. International Trade Commission (USITC or Commission) established the Office of Inspector General (OIG) when the Inspector General Act (IG Act) was amended in 1988. The IG Act states that the Inspector General (IG) is responsible for conducting audits and investigations; recommending policies and procedures that promote economy, efficiency, and effectiveness of agency resources and programs; and preventing fraud, waste, abuse, and mismanagement.

Our mission is to promote and preserve the efficiency, effectiveness, and integrity of the Commission. We plan and conduct our activities based on several factors: requirements of laws and regulations, requests from management officials, complaints from Commission personnel and other sources, resource availability, and the Inspector General's initiative.

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### Semiannual Report Requirements

The IG Act requires each Inspector General to prepare a report twice a year that summarizes the office's activities. This Semiannual Report covers April 1, 2025, through September 30, 2025. The 24 requirements in Table 1 are specified in the IG Act or other legislation and must be included in the report.

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### Top Management and Performance Challenges

Each year, our office must identify and report the most significant management and performance challenges facing the Commission in the coming year and management's actions to address them. The OIG's management and performance challenges reports are available on our website at: <https://usitcoig.oversight.gov/reports-publications/top-management-and-performance-challenges>. The most recent report focuses on the three challenges listed in Table 2.

Table 2: Management and Performance Challenges

| Management and Performance Challenges |
|---------------------------------------|
| 1. Internal Controls                  |
| 2. Data Management                    |
| 3. Human Capital Management           |

# U.S. International Trade Commission

## Inspector General Semiannual Report

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The challenges are based on oversight work by the Office of Inspector General, knowledge of the Commission's programs and operations, the Commission's strategic plan, annual management plan, enterprise risk management assessments, statements of assurance, observations, and discussions with senior leaders.

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### Prior Report Recommendations with Final Action Pending

The Inspector General did not identify any recommendations made before April 1, 2025, where the corrective actions were not completed before the end of the reporting period.

Table 3: Status of Reports Issued Without Final Action Made Before the Reporting Period

| Report Title | # of Recs. | Mgt. Decisions | Final Action Complete | Action Not Complete |
|--------------|------------|----------------|-----------------------|---------------------|
| N/A          | N/A        | N/A            | N/A                   | N/A                 |

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### Summary of Significant Investigations Closed and Convictions

The Office of Inspector General had no significant investigations closed or convictions during the reporting period.

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### Inspector General Reports Issued During This Period

During this reporting period, the Inspector General issued four reports containing a total of six recommendations. Table 4 lists each report issued, the number of recommendations in each, and whether a management decision has been made.

# U.S. International Trade Commission

## Inspector General Semiannual Report

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Table 4: Reports Issued from April 1, 2025 – September 30, 2025

| Report Number  | Report Title  | Date Issued | # of Recs | Mgt Decision         |
|--|---|-------------|-----------|----------------------|
| <a href="#">OIG-MR-25-06</a>   | <i>Management Report: Improper Payment Determination for Fiscal Year 2024</i>                     | 5/12/2025   | 0         | N/A                  |
| <a href="#">OIG-ML-25-07</a>   | <i>Management Letter - Action is Needed to Improve Awareness of Outside Employment Activities</i> | 8/18/2025   | 0         | N/A                  |
| <a href="#">OIG-AR-25-08</a>   | <i>Audit of USITC's Contract File Management System</i>   | 9/25/2025   | 6         | Pending <sup>1</sup> |
| <a href="#">OIG-AR-25-09</a>   | <i>Fiscal Year 2025 FISMA Audit</i>   | 9/26/2025   | 0         | N/A                  |
| <b>Total recommendations issued during this reporting period</b>   |   |             |           | <b>6</b>             |
| <b>Note: These reports did not identify any questioned costs, unsupported costs, or funds that could be put to better use.</b> |   |             |           |                      |

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## Management Decisions for Recommendations Issued in Prior Periods

In the previous reporting period, there were no reports in which the Commission did not provide management decisions within the reporting period.

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## Federal Financial Management Improvement Act Reporting

The IG Act and the Federal Financial Management Improvement Act of 1996 (FFMIA) require the inspectors general of certain agencies to report “instances and reasons” when the agency has not met intermediate target dates established in a remediation plan to bring the agency’s financial management system into substantial compliance with the FFMIA. The Commission is not subject to the FFMIA but voluntarily complies with most of its requirements. During this reporting period, no events gave rise to a duty to report under FFMIA.

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<sup>1</sup> Due to a lapse in government appropriations impacting the Commission’s ability to meet the agreed-upon due date of 10/25/2025, the OIG granted an extension to 12/15/2025.

# U.S. International Trade Commission

## Inspector General Semiannual Report

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### Peer Review

The Inspector General Act of 1978, as amended, requires OIGs to report the results of peer reviews of their operations conducted by other OIGs, the date of the last peer review, outstanding recommendations from peer reviews, and peer reviews conducted by an OIG of other OIGs in the semiannual period. Peer reviews are conducted by member organizations of the Council of Inspectors General on Integrity and Efficiency (CIGIE).

The Consumer Product Safety Commission OIG completed an external peer review of our audit organization. The USITC OIG received a rating of pass for its system of quality control for the three-year period ending September 30, 2024. Pursuant to the March 2020 *CIGIE Guide for Conducting Peer Reviews of Audit Organizations of Federal Offices of Inspector General*, a pass rating issued from an external peer review is the highest rating that can be issued. A copy of the [final peer review report](#) is posted on our website.

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### Hotline and Investigations

#### Investigations and Inquiries: Overview

One of our functions is to conduct investigations and inquiries into alleged criminal, civil, and administrative wrongdoing involving Commission programs, operations, and personnel. Our office primarily receives complaints through the OIG hotline, which allows Commission employees and members of the public to contact the OIG. We may investigate possible violations of federal criminal law, regulations on employee responsibilities and conduct, and other statutes and regulations covering Commission activities.

The OIG reviews and analyzes each complaint received to decide the correct course of action and, as appropriate, conducts a preliminary inquiry. If the information we find during the preliminary inquiry indicates that a full investigation is warranted, we will launch an investigation.

#### OIG Hotline Contacts

Our office maintains a hotline for reporting information about suspected waste, fraud, abuse, or other misconduct involving Commission programs or operations. The information may come to us in person, by telephone, email, or mail, or through a web-based form. Complaints may also be made anonymously. When requested, we will endeavor to keep a provider's identity confidential.

# U.S. International Trade Commission

## Inspector General Semiannual Report

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We receive complaints from employees, contractors, and the public regarding the Commission's responsibility areas. We examine these complaints to determine whether there is any indication of Commission wrongdoing or misconduct. If the complaint does not relate to the Commission, we refer it to the appropriate entity for a response. If the complaint lacks merit, we close the matter.

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## Investigative Reports

Table 5: Statistical Table of Investigative Reports and Referrals

| Description  | Count |
|--|-------|
| Number of investigative reports issued   | 0     |
| Number of persons referred to DOJ for criminal prosecution   | 1     |
| Number of persons referred to State and local authorities for criminal prosecution                           | 0     |
| Number of indictments and criminal information resulting from any prior referrals to prosecuting authorities | 0     |

**Note: The information in this table is derived from the Office of Inspector General's investigations.**

## Investigations With Substantiated Allegations Involving Senior Government Employees

The Office of Inspector General did not issue any investigative reports substantiating allegations involving senior government employees.

## Instances of Whistleblower Retaliation

The Office of Inspector General identified no instances of whistleblower retaliation during this reporting period.

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## Trafficking Victims Prevention and Protection

As required by PL 117-348, section 122(e), the OIG submits the data in Table 6 related to Trafficking Victims Prevention and Protection.

# U.S. International Trade Commission

## Inspector General Semiannual Report

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Table 6: Statistical Table of Trafficking Victims Prevention and Protection

| Number of Suspected Violations Reported | Number of Investigations | Status |
|---|--------------------------|--------|
| 0                                       | 0                        | N/A    |

**Note: The OIG made no recommended actions to improve the programs and operations related to trafficking victims.**

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## Interference by the Establishment

The USITC OIG encountered no instances of attempted interference with the office's independence. There were no attempted budget constraints designed to limit the capabilities of the OIG during this reporting period, and no attempted instances in which the establishment resisted or objected to the OIG's oversight activities or restricted or significantly delayed access to information. The USITC OIG did not make any reports under section 406(c)(2) during this reporting period.

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## Summary of Reports Not Disclosed to the Public

### Inspections, Evaluations, and Audits

The Office of Inspector General did not issue any inspections, evaluations, or audits that were not disclosed to the public during this reporting period.

### Investigations

The Office of Inspector General did not conduct any investigations involving senior Government employees that were closed and not disclosed to the public during this reporting period.

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## Legislation Review

We reviewed legislation and/or regulations individually and in coordination with CIGIE.

# U.S. International Trade Commission

## Inspector General Semiannual Report

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### **Council of the Inspectors General on Integrity and Efficiency**

The Council of Inspectors General on Integrity and Efficiency (CIGIE) was established by law as an independent entity by the Inspector General Reform Act of 2008 (P.L. 110-409) to address integrity, economy, and effectiveness issues that transcend individual government agencies. CIGIE is comprised of Presidentially Appointed, Senate-Confirmed inspectors general and Designated Federal Entity inspectors general.

The USITC OIG participates in CIGIE's efforts to enhance efficiency and effectiveness through communication and coordination across federal inspectors general offices. The Inspector General is a member of the Audit Committee and the Technology Committee. OIG staff participate in the Mentoring Program, the CIGIE Fellows Program, the Audit Committee, the Financial Statement Audit Network, and the Inspections and Evaluations Committee.

# U.S. International Trade Commission

## Appendix A: Chairman's Statistical Tables

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Table A: Management Decisions for Reports from Prior Periods

The table below identifies each report issued in a prior reporting period in which management decisions were received during this reporting period.

| Report       | Management Decisions Made This Reporting Period | Recommendations Without Management Decisions | Disallowed Costs | Funds to Be Put to Better Use |
|--------------|---|--|------------------|-------------------------------|
| N/A          | N/A   | N/A  | \$0              | \$0                           |
| <b>Total</b> | -   | -  | <b>\$0</b>       | <b>\$0</b>                    |

Table B: Recommendations with Final Action Completed Prior to the End of the Reporting Period

The table below provides statistical information on recommendations with questioned costs and the total dollar value of disallowed costs where final action was completed during this reporting period.

| Category  | Number of Recommendations | Dollar Value |
|---|---------------------------|--------------|
| Recommendations with Final Action Completed   | 14                        | \$0          |
| • Disallowed Costs Recovered by Management  |                           | \$0          |
| • Disallowed Costs Written Off by Management  |                           | \$0          |
| • Disallowed Costs and Funds to be Put to Better Use Not Yet Recovered or Written Off by Management |                           | \$0          |
| Recommendations that Management has Concluded Should Not or Could Not be Implemented or Completed   | 0                         | \$0          |

# U.S. International Trade Commission

## Appendix A: Chairman's Statistical Tables

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Table C: Status of Reports Issued Prior to This Reporting Period

The table below provides information on the number of reports with questioned costs, the total dollar value of disallowed costs, and funds to be put to better use as identified in the management decision. In cases where a management decision has not been received, the dollar value shown is the amount identified in the report.

| <b>Status</b>   | <b>Number of Reports</b> | <b>Disallowed Costs</b> | <b>Funds to be Put to Better Use</b> |
|---|--------------------------|-------------------------|--------------------------------------|
| Reports Issued Prior to This Reporting Period with Final Action Completed This Reporting Period | 4                        | \$0                     | \$0                                  |
| Reports Issued Prior to This Reporting Period Without Final Action Completed                    | -                        | \$0                     | \$0                                  |
| <b>Total</b>  | <b>4</b>                 | <b>\$0</b>              | <b>\$0</b>                           |

Table D: Reports with Management Decisions Without Final Action

The table below identifies each report from prior periods in which management decisions were made, but no final action was taken.

| <b>Report</b> | <b>Date Issued</b> | <b>Reason Final Action has Not Been Taken</b> |
|---------------|--------------------|---|
| N/A           | N/A                | N/A   |



**U.S. International Trade Commission  
Office of Inspector General  
500 E Street, SW Washington, DC 20436**

**REPORT WASTE, FRAUD, ABUSE, OR MISMANAGEMENT**

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