

U.S. International Trade Commission

Inspector General Semiannual Report



October 1, 2017 - March 31, 2018



Office of Inspector General

The U.S. International Trade Commission is an independent, nonpartisan, quasi-judicial federal agency that provides trade expertise to both the legislative and executive branches of government, determines the impact of imports on U.S. industries, and directs actions against certain unfair trade practices, such as patent, trademark, and copyright infringement. USITC analysts and economists investigate and publish reports on U.S. industries and the global trends that affect them. The agency also maintains and publishes the Harmonized Tariff Schedule of the United States.

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Chairman



UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

May 31, 2018

Message from the Chairman

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”) transmits the Inspector General’s Semiannual Report of the USITC, for the October 1, 2017 to March 31, 2018 period.

The Commission appreciates the Office of Inspector General’s continuing efforts to ensure the effectiveness, efficiency, and integrity of the Commission’s operations. Inspector General Philip Heneghan and his staff have provided valuable assistance to the Commission and its staff throughout the year on these issues. Our agency has benefitted significantly from his analysis of our operations.

The Semiannual Report identifies the agency’s top management and performance challenges from the Inspector General’s perspective. The Commission agrees with his assessment of these challenges. The Commission will address these issues and take the steps needed to improve its operations. Moreover, the Commission appreciates the great efforts made by Commission staff to resolve these issues and the Inspector General’s acknowledgement that progress has been made on these matters during the year.

Part I of this message discusses the steps that the Commission has taken during the reporting period to address the managing data, internal control, and information technology challenges identified by the Inspector General. Part II discusses the Commission’s responses to the specific recommendations made by the Inspector General. Part III addresses the Commission’s responses to investigatory reports of employees issued by the Inspector General.

I. Addressing General Management and Performance Challenges

A. Managing Data

As noted by the Inspector General, many Commission systems, more specifically in the administrative area, were developed to address specific needs or to solve single problems and therefore not viewed as an enterprise resource. As a result, the functionality, access, and reporting capabilities of these systems are limited. Furthermore, Commission staff have to spend additional time reconciling multiple data sets across the organization. The Commission has begun to make headway in its efforts to address these and other data management issues.

The Commission has initiated the process of taking an inventory of its data systems. As the inventory of data is developed, the Commission is capturing the purpose of each system, the types of data in the system, its owner, and whether it has a data dictionary. As system owners provide this information, the Commission is identifying common uses of the data, redundant systems, whether there is a need for strengthened documentation, who has access to the data, how is the data input, and, if there are conflicting sources, which one is the system of record. Gathering this information and mapping the responses is an important first step.

At the same time, the Commission is reviewing its accounting practices and the associated coding. The accounting system is particularly important because the Commission uses it to record and report all of its financial transactions. The Commission reviewed the use of Budget Object Codes (BOCs), which are the government-wide numeric codes used to classify transactions, and ensured that BOCs are now mapped to the correct transaction and are in compliance with government-wide standards. Also, the Commission is leveraging the work performed in connection with the Digital Accountability and Transparency (DATA) Act reporting requirements to ensure the internal procurement documentation, externally reported data, and accounting data are all consistent. In support of these requirements, the Commission documented and standardized a number of processes, automated the reconciliation of the three data sources noted, and identified and corrected errors between internal and external procurement data. As a result, the Commission has more efficient and effective processes and more accurate data.

Concurrently, the Commission is reviewing its time and attendance processes, policies, and procedures, and the reporting capabilities of the underlying time system. Since payroll costs account for 70 percent of the Commission's budget, it is quite possible that some of the findings from that effort will be addressed as part of this particular management and performance challenge.

The Commission's efforts to manage its data align with the Office of Management and Budget's

proposed Appendix A to Circular A-123 -- Reporting and Data Integrity Risk. If the Commission's data are not managed effectively, the agency will continue to be exposed to a number of risks, such as strategic risk inherent to the formulation, assumptions, or execution of the Commission's strategy; operational risk that impedes the successful activities of the Commission; reporting risk that reports will not be timely or accurate; and, compliance risk inherent to the Commission's commitment and ability to comply with applicable laws and regulations. The efforts also correspond to several annual performance goals.

Finally, the Commission plans, as recommended by the Inspector General, to take a thoughtful, enterprise-wide approach to managing data to ensure data are relevant, complete, and available to inform strategic and operational decisions while minimizing enterprise risks.

B. Internal Control

As the Inspector General notes, the Commission has recognized the importance of having strong internal controls and has consistently acknowledged and responded to internal control weaknesses. Since the issue of internal controls was first identified as a management challenge, the Commission has been committed to improving and strengthening its system of internal control, and has made significant strides in this critical area. The Commission will continue to improve and refine its internal controls and has undertaken several multi-year corrective action initiatives to ensure that controls are working effectively on a continuous basis.

One ongoing high priority corrective action initiative is the redesign of the Commission's system of internal rules, which includes the USITC's policy directives and related procedural documents. The system of internal rules sets forth all delegations of authority, provides the foundation of the Commission's control environment, and is essential to ensuring the USITC's internal policies and procedures are accessible, intelligible, and consistent. The system is also crucial to enforcing accountability among USITC staff as its content sets forth the appropriate standards by which Commission functions should be carried out.

The Inspector General, when reviewing the Commission's policy directives, found that many policies were outdated and inconsistent and that the agency's management of this function did not adequately ensure accountability for its upkeep. Senior management and staff established a working group to address the issues identified by the Inspector General. The working group found problems similar to those identified by the Inspector General across its system of internal rules and concluded that, in order to remediate the issues identified, the Commission would have to redesign its policies and procedures for managing the entire system of internal rules and update all content within it. This effort was a tremendous undertaking that raised issues central to agency governance and organization. Though the process for addressing the Inspector General's findings

has been lengthy, it has been necessary to ensure that these critical issues are addressed effectively as well as to prevent future reoccurrences of the dynamics that led to significant problems with the current system.

The working group completed drafts of policy and procedure documents that form the basis for a new system of internal rules, received legal review of each from the Office of the General Counsel, and obtained Commission approval of the new system. The Chairman began implementing the new system by establishing an Internal Administration Committee to ensure Senior Executives are regularly engaged in agencywide policy development, review, and analysis, as well as tracking and implementing external requirements. The Committee has begun meeting and has issued a multi-year remediation plan.

The new system and implementation plan addresses all of the issues raised by the Inspector General, including the underlying process inefficiencies that gave rise to the problems identified, and provide standards for accountability in case procedures are not followed. The Commission has dedicated significant resources to address this management challenge, and implementing the new system of internal rules will be a priority for the Commission over the coming fiscal years.

C. IT Management

The Commission continued to make substantial improvements to its IT platforms, modernizing the infrastructure, stabilizing operations, supporting mission functions, and reducing cybersecurity risks. While accomplishing these goals, the Office of the Chief Information Officer (OCIO) made significant progress toward full compliance with all IT mandates.

OCIO implemented the four technical capabilities identified within the DHS Continuous Diagnostics and Mitigation (CDM) program; Hardware Asset Management (HWAM), Software Asset Management (SWAM), Vulnerability Management (VULN), and Configuration Settings Management (CSM). These four capabilities directly correlate to the four foundational, critical security controls identified in the Inspector General's report.

In addition, the Commission participated in the Department of Homeland Security (DHS) Continuous Monitoring as a Service (CMaaS) program. This program provides small agencies access to CDM capabilities provided and managed by DHS in the cloud to include HWAM, SWAM, VULN, and CSM. The DHS CMaaS solution supports automated reporting of every agency's risk posture across the federal-enterprise. OCIO staff are currently working with DHS integrators to deploy the solution in FY18.

The Commission continues to identify and implement business systems that will automate and

improve the effectiveness of the Commission's operations. OCIO staff are actively meeting with stakeholders in the Office of Operations to review and refine the requirements for a web-based application and database to support business operations and reporting related to Title VII investigations. Development on this project will begin by the end of FY2018. In conjunction with that effort, consideration is also being given to consolidating similar functions related to 337 investigations for a comprehensive enterprise portal for all agency investigations to improve maintenance and availability of information to all users. In addition, enhancements are planned to improve the editing capabilities of the HTS Data Management System in FY2018 to improve the efficiency and accuracy of updates to the HTS. Other in progress initiatives where the Commission is taking advantage of automation to improve the integrity, effectiveness, and efficiency of its work include improvements to DataWeb and Electronic Document Information System (EDIS).

To continue to provide a more stable and secure technology infrastructure, OCIO has undertaken several key initiatives to modernize Commission IT systems. The Commission is currently in the middle of an end user Operating System (OS) migration; deploying the most recent version Microsoft's OS. In parallel, all new Windows servers are built on the most recent version of the OS. All operating systems within the Commission are deployed using security baseline recommendations from the Defense Information Systems Agency (DISA). The Commission also recently transitioned from Blackberry mobile devices to iPhones, leveraging a mobile device management system to enforce security controls on these new devices to protect Commission data in the mobile environment. These modernized operating systems provide enhanced security and help to ensure vendor support for the system's lifecycle. OCIO also modernized the Commission's IT system backup solution; the new solution supports backups that are more reliable, file archiving, compression, and enables cloud backups.

The Commission has re-evaluated and improved its plan to relocate its data center to a remote location. This will provide greater accessibility and availability to users, all the while increasing security and improving performance. OCIO continues to work on preparing the existing equipment for its relocation to the remote location, which is scheduled to occur before the end of the calendar year.

The Commission is also focusing on building a stable and secure technology platform to help carry out its mission. To achieve this goal, the Commission continues to follow its strategic vision which has a major focus on cloud computing. OCIO is currently in the process of migrating all of its email capabilities to a FedRAMP approved cloud service provider. This cloud-based solution is replacing the Commission's aging on-site solution and should provide a much more reliable delivery of service. The Commission expects to complete its cloud email migration in early summer of 2018. Shortly thereafter, OCIO will begin to transition additional office processing capabilities to a cloud solution. In FY18, the Commission improved its remote computing posture by replacing its

longstanding remote access solution with a more modern Virtual Private Network-based (VPN) solution. The VPN solution increased the reliability for users engaged in remote work and most importantly helped the agency meet its Personnel Identity Verification (PIV) card requirement for remote access.

In sum, the Commission is committed to addressing its management challenges. We appreciate the Inspector General’s efforts to identify areas of improvement and his advice on how to successfully improve the efficiency and effectiveness of operations.

II. Actions on Recommendations

A. Actions Taken on Inspector General Recommendations in this Reporting Period

During this reporting period, the Inspector General issued nine new reports containing 17 new recommendations for management action¹. The Commission issued management decisions on all of these recommendations during this reporting period. The Commissions completed final action on three of the management decisions.

Digital Accountability and Transparency Act Audit (OIG-AR-18-06)

During the period the Commission closed out three Management Decisions related to the DATA Act. First, the Commission developed a process to compare, on a quarterly basis, and for each contract reportable in the Federal Procurement Data System (FPDS), the data elements in FPDS and the corresponding elements in the contract file (OIG-AR-18-06-01.1). Any differences that can be corrected are done so in FPDS and differences that require further research are documented.

The types of errors, causes of errors, recommendations, and corrective efforts are all being documented, giving the Commission a clear understanding of its data and any data issues.

This manual reconciliation is the first step in a process the Commission expects to evolve over time. By the end of FY 2018 we expect to be able to produce a contract file report with the same data elements as the FPDS report. The goal is to sync the two reports up so they can be automatically compared, and staff can devote its efforts to researching and correcting differences and errors instead of manually detecting them.

Next, and largely using the process described above, the Commission implemented a process for the Chief Procurement Officer to submit an annual report to the General Services Administration that contained certain statistical data, and also certified that the Commission’s policies, procedures, and internal controls included regular reviews of qualitative data, such as

¹ See Table 3 of the Inspector General’s report.

performance and integrity data, to assess the quality of the information required (OIG-AR-18-06-2.1). The quarterly reconciliation previously described provided the basis for our certification.

Finally, the Commission also implemented a process for the Commission's Chief Financial Officer to review DATA Act reconciliations prior to certifying their accuracy (OIG-AR-18-06-4.1). In addition to reconciling the data elements in FPDS with the corresponding elements in the contract data as described above, the Chief Financial Officer also reconciles the data in the accounting system with the data in FPDS; ensures quarterly reviews of budget object codes (BOCs) are being performed; and, ensures the DATA Act files have been tested, and any cross validation warnings or differences are acceptable for DATA Act submission. Lastly, the Chief Financial Officer now prepares and signs a Reconciliation and Review Checklist prior to certification each quarter.

B. Actions on Recommendations Made in Prior Periods

The Commission completed final action on a number of management decisions contained in three reports issued by the Inspector General during prior reporting periods². The Commission is committed to addressing all of the remaining management decisions. The Commission's actions on outstanding recommendations from prior periods are summarized below.

(1) Audit of Directives Management (OIG-AR-15-14)

As referenced in Part 1.B. of this letter addressing internal controls, in response to this audit the Commission has dedicated significant resources to the Commission's system of internal rules, which houses the USITC's policy directives and related procedural documents. In this audit, the Inspector General concluded that the Commission needed to improve the clarity, consistency and usefulness of its system of internal rules. To address his recommendations, the Commission

established a senior-level working group to design an understandable, accessible and usable system of internal rules. The working group developed a proposal for the new internal rules system which has received legal review and has been approved by the Commission. The Commission is committed to building a strong, integrated, and clear system of internal rules that will address the Inspector General's concerns and improve the usefulness, consistency, and timeliness of the all Commission policies and procedures. The Chairman began implementing the new system by establishing an Internal Administration Committee (IAC) to ensure Senior Executives are regularly engaged in agencywide policy development, review, and analysis, as well as tracking and implementing external requirements. The Committee has begun meeting and has issued a multi-year remediation plan. The IAC has prioritized drafting, updating and issuing Directive to address the major concerns raised by the Inspector General. Although resources for this considerable project remain a constant challenge, the Commission's goal is to close out the

² See Tables 8 and 9 of the Inspector General's report.

remaining management decisions by FY2019.

(2) Audit of Off-Site Storage Facilities (OIG-AR-17-02)

The Commission had closed out 10 of 11 management decisions related to this audit during prior SARC periods. For the one remaining management decision related to this audit, the Chief Administrative Officer (CAO) agreed to review the Commission's inventory annually and dispose of any items that have been in storage for more than two years, absent a specific finding entered into the inventory system that retention is cost effective. To close this management decision out, the Commission took the following actions during the SARC period. Many of the items at the off-storage facility were disposed of when it was decided the space was no longer needed. The rest (new and gently used bookcases, cabinets, tables and chairs) were brought onsite to P-1. The Commission's security office now has an ITC Form 110 for every item in P-1. Going forward, after each annual inventory, the security office will update the Inventory Management System, and then compare the items listed in P-1 to the ITC Form 110s. Any items in P-1 stored for over two years, absent a specific finding that retention is cost effective, will be excessed through CEPO. Accordingly, all management decisions related to this audit have now been closed out.

(3) Management Letter on Conflict of Interest Process (OIG-17-10)

The Inspector General recommended that the Commission develop a process for senior officials to provide positive assurance that there are no conflicts of interest as they are assigned cases. Recognizing that the current financial conflict of interest screening process should be improved, the Designated Agency Ethics Official (DAEO) drafted revised procedures to use the CIO's new business intelligence software to allow senior officials or their designees to search the relevant databases to screen for potential conflicts of interest. Accordingly, the Commission closed out its first management decision related to this audit. Addressing the Commission's second management decision, unfortunately during this SARC period the Commission hired a new ethics counselor only to have that person leave for another federal position a few months later. This abrupt departure has required the Commission to request an extension on the target date for this second management decision. Once the DAEO hires a new ethics counselor and the new system is tested, the DAEO will provide in-person training during the next SARC period to senior officials to implement the revised conflict of interest process. The new system will be more effective, efficient and timely.

C. Actions on External Reviews

The Office of Personnel Management conducted an evaluation of the Commission's strategic management of human capital, the efficiency and effectiveness of its human resources programs,

and its compliance with merit system principles and other civil service laws and regulations.

The final report issued on December 8, 2017, by the Office of Personnel Management found that the Commission had “Not Met” the anticipated results in 9 of the 26 assessment areas. The Office of Personnel Management noted that the Commission’s policies were outdated and that improvements were needed in the external and internal hiring processes.

The Office of Personnel Management issued 15 required actions and 6 recommended actions to the Commission. During this SARC period, the Commission developed management decisions to address all 21 actions from the report.

III. Actions on Investigatory Reports

The Commission appreciates the Inspector General’s efforts on investigatory reports. As discussed below, the Commission has responded to and closed out all matters that have been the subject of investigatory reports by the Inspector General during this period.

1. Allegation of Conflict of Interest

After completing its investigation into the allegation of conflict of interest, on May 10, 2018 the employee’s supervisor issued a written reprimand to the employee as final agency corrective action.

2. Allegation of Unauthorized Recording

The employee alleged to have engaged in unauthorized recording resigned from the federal government prior to final agency corrective action.

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

Sincerely,



Rhonda K. Schmidlein
Chairman

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Table 1: Reporting Requirements Index

Reporting Requirements Index		
IG Act Section	Description	Page
4(a)(2)	Review of Legislation	None
5(a)(1)	Description of Significant Problems, Abuses, and Deficiencies	2
5(a)(2)	Description of Recommendations for Corrective Action with Respect to Significant Problems, Abuses, and Deficiencies	6
5(a)(3)	Significant Recommendations from Prior Reports on Which Corrective Action Has Not Been Completed	11, 18
5(a)(4)	A Summary of Matters Referred to Prosecuting Authorities	13
5(a)(5)	Summary of Instances Where Information or Assistance Was Unreasonably Refused	None
5(a)(6)	Listing by Subject Matter of Each Report Issued During This Reporting Period	6
5(a)(7)	Summary of Significant Reports	6
5(a)(8)	Statistical Table: Questioned and Unsupported Costs	18
5(a)(9)	Statistical Table: Recommendations Where Funds Could Be Put to Better Use	19
5(a)(10)	Summary of Prior Reports	11
5(a)(11)	Description of Any Significant Revised Management Decisions	None
5(a)(12)	Information Concerning Any Significant Management Decision With Which the Inspector General Is in Disagreement	None
5(a)(13)	Information Described Under Section 5(b) of FFMIA	17
5(a)(14)	Results of Peer Review Completed During This Period or Date of Last Peer Review	17
5(a)(15)	List of any Outstanding Recommendations from Peer Review	None
5(a)(16)	List of any Peer Reviews Conducted of Another Office of Inspector General During This Period	None
5(a)(17)	Statistical Table: Investigative Reports	22
5(a)(18)	Description of the Metrics Used for Developing Investigative Statistics	22
5(a)(19)	Investigations With Substantiated Allegations Involving Senior Government Employees	13
5(a)(20)	Description of Any Whistleblower Retaliation	None
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Office of Inspector General

The U.S. International Trade Commission (Commission) established the Office of Inspector General under the 1988 amendments to the *Inspector General Act* (IG Act). Our office provides audit, evaluation, inspection, and investigative services covering all Commission programs and operations. Our mission is to promote and preserve the effectiveness, efficiency, and integrity of the Commission. We plan and conduct our activities based on several factors: requirements of laws and regulations, requests from management officials, allegations received from Commission personnel and other sources, and the Inspector General's initiative.

Semiannual Report Requirements

The IG Act requires each Inspector General to prepare a report twice a year that summarizes the activities of the office. This Semiannual Report covers the period from October 1, 2017, through March 31, 2018. The 23 requirements shown in table 1 are specified in the IG Act and must be included in the report.

This Semiannual Report starts with a description of the Top Management and Performance Challenges Report, which identified three management challenges facing the Commission and the actions that management has taken to address them. It then summarizes the results of the other reports issued during this period. This is followed by a summary of prior year reports with unimplemented recommendations; a description of significant recommendations from prior reports where final action is not complete; details of hotline and investigative activities; and information on reports that we did not publicly disclose.

The next section summarizes other reviews of the Commission conducted by external parties, along with the status of recommendations from those reports. The last sections provide information on other reportable items and include congressional activity, participation in the Council of Inspectors General for Integrity and Efficiency, other compliance activities, and the outcome of our peer review.

Additional tables at the end of the report provide summarized information of our work and the status of recommendations.

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Top Management and Performance Challenges

Each year, our office must identify and discuss the most significant management and performance challenges facing the Commission in the coming year. We provided this report (OIG-MR-18-01) to the Commission on October 12, 2017. In the report, we focused on the three major challenges listed in table 2. We identified these challenges using information gained from our audit, evaluation, and inspection work; a general knowledge of the Commission's programs and activities; and input from management. Following table 2 is a short discussion of the three challenges and the efforts the agency has taken to address them.

Table 2: Management and Performance Challenges

Management and Performance Challenges
1. Managing Data
2. Internal Controls
3. Information Cechnology Management

Managing Data

Information drives decision-making in an organization. For the Commission, this information is derived from data in its systems and databases. An organization needs complete, accurate, and consistent enterprise data to make timely and effective decisions. Thus, the underlying business processes and practices for the creation, storage, and use of data should be designed to allow key information to be entered consistently across applications, systems, and databases.

Properly managed data is essential for the development of timely, reliable, and accurate reporting. Managers should identify information needs, understand the characteristics of the data, and determine the appropriate level of detail required to ensure data is collected to develop useable and relevant management reports. Management reports should be based on a clear purpose and meet the defined needs of the intended user. Properly designed reports with relevant and timely information serve to help effectively manage day-to-day operations, support the decision-making process, evaluate performance, and communicate information across the organization.

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Effective organization of data is critical to obtain useful and relevant information that is versatile enough for a variety of purposes across all levels of the organization. The Commission should have a flexible and adaptable coding structure, requiring minimal human interaction, that is organized to generate accurate and complete information in a timely manner. The codes should follow a systematic method of assignment based on a logical flow of data that allows detailed information to be aggregated to meet the needs of managers at every level of the Commission. This logical structure must be considered when determining the level of data necessary to provide the desired information. Inconsistent methods of assigning and entering codes increase the risk that aggregations of data will be incomplete and information from different systems will seem to provide conflicting results.

In order for the Commission to depend on the quality and integrity of its data, it is important to accurately capture, enter, code, and reconcile data at the source of entry. To achieve this, employees should understand the importance of the data and how inaccurate or incomplete entries affect the organization. Data reconciliation processes should be performed regularly to identify and correct any mistakes as well as detect areas in the processes that can be improved to reduce future errors.

The Commission originally developed its systems to address specific needs or to solve single problems rather than viewing the system and its data as an enterprise resource. Because the systems focused on a single purpose, their functionality, access, and reporting capabilities are limited. At times, Commission staff does not know how the information from various systems and subsystems is defined, captured, and updated, which can produce misleading information and lead to excess staff time spent to reconcile multiple data sets across the organization.

The Commission needs to take a thoughtful, enterprise-wide approach to managing data to ensure data is relevant, complete, and available to inform strategic and operational decisions while minimizing enterprise risks. The Commission's strategy should use all data assets across the organization to meet its financial and nonfinancial reporting objectives.

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Internal Controls:

Commission management is responsible for establishing and maintaining a system of internal controls. Internal controls are the plans, policies, procedures, and organizational environment that managers use to ensure their programs and operations achieve intended results through effective use of public resources.

The *Standards for Internal Control in the Federal Government* (Green Book) defines internal control as “a continuous built-in component of operations, effected by people” and identifies five components for internal control. In order for a system of internal control to be effective, all five components must be effectively designed, implemented, and operating. In addition, all five components must work together in an integrated manner.

The control environment is the foundation for a system of internal control. One principal of the control environment is the establishment of an organizational structure, assignment of responsibility, and delegations of authority to meet the objectives of the organization. In 2015, we completed an audit of the Commission’s directives management system which included a review of these control environment elements. The audit found that Commission directives were not current and the directives contained outdated assignments of responsibility and delegations of authority. The absence of consistent monitoring led to weaknesses in each of the five components of internal control, and a lack of accountability meant that no one was accountable for the overall success of the Commission’s directives system.

Although the Commission recognized the importance of strong internal controls and consistently responded to each internal control weakness identified by the Office of Inspector General, there persists an underlying assumption that these specific problems are the only internal control areas that need to be addressed. Management needs to continually monitor and review internal controls to ensure that controls work effectively and achieve desired results.

Another area where the Commission has shown continued commitment towards improving and strengthening the internal control environment is in enterprise risk management. The Enterprise Risk Management Program continues to mature and has been integrated into the budget process to assist management in making informed decisions. Because effective enterprise risk management is an iterative process, Commission management must continue to focus on processes and procedures, ensure completion of program risk assessments to inform enterprise risk, identify new and emerging risks, reevaluate the risks’ impact/probability scores for reasonableness, and assess whether mitigation strategies are working effectively.

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The Commission must continue to engage senior management in all aspects of internal control to drive the cultural changes necessary to implement an effective internal control program.

IT Management

Daily attention to the four foundational, critical security controls remains necessary, as these controls serve as the cornerstone to secure the Commission's network. These controls are: (1) Inventory of authorized and unauthorized devices; (2) Inventory of authorized and unauthorized software; (3) Secure configurations of hardware and software; and (4) Continuous vulnerability assessment and remediation.

The Commission has identified and begun to implement business systems that will automate and improve the effectiveness of the Commission's operations. These new systems include the collecting of electronic data for some Title VII investigations; consolidating different databases of 337 data; cataloging external administrative reports in a manageable database; and modernizing the Harmonized Tariff Schedule business processes and information systems. Taking advantage of automation should improve the integrity, effectiveness, and efficiency of all the Commission's work.

Modern computing platforms have the potential to provide staff with important features that will help get the job done, while also providing high levels of information security. The Commission should work to modernize its systems to benefit from the native capabilities of modern software platforms to enhance functionality and reduce the complexity of its network.

The Commission has recently suffered multiple and extended outages related to basic functions, including internet access and wireless availability. These outages have a cost to productivity and lower confidence in the reliability of these platforms. The Commission's professional staff require a consistent and stable IT foundation to carry out their mission. If Commission IT systems do not work effectively, staff are unnecessarily stressed and deadlines are risked, which can drive staff to use unmanaged devices to complete their work. The Commission should continue to focus on building a stable and secure technology platform to help carry out its mission.

Inspector General Reports Issued During this Period

The Inspector General issued nine reports with 17 recommendations during this reporting period. The Commission made management decisions on nine recommendations from two reports. The Inspector General agreed with all of these management decisions.

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Management decisions on the remaining recommendations were not due until after this reporting period had closed.

A listing of each report issued during this reporting period, by subject matter, is provided in table 3.

Table 3: Reports by Subject Matter

Reports by Subject Matter				
Subject Matter	Report Number	Report Title	Date Issued	Number of Recommendations
Administrative	OIG-MR-18-01	<i>USITC Management and Performance Challenges</i>	10/12/2017	0
Administrative	OIG-AR-18-09	<i>Audit of Time and Attendance</i>	03/27/2018	8
IT Security	OIG-ML-18-02	<i>Inspector General Cyberscope FY 2017 Submission</i>	10/31/2017	0
Financial	OIG-AR-18-03	<i>Audit of FY 2017 Financial Statement</i>	11/09/2017	0
Financial	OIG-AR-18-04	<i>Report on Internal Controls FY 2017</i>	11/09/2017	0
Financial	OIG-AR-18-05	<i>Report on Compliance with Laws and Regulations FY 2017</i>	11/09/2017	0
Financial	OIG-AR-18-06	<i>Digital Accountability and Transparency Act Audit</i>	11/21/2017	6
Financial	OIG-ML-18-07	<i>Management Letter for FY 2017 Financial Statement</i>	12/20/2017	3
Financial	OIG-MR-18-08	<i>2018 Charge Card Risk Assessment Report</i>	01/31/2018	0
Total recommendations issued during this reporting period				17
<i>NOTE: None of these reports identified any questioned costs, unsupported costs, or funds that could be put to better use.</i>				

The title, key findings, and summary information for each report are provided below.

Inspector General Cyberscope Fiscal Year 2017 Submission, OIG-ML-18-02

RESULT: Of the five program areas evaluated using a capability maturity model framework that assesses the level and consistency of implementation, one was “Level 1: Ad hoc,” three were “Level 2: Defined,” and only one was “Level 3: Consistently Implemented.”

The Federal Information Security Management Act of 2002 (FISMA) requires the Office of Inspector General to independently evaluate and report to the Office of Management and Budget on how the Commission has established and implemented information security programs. Each year, the Office of Management and Budget requests input on

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select programs. For Fiscal Year 2016, the Office of Management and Budget requested an assessment using the capability maturity model. The list below provides the areas reviewed followed by the Inspector General's assessment rating.

- Identify – Level 2: Defined
- Protect – Level 3: Consistently Implemented
- Detect – Level 2: Defined
- Respond – Level 1: Ad hoc
- Recover – Level 2: Defined

The Commission has plans to deploy new technologies to meet shifting priorities and goals, including email migration to the cloud and enhancements to an electronic portal to support work on the next cycle of miscellaneous tariff bills. New projects introduce new risks as the focus moves from maintenance operations to developing and deploying new systems.

Audit of Fiscal Year 2017 Financial Statement, OIG-AR-18-03

RESULT: The audit resulted in an unmodified opinion of the Commission's Fiscal Year 2017 financial statement.

We engaged the services of an independent certified public accounting firm to audit the balance sheet and related statements of net cost, changes in net position, and budgetary resources for Fiscal Year 2016. The auditors concluded that the Commission's financial statements for the fiscal year ended September 30, 2017, present fairly in all material respects the financial position of the Commission. The auditors did not issue any recommendations.

Report on Internal Controls Fiscal Year 2017, OIG-AR-18-04

RESULT: The audit did not identify any material weaknesses or significant deficiencies.

As part of the audit of the financial statement, the independent certified public accounting firm was required to issue a report on internal control. The testing was limited solely to internal controls over financial reporting as they relate to the financial statement. The auditors did not test internal controls relevant to ensuring effective operations. The results of the testing performed did not identify any material weaknesses or significant deficiencies in the Commission's internal control over financial reporting.

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Report on Compliance with Laws and Regulations Fiscal Year 2017, OIG-AR-18-05

RESULT: The report did not identify any instances of noncompliance.

The independent public accounting firm also performed an audit of the Commission's compliance with certain laws and regulations. The auditors did not test compliance with all laws and regulations applicable to the Commission, only those that would have a direct and material effect on the determination of financial statement amounts. The results of the testing performed by the audit team did not identify any instances of noncompliance.

Digital Accountability and Transparency Act Audit, OIG-AR-18-06

RESULT: The Commission did not have an effective process to validate the reliability of data in its DATA Act submission.

The DATA Act requires the Inspector General to report on the completeness, timeliness, quality, and accuracy of the agency's quarterly DATA Act submission. We performed an audit of the Commission's DATA Act submission to determine if the process for validating the reliability of data was effective.

We found that the Commission's reconciliation process was limited to summary level data and comparing the dollar amounts between the files. The Commission's process did not include any steps to validate the proper use, completeness, or accuracy of the standard data elements of award and transaction level information. Our review of the award level transactions resulted in an error rate of 84% for accuracy and an error rate of 13% for completeness. We determined that the process to validate the reliability of data did not sufficiently prevent or detect errors and omissions in the required data elements.

Other errors we identified were attributed to Commission object class codes not properly aligning to Office of Management and Budget Circular A-11, Section 83.

We issued six recommendations to improve the quality, accuracy, and completeness of the Commission's quarterly reporting of financial and award data.

Management Letter for Fiscal Year 2017 Financial Statement, OIG-ML-18-07

RESULT: The Commission needs to improve their quality control review processes for the quarterly financial statement submission and accruals.

We contracted with an independent certified public accounting firm to conduct the financial statement audit and associated reports. The Management Letter discusses

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matters involving internal control that the auditors identified during the audit but were not required to be included in the audit report.

The independent auditors issued three recommendations. Two focused on establishing a quality control review of the quarterly financial statements, while the third recommendation was related to additional monitoring of accrual estimates for major contracts.

2018 Charge Card Risk Assessment, OIG-MR-18-08

RESULT: The Commission's risk of illegal, erroneous, or improper charge card purchases is low.

Our office participated in the CIGIE purchase card project and is using the work completed from that audit as the basis for our annual risk assessment report. Based on the CIGIE methodology, we found two exceptions related to recovering sales tax and two exceptions related to charge card accounts of departed employees.

In assessing the risk of these transactions, we considered the number of purchase card holders, the dollar amount of sales tax paid, and the automated controls in place to prevent cardholders from exceeding the single purchase card limits and monthly purchase card limits.

We did identify two areas where the Commission can improve the internal control over the purchase card program and a contract issue that requires management attention. These matters, along with our recommendations, were addressed in separate reports to the Commission after this reporting period closed.

Audit of Time and Attendance, OIG-AR-18-09

RESULT: The Commission did not effectively manage its process for overtime, compensatory time, religious compensatory time, or credit hours.

We performed an audit on the management of the time and attendance process for extra hours worked by Commission staff. To manage the time and attendance process, the Commission should have a clear policy, standard procedures to effectively implement the policy, and perform monitoring and oversight activities to ensure the process is working as designed.

We found that the Commission's policy and procedure for approval authority of overtime was not clear or enforced by management. The Commission did not perform oversight activities regularly or in sufficient detail to identify problems. We also found that the

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Commission could not accurately account for the actual number of hours worked, as many employees often work “off the clock” to meet statutory and other deadlines.

We issued eight recommendations to the Commission to improve the management and oversight of the time and attendance process. The Commission agreed with our findings and was in the process of developing management decisions to address our recommendations.

Summary of Prior Period Reports

Reports Without Management Decisions

The Commission has provided management decisions to all recommendations in reports issued prior to the commencement of this reporting period.

Reports Without Management Comments

The Commission provided management comments for all reports that contain recommendations within 60 days. Internal policy does not require management to provide comments on reports that do not have recommendations.

Prior Year Unimplemented Recommendations and Cost Savings

A summary of reports containing unimplemented recommendations by fiscal year is provided in table 4 below.

Table 4: Prior Year Unimplemented Recommendations and Cost Savings

Prior Year Unimplemented Recommendations and Cost Savings			
Fiscal Year	Number of Reports With Unimplemented Recommendations	Number of Unimplemented Recommendations	Dollar Value of Aggregate Potential Cost Savings
15	1	9	\$0

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Significant Recommendations From Prior Periods

The Commission has not completed corrective action for 10 recommendations described in prior semiannual reports. We have identified four of these recommendations—all related to the Commission’s system of internal rules—as significant. A brief summary of these four recommendations appears below.

The report containing these recommendations focused on directives management. Managing directives is a core function of the system of internal rules. The internal rules system, in turn, shapes the Commission’s governance culture and plays a key role in internal control activities.

We recommended that the Commission develop a directives management framework that would clearly assign responsibility and accountability for meeting the Commission’s objectives; set the tone for employees’ conduct and expected behavior; and set the direction for how the Commission complies with certain laws and regulations in its daily operations. We also recommended setting up a periodic review process to ensure the directives are current, relevant, readily accessible, and easily understood.

Hotline and Investigations

Investigations and Inquiries: Overview

One of our functions is to conduct investigations and inquiries of criminal, civil, and administrative wrongdoing involving Commission programs, operations, and personnel. We may investigate possible violations of federal criminal law, of regulations on employee responsibilities and conduct, and of other statutes and regulations covering Commission activities.

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

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OIG Hotline Contacts

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

We receive complaints from employees, contractors, and the public that involve the Commission's areas of responsibility. 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 the complaint to the appropriate entity for response. If the complaint does not have merit, we close the matter.

The OIG has worked to increase awareness of the Hotline throughout the Commission by creating a series of Hotline posters and holding "OIG Outreach" sessions with Commission offices.

Summary of Matters Referred to Prosecuting Authorities

Allegation of Conflict of Interest

The Office of Inspector General received a referral alleging that a senior government employee had purchased a financial interest in possible violation of federal law and Standards of Ethical Conduct Regulations. The matter was referred to the Department of Justice on November 13, 2017, and was declined for prosecution on November 20, 2017. Specifically, the Office of Inspector General sought to determine whether the senior government employee participated in an official capacity in a matter in which to his knowledge he had a financial interest. The Office of Inspector General found that the senior government employee violated conflict of interest laws by participating in an investigation in which he had a financial interest and was not otherwise exempt. The Commission has informed the Office of Inspector General that it is currently determining the appropriate corrective action as a result of this report.

Allegation of Unauthorized Recording

The Office of Inspector General initiated an investigation into a senior government official who allegedly used a Commission-issued device to surreptitiously record a closed-door discussion of his performance evaluation. The Office of Inspector General referred the potential criminal violation to the Department of Justice on December 12, 2017. The Department of Justice declined to pursue a criminal investigation on December 13, 2017. The Office of Inspector General found that the senior government employee

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violated criminal laws as well as the Standards of Ethical Conduct when he recorded what was intended to be a private discussion without the consent of any participant. The Commission has informed the Office of Inspector General that it is currently determining the appropriate corrective action as a result of this report.

Investigations With Substantiated Allegations Involving Senior Government Employees

Allegation of Abuse of the Time and Attendance Process

The Office of Inspector General initiated an investigation into a senior government official who accrued significant amounts of religious compensatory time with no apparent intent to use that time for religious activities. The Office of Inspector General found that by continually claiming that extra hours were necessary to attend to religious requirements without intending to use the hours for this purpose, the senior government official's actions created the appearance of violating the Standards of Ethical Conduct. The agency official retired from federal service prior to the Commission determining appropriate corrective action; however, the agency official did not receive any compensation for accrued religious compensatory time upon retirement.

In addition to this investigation, the investigations summarized in the preceding section involved substantiated allegations involving senior government employees.

- Allegation of Conflict of Interest
- Allegation of Unauthorized Recording

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 investigations summarized in the preceding two sections were not disclosed to the public during this reporting period.

- Allegation of Conflict of Interest

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- Allegation of Unauthorized Recording
 - Allegation of Abuse of the Time and Attendance Process
-

External Reviews Completed During This Period

The Commission had two external reviews completed during this reporting period. A summary of each report is provided below.

Office of Government Ethics

The Office of Government Ethics performed an inspection of the Commission's ethics program. The objective of the inspection was to collect and assess ethics program compliance data in order to identify and mitigate program vulnerabilities.

On October 11, 2017, the Office of Government Ethics issued Inspection Report 18-021. The report provided the results of the Commission's compliance in seven specific areas of review: Leadership, Ethics Agreements, Public Financial Disclosure, Confidential Financial Disclosure, Initial Ethics Orientation, Annual Ethics Training, and Ethics Advice and Counseling. The report did not include any findings or recommendations to the Commission.

Office of Personnel Management

The Office of Personnel Management conducted an evaluation of the Commission's strategic management of human capital, the efficiency and effectiveness of its human resources programs, and its compliance with merit system principles and other civil service laws and regulations.

The final report issued on December 8, 2017, by the Office of Personnel Management found that the Commission had "Not Met" the anticipated results in 9 of the 26 assessment areas. The Office of Personnel Management noted that the Commission's policies were extremely outdated and that improvements were needed in the external and internal hiring processes.

The Office of Personnel Management issued 15 required actions and 6 recommended actions to the Commission. The Commission developed management decisions to address all 21 actions from the report.

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Status of Actions Related to External Reviews Completed During Prior Periods

The Commission did not have any open recommendations from external reviews completed during prior reporting periods.

Reviews Completed for Other Offices of Inspector General

Section 6(a)(3) of the Inspector General Act of 1978, as amended, gives the Inspector General the authority to obtain assistance from any other federal agency to carry out the duties and responsibilities assigned by the Act.

Our office assists other Offices of Inspector General by performing independent information technology reviews. Our support may vary widely, ranging from penetration testing, vulnerability assessments, and configuration reviews to evaluating the monitoring, detection, and remediation of cyber incidents.

When assistance is requested, the Commission's Inspector General will enter into a memorandum of understanding with the other federal agency, in accordance with 31 U.S.C. §1535 (the Economy Act of 1932), as amended. The memorandum of understanding describes in writing the work to be completed, methodology, cost, and schedule, as well as any associated deliverables, before work begins.

Congressional Activities

Our office received one Congressional inquiry through the Council of Inspectors General on Integrity and Efficiency. The inquiry was from Senator Duckworth, who requested information regarding the deliberative process privilege.

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Council on Inspectors General for Integrity and Efficiency

The Inspector General has actively participated in meetings and supported the efforts of the Council on Inspectors General for Integrity and Efficiency (CIGIE). Members of our staff have volunteered to serve on various CIGIE working groups and committees that address cross-cutting issues, such as knowledge management, cloud computing, investigations, cyber security, new media, small-agency concerns, and legal matters.

During this reporting period, the Office of Inspector General participated in the CIGIE government-wide purchase card project. We provided informal results to the Chairman prior of our submission to the CIGIE Purchase Card Working Group. We will formally transmit an audit report to the Commission during the next reporting period.

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; however, it voluntarily seeks to comply with most of its requirements. During this reporting period, there were no events that gave rise to a duty to report under FFMIA.

Peer Review

The Equal Employment Opportunity Commission’s Office of Inspector General performed a peer review of our office during the prior reporting period. The final report, issued on April 18, 2016, found that the system of quality control for conducting audits was suitably designed and implemented, giving it a peer review rating of “pass.” The reviewers did not make any recommendations. The next peer review of our office will be in 2018, in accordance with the peer review schedule set by the CIGIE.

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Table 5: Prior Significant Recommendations Where Corrective Action Has Not Been Completed

Prior Significant Recommendations Where Corrective Action Has Not Been Completed	
Report Number	Recommendation
OIG-AR-15-14	Recommendation 1: Update policy to clearly define the different types of internal rules. Recommendation 2: Define standard format and content requirements for each type of internal rule. Recommendation 4: Deploy an effective process to perform periodic reviews of the directives. Recommendation 9: Require delegations of authority and agency designations to include authoritative sources and core responsibilities.

Table 6: Reports With Questions and Unsupported Costs

Reports With Questioned and Unsupported Costs Section 5(a)8			
Description	Number of Reports	Questioned Costs	Unsupported Costs
Reports for which no management decision has been made by the commencement of the reporting period.	0	\$0	\$0
Reports issued during the reporting period.	9	\$0	\$0
Subtotals	9	\$0	\$0
Reports for which a management decision was made during the reporting period.	8	\$0	\$0
• Dollar value of disallowed costs.		\$0	\$0
• Dollar value of allowed costs.		\$0	\$0
Reports for which no management decision has been made by the end of the reporting period.	1 ¹	\$0	\$0
Subtotals	9	\$0	\$0

¹ Management decisions for report number OIG-AR-18-09 were not due until after the reporting period had closed.

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Table 7: Reports w/ Recommendations that Funds Be Put to Better Use

Reports With Recommendations That Funds Be Put to Better Use Section 5(a)9		
Description	Number of Reports	Funds Put to Better Use
Reports for which no management decision has been made by the commencement of the reporting period.	0	\$0
Reports issued during the reporting period.	9	\$0
Subtotals	9	\$0
Reports for which a management decision was made during the reporting period.	8	
<ul style="list-style-type: none"> • Dollar value of recommendations agreed to by management. 		\$0
<ul style="list-style-type: none"> • Dollar value of recommendations not agreed to by management 		\$0
Reports for which no management decision has been made by the end of the reporting period.	1 ²	\$0
Subtotals	9	\$0

² Management decisions for report OIG-AR-18-09 were not due until after the reporting period had closed.

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Table 8: Reports With Final Action Completed During This Reporting Period

Reports With Final Action Completed During this Reporting Period				
Reports Issued this Reporting Period				
Report Title	# of Recs.	Mgt. Decisions	Final Action Completed in Prior Periods	Final Action Completed This Period
1 USITC Management and Performance Challenges, OIG-MR-18-01	0	0	0	0
2 Inspector General Cyberscope FY 2017 Submission, OIG-ML-18-02	0	0	0	0
3 Audit of FY 2017 Financial Statement, OIG-AR-18-03	0	0	0	0
4 Report on Internal Controls FY 2017, OIG-AR-18-04	0	0	0	0
5 Report on Compliance with Laws and Regulations FY 2017, OIG-AR-18-05	0	0	0	0
6 2018 Charge Card Risk Assessment Report	0	0	0	0
Totals	0	0	0	0
Prior Reporting Periods				
Report Title	# of Recs.	Mgt. Decisions	Final Action Completed in Prior Periods	Final Action Completed This Period
1 Audit of Off-Site Facilities, OIG-AR-17-02	11	11	10	1
Totals	11	11	10	1

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Table 9: Status of Reports Issued Without Final Action

Status of Reports Issued Without Final Action					
This Reporting Period					
Report Title	# of Recs.	Mgt. Decisions	Decisions IG Disagrees With	Final Action Complete	Action Not Complete
1 Digital Accountability and Transparency Act Audit, OIG-AR-18-06	6	6	0	2	4
2 Management Letter for FY 2017 Financial Statement, OIG-AR-18-07	3	3	0	0	3
3 Audit of Time and Attendance, OIG-AR-18-09	8	0 ³	0	0	8
Totals	17	9	0	2	15
Prior Reporting Periods					
Report Title	# of Recs.	Mgt. Decisions	Final Action Complete Prior Periods	Final Action Complete This Period	Action Not Complete
1 Management Letter on Conflict of Interest Process, OIG-ML-17-10	1	1	0	0	1
2 Audit of Directives Management, OIG-AR-15-14	11	11	1	1	9
Totals	12	12	1	1	10

³ Management decisions for report OIG-AR-18-09 were not due during this reporting period.

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Table 10: Statistical Table of Investigative Reports

Statistical Table of Investigative Reports Section	
Description	Count
Number of investigative reports issued.	3
Number of persons referred to DOJ for criminal prosecution.	2
Number of persons referred to State and Local authorities for criminal prosecution.	1
Number of indictments and criminal information resulting from any prior referrals to prosecuting authorities.	0
The information in this table is derived from the Office of Inspector General's investigation report.	

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Appendix A

Appendix A: Chairman's Statistical Tables

Table A: Reports with Disallowed Costs

Total Number of Reports and the Dollar Value of Disallowed Costs		
Description	Number of Reports	Dollar Value of Disallowed Costs
Reports issued during the period.	9	\$0
Reports for which final action had not been taken by the commencement of the reporting period.	3	\$0
Reports on which management decisions were made during the reporting period.	8 ¹	\$0
Reports for which final action was taken during the reporting period.	7	\$0
<ul style="list-style-type: none"> • Dollar value of disallowed costs, recovered by management. 		\$0
<ul style="list-style-type: none"> • Dollar value of disallowed costs written off by management. 		\$0
Reports for which no final action has been taken by the end of the reporting period.	5	\$0

¹ Management decisions for report number OIG-AR-18-09 were not due until after the reporting period had closed.

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Appendix A

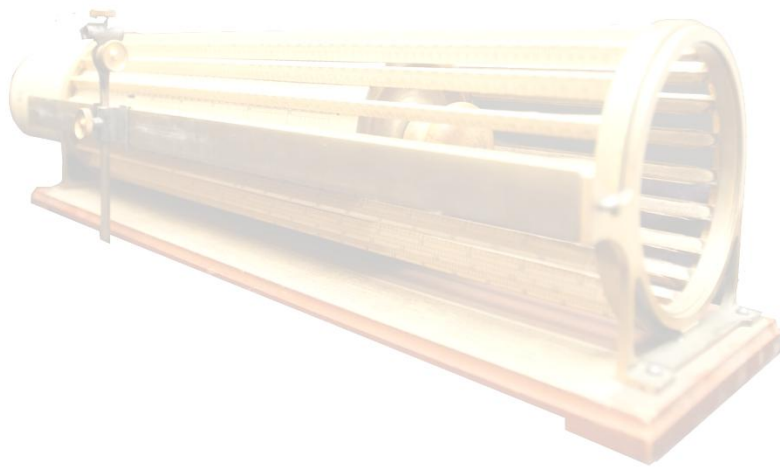
Table B: Reports with Recommendations that Funds be Put to Better Use

Reports with Recommendations that Funds be Put to Better Use		
Description	Number of Reports	Funds Put to Better Use
Reports for which final action had not been taken by the commencement of the reporting period.	3	\$0
Reports on which management decisions were made during the reporting period.	8 ²	\$0
Reports for which final action was taken during the reporting period including:	7	\$0
<ul style="list-style-type: none"> • Dollar value of recommendations that were actually completed. 		\$0
<ul style="list-style-type: none"> • Dollar value of recommendations that management has subsequently concluded should not or could not be completed. 		\$0
Reports for which no final action has been taken by the end of the reporting period.	5	\$0

Table C: Prior Year Management Decisions Without Final Action

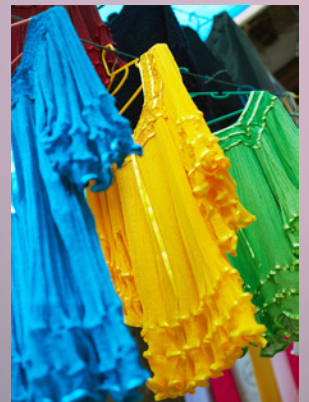
Prior Year Audit Reports On Which Management Decisions Have Been Made but Final Action has Not Been Taken				
Audit Report	Date Issued	Disallowed Costs	Funds Put to Better Use	Reason Final Action has Not Been Taken
OIG-ML-17-10	02/10/2017	\$0	\$0	Provided in the Chairman's Message
OIG-AR-15-14	09/02/2015	\$0	\$0	Provided in the Chairman's Message

² Management decisions for report number OIG-AR-18-09 were not due until after the reporting period had closed.



“Thacher’s Calculating Instrument” developed by Edwin Thacher in the late 1870s. It is a cylindrical, rotating slide rule able to quickly perform complex mathematical calculations involving roots and powers quickly. The instrument was used by architects, engineers, and actuaries as a measuring device.

To Promote and Preserve the Efficiency, Effectiveness, and Integrity of the U.S. International Trade Commission



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