

U.S. International Trade Commission

Inspector General Semiannual Report



April 1, 2017 - September 30, 2017



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.

Commissioners

*Rhonda K. Schmidlein, Chairman
David S. Johanson, Vice Chairman
Irving A. Williamson
Meredith M. Broadbent*

Chairman



UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

November 30, 2017

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 April 1, 2017 to September 30, 2017 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 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.

I. Addressing General Management and Performance Challenges

A. Managing Data

Data management has been newly identified by the Inspector General as a management challenge facing the Commission. Data management is integral to the Commission's operations and the productivity of its staff. The Commission recognizes that our data are a valuable asset which can be optimized through the use of improved data governance and technology. As the Commission addresses this challenge, processes will be reviewed to ensure data are handled and maintained correctly and made accessible to those with legitimate uses. The agency will also assess existing data to identify opportunities to consolidate the data and reduce duplication. The Commission will develop adaptive and flexible structures that enable the data to be used for a variety of purposes throughout the enterprise.

The Commission will examine its business systems and processes to find ways that data capture can be made more efficient and accurate. More fundamentally, the agency will review the way it currently classifies data to ensure that systems using the same data are defining the data in the same way and that the classifications are maintained over time.

At the end of FY 2016 the Commission acquired a business intelligence software used to enhance reporting capabilities, providing management and staff with useable and relevant reports to effectively manage day-to-day operations, support decision-making, and communicate information across the organization and, where appropriate, to the public. Over the next few years, the agency will continue to identify reporting needs across the agency, develop or refine its data systems accordingly, and issue improved reports.

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 and received legal review of each from the Office of the General Counsel. Currently, the documentation is undergoing Commission review and approval. Upon Commission approval, the Chairman will begin 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 will also implement a multi-year remediation plan that is currently in draft form.

The proposed system and implementation plan will address 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 has continued to make substantial improvements in the 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) has made significant progress toward full compliance on all mandates as well as fully implementing an online portal for the submission and management of Miscellaneous Tariff Bill petitions. The Commission has also made progress in improving its IT security posture and

management of IT assets by closing out all management decisions in response to audit findings.

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.

OCIO has taken several steps to secure the Commission's network. OCIO deployed two data loss prevention solutions Commission-wide to protect the Commission from the possible exfiltration of sensitive data (e.g., Social Security Numbers). This strategy is a repeatable process allowing OCIO to implement changes to the various offices across the Commission while mitigating downtime and impacts to productivity. OCIO deployed a threat detection and prevention tool to all Commission workstations. This tool continuously monitors Commission endpoints for Indicators of Compromise (IOCs) and immediately locks down endpoints and performs automated forensics when an IOC is detected.

The Commission continues to improve device management, security, and operability. The United States Government Configuration Baseline (USGCB) has been applied and maintained for all workstations, bringing the Commission into compliance with the Federal government-wide mandate. All new Commission servers have secure baseline configurations customized for our environment and unique mission needs. Mobile device configurations are also managed via a secure solution. These standardized configurations improve the Commission's ability to manage and safeguard network devices against intrusion or exposure to vulnerabilities, as well as ensuring optimal operations.

OCIO conducts ongoing continuous security control monitoring and risk assessment of systems and networks. To augment these cybersecurity programs, OCIO coordinates with DHS National Cybersecurity & Communications Integration Center (NCCIC) to conduct numerous external cybersecurity assessments of USITC systems. OCIO converted all public-facing websites and web applications to use secure encrypted protocols for all transmissions, improving the security of information for all users.

OCIO continues to work to improve the availability of Commission systems. The Commission is deploying new technologies to meet shifting priorities and goals while at the same time seeking to avoid introducing unnecessary obstacles to daily operations. In support of agency operations, OCIO implemented several critical enhancements to the agency's internal and external software systems and websites. OCIO enhanced the USITC repository for all Commission investigation documents and conducted a redesign of a new internal intranet website, providing for easier

access to agency information and services. OCIO developed and deployed a new application to create and maintain the administrative, cost and appeal information related to FOIA requests. OCIO began a project to re-engineer its legacy DataWeb platform, which provides the public access to trade data reports and query capabilities. The new system, planned for deployment in 2018, provides a modernized interface for users. OCIO also enhanced its internal system for managing the Harmonized Tariff Schedule (HTS) to improve the efficiency of the update process.

The Commission has recently deployed a business intelligence (BI) tool to allow internal and external users greater access to data as well as providing a robust suite of analytic and visualization options. The initial project assigned to this solution was the development of the preliminary and final reports for the Miscellaneous Tariff Bill Petition process. Other projects using the BI tool included the development of a Conflict of Interest (CoINs) system to identify conflicts of interest for key Commission staff and expenditure reporting for Finance. A prototype for collecting vote information (for Title VII and adequacy) is near completion. Operational FOIA reports have been in development and requirements are being gathered for labor cost reports.

In further efforts to improve on the Commission's ability to better manage its data as an asset, modernize systems, and deliver a stable technology platform, the OCIO upgraded its existing SharePoint platform from Version 2010 to 2013, not only replacing an archaic architecture but also providing better navigation, search, and collaboration capabilities for USITC staff.

The Commission is dedicated to providing its staff with a consistent and stable IT foundation and has taken steps to address recent outages identified by the Inspector General that have affected staff productivity. For example, the Commission is addressing recent email issues by investing in a cloud email solution with a target of early calendar year 2018. Moreover, the Commission has also engaged our internet service provider to ensure better communication and escalation strategies to minimize the impact of future maintenance outages on agency operations.

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 three new reports containing two new

recommendations for management action.¹ The Commission issued management decisions on all of these recommendations in a timely manner during this reporting period and completed final action on all of these management decisions.

(1) Management Report – IPERA Determinations (OIG-MR-17-11)

In response to the management decision, the Office of the Chief Financial identified the different sources where improper payments can be made, established a tracking mechanism (improper payment log), and established processes to notify the appropriate office and to follow up until the improper payment is recaptured. Overpayments to employees through payroll (the result of administrative error) are reported to the Office of Human Resources so the root cause can be corrected, and action is taken to collect the overpayment. Overpayments to vendors are captured through the OCFO OMB Circular A-123 internal audits, and the Contracting Office and the Office of Finance are notified to determine the best method to correct the issue. Finally, overpayments to travelers are captured during the monthly analysis of travel card funds performed by the Senior Systems Accountant, or the Travel Officer may detect an overpayment during a voucher audit. In all instances the payments are recorded in the improper payment log and the Office of Finance tracks the process through final collection. Based upon these actions, the Management Decision has been closed out.

(2) Management Letter – Wounded Warriors Federal Leave Act (OIG-ML-17-13)

The Commission completed final action on this item by issuing an Administrative Announcement (FY-17-04) that implements the Wounded Warriors Federal Leave Act. The procedures set forth in that Administrative Announcement make clear what a newly hired disabled veteran must do to request and use this new type of leave for undergoing medical treatment for service-connected disabilities.

B. Actions on Recommendations Made in Prior Periods

The Commission completed final action on a number of management decisions contained in eleven reports issued by the Inspector General during this or prior reporting periods.² 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 See Table 3 of the Inspector General's report.

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

(1) Evaluation of Public Website Security (OIG-ER-16-13)

The Commission has created a number of processes and an automated reported mechanism to address two management decisions related to the evaluation of public website security—more specifically the failure of credentialed vulnerability scans from the Commission's vulnerability management solution (Nessus). Nessus has been configured to log credential scan failures resulting from any of the vulnerability scans at the commission. Weekly a detailed summary report is created and sent to Commission's Cyber Security Division (CSD) and Network Services Division (NSD). NSD has created a process to address these failed scans and elements of the process have been incorporated into its patching and build checklist processes. The final management decision was met by integrating application security tools and testing into the development process.

(2) 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 has developed a proposal for the new internal rules system which has received legal review and is now before the Commission for approval. The Commission anticipates approval of the new system by the end of calendar year 2017. 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.

(3) Audit of Hardware Inventory (OIG-AR-15-11).

In this audit, the Inspector General concluded that the Commission managed its hardware inventory effectively but made several recommendations to improve its practices in this area. The Commission completed the final open management decisions to populate inventory information. Inventory management has been transferred to a more robust tracking tool (Manage Engine) and necessary attribute data is being captured used to enable oversight and management decisions. With the addition of numerous inventory attributes to the existing records that enable both compliance alerts with general reporting, all management decisions associated with this audit have now been closed out.

(4) Audit of the Commission's Patching Process (OIG-AR-14-02).

The Commission has completed of the last two of thirty-four management decisions associated with this audit. The Commission partnered with the Inspector General to re-evaluate the remaining two management decisions, and determined the appropriate level of network complexity that allowed complete network security scanning on a daily basis, exceeding the recommendation of weekly scanning.

(5) Assessment of USITC Website Encryption (OIG-MR-16-10)

Having already implemented regular testing of USITC website encryption, the Commission closed the last of 2 management decisions by implementing HTTP Strict Transport Security (HSTS) on its websites to ensure effective website encryption.

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

The Commission has closed out 10 of 11 management decisions related to this audit. The Chief Administrative Officer (CAO) reviewed the Commission's warehouse space requirements in light of the Commission's new 15-year occupancy agreement (OA) with the General Services Administration (GSA). Based on the review, the CAO determined that warehouse storage, specifically the warehouse storage space at Cryden Way, was no longer required. The CAO requested that GSA initiate an early termination of the warehouse lease and the Commission's OA for that space, both of which were originally scheduled to terminate on July 31, 2017. The Commission's OA with GSA was terminated in April 2017, saving the Commission three months of warehouse rent. Most of the contents of the warehouse space were disposed of through the Central Excess Property Operation; the remainder was brought onsite to P-1. The CAO will continue to monitor the Commission's warehouse requirements, but at this time no offsite warehouse storage is needed. Additionally, management in Operations and the Office of Analysis and Research Services (OARs) assessed library resources with regard to the different types of resources within the library, and developed processes to measure the frequency of use of library materials. The final management decision, relating to offsite storage of library materials, remains open due to continuing need for this resource, particularly during the current repainting/re-carpeting and building renovation projects, and is due to be closed out during the next SARC period.

(7) Evaluation of Details (OIG-ER-17-01)

The Office of Human Resources drafted and issued policies and procedures that conform to OPM guidelines and that clearly delineate the process for details and temporary promotions, requiring

competition where necessary, The policies and procedures are set forth in Administrative Orders AO-17-13 (for general schedule positions) and AO -17-14 (for SES positions). Accordingly, the Commission has closed all management decisions related to this audit.

(8) Management Letter for FY 2016 Financial Statement (OIG-ML-17-07)

In this management letter, the Inspector General stated that the Commission needed to establish policies for the maintenance of negative leave requests and supporting documentation and perform reviews of employees with negative sick balances throughout the fiscal year. In response, the Commission established an Advanced Leave Procedure that was distributed to all Commission employees on March 30, 2017. This procedure also documented the new requirement for a quarterly review of negative leave balances to verify requests were approved in accordance with policies and procedures and to determine whether stated balances are valid. In order to address the management decision relating to travel cardholder training, the Office of Finance reviewed the status of each agency travel cardholder's training certificate, and if the certificates were missing, expired, or close to expiring, the cardholders were requested to either forward the missing training certificates or take the necessary online training. The Office of Finance also set up a tracking log to monitor the status of each travel cardholder, and reviews the training certificate data on a periodical basis in order to ensure the certificates are valid. Cardholders whose certificates are expired or are about to expire are notified. Finally, cardholders will not be allowed to travel if their certificates have expired. Based upon these actions, all management decisions associated with this management letter have now been closed out.

(9) Digital Accountability and Transparency Act Readiness Review (OIG-MR-17-08)

Pursuant to its management decisions, the Commission took several actions in order to meet the reporting requirements of the Digital Accountability and Transparency Act (DATA Act). In particular, it organized a DATA Act Working Group to complete the agency-specific actions identified in the DATA Act Playbook, such as identifying and addressing agency specific requirements, issues, challenges, and gaps; performing a review of the DATA Act elements to identify challenges and limitations concerning Commission data; creating an inventory of USITC-specific data and associated business processes and systems; and, identifying and validating Source System and Data gaps. The Working Group also reconciled the data in the reports generated from Oracle Federal Financials, Federal Procurement Data System, and USASpending.gov. Finally, in the event the Commission's shared service provider was not able to successfully generate the data files, the Working Group also determined there was a viable option internally to meet the DATA Act Reporting deadline. As a result of these actions, the Commission closed out all management decisions in response to this review.

(10) 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 could 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, once 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

In 2015, the Commission's Chief Information Officer voluntarily asked the DHS to perform a Risk and Vulnerability Assessment of USITC Information Technology networks. In this assessment, DHS examined the extent to which our networks are vulnerable to malicious attacks from outside entities. In FY 2017, the Commission closed out the remaining findings (all moderate or low) of DHS's original sixteen critical, high, moderate, and low areas of vulnerability.

In March 2016, the U.S. Equal Employment Opportunity Commission (EEOC), Office of Federal Operations (OFO) met with the Commission to review the status of its EEO program. The Commission has taken action to address all of the recommendations in the EEOC's report. Accordingly, all management decisions related to this external audit are closed.

OPM performed a review of the Commission's personnel security and suitability program during FY 2017. The final OPM report contained six recommendations. Commission management completed final action on all six recommendations during the period. In addressing audit findings, the Commission enhanced its personnel security procedures to ensure that unacceptable investigative requests are kept to 5 percent of requests or fewer, that adjudications are reported to OPM within 90 days of receipt of the final investigative report, that a Certificate of Investigation (or equivalent) is maintained in each subject's eOPF, and that all SF-312 NDAs are executed and secured within prescribed timeframes and maintained in each subject's eOPF. Additionally, all clearances with "unknown" status in OPM's CVS were corrected, and all investigations identified as missing a record of investigation were initiated during the period.

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

Sincerely,

A handwritten signature in blue ink that reads "Rhonda K. Schmidlein". The signature is written in a cursive style with a large initial "R" and a distinct "K".

Rhonda K. Schmidlein
Chairman

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UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

October 31, 2017

IG-PP-021

Commissioners:

Attached is the Semiannual Report summarizing the activities of the Office of Inspector General for the period April 1, 2017, to September 30, 2017. This Semiannual Report includes the new reporting requirements specified in the *Inspector General Empowerment Act of 2016*.

During this period, we issued three reports and made two recommendations to promote the efficiency, effectiveness, and integrity of the Commission's operations. The Commission provided management decisions and completed final action for both the recommendations we made during this reporting period. The Commission completed final action on 21 recommendations we made in prior reporting periods.

I would like to thank you for your commitment to strengthening the integrity of the Commission's operations; and for your support of the work of my office.

Philip M. Heneghan
Inspector General

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Table 1: Reporting Requirements Index

Reporting Requirements Index		
IG Act Section	Description	Page
4(a)(2)	Review of Legislation	None
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5(a)(2)	Description of Recommendations for Corrective Action with Respect to Significant Problems, Abuses, and Deficiencies	6
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5(a)(4)	A Summary of Matters Referred to Prosecuting Authorities	10
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	15
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5(a)(11)	Description of Any Significant Revised Management Decisions	None
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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 April 1, 2017, through September 30, 2017. 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 Management and Performance Challenges Report, OIG-MR-18-01, 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 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 below 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 technology management

Managing Data

Information drives decision-making in an organization, and this information is derived from data in the Commission's 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. As such, the format and content of management reports should contain a sufficient level of information to meet the purpose for which those reports were developed. Properly designed reports with relevant and timely information serve to help effectively manage

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day-to-day operations, support the decision-making process, evaluate performance, and communicate information across the organization.

Effective organization of data is critical to obtain useful and relevant information that is versatile for a variety of purposes across all levels of the organization. The Commission should have a flexible and adaptable coding structure organized to generate useful information in a timely manner that is accurate and complete, with minimal human interaction. 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 provide conflicting results.

The Commission should be able to rely on the quality and integrity of its data across systems, applications, and databases. The accuracy and completeness of information relies on how we capture, enter, code, and reconcile data at the source of entry. The value of the information generated by a system is only as good as its quality at the point of entry. Employees need to understand the importance of the data and, more importantly, how inaccurate or incomplete entries affect the organization. Data reconciliation processes should be performed regularly to identify and correct any errors or omissions and improve the processes to reduce future errors.

The Commission's systems were developed for a specific need or to solve a single problem. The data within these systems was not seen as an enterprise resource. Because these systems were developed for a single purpose, their functionality, access, and reporting capabilities are limited. Without staff knowing how the information from various systems and subsystems is defined, captured, and updated, misleading information can be produced and excess staff time might be needed to attempt to reconcile multiple data sets across the organization.

The Commission needs to take a thoughtful, enterprise-wide approach to manage data to ensure it is relevant, complete, and available when necessary to make good strategic and operational decisions and manage 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:

The Commission's management is responsible for establishing and maintaining a system of internal controls. These internal controls are the plans, policies, procedures, and organizational environment that managers use to ensure their programs and operations are achieving the intended results through the 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 be working 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 Commission. 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 the Commission's directives were not current and the directives contained outdated assignments of responsibility and delegations of authority. This lack of monitoring led to weaknesses in each of the five components of internal control. Monitoring is necessary to determine if the system of internal control is properly designed, working as intended, and achieving the desired results. The lack of accountability meant that individuals had roles and responsibilities within the process, but no one was held accountable for the overall success of the Commission's directives system.

The Commission has now recognized the importance of having strong internal controls. The Commission has consistently acknowledged and responded to internal control weaknesses identified in reports issued by the Office of Inspector General. However, even with the strides taken by the Commission over the past five years, there is still an underlying assumption that because specific actions were completed, all internal control problems have been resolved. Management needs to continually monitor and review internal controls to ensure that controls work effectively and achieve the 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 enterprise risk management is an iterative process, the Commission

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must keep management focused on maturing its processes and procedures, ensuring that program risk assessments are completed and used to inform the enterprise risk, identifying new and emerging risks, reevaluating the risks' impact/probability scores for reasonableness, and assessing whether mitigation strategies are working effectively.

The Commission must continue the engagement of senior management in all aspects of internal control to ensure buy-in across programmatic and administrative offices and to make certain it can be sustained over a long period of time in order to achieve a mature and effective internal control program. The Commission will be challenged to manage and drive the cultural changes associated with the development and implementation of an effective organizational internal control program.

IT Management

Daily attention to the four foundational, critical security controls remains necessary, as these controls are the cornerstone of securing the Commission's network. These controls are: (1) Inventory of authorized and unauthorized devices, (2) Inventory of authorized and unauthorized software; (3) Secure configurations for hardware and software on mobile device laptops, workstations, and servers; 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 collecting 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 a high level of availability and the features they need to get their jobs 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 management 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 all have a cost to productivity and lower staff's confidence in the reliability of these platforms. The Commission's professional staff require a consistent and stable IT foundation that is developed and managed effectively to enhance the work done by Commission staff. If the

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Commission’s IT systems do not work effectively, staff are unnecessarily stressed, deadlines are risked, and results-oriented staff will use alternative means of accomplishing their work on unmanaged devices. The Commission should continue to focus on the delivery and maintenance of a stable and secure technology platform that serves its staff.

Inspector General Reports Issued During this Period

The Inspector General issued 3 reports with 2 recommendations during this reporting period. The Commission made management decisions on all of the recommendations, and the Inspector General agreed with all of the management decisions.

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-17-12	<i>Management Report – Description of OUII’s Participation Selection Process</i>	05/03/2017	0
Administrative	OIG-ML-17-13	<i>Management Letter - Wounded Warriors Federal Leave Act</i>	05/11/2017	1
Financial	OIG-MR-17-11	<i>Management Report – IPERA Determination</i>	05/01/2017	1
Total recommendations issued during this reporting period				2
<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.

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Management Report - IPERA Determination, OIG-MR-17-11

RESULT: The Commission has complied with the requirements of the *Improper Payments Elimination and Recovery Act* (IPERA).

We performed an review of the Commission's Agency Financial Report and other documentation provided by the Office of the Chief Financial Officer. We determined that the Commission had complied with all of the requirements of IPERA and did not have any programs or activities susceptible to significant improper payments. Although the Commission met the requirements of IPERA, we did make a recommendation to the Commission to improve the effectiveness of its improper payment tracking process.

Management Report – Description of OUII's Participation Selection Process, OIG-MR-17-12

RESULT: A description of the process the Office of Unfair Import Investigations uses to decide participation in section 337 investigations.

The Office of Unfair Import Investigations (OUII) serves as an independent party representing the public interest in investigations of any alleged violations of unfair practices in import trade. At one time, OUII participated in every 337 investigation brought before the Commission. In light of caseload changes and budgetary constraints, OUII developed criteria to determine to determine if they should fully participate, partially participate, or not participate in 337 investigations. OUII began a pilot program using this new criteria in November 2010. The objective of this review was to describe the process the Office of Unfair Import Investigations used to decide participation in 337 investigations for management to help evaluate the effectiveness of the pilot program.

Management Letter – Wounded Warriors Federal Leave Act, OIG-ML-17-13

RESULT: The Commission did not establish a process to implement the *Wounded Warriors Federal Leave Act*.

The Wounded Warriors Federal Leave Act of 2015, created a new leave category entitled "disabled veteran leave". This leave is available to new Federal civilian employees, who are veterans, hired by Federal government after November 5, 2016. To be eligible, the veteran must have a service-connected disability rated at 30 percent or more for purposes of undergoing medical treatment for which sick leave could regularly be used.

We found that the Commission did not establish a process to implement the Wounded Warriors Federal Leave Act. As a result, it was difficult for our newly hired disabled

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veterans to request and use this new leave category to undergo medical treatment for service-connected disabilities. We issued one recommendation to the Commission to establish a process to implement disabled veteran leave.

Summary of Prior Period Reports

Reports without Management Decisions

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

Reports without Management Comments

The Commission has 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 11 recommendations described in prior semiannual reports. We have identified 4 of these recommendations—all related to the Commission’s system of internal rules—as significant. A brief summary of these 4 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 all complaints received to decide the appropriate course of action, and then conducts a preliminary inquiry into the complaint. If the information we find during the preliminary inquiry indicates that a full investigation is appropriate, we will launch an investigation of the allegation.

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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 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 agency 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

The Inspector General did not refer any matters to prosecuting authorities during this reporting period.

Summary of Reports Not Disclosed to the Public

The Office of Inspector General did not issue any reports that were not disclosed to the public during this reporting period.

External Reviews Completed During this Period

The Commission did not have any external reviews completed during this reporting period.

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Status of Actions Related to External Reviews Completed During Prior Periods

Office of Personnel Management

The Office of Personnel Management performed a review of the Commission's personnel security and suitability program. The objective of the review was to determine if the Commission had effectively implemented the performance goals and measures identified by the Performance Accountability Council and the Reform Effort.

The Office of Personnel Management issued the final report on February 14, 2017. The report contained six recommendations to improve the quality of investigation requests, report adjudicative determinations, revalidate clearances, and improve recordkeeping. The Commission has made management decisions to address the recommendations. The Commission completed final action on all six recommendations during this reporting period.

Equal Employment Opportunity Commission

The Equal Employment Opportunity Commission's Office of Federal Operations reviewed the Commission's progress towards carrying out the priority actions and strategies identified in the government-wide Federal Complement Plan. The review examined information about the use of Schedule A hiring authority; implementation of reasonable accommodation and anti-harassment programs; and barriers to employment in senior positions and in selected mission-critical operations.

The final report was issued on July 25, 2016. The report contained 14 recommendations to the Commission. Many of the recommendations involved collecting and analyzing data to learn if there were any discrimination barriers in hiring for executive positions and to improve managers' ability to focus on resolving the root causes of opportunity barriers. The Commission made management decisions to address the recommendations in the report. The Commission completed final action on all 14 recommendations during this reporting period.

Department of Homeland Security

The Commission requested the Department of Homeland Security perform a risk and vulnerability assessment of the Commission's information security posture. The assessment involved both remote and onsite testing of the Commission's information

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security. The testing revealed a number of problem areas that might place the Commission's systems and data at risk, including vulnerabilities caused by insecure web applications, ineffective internal security policies, and inadequate strategies to detect and prevent internal intrusions. The assessment did highlight the Commission's effective deployment of whitelisting, which strengthened the Commission's resistance to external phishing attempts.

The Department of Homeland Security issued the results of the assessment on July 9, 2015. The report had 16 recommendations for action to improve the Commission's information security. The Commission made management decisions to address the recommendations. The Commission had completed nine recommendations in prior reporting periods and completed final action on the remaining seven recommendations during this reporting period.

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.

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Congressional Activities

The Inspector General transmitted an annual report that affirmed the Commission's compliance with the Improper Payment Elimination and Recovery Act. In addition, as required by the *Inspector General Empowerment Act*, the Inspector General submitted two reports that contained recommendations to the congressional committees of jurisdiction.

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.

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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 two years, 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.	3	\$0	\$0
Subtotals	3	\$0	\$0
Reports for which a management decision was made during the reporting period.	3	\$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.	0	\$0	\$0
Subtotals	3	\$0	\$0

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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.	3	\$0
Subtotals	3	\$0
Reports for which a management decision was made during the reporting period.	3	
<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.	0	\$0
Subtotals	3	\$0

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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	Management Report – IPERA Determination, OIG-MR-17-11	1	1	0	1
2	Management Report – Description of OUII’s Participation Selection Process, OIG-MR-17-12	0	0	0	0
3	Management Letter – Wounded Warriors Federal Leave Act, OIG-ML-17-13	1	1	0	1
Totals		2	2	0	2
Prior Reporting Periods					
	Report Title	# of Recs.	Mgt. Decisions	Final Action Completed in Prior Periods	Final Action Completed This Period
1	Evaluation of Details, OIG-ER-17-01	1	1	0	1
2	Management Letter for FY 2016 Financial Statement, OIG-ML-17-07	3	3	0	3
3	Digital Accountability and Transparency Act Readiness Review, OIG-MR-17-08	4	4	0	4
4	Evaluation of Public Website Security, OIG-ER-16-13	3	3	2	1
5	Assessment of USITC Website Encryption, OIG-MR-16-10	2	2	1	1
6	Audit of Hardware Inventory, OIG-AR-15-11	5	5	4	1
7	Audit of Patching Process, OIG-AR-14-02	7	7	6	1
Totals		25	25	13	12

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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	
Totals	0	0	0	0	0	
Prior Reporting Periods						
Report Title	# of Recs.	Mgt. Decisions	Final Action Complete Prior Periods	Final Action Complete This Period	Action Not Complete	
1 Audit of Off-Site Facilities, OIG-AR-17-02	11	11	2	8	1	
2 Management Letter on Conflict of Interest Process, OIG-ML-17-10	1	1	0	0	1	
3 Audit of Directives Management, OIG-AR-15-14	11	11	1	1	9	
Totals	23	23	3	9	11	

Table 10: Statistical Table of Investigative Reports

Statistical Table of Investigative Reports Section	
Description	Count
Number of investigative reports issued.	0
Number of persons referred to DOJ for criminal prosecution.	0
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
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.	3	\$0
Reports for which final action had not been taken by the commencement of the reporting period.	10	\$0
Reports on which management decisions were made during the reporting period.	3	\$0
Reports for which final action was taken during the reporting period.	10	\$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.	3	\$0

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.	10	\$0
Reports on which management decisions were made during the reporting period.	3	\$0
Reports for which final action was taken during the reporting period including:	10	\$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.	3	\$0

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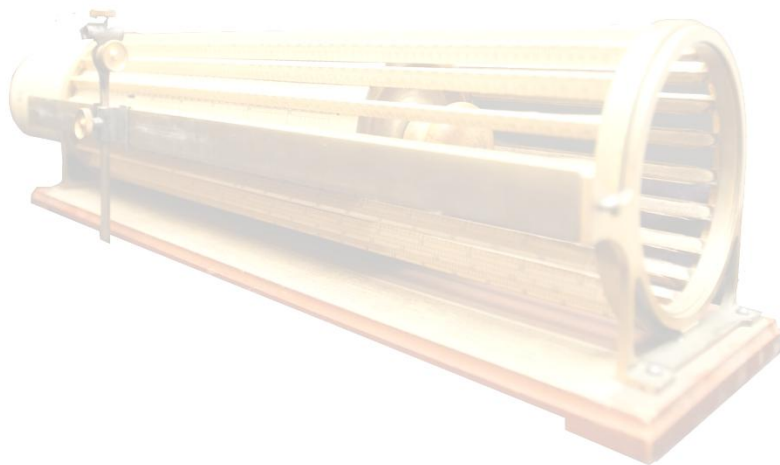
Appendix A

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-AR-15-14	09/02/2015	\$0	\$0	Provided in Part II B of the Chairman's Message

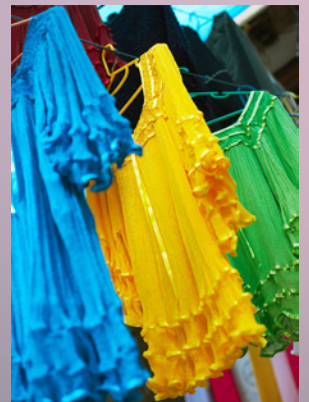
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“Thacher’s Calculating Instrument” developed by Edwin Thacher in the late 1870s. It is a cylindrical, rotating slide rule able to quickly perform complex mathematical calculations involving roots and powers quickly. The instrument was used by architects,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

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



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

Office: 202-205-6542
Fax: 202-205-1859
Hotline: 202-205-6542
OIGHotline@USITC.GOV