



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



Management Report: Improper Payment Determination for Fiscal Year 2025





UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

May 12, 2026

IG-YY-004
OIG-MR-26-04

Chair Karpel:

This transmits the Inspector General's report on the U.S. International Trade Commission's (USITC or Commission) compliance with the Payment Integrity Improvement Act of 2019 (PIIA) (Public Law 116-117). We conducted this review based on the requirements in the Office of Management and Budget (OMB) Circular A-123, Appendix C (M-21-19), OMB Circular A-136, OMB Annual Data Call Instructions, OMB Payment Integrity Question and Answer Platform, and guidance issued by the Council of Inspectors General on Integrity and Efficiency.

Enacted in March 2020, the PIIA requires federal executive agencies to periodically review and identify all programs and activities an agency administers that may be susceptible to significant improper payments.¹ The PIIA defines an improper payment as one that should not have been made, or that was made in an incorrect amount, including an overpayment or underpayment, based on statutory, contractual, administrative, or other legally applicable requirements.² The OMB defines significant improper payments as annual Improper Payment (IP) and Unknown Payment (UP) exceeding: (1) both 1.5 percent and \$10 million of all program payments; or (2) \$100 million regardless of the percentage of program payments.³ The PIIA aims to improve efforts to identify and reduce government-wide improper payments and sets forth improper payment reporting requirements for federal agencies, including an annual compliance review to be conducted by the agency Office of Inspector General (OIG).

We determined that the Commission complied with applicable PIIA requirements for Fiscal Year 2025 (FY 25), as shown in Table 1.

¹ Public Law no. 116-117, 134 Stat. 113.

² 31 USC §3351, Definitions, (4).

³ OMB Circular A-123, Appendix C (M-21-19), Section II, C, 1.

Table 1: The Commission’s FY 25 Compliance with PIIA Requirements, by Agency Program

PIIA Requirements		
Has the U.S. International Trade Commission...	Payroll	Services
1a. Published payment integrity information with the annual financial statement?	Yes	Yes
1b. Posted the annual financial statement and accompanying materials on the agency website?	Yes	Yes
2a. Conducted IP risk assessments for each program with annual outlays greater than \$10,000,000 at least once in the last three years?	Yes	Yes
2b. Adequately concluded whether the program is likely to make IPs and UPs above or below the statutory threshold?	Yes	Yes
3. Published IP and UP estimates for programs susceptible to significant IPs in the accompanying materials to the annual financial statement?	N/A	N/A
4. Published corrective action plans for each program for which an estimate above the statutory threshold was published in the accompanying materials to the annual financial statement?	N/A	N/A
5a. Published IP and UP reduction targets for each program for which an estimate above the statutory threshold was published in the accompanying materials to the annual financial statement?	N/A	N/A
5b. Demonstrated improvements to payment integrity or reached a tolerable IP and UP rate?	N/A	N/A
5c. Developed a plan to meet the IP and UP reduction target?	N/A	N/A
6. Reported an IP and UP estimate of less than 10% for each program for which an estimate was published in the accompanying materials to the annual financial statement?	N/A	N/A

Source: U.S. International Trade Commission Office of Inspector General, based on Commission data

Two of the six PIIA requirements listed in Table 1 applied to the Commission. Based on our analysis of the improper payment documentation provided and testing performed by the Office of the Chief Financial Officer (OCFO) and the Internal Control and Risk Management Division, requirements 3–6 did not apply because the programs or activities assessed by the Commission were not determined to be susceptible to significant improper payments.

The Commission is required to conduct a risk assessment no less than every three years. The USITC’s FY 2025 risk assessment did not identify any programs or activities susceptible to significant improper payments at or above the reporting threshold. The OIG agreed with the OCFO’s conclusion that the Commission is at low risk for significant improper payments and that the Commission’s programs are below the established thresholds for additional reporting requirements.

We are not issuing any recommendations in this report. If you have any questions, please do not hesitate to contact me. We appreciate the Commission staff's cooperation during our review.

Sincerely,

A handwritten signature in blue ink that reads "Rashmi Bartlett". The signature is written in a cursive style with a light blue background behind the text.

Rashmi Bartlett
Inspector General



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