



**Supplement to the Strategic Human Capital Plan:
Reorganization of Agency-wide Administrative Functions
2009-2013**



June 2011

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UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

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MEMORANDUM

TO: Commission Staff

FROM: Deanna Tanner Okun, Chairman

SUBJECT: Supplement to the Commission's Strategic Human Capital Plan 2009-2013
Regarding Reorganization of Agency-wide Administrative Functions

I am pleased to present to you the Commission's supplement to the Strategic Human Capital Plan 2009-2013 (Plan), approving reorganization of agency-wide administrative functions. Human capital is the Commission's most important resource, so planning for an appropriate workforce is essential to the fulfillment of the Commission's mission.

The Commission approved the second edition of the Strategic Human Capital Plan 2009-2013 on January 29, 2010. Recent and ongoing audits and reviews by external financial auditors, the USITC Inspector General and the U.S. Office of Personnel Management identified performance and management weaknesses and deficiencies that affect the efficient administration of Commission resources. After a comprehensive review, the Commission determined to reorganize certain functions and allocate an increased share of the agency's resources to agency-wide administrative services to ensure it has sufficient resources and personnel with appropriate skill sets to perform critical, statutorily required administrative functions, including financial reporting, internal controls and security.

Therefore, the Commission has adopted the following changes to the Plan:

1. Create an Office of the Chief Financial Officer, which includes the budget, finance and procurement functions;
2. Reorganize the Office of Administration into the Office of Administrative Services, which includes the human resources, Secretary/dockets, and security and support services functions; and
3. Create a Deputy Chief of Staff to oversee the day-to-day management of administrative matters.

Reorganization of Agency-wide Administrative Functions

2011 Strategic Human Capital Plan
(Superseding 2009-2013 Strategic Human Capital Plan¹)

Executive Summary

Recent and ongoing audits and reviews by external financial auditors, the USITC Inspector General and the U.S. Office of Personnel Management identified performance and management weaknesses and deficiencies that affect the efficient administration of Commission resources. After a comprehensive review, the Commission determines to reorganize certain functions and allocate an increased share of the agency's resources to agency-wide administrative services to ensure it has sufficient resources and personnel with appropriate skill sets to perform critical, statutorily required administrative functions, including financial reporting, internal controls and security.² The efficient operation of administrative functions is required to support the programmatic mission of the USITC.

The Commission's holistic approach to this reorganization is necessary as the current offices of Administration, the Secretary and the Chief Information Officer provide the core administrative services to the agency.³ The Commission recognizes in developing this

¹ The Commission approved the second edition of the Strategic Human Capital Plan in January 2010, which reorganized the Office of Administration by separating the Office of the Chief Information Officer (OCIO). The approved plan identified major organizational challenges facing the Office of Administration. Two months before the Commission approved the Plan, the agency's fiscal 2009 financial statement audit resulted in a disclaimer of opinion. The Commission contracted with Federal Management Partners for an independent evaluation to assess the organization and allocation of resources of the agency's administrative functions. The consultant delivered its final report on August 11, 2010. The Commission sought and received comments on the report and recommendations from its Strategic Planning Committee and the Director of Administration. The Commission also consulted with its Inspector General.

² The Commission intends for this reorganization to be cost neutral, if not a cost savings measure to the agency. Over the years, the Office of Administration has had to rely increasingly on contractor support as the number of full-time equivalent (FTE) positions did not increase even though its reporting requirements grew. The Commission anticipates that the additional positions in this area will serve the agency in two ways. First, they target needs that largely have been unaddressed. Second, they should reduce reliance on contractor support. While relying on contractors is logical and cost-effective in the short term as it preserves flexibility while the Commission analyzed its recurring and transitional requirements, relying on contractor support over the long run may not be cost effective and, due to lack of continuity, may negatively impact performance of inherently governmental functions. In addition, the Commission intends for this reorganization to be FTE neutral. In the long-term, the Commission will re-allocate some FTE positions from the programmatic offices when the Executive Management Committee and the Commission next review the Strategic Human Capital Plan for those offices. The Commission already has done this with the recent transfer of staff and an FTE for the new Director of Finance.

³ The Chief Information Officer soon intends to reorganize OCIO to address the evolving nature of technology (e.g., electronic filing and cloud-based computing) and certain audit recommendations. The Commission is not presently addressing the OCIO, but does not anticipate that the reorganization will affect the structure of other offices.

reorganization that the agency faces an increased level of requirements imposed by Congress and the executive branch in the areas of information and personnel security, and the need to respond to regular audits of human resources management, financial reporting, and information security.

Therefore, the Commission adopts the following changes to the Strategic Human Capital Plan:

- **Create an Office of the Chief Financial Officer** – The Commission establishes a new Office of the Chief Financial Officer (OCFO) with a Chief Financial Officer that reports directly to the Commission. The Office includes the USITC’s financial, budget, procurement, and financial reporting internal control functions. The Office integrates robust financial planning and reporting into the management of the agency. The Office provides managers with access to timely, reliable, and practical information concerning the financial affairs of the USITC to assist managers in program planning and decision-making.
- **Reorganize the Office of Administration** – The Commission reconfigures the current Office of Administration (AD) into the Office of Administrative Services (OAS). The Office retains the Office of Human Resources. To maintain the official records and documents of the agency, the Commission subsumes the Office of Docket Services into the Office of the Secretary and places the newly constituted Office within OAS. In order to ensure the safety and welfare of its personnel and to protect and maintain its assets, the Commission creates the Office of Security and Support Services within OAS. The Office includes the following functions from AD: the Personnel & Physical Security Officer and the Office of Facilities Management, which oversees the management of the building and various support services. The new Office includes the following functions from the Office of the Chief Information Officer: the security of physical information assets (both national security information and controlled unclassified information) and continuity of operations program.
- **Create a Deputy Chief of Staff** – The Commission creates a Deputy Chief of Staff (DCOS) to oversee the day-to-day management of administrative matters. The DCOS serves as the USITC’s audit follow-up official and liaison between management and the Office of the Inspector General. The DCOS is a permanent, career employee who provides continuity to the Commission during statutorily required leadership changes (the Chairman and Vice Chairman must rotate every two years).

The Commission has determined to pursue the following approaches as necessary to the successful implementation of the reorganization:

- **Update Policies and Procedures** – The USITC must implement new policies and procedures and train staff throughout the agency on these policies and procedures. The USITC must maintain and update the policies and procedures, monitor compliance, test for viability, and report on the results. Further, all areas of administrative practice must develop transparent reporting processes

and performance metrics to ensure that internal customers have what they need to perform their functions and that the USITC prudently manages its resources.

- **Acquire Appropriate Expertise through Hiring or Training** – In view of the recent audit findings and reviews confirming that the USITC lacks the necessary technical and analytical expertise required to provide the appropriate management of agency resources, the Commission will acquire appropriate skill sets either through hiring or training.
- **Update the USITC Strategic Plan** – The Commission has requested the Executive Management Committee to review and revise the USITC strategic plan to consider establishing a separate goal for agency-wide administrative support activities, which are provided by the Office of Administrative Services, Office of the Chief Financial Officer, and Office of the Chief Information Officer. The strategic plan should recognize the statutorily mandated reporting requirements for these types of functions including (1) financial management, (2) human resources, (3) personnel, physical and information security, (4) internal control, and (5) technology. The plan also should include a vision statement that includes customer service goals and metrics.
- **Update Mission and Functions Statements** – The Commission expects senior management to review, revise and create mission and functions statements of the component levels of the Office of Administrative Services and the Office of the Chief Financial Officer to reflect this Strategic Human Capital Plan.

Offices Subject to Reorganization

The following offices and their functions are subject to the reorganization.

Office of Administration

AD provides administrative and support services to the Commissioners and USITC operational divisions. AD compiles the Commission's annual budget, prepares the appropriation and authorization requests, and monitors budget execution. AD provides human resource services – including collective bargaining with union representatives – procurement, dockets, and facilities management services, and oversees USITC physical and personnel security matters. Component offices include Human Resources, Facilities Management, Finance, Procurement, and Docket Services. These offices provide the following services:

- **Office of Human Resources** – Provides administrative and support services to USITC in the areas of human resource management, including staffing and recruitment, classification and position management, performance

management and awards, benefits, payroll, records, and related functions. The Office also provides advice and counsel to customers as needed, manages labor and employee relations, and arranges training opportunities.

- **Office of Facilities Management** – Provides management and support services to ensure an adequate level of facility services for USITC. The Office of Facilities Management also serves as liaison with the lessor of USITC's space and administers the facilities, property, furniture, supplies, space, and equipment management programs, as well as the occupational health and safety program and the occupant emergency program. In addition, the Office administers the vehicle reservation program and manages the budget and accounting for AD.
- **Office of Finance** – Provides financial services to USITC, including management of the accounting system, obligations and disbursements, payroll, and travel management claims. The Office of Finance also is responsible for financial reporting, managing controls over financial operations, and maintaining policies, procedures, and documentation per applicable laws and regulations.
- **Office of Procurement** – Manages all USITC procurement activities, including service contracts, furniture, supplies, and equipment, and ensures that the Commission's procurement system meets the requirements of applicable laws and regulations. The Office of Procurement also is responsible for entering into, administering, and terminating contractual relationships. The Office provides senior management with business advice relating to USITC's purchasing requirements.
- **Office of Docket Services** – Processes over-the-counter and electronically filed documents in the Electronic Documents Information System (EDIS), the repository for documents filed in investigations before the Commission. The Office utilizes a case management structure to manage the information flow in EDIS and to facilitate the investigation and litigation process. The Office also manages the Commission's mediation program to facilitate the settlement of intellectual property based disputes.

Office of the Secretary

The Office of the Secretary maintains the official records and documents of the Commission. The position of Secretary is provided for by statute (Section 331(a) of the Tariff Act of 1930, as amended (19 U.S.C. 1331(a))). The Secretary issues official notices and maintains records of Commission meetings and hearings, prepares the agenda and official minutes for Commission meetings, and prepares for hearings, including the calendar of witnesses, and all logistical details. The Secretary oversees and preserves the official records of the USITC, makes initial determinations as to whether a document qualifies for confidential treatment, and maintains the list of potential APO breaches. In addition, the Secretary is the custodian of the USITC Seal, maintains the Official Filings Desk and the Public Reading Room, serves as the Freedom

of Information Act (FOIA) Officer, and Privacy Act Officer. The Secretary has lead policy responsibilities for EDIS and e-filing and serves as a contact point for public inquiries and dissemination of USITC publications and other documents. Other functions of the Office include maintaining the Commission history, acting as the Government Passports Agency Acceptance Agent, and providing notary services. The Office currently reports directly to the Commission.

Office of the Chief Information Officer

In addition to its other responsibilities, OCIO oversees the security of physical information assets (both national security information (NSI) and controlled unclassified information (CUI)) and the Commission's continuity of operations (COOP) program. OCIO oversees the resources used to protect both NSI and CUI information such as storage facilities and network infrastructure. OCIO ensures continuity of the agency's mission by assessing and managing risk, allocating resources, and documenting appropriate responses in the event of a natural or man-made disaster.

Challenges

The Commission faces six inter-related challenges with regard to the administrative functions, which include (1) strengthening internal control (documentation, monitoring, testing and reporting), (2) acquiring appropriate expertise, (3) responding to increased reporting requirements, (4) building a customer service culture, (5) strengthening security and contingency planning, and (6) increasing continuity from one Chairman to the next.

Strengthening Internal Control, Staff Expertise, Information Security

The USITC Inspector General recently identified the top management and performance challenges facing the Commission, which include (1) internal control, (2) financial management, and (3) information technology security. Outside auditors also provided similar insights. The Commission concurs with these challenges.

Management Challenge: Internal Control – Reviews performed over the past year have identified issues associated with weak internal control. The most significant weaknesses identified were noncompliance with the *Federal Manager's Financial Integrity Act and OMB Circular A-123, Management's Responsibility for Internal Control*. Although initially identified by the auditors in the financial management area, the internal control weaknesses appear to be widespread throughout the agency because the Commission has a long standing culture of undocumented and informal processes to complete daily tasks.

Documented and consistent processes and procedures are necessary to provide a reasonable level of assurance that all units are operating in an efficient and cost-effective manner. The USITC must maintain and update the policies and procedures, monitor compliance, test for viability, and report on the results. The most significant challenge will be to manage the cultural changes associated with implementing new systems of internal control throughout the agency.

Management Challenge: Financial Management – The Commission is responsible to ensure that managers have access to timely, reliable, and practical information to make informed decisions. Recent reviews have found that the Commission lacks the systems or core competencies required to integrate and coordinate budget formulation, execution, and financial reporting into a comprehensive financial management program that provides accountability for agency funds and provides essential data to managers for decision making purposes.

Recent reviews have found that the Commission does not have the appropriate technical systems expertise to provide managers with adequate, timely financial information to administer budget execution activities. Thus, managers may lack information needed to effectively monitor the expenditure of funds, evaluate program performance, and make informed financial decisions on their programs and operations.

Further, the Commission lacks the necessary technical and analytical skills required to provide the appropriate management of agency resources.

The external auditors hired by the Inspector General to audit the Commission's financial statements recently opined that the Commission

did not have adequate resources and personnel with appropriate skills sets and expertise to perform financial management accounting and reporting. To address previously identified internal control weaknesses, [USITC] augmented its staffing through the use of consultants to assist in performing its financial management operations. As a result of these efforts, [USITC] was able to improve its financial reporting accordingly. However, we noted that [USITC] placed significant reliance on the consultants for financial management expertise. Although the reliance on consultants may be necessary, in the short-term, to expedite the resolution of the weaknesses identified, [USITC] needs to ensure that it has the skills and expertise on staff going-forward.

Significantly, with the push toward relying upon service contractors instead of hiring permanent employees, USITC service contracting has increased from \$3.6 million in FY 2001 to \$12.1 million in FY 2010. A service contract is the most complex type of contract from a procurement planning and administration standpoint.

Budget formulation, budget execution, accounting, and financial reporting should be fully integrated and have transparent processes that promote accountability and deter potential fraud, waste, and abuse of agency budgetary resources. The Commission must transform

the current approach to financial management from an accounting exercise to a process that provides transparency and accountability in the formulation, execution, performance, and management of agency budgetary resources.

Management Challenge: Information Technology Security – In order for the Commission to fulfill its core strategic goals, members of the public who submit proprietary business information must trust that it will be protected. The Commission must ensure that the proper security controls are in place to protect and secure sensitive data.

The use of information technology is an integral component of the Commission's day-to-day operations. The Commission currently does not have a disaster contingency plan in place to restore data and operations if an event were to occur that disabled the network. Without a plan, the Commission may not be able to restore core business functions or minimize the disruption of services.

Responding to Increased Reporting Requirements

Over the last decade, additional statutory and regulatory reporting requirements have been placed on small agencies. These requirements have significantly added to the workload of personnel, particularly those involved in administration. The following is a non-exhaustive list:

Finance & Budget

The Commission has never had significant financial management resources or expertise. The focus has always been on accounting and budget formulation and presentation. Significant financial management capabilities were not required prior to the legislative changes beginning in 2002 but are necessary now.

- The Accountability of Tax Dollars Act of 2002 requires the USITC to fully comply with an array of financial management requirements including the Federal Managers' Financial Integrity Act and Federal Financial Management Improvement Act. As a result, the Commission is required to produce audited financial statements and unaudited quarterly financial statements;
- The Improper Payments Elimination and Recovery Act of 2010 (IPERA), enacted on July 22, 2010, requires the development of policies and procedures for the prevention and detection of improper payments in the federal government. The Act expands on the Improper Payments Information Act of 2002 (IPIA), which requires an initial assessment to identify those programs that are susceptible to significant risk of improper payments; and
- The Government Performance and Results Act (GPRA) requires the integration of performance and budget, which places greater emphasis on the Commission's labor cost system.

Facilities/Security/Emergency preparedness

- Upgraded physical security requirements post Oklahoma City and the September 11 attacks;
- COOP requirements (from FISMA and Presidential Decision Directive 67 - 1998); and
- HSPD-12 employee badge implementation and annual report began in FY 2004.

Human Resources

- GPRA brought about human capital planning. The USITC first developed a strategic human capital plan in 2004. Human Capital Management Reports are sent to OPM (quarterly);
- Senior Executive Service certification and new pay systems came into effect in 2007-08. The program needs to be certified annually;
- Hiring reform initiative in 2010 is required by Executive Order in 2010; and
- The new performance management system was developed and implemented in 2005-2006 and was developed in part as a response to performance management requirements of the National Defense Authorization Act of 2004.

Building a Customer-Focused Culture

As a support organization, the services AD performs are critical to ensuring that the Commission achieves its mission and goals. Recent reviews found that AD lacks a robust customer-oriented administrative support culture, which reduces its ability to effectively and efficiently support USITC organizations and operations.

Strengthen Security and Contingency Planning

Various offices manage security related matters. The Personnel Security and Physical Security Officer reports to the Director of Administration and manages personnel and physical security. This position oversees the guard contract. OCIO oversees the security of physical information assets and the USITC's COOP program. Recent reviews found limitations with many of these programs and suggest that they require additional management and planning resources in order to ensure that the agency has an effective security program.

Strengthen Commission Oversight

The structure of the Chairman's office has remained the same for approximately two decades. Each Commissioner's office has funding to support three aides and a confidential assistant. The Office of the Chairman is authorized one additional position to serve as the Chairman's Chief of Staff, who oversees agency management and administrative functions. Although this structure has worked reasonably well over the years, it has significant drawbacks. As the Commission's leadership changes every two years (by law, the Chairman and Vice Chairman must be of different political parties and must rotate every two years), the Chairman, the Vice Chairman, and the Chairman's Chief of Staff normally have steep learning curves. Moreover, with each rotation, this structure engenders a lack of continuity, both in terms of processes and record keeping.

In recent years, various factors have imposed significant additional management responsibilities on the Commission and the Chairman's office in particular. These include the increased statutory and regulatory reporting requirements. Moreover, the Commission's Office of Inspector General now has more staff and has undertaken a more active investigation and audit program. The Inspector General's recent focus has been in the areas of human resources management, financial reporting, and information security. The Inspector General's five-year plan, however, will expand into the Commission's programmatic areas as well. Finally, the Commission recognizes that it must devote additional time and resources to manage the reporting requirements and audits. The Chairman's office participates actively in the audit process and the Chief of Staff serves as the agency's audit follow-up official, which requires overseeing the development of management decisions to respond to audit findings and ensuring that those management decisions are implemented in a timely manner. These increased responsibilities strain the resources of the Chairman's office and, as such, limit its ability to guide the agency's management.

Workload

The basic functions of personnel, accounting, finance, budgeting, procurement, facilities support service, and security require additional resources and staff expertise due to increased statutory and regulatory reporting requirements. Despite the increasing reporting requirements, AD's authorized staffing levels have remained largely unchanged at approximately 44 permanent FTE positions, and reported work hours for most of AD have been essentially unchanged in the last 20 years.⁴ These statistics, however, are misleading. As evidenced by the recent audits, necessary functions and responsibilities were not assigned. Thus, workload statistics did not increase with the work requirements.

⁴ Generally, the workload is predictable both in terms of overall level and the ebb and flow during the year. The one exception to this statement is Dockets, as that workload varies according to the level of somewhat unpredictable case filings. The variable component of the workload, other than its volume, is the distribution of the overall administrative workload burden between the administrative offices and the operating units. Almost all administrative functions require staff in operating units to participate, whether that is a recruitment action or a procurement action or a request for equipment. This shared responsibility will require better documentation of the various administrative processes than is currently the case.

The increase in work has been met largely through contractors. USITC service contracting in Administration has increased from \$1.3 million in FY 2001 to \$5.2 million in FY 2010. This includes \$1.2 million for core financial management support and more than \$800,000 in direct support of other AD activities due to high vacancy rates.⁵ A drawback of extensive use of contractors was the lack of development of in-house capabilities needed for the long term. Auditors found that many staff lacked the appropriate skills sets and expertise to perform their functions. Further, auditors found that existing staff were spending time on data entry and other functions that more efficiently could have been done by financial management software and contractors. A more efficient use of resources would have freed staff time to perform the more important analysis and management oversight functions now being done by consultants.

Even with more efficient use of staff time, workload is expected to increase in the near term as the agency continues to improve upon its implementation of statutory and regulatory requirements. Once administrative staff and other agency staff are trained, and they implement robust internal controls, workload performed by internal staff should then remain at an increased level, although efficiency gains may mitigate the increase.

Solutions to the Challenges

Beginning with disclaimer of opinion on the Commission's Fiscal Year 2009 financial statement audit, which highlighted the financial management deficiencies and challenges that the agency faced, the Commission began developing an aggressive and comprehensive strategy to address the findings. As a result of the major efforts taken during FY 2010, the Commission was able to achieve a qualified opinion on the Commission's FY 2010 financial statements. While this was a significant improvement, the Commission recognizes that it has much more to do to ensure that it efficiently manages the resources entrusted to the agency. Concurrent with the FY 2010 audit, the Commission began to assess existing staffing agency-wide to identify the skills and personnel resources needed to implement new internal control and financial management procedures. The Commission also conducted a thorough review of its administrative functions generally.⁶

In order to address the deficiencies identified by recent audits, the Commission intends to reorganize certain functions, establish new financial management and security structures, hire or train staff with requisite high-level analytical and communication skills, and ensure transparency and accountability in the formulation, execution, performance, and management of agency budgetary resources. In doing so, the Commission will allocate an increased share of the agency's resources to agency-wide administrative services.

⁵ Over the past year, the Commission allowed the vacancy rate in AD to remain high while relying more heavily on contractor support in order to evaluate the needs of the agency for this human capital review.

⁶ The Commission contracted with Federal Management Partners for an independent evaluation to assess the organization and allocation of resources of the agency's administrative functions. The consultant delivered its final report on August 11, 2010. The Commission sought and received comments on the report and recommendations from its Strategic Planning Committee and the Director of Administration. The Commission also consulted with its Inspector General.

In order to achieve a comprehensive remedy, the Commission adopts a two-step transformation of the agency's administrative functions (interim and future states). The Commission plans to begin the reorganization immediately, and it anticipates moving from the interim state to the future state within a six to 12-month timeframe.

Create an Office of the Chief Financial Officer

The Commission establishes a new Office of the Chief Financial Officer (OCFO) with a Chief Financial Officer (CFO) who reports directly to the Commission. The CFO will be a Senior Executive Service (SES) level position, and the Commission places urgent importance on recruiting and hiring a CFO with the requisite skills and federal expertise to address the financial management and reporting challenges identified above.

The Office of Finance, the Office of Procurement and the budget functions, which currently report to the Director of Administration, will report to the CFO. The Commission establishes an Office of Budget within OCFO. The CFO will acquire or train personnel with the necessary high-level technical and analytical skills to integrate and coordinate budget formulation, execution and financial reporting, including financial reporting internal controls, and procurement into a comprehensive financial management program that provides accountability for agency funds and essential data to managers for decision-making purposes.

Future State

The Commission anticipates creating or altering nine positions in the OCFO in the future state.

Chief Financial Officer (SES) is a Certified Public Accountant and/or Certified Government Financial Manager who is responsible for the development, management, coordination and direction of the Commission's financial management programs and services, enabling the agency to enhance its financial management functions and to improve financial management operations and accountability. Subordinate managers and organizational elements assist the CFO in implementing these responsibilities. The CFO oversees the budget, procurement, accounting, financial management, financial reporting internal controls, risk management, and asset evaluation, and is responsible for the development of efficient financial and administrative reporting and data information systems. The CFO assists and fully participates with the Chairman, other senior staff, and the Commission in the formulation of long-range strategic plans, as well as short-term program goals and objectives to accomplish the mission of the agency, and ensures that the plans are consistent with the overall goals and objectives of the Commission, applicable laws and regulations, and fulfill the objectives of the strategic plan. The CFO organizes and coordinates all of the agency's financial activities, including budget formulation and execution; procurement; financial operations revenue projections; financial reporting, related internal controls, and analysis; facilitating and providing information for annual and other audits. The CFO is responsible for adhering to all applicable federal regulations and standards and all accounting standards applicable

to the Federal Sector. Working closely with senior managers, the CFO is responsible for interactions with Congressional staff regarding financial and budgetary matters. OPM recently approved an SES allocation for this new position.

Director of Budget (GS 14/15) directs and oversees the following functions: (1) budget formulation – develops instructions for program offices, calls for estimates, prepares estimates, and reviews and consolidates estimates; (2) budget presentation – advises the CFO, the Executive Management Committee, and the Commission of funding requirements, and recommends funding of programs that reflect the agency’s priorities; and (3) budget execution – oversees funds control (safeguards funds, properties and other assets against waste, loss, misappropriation or unauthorized use), manages program adjustments, reviews and prepares reports. Currently, the Commission has a senior budget analyst promoted temporarily to serve as a Budget Officer. In the future state, the Director will oversee the Office of the Budget.

Internal Auditor / Financial Controls Manager (GS 13/14) is responsible for researching laws, regulations, and standards issued by accounting boards and related professional organizations including, the Federal Accounting Standards Advisory Board (FASAB), American Institute of Certified Public Accountants (AICPA) and Institute of Internal Auditors (IIA). He or she reviews financial systems and agency-wide programs to ensure compliance with policies, plans, procedures, laws and regulations that could have a significant impact on the Commission’s financial reporting and operations. He or she serves as a liaison with auditors; assists in the implementation of recommendations from internal audits; communicates results of internal audits to stakeholders; establishes quarterly audit plans and audit programs; and follows-up on audits for the implementation of recommendations. Internal audit responsibilities include financial, internal controls, FISMA, Inspector General, GAO, and any other audits applicable to the Commission. He or she acts as the Competition Advocate. Portions of this position currently are filled by a contractor.

Systems Accountant (GS 13/14) is the technical expert on all financial systems and financial reports used by the Commission, including Oracle and FPPS. He or she oversees Oracle reporting and database issues, produces financial statements and underlying reports. The Systems Accountant provides reports for customers in operational units regarding a number of financial areas reconciling budgetary and proprietary accounts, and manages issues with the financial system. He or she possesses experience in compiling Federal financial statements and the Performance and Accountability Report in accordance with applicable standards. Portions of this position currently are filled by a contractor.

Financial Manager (GS 13/14) assists the Director of Finance in implementing a comprehensive financial management program. He or she monitors and assesses the impact that new or revised laws and regulations may have on the financial operations and financial reporting requirements applicable to the Commission. The Financial Manager monitors and documents compliance with relevant internal controls, laws, regulations and standards. He or she revises the accounting manual to document accounting policy for financial reporting and other financial cycles and trains all employees responsible for the accounting function to ensure that financial transactions are properly classified and reported. He or she coordinates

and oversees actions with respect to the following quarterly reviews: the open obligations/accounts payable review, the prepaid expense review, the purchase card transaction review, and the improper payment review. The Financial Manager ensures the property, plant, and equipment working files are in good order, and regularly reviews period-to-period trial balance variances. Currently, the Senior Accountant fills this role.

Program Analysts (GS 11/12/13) serve as technical advisors to the CFO on a range of financial matters related to process improvements, managerial policies, practices, and procedures governing agency wide fiscal programs. The analysts apply knowledge in the conduct of special studies, applying both technical and financial expertise. They provide technical guidance and advice on all business process re-engineering matters. The analysts analyze feedback directly from customers for input into the revising operating procedures as they relate to financial, budget, and procurement matters. The analysts conduct briefings to communicate findings, provide advice, and recommendations on course of action, implementation plans, directives and guidelines. Specifically, they conduct in-depth analytical studies and/or projects and analyze financial data, requirements, to determine how to resolve problems or improve financial reporting.

Junior Contract Specialist (GS 11/12) is responsible for administering routine contracting functions: executing simplified acquisitions, conducting market research, modifying contracts, terminating contracts, and closing contracts. The Contract Specialist also oversees the Commission's purchase card program. The Contract Specialist maintains the reconciliation files and ensures that internal controls and current laws and regulations are followed, including adherence to the FAR. Currently, an internal USITC detail fills this role.

Junior Contract Specialist (GS 5/7/9) performs both professional and technical contracting functions: executing simplified acquisitions, conducting market research, modifying contracts, terminating contracts, and closing contracts. The Junior Contract Specialist also serves as a purchase card holder for the agency.

Interim State

To address critical areas, the Commission has undertaken a thorough assessment of the skills and personnel resources needed to implement new internal control and financial management procedures, and it is updating its Strategic Human Capital plan accordingly. The Commission already has added financial management expertise by appointing a new Director of Finance, who is a CPA, adding a financial analyst term appointment, and approving a program analyst position. The Commission also has sought and received approval from OPM for an out-cycle SES allocation for a Chief Financial Officer. In addition, during the interim state the Commission is utilizing contractor support for systems accounting and internal controls. The Commission also continues to use contractor support and internal USITC details for several procurement positions. Once the Procurement filing system is updated and completed, Procurement will need to be staffed only to address procurement matters relevant to a small agency. Finally, recruiting and filling positions for the new

OCFO organization cannot be completed before the end of the current fiscal year. Therefore, the Commission must rely on additional contractor resources through calendar year 2011 to prepare for the FY 2011 financial audit.

The Directors of Finance and Procurement and the Senior Budget Analyst will report to the Chief Administrative Officer until a CFO is in place. Once a CFO is hired, the OCFO will be created and the Finance, Budget, and Procurement functions will be transferred to the new Office. In the interim, the CAO will serve as the acting CFO.

Through attrition and retirements, the Commission anticipates a future state of 20 FTEs in the OCFO. Thus, this new plan represents a net addition of four positions (CFO, Junior Contract Specialist and two Program Analysts) as the Commission anticipates that several of the newly created positions (Systems Accountant, Internal Auditor / Financial Controls Manager, and Procurement Assistant) will reduce or eliminate the need for contractors, resulting in cost savings to the agency. In addition, roles will change from the interim to future states (Financial Manager vice Senior Accountant through attrition). To enhance the CFO's likelihood of meeting the challenges of standing up a newly created organization, all hiring decisions for the newly created positions (Director of Budget, Systems Accountant, Internal Auditor / Financial Controls Manager, Program Analysts, Financial Manager, Junior Contract Specialist, and Procurement Assistant) will not be finalized until a CFO is hired by the Commission. The exception is that the currently vacant Travel Manager position can be advertised and filled in the interim.

Most agencies with a CFO organization situate Budget and Finance within the Office. Practice is mixed with regard to placing Procurement in the CFO organization. After careful deliberation, the Commission included Procurement in the OCFO to advance the following goals. First, there are some natural synergies between the subject matter and functions that will be overseen by the CFO and those involving the Office of Procurement. The status and implementation of large contracts have a significant impact on both budget considerations and effective financial accounting. Second, several large cost centers are overseen by the Office of Administrative Services, including payroll, rent, and other facilities associated expenses such as the guards/physical building security. This approach provides for more transparency and seeks to provide some separation of duties between the financial tracking and accounting functions, and those cost centers using the funds to execute operational requirements.

The Commission intends to create the OCFO and the aforementioned new positions based upon the current needs of the agency. The Commission, however, anticipates that the CFO likely will wish to re-assess the OCFO structure once he or she is in place.

Reorganize the Office of Administration

The Commission reorganizes the current Office of Administration into the Office of Administrative Services (OAS) with a Chief Administrative Officer (CAO), a SES-level position, who reports directly to the Commission. The Commission adopts a two-step process to address the challenges facing AD. First, the Commission reorganizes the Office to

streamline and focus functions. Second, the Office must acquire or train personnel with the necessary high-level analytical and customer-service skills to serve as an efficient, effective support organization.

The new OAS organization consists of the following offices: Human Resources (HR), the Secretary, and Security and Support Services.

Human Resources

Future State

HR would retain most of its current structure. The exception is creating a Training Officer position. The Director of HR will report to the CAO. The Commission anticipates creating one new position in HR in the interim and future states.

Training Officer (GS 13/14) develops and monitors a training curriculum for each office within the Commission. He or she reviews all individual development plans (IDP), meets annually with every employee to review their training plan and IDP, advises managers on appropriate training, develops and maintains a management development program, and prepares an agency wide training program for basic training needs. The Training Officer serves as the agency's technical authority on training, career development and succession planning, ensuring consistency with government-wide requirements and standards and consideration of current state-of-the art practices. The training officer also adopts or develops an instructional design system appropriate for the USITC environment. This position currently is filled by a contractor.

Interim State

During the interim state, the Commission continues to use contractor support for HR training. Thus, this new plan represents a net addition of one position (Training Officer) in exchange for fewer contractors.

Office of the Secretary

Future State

Several years ago, the Commission severed Dockets from the Office of the Secretary in order to provide the CIO with control over the manual processes supporting EDIS while it developed a fully accredited system. The process of reengineering internal Dockets processes and the alignment of those processes with system's functionality has been completed. Therefore, the Commission realigns the Secretary and Dockets as both offices are stewards of the Commission

records.⁷ The combined Office of the Secretary executes Commission rules and regulations relating to filing documents with and obtaining notice of decisions from the Commission. The Secretary speaks for the Commission on certain matters and works with the Commission in scheduling and conducting Commission meetings and hearings and maintaining Commission voting records. The merged office will have agency-wide responsibilities for case management, investigative records management, and other services.⁸

The Commission expects the Secretary to evaluate all functions of the combined office, including document flows and process management, in order to re-engineer the process to promote service, customer focus, efficiency, accuracy and high quality work product. The Commission expects recommendations on changes in procedures and reporting structures to better capture the efficiencies offered by Dockets' case management model, improved electronic document handling and related process improvements and separation of approval authority and execution. Process redesigns will result in improved internal controls and metrics that measure quantifiable objectives.

The merged office will be administratively divided into two functional divisions, Hearings and Information Management Division and Case Management Division, generally based upon the existing duties performed by staff in the Office of the Secretary and Docket Services. The Hearing and Information Management Division manages hearings, Commission documents under the agency Records Management program, FOIA, Privacy Act, general correspondence, general Federal Register notices, and action jackets. The Case Management Division manages the process by which documents are filed with the Commission and placed on the record in investigations before the Commission. It also manages the Commission's mediation program to facilitate the settlement of intellectual property based disputes.

The merger will lead to cost savings based on reduced staffing levels through consolidation, attrition, reassignment, and the increase in e-filing once rulemaking is completed. Thus, the number of FTEs will decline from 21 to 16. Several positions will need to be reviewed to determine if higher levels of responsibility are not credited within current position descriptions.

The Commission anticipates creating the following positions in the Office of the Secretary in the future state from positions that exist currently. Many positions will see increased responsibilities. The Commission expects the Secretary to re-assess the positions and responsibilities once e-filing has been implemented.

Hearings and Information Management Officer (GS 13/14) is the principal advisor responsible for managing hearings and provides independent advice to the Commission's leadership on all aspects including interpreting related administrative rules. He or she also directs and/or supports a significant part of the Commission's Records Management, FOIA, and Privacy Act programs and actively works to streamline service delivery and improve

⁷Dockets processes over-the-counter and electronically filed documents, and the Secretary maintains the official records and Commission history.

⁸ The Secretary will serve as the Freedom of Information Act Officer and Privacy Act Officer. The Office also manages the Commission's mediation program to facilitate the settlement of intellectual property based disputes. The Office also maintains the Commission history, acts as the Government Passports Agency Acceptance Agent, and provides notary services.

customer service using technology whenever possible. The Hearings and Information Management Officer conducts meetings and hearings and maintains the voting record of the Commission in the absence of the Secretary. He or she prepares the official minutes of Commission actions, acts as a control point for executive correspondence and all other documents circulated through the Commission, and generally acts in the Secretary's absence in a number of administrative matters. He or she also is the COTR on the Court Reporting contract. Portions of this position currently are filled by the Hearings and Meetings Coordinator.

Records Management Specialist (GS 11/12) is responsible for the planning, development, controlling, organizing, training, promoting, assessing and administration of the office records management program, including destruction of all materials filed into EDIS after a minimum of three internal checks to verify the accuracy of the information. He/she also monitors database accuracy for FOIA, publications, and CISP. He/she processes FOIA requests, handles reporting requirements, and is responsible for special projects. This position currently resides in Docket Services as a high-level case manager.

Hearings and Meetings Assistant (GS 7/9) is responsible for backup support for all administrative functions in the Office of the Secretary, including the Case Management Division. The functions of the position primarily relate to providing clerical support for Commission hearings, maintaining /reviewing official records, processing /reviewing requests for assistance, preparing correspondence, recordkeeping, distributing mail, reporting requirements, word processing support, managing, designing and distributing reports, and providing clerical assistance to the staff. He or she is the timekeeper and maintains the related files. This position currently exists, but its duties will be expanded.

Information Assistant (GS 7/8) is responsible for ensuring compliance with all requirements for access and handling of business proprietary information. He or she reviews all Federal Register notices, letters, and other documents for the Secretary's signature. In the future state, two Information Assistants will replace the current higher-graded Information Specialist.

Supervisory Attorney (GS 13/14) is responsible for leading Case Management staff in maintaining a comprehensive legal document processing system (EDIS) for Title VII and 337 investigations material, including internal controls, security, document maintenance and disposal. The Supervisory Attorney manages policy and procedure development to implement the legal requirements in USITC filings and hearings. He/she also manages the Section 337 Mediation Program, under the oversight of the Chairman and in consultation with the chief Administrative Law Judge and the General Counsel. He/she directs legal quality assurance, ensuring that the office processes comply with applicable rules. The Supervisory Attorney reviews all publications and guidance for the public involving EDIS and all draft Institution Memoranda and Certified Lists prepared by Case Managers. He/she performs systems analysis to troubleshoot problem documents and resolves issues. The Supervisory Attorney is responsible for the full range of HR, financial and administrative responsibilities for the unit and its staff. Currently, this position is being filled temporarily by the Attorney Advisor.

Attorney Advisor (GS 12/13) directs the Division's legal quality assurance activities. He or she reviews and enhances quality assurance processes and manages workflow. He or she reviews the case managers' work, spot checks queues for appropriate workflow, designates back-ups when necessary and prepares weekly reports regarding metrics and document workflow. The attorney advisor also assists with managing the Mediation Program and guides the development and maintenance of operating procedures for the office. Currently, this position is being filled temporarily by a case manager.

Case Managers (GS 9/11) are responsible for document intake, processing, filing, review and publication to EDIS, in addition to training the public in all aspects of the USITC docketing system. Two (2) Title VII Case Managers have additional responsibilities for coordinating with the Office of the Secretary and the OINV, ensuring that Action Requests are handled properly. He or she reviews questionnaire responses for accuracy and works closely with OINV to ensure that releases of confidential business information (CBI) under Administrative Protective Orders (APO) are handled properly. Three (3) Section 337 Case Managers are assigned to two (2) individual judges each so that the public has a person to contact for information about each case before the ALJs. They are responsible for processing all orders, tracking motions, and service of the judges' rulings. They are also responsible for the EDIS Help Desk, preparing Institution Memoranda for OUII for new complaints, and preparing certified lists for the Court of Appeals for the Federal Circuit for investigations on appeal. Currently, there are eight case managers. Four case managers are on detail to other positions/offices, and three of those slots are backfilled by contractors. In the future state there would be seven case managers.

Legal Documents Assistant (GS 6/7/8) reviews and processes hard-copy over-the-counter filings for compliance with applicable rules, e.g., Title VII, 332, 204, 22, 131, 303, 406, 503, 751(b &c), 1205, and 201; and regarding Section 337 cases, protective orders under Title VII and NAFTA. He or she is responsible for the tracking, distribution and collection of documents for internal customers. The Legal Document Assistant performs some case manager duties including processing and reviewing all filings for pre-institution complaints and unassigned Section 337 investigations in the Electronic Document Information System (EDIS). He or she assists the Title VII case managers in processing and preparing APO releases, and also assists in the collection of Section 337 and Title VII data. He or she responds to information requests from internal and external parties and serves as an authoritative technical resource regarding the release of confidential business information (CBI) and Business Proprietary Information (BPI). Once e-filing is implemented, this position will handle the residual over-the counter document scanning. While the current staffing plan calls for two Dockets Clerks, when the Commission completes its rulemaking on e-filing in all proceedings, one of these positions will no longer be necessary. Currently, a contractor is backfilling one these positions.

Interim State

The Commission will merge the Office of Docket Services into the Office of the Secretary. The Secretary will report to the CAO.⁹ The combined Office will be divided into two divisions generally based upon the existing duties performed by staff in the Office of the Secretary and Docket Services. Through attrition and reassignments, the number of FTEs will decline from 21 to 16 in the future state. The Commission is using internal USITC details to manage the Office of Docket Services.

The following roles will change from the interim to future states:

- Hearings and Information Management Officer instead of Hearings and Meetings Coordinator
- Case Management Supervisory Attorney instead of Dockets Services Manager
- Information Assistant instead of Information Specialist
- Information Assistant instead of Legal Document Assistant (Secretary)
- Legal Document Assistant (Case Management) instead of Dockets Clerk

The Commission approves two temporary over-hires for the Assistant Secretary and the Administrative Specialist positions. Through attrition, these over-hire positions will end in the future state. In addition, through attrition, the Document Review Specialist and two Term Scanner Operator positions will end in the future.¹⁰

Office of Security and Support Services

Future State

The Commission establishes a new Office of Security and Support Services (OSSS), which includes components from the Office of Administration and the Office of the Chief Information Officer. It combines what currently are the Office of Facilities Management, the Personnel & Physical Security Officer, the Continuity Response Officer, and the NSI/CUI Security Officer and the Administrative Staff Assistant for Security. The Director of OSSS will report to the CAO.¹¹

⁹ For certain limited matters, the Secretary may report directly to the Chairman. Specifically, the Secretary speaks for the Commission on certain matters and works with the Commission in scheduling and conducting Commission meetings and hearings and maintaining Commission voting records. In all other areas, the CAO supervises and evaluates the Secretary.

¹⁰ The two over-hires and two term Scanner Operator positions will continue until either they resign their current positions or the term positions expire.

¹¹ For certain limited matters, the Director of OSSS may report directly to the Chairman. Specifically, the Director of OSSS should interact directly with the Chairman on continuity of operations and emergency related security matters. In all other areas, the CAO supervises and evaluates the Director of OSSS.

OSSS brings together three functions essential to the effective operation of the Commission and to the safety and welfare of its personnel. The rationale to combine them within one office is (1) to bring strong management focus on execution, (2) to address shortcomings in current disparate operations, and (3) to derive benefit from synergies and alignment of staff skills. The recent OPM review of the USITC personnel security program demonstrated the need for a top-down review of the security function. This function is important because the agency cannot hire any staff until the Personnel Security Officer (PSO) determines the applicant's suitability for employment with the Federal Government. While the Commission recently hired a new Personnel & Physical Security Officer, the PSO needs additional resources to support this function. In addition, the function of physical safety has been a collateral duty in Facilities Management. The Commission recognizes the need to separate personnel security and physical security and create a new position of Physical Security and Safety Officer to address the security of the building and the welfare of building inhabitants in case of an emergency.

There is a strong synergy between addressing personnel security, personnel safety (through the contingent of contracted security guards and effective liaison with the Department of Homeland Security / Federal Protective Service) and the security of physical information assets (both national security information (NSI) and controlled unclassified information (CUI)). The Commission, therefore, transfers the NSI program from OCIO to OSSS. Finally, the USITC's nascent Continuity of Operations (COOP) program, currently housed in OCIO, is another related component transferred to OSSS. The agency's emergency response plan for continuity requires testing, and staff must be trained in their roles and expected responses. Combining continuity planning, emergency response, and security functions (both personnel and physical) will allow the agency to align related functions and develop a comprehensive plan. OSSS will focus on securing the building's perimeter and physical information assets and providing continuity facilities following an emergency event.

The Commission anticipates creating or altering the following positions in the Office of the Security and Support Services in the future state.

Director of Security and Support Services (GS 14/15) is responsible for directing a comprehensive personnel and physical security program, including continuity of operations, all office activities and special projects, and the planning/coordination of Commission-wide administrative support services. He or she oversees outreach to USITC customers, supervision and staff development, policy and procedure development, and management of the Administrative Services Cost Center (including budget formulation and execution). He or she will manage and provide oversight for audit response and external mandatory reporting for personnel and physical security and administrative support programs. Administrative support services include mail management, property management, supply management, space management, transportation management, work life programs, temporary contract support, facilities and equipment maintenance, occupational safety and health, personnel and physical security, and destruction of sensitive information. This is a new position.

Support Services Manager (SSM) (GS 13/14) is a partner to the OSSS Director in managing administrative support services to the Commission. Specifically, the SSM is responsible for providing day-to-day guidance to subordinate staff (exclusive of security staff) within OSSS. Administrative support services include mail management, property management, supply management, space management, transportation management, work life programs, temporary contract support, facilities and equipment maintenance, and occupational safety and health. He or she performs analyses of programs and customer requirements and presents options for future action. The SSM provides technical direction to staff and offers expert advice and guidance to senior agency managers and customers. This position entails similar responsibilities to what had existed in the position of Director of Facilities Management, which is vacant. Currently, an internal detail serves as an Administrative Services Manager.

Physical Security & Safety Officer (GS 13/14) is responsible for building security and is the COTR for the security guard contractors' contract. The Physical Security & Safety Officer (PSSO) also is responsible for developing and maintaining an emergency shelter-in-place and evacuation program and ensuring regular testing. He or she manages the occupational safety and health program, chairs the OSH Committee, participates in inspections and prepares reports. The PSSO maintains regular outreach to USITC customers regarding safety and health and emergency preparedness issues. He or she monitors all laws and regulations pertaining to emergency preparedness, building safety, and occupational safety and health. The PSSO coordinates external reporting requirements and responds to audit findings and recommendations, coordinating with the Program Analyst and the Internal Controls Program Manager. Currently, this position is combined with personnel security in the position of the Personnel & Physical Security Officer. In the Interim and Future state, there will be two positions, the PSSO and the Personnel Security Officer.

Interim State

In order to ensure the safety and welfare of its personnel and to protect and maintain its assets, the Commission creates the Office of Security and Support Services from the following components Office of Facilities Management, the Personnel & Physical Security Officer, the NSI/CUI Security Officer and assistant, and the Continuity Response Officer. OSSS combines existing functions and FTEs and will add two additional FTEs, the Office Director and the Physical Security and Safety Officer, which had represented collateral duties in the past. The Commission recently has addressed two shortcomings by appointing and training a new Personnel & Physical Security Officer and using an internal USITC detail to oversee the delivery of administrative services.

Office of the Chief Administrative Officer

The Commission anticipates creating two new positions in and transferring one position to the Office of the CAO in the interim and future states.

Senior Program Analyst (GS 13/14) serves as a senior technical advisor to the CAO on a wide range of issues related to the organization and managerial policies, theories, practices, and procedures governing administrative programs. The analyst applies expert level knowledge in the conduct of special studies, applying both technical and administrative expertise. He or she supervises the day to day assignments of the OAS program analysts and the cost center manager. He or she provides authoritative technical guidance to them and others as well as offers advice on all business process re-engineering matters. The senior analyst analyzes feedback from customers for input into efficiency and process studies. The analyst conducts briefings to communicate findings, advice, and recommendations on course of action, implementation plans, directives and guidelines. Specifically, he or she conducts in-depth analytical studies and/or projects and analyzes project data, requirements, and impact to identify problem areas and determine how to resolve substantive problems or improve effectiveness and efficiency of administrative programs.

Internal Control Program Manager (GS 13/14) is responsible for gathering and analyzing data for internal audits; monitoring compliance; maintaining expertise in all applicable Federal laws, regulations and standards; providing liaison with the auditors; assisting in the implementation of recommendations from internal audit; communicating results of internal audit to stakeholders; establishing quarterly audit plans and audit programs; and following-up on audits for the implementation of recommendations. Internal audit responsibilities include internal controls, Inspector General, GAO, and any other audits applicable to the Commission. This position currently is filled by a contractor.

In the future state, the Commission will transfer the program analyst from Facilities Management to the Office of the CAO. The CAO can then allocate the two analysts between the reporting offices as necessary to meet requirements and shift them as needed.

Create a Deputy Chief of Staff

Recognizing the Chairman and Commissioners must devote more time and resources to manage the aforementioned reporting requirements and to respond to internal and external audits, the Commission establishes a Deputy Chief of Staff (DCOS), who reports to the Chairman. The DCOS works closely with, and takes direction from, the Chief of Staff. The DCOS (GS 13/14/15) is a permanent, career employee who provides continuity to the Commission during leadership changes.

The DCOS is responsible for management oversight of the Commission's administrative operations, as assigned by the Chairman. The DCOS is well versed in government-wide administrative regulations and the agency's policies and procedures. As a member of the senior staff, he or she collaborates with Commission management on strategic planning, policy development, and problem resolution to refine the structure and practices of the agency's administrative operations to improve service delivery. He or she partners with others to analyze the implications and impact of current and proposed policies, programs, and practices, with broad discretion to identify feasible solutions and to approve courses

of action. The DCOS manages the Commission's administrative priorities, including the design and/or execution of plans to meet agency goals. He or she serves as the USITC's audit follow-up official and liaison between management and the Office of the Inspector General.

The Commission adopts the following actions as necessary to successfully implement the reorganization.

Update Policies and Procedures

The USITC Inspector General identified weak internal control as a major management challenge. This weakness is not limited to the financial management area, but rather is common throughout the agency. While the Commission maintains a good record of meeting its deadlines, the focus that goal has created is a culture of undocumented and informal processes to complete certain tasks. The Commission has acknowledged this weakness.

Following the results of the FY 2009 financial statement audit, the Commission launched a major, high-priority effort to improve its internal controls over financial and program operation and to bring its internal controls into full compliance with Office of Management and Budget Circular No. A-123. Enhancing effective internal controls over its operations is a top priority to ensure that the Commission continues to meet its objectives.

Last December, the USITC issued its first Accounting Manual and continues to update it as testing has shown the need for refinement. In addition, the Office of Operations is nearing completion of process mapping Strategic Operation 1 (Import Injury Investigations), and will soon begin to map the remaining Strategic Operations. The USITC must maintain and update these more robust policies and procedures, monitor compliance, test for viability, and report on the results.

Documented and consistent processes and procedures are necessary to provide a reasonable level of assurance that the Commission is operating in an efficient and cost-effective manner. They also are necessary for succession planning. The Commission must complete remedial efforts and put lasting reforms in place.

Acquire Appropriate Expertise through Hiring and Training

The USITC Inspector General and outside auditors have found that the Commission lacks core competencies required to integrate and coordinate budget formulation, execution, and financial reporting into a comprehensive financial management program. In several areas, for example in financial management and security planning, the Commission lacks the requisite technical and analytical skills sets required to provide the appropriate management of agency resources. This problem has been linked to a shortage of staff and compounded further by the lack of disciplined training programs for financial and program staff at all levels of the Commission.

This Strategic Human Capital Plan addresses this weakness by efficiently organizing functions (e.g., creating an Office of the Chief Financial Officer, merging related offices into the Office of the Secretary and the Office of Security and Support Services) and creates or modifies the necessary positions to address these functions. Further, the proposed staffing levels will provide Commission staff more time to take the training they need in order to keep abreast of the latest standards, technology, and other issues that impact their ability to perform their job. The Commission has already appointed qualified candidates in the positions of Chief Information Officer, Director of Finance, and Personnel & Physical Security Officer. The focus going forward is to acquire the necessary expertise through strategic hiring or training of new and existing employees. The Commission must employ the necessary skill sets and provide proper training in order to improve accountability of agency funds and provide essential data to managers for decision making purposes.¹²

Risks if Challenges Are Not Addressed

Any decision about resource allocation must consider and assess the risks associated with failing to address known problems. The most severe risks include (1) a disclaimer opinion for a future financial audit, (2) additional Congressional inquiries and/or external audits, (3) compromised information security, and (4) a failure to respond to emergencies and to reconstitute the Commission's operations following a catastrophic event.

In addition to the most severe risks, the failure to address these challenges runs the following risks:

1. Poor utilization of funds as invalid obligations carry forward, tying up funds needed for requirements, resulting in poor execution of the budget;
2. The possibility of waste of funds in the procurement process, mismanaged contracts and accounts, and loss of goods due to lack of inventory control;
3. Increased delays in processing personnel if the USITC is required to use an outside service provider for personnel security or if the USITC loses its delegated examining authority to recruit personnel;
4. The possibility that someone will be injured in the event of a fire or other emergency situation; and
5. A lack of internal control will continue to exacerbate customer service problems.

Accordingly, the Commission adopts the aforementioned reorganization in order to ensure transparency and accountability in the formulation, execution, performance, and management of agency budgetary resources. This restructuring represents an important step forward. The

¹² If the OCFO, OCIO and OAS organizations are to become efficient, effective support organizations, all three must develop a culture and business focus on accurate, proactive, and collaborative customer service that supports the Commission overall. In order to achieve this, procedures and processes must be cooperatively determined, transparent, technically sound, timely, ensure compliance with rules and regulations, and meet customer needs with minimal disruption to business processes. It also is incumbent upon the customers to recognize regulatory and legal constraints and work with the administrative support offices to ensure requirements are met in a cost effective and program efficient manner.

Commission is aware that its next challenge will be to implement the significant restructuring of administrative functions described above and to manage the cultural changes associated with implementing new systems of internal control throughout the agency.

Position Narratives

Office of the Chief Financial Officer (OCFO)

Chief Financial Officer (SES)

The Chief Financial Officer (CFO) establishes and maintains effective working relationships with senior Commission executives, including the Chairman, Commissioners, and other members of the SES Corps. The CFO is responsible for the development, management, coordination and direction of the Commission's financial management programs and services, enabling the agency to enhance its financial management functions and to improve financial management operations and accountability. Subordinate managers and organizational elements assist the CFO in implementing these responsibilities. The CFO oversees the budget, procurement, accounting, financial management, financial reporting internal controls, risk management, and asset evaluation, and is responsible for the development of efficient financial and administrative reporting and data information systems. The CFO assists and fully participates with the Chairman, other senior staff, and the Commission in the formulation of long-range strategic plans, as well as short-term program goals and objectives to accomplish the mission of the agency, and ensures that the plans are consistent with the overall goals and objectives of the Commission, applicable laws and regulations, and fulfill the objectives of the strategic plan. The CFO organizes and coordinates all of the agency's financial activities, including budget formulation and execution; procurement; financial operations revenue projections; financial reporting, related internal controls, and analysis; facilitating and providing information for annual and other audits. The CFO is responsible for adhering to all applicable federal regulations and standards and all accounting standards applicable to the Federal Sector. Working closely with senior managers, the CFO is responsible for interactions with Congressional staff regarding financial and budgetary matters.

Internal Auditor / Financial Controls Manager GS 13/14

The Internal Auditor / Financial Controls Manager is responsible for researching laws, regulations, and standards issued by accounting boards and related professional organizations including, the Federal Accounting Standards Advisory Board (FASAB), American Institute of Certified Public Accountants (AICPA) and Institute of Internal Auditors (IIA). He or she reviews financial systems and agency-wide programs to ensure compliance with policies, plans, procedures, laws and regulations that could have a significant impact on the Commission's financial reporting and operations. He or she serves as a liaison with auditors; assists in the implementation of recommendations from internal audits; communicates results of internal audits to stakeholders; establishes quarterly audit plans and audit programs; and follows-up

on audits for the implementation of recommendations. Internal audit responsibilities include financial, internal controls, FISMA, Inspector General, GAO, and any other audits applicable to the Commission. He or she acts as the Competition Advocate.

Two (2) Program Analysts (OCFO) GS 11/12/13

The Program Analysts serve as technical advisors to the CFO on a range of financial matters related to process improvements, managerial policies, practices, and procedures governing agency wide fiscal programs. The analysts apply knowledge in the conduct of special studies, applying both technical and financial expertise. They provide technical guidance and advice on all business process re-engineering matters. The analysts interpret feedback directly from customers for input into the revising operating procedures as they relate to procurement, financial and budget matters. The analysts conduct briefings to communicate findings, provide advice, and recommendations on course of action, implementation plans, directives and guidelines. Specifically, they conduct in-depth analytical studies and/or projects and analyzes financial data, requirements, to determine how to resolve problems or improve financial reporting.

Office of Finance

Director of Finance GS 14/15

The Director of Finance is the principal official responsible for planning, developing and directing a comprehensive financial management and accounting program for the Commission and for staff supervision and oversight. Primary responsibilities include management of financial policies and procedures, financial reporting, audit preparation, response, and follow up, customer outreach and reporting, internal controls, COTR liaison, financial systems, accounts payable, payroll, travel, accounts receivable/collections, capital assets, and the travel card program. The Director exercises wide latitude of independent judgment and initiative in developing, executing and directing financial management and accounting programs and systems ensuring appropriate internal controls. He/she establishes a monitoring system to ensure current process, procedures and programs are in compliance and consistent with applicable laws and regulations. The Director establishes procedures to analyze and assess, throughout the year, new or revised financial management laws and regulations to determine applicability.

Senior Accountant GS 15 (Interim State)

The Senior Accountant provides specialized expert accounting advice related to fiscal program goals. He or she provides advice to program managers and others on unusual and difficult accounting systems and/or operations problems. The senior accountant determines and/or provides accounting data requirements and contributes to the development of procedural manuals, methods, and directives. He or she also coordinates surveys for gathering, analyzing, and validating data to resolve accounting discrepancies in reported data.

Financial Manager GS 13/14

The Financial Manager assists the Director in implementing a comprehensive financial management program. The Financial Manager monitors and assesses the impact new or revised laws and regulations may have on the financial operations and financial reporting requirements applicable to the Commission. He/she monitors and documents compliance with relevant laws and regulations. The Financial Manager revises the accounting manual to document accounting policy for financial reporting and other financial cycles and trains all employees responsible for the accounting function to ensure that financial transactions are properly classified and reported. The Financial manager is responsible for coordinating, overseeing, and ensuring the proper follow-up is taken with respect to the following quarterly reviews: the open obligations/accounts payable review, the prepaid expense review, the purchase card transaction review, and the improper payment review. Additionally, he/she is responsible for ensuring the property, plant, and equipment working files are in good order, and regularly reviews period-to-period trial balance variances.

Systems Accountant GS 13/14

The Systems Accountant is the technical expert on all financial systems and financial reports used by the Commission, including Oracle and FPPS. He/she is able to work with all nuances of Oracle reporting and database issues, producing financial statements, and all underlying reports. The Systems Accountant provides reports for customers in operational units regarding a number of financial areas reconciling budgetary and proprietary accounts, and trouble shoots issues with the financial system. The systems accountant possesses experience in compiling Federal financial statements and the Performance and Accountability Report in accordance with applicable standards.

Accountant GS 11/12/13

The Accountant serves as the technical expert on all accounting issues and procedures relating to financial reporting, accounts payable, accounts receivable, payroll, travel, credit card transactions, capital assets, and property, plant and equipment. The Accountant prepares the monthly reconciliations and journal entries into the accounting system. He/she certifies

payments for disbursement and certifies deposits. The Accountant performs the routine accounting procedures for the Finance Office involving accounts payable, accounts receivable, property, plant & equipment, payroll, time and attendance. He/she provides guidance to the Systems Accountant on day-to-day accounting transactions, develops solutions to improve operating program effectiveness. The Accountant coordinates long range and comprehensive systems studies for the modification, and implementation of automated accounting systems.

Financial Analyst GS 9/11

The Financial Analyst is responsible for tracking intragovernmental payments (IPAC) in the accounting system and coordinating with the Program Analyst in Procurement to ensure that payments are correct according to the contract. He/she maintains contacts with IPAC agencies, in particular, GSA and GPO, and negotiates the resolution of payment disputes. He/she is responsible for maintaining IPAC files for internal control and audit purposes. The Financial Analyst performs a variety of accounting and budget-related functions and provides technical advice to the Accountant and Director. Within authority delegated, he/she certifies availability and correctness of funds on various financial documents. He or she maintains cognizance of funding balances and Appropriations Law Regulations to ensure proper certification is made in accordance with the Anti-Deficiency Act regulations. The Financial Analyst ensures that financial requirements, policies, and procedures are followed by ensuring fund reservations, obligations, payments, reimbursements and collections are within regulation.

Travel Officer GS 12/13

The Travel Officer directs, manages, and provides policy guidance and oversight of the Commission's travel program. The incumbent issues policy and guidance to employees relative to domestic and foreign travel. He or she directs the operations to achieve specified goals and objectives. The Travel Officer ensures that obligations from travel booked are transmitted to the Oracle accounting system by producing reports and reconciling with the Financial Technicians and Financial Analyst. He/she evaluates and comments on current and proposed changes to the Commission's automated travel system and recommends actions to initiate, modify, or discontinue practices as needed. The Travel Officer possesses delegated responsibility to manage the agency's automated travel system, including the management of the travel card program.

Two (2) Financial Technicians GS 5/7

The financial technician performs procedural financial work associated with obligations, accounts payable, travel, collections, payroll and other financial programs. Both technicians work as a support team providing technical assistance to the accountants, the financial manager, and the financial analyst. The technician reviews and processes various financial

documents such as purchase orders, invoices, government payments, cash receipts claims for reimbursements, travel documents, training obligations, payroll records and credit card records. The financial technician enters transactions into the accounting system, payroll system, e-travel system, time and attendance system, and credit card program system.

Office of Budget

Director of Budget GS 14/15

The Budget Director directs and oversees the development of plans, programs, and budgets for the Commission. He/she reviews and assesses budget planning, formulation, and execution for program offices. He/she provides review and oversight for the funds provided directly to cost center managers and serves as an “honest broker,” advising the CFO and the Budget Committee of funding requirements with recommendations as to funding priorities for the agency. The Director provides leadership for the development of sound programming, budgeting, budget execution, and management systems, controls and procedures. He/she safeguards funds, properties and other assets against waste, loss, misappropriation or unauthorized use, and develops and maintains organizational processes to accomplish the above protection and assures that costs and obligations are in accordance with applicable laws and regulations. He/she manages the budget staff.

Senior Budget Analyst GS 12/13 (Interim State)

The Senior Budget Analyst analyzes and interprets budgetary formulation and execution guidance and instructions. He/she plans, prepares, and distributes the annual spending plan in consultation with customer requirements and tracks progress of appropriations through Congress. He/she monitors the execution (i.e., obligation and expenditures of funds) of the approved operating budget to assure funds are properly allocated and are obligated and spent in support of authorized management objectives. He/she defends budget execution and unfinanced requirement submissions before the Budget Committee. He/she recommends funding adjustments and reprogramming actions to the Commission and between organizations to optimize use of the funds, in consultation with customer requests. The Senior Budget Analyst exercises budget controls through review and recommendation of obligation and expenditure of funds (for Budget Committee approval). The Senior Budget Analyst drafts a variety of budget procedural and policy guidelines to assist agency officials in planning and estimating funding needs for staffing, base operations, travel and other programs.

Budget Analyst GS 11/12/13

The Budget Analyst performs a variety of budget analysis functions in assigned areas, including budget formulation, budget presentation-enactment, or budget execution. His/her duties typically include assisting in the preparation of budget estimates and justifications; interpreting government-wide directives and circulars; providing information and advice to program managers and customers; reviewing and editing office budget submissions for reasonableness, accuracy, and conformance with procedures and guidelines; negotiating budget funding amounts, timing, and changes with program managers; and monitoring budget; recommending reprogramming of funds as needed.

Office of Procurement

Director of Procurement GS 14/15

The Director of Procurement is responsible for the direction and oversight of a comprehensive procurement program, fully integrated with all aspects of financial management at the Commission. The Director manages the Procurement staff and is responsible for ensuring that all acquisitions adhere to USITC's Policies. He/she is responsible for ensuring compliance with statutes, regulations, standards, and internal controls; for compliance with audit procedures and recommendations; and for customer service. He/she manages the work of the office with Finance to ensure that obligations and expenditures are reconciled and that timely deobligation of funds at the end of contract periods is accomplished, including IPAC transactions. The Director plans, develops, and implements policies and procedures for acquisitions and the purchase card program. The Director oversees contract administration, requiring in-depth analysis of obligations, contracts, invoicing, and disbursements using a multi-team approach, involving Procurement, Finance, program cost center managers, and Contracting Officers' Technical Representatives (COTR).

Three (3) Contract Specialists GS 11/12/13

Contract Specialists are responsible for cradle to grave contracting functions: assisting customers in developing requirements and conducting market research, soliciting contracts, assisting customers in writing the Statement of Work, assisting the Technical Evaluation Team, monitoring contracts with the COTR, modifying contracts, terminating contracts, and closing contracts. The Contract Specialists also monitor the Commission purchase card program and the COTR programs. The Contract Specialists maintain the procurement files and ensure that internal controls and current laws and regulations are followed, including adherence to the FAR. Contract Specialists maintain contracting certification.

Junior Contract Specialist GS 9/11/12

The Junior Contract Specialist is responsible for administering routine contracting functions: executing simplified acquisitions, conducting market research, modifying contracts, terminating contracts, and closing contracts. The Contract Specialist also oversees the Commission's purchase card program. The Contract Specialist maintains the reconciliation files and ensures that internal controls and current laws and regulations are followed, including adherence to the FAR.

Junior Contract Specialist GS 5/7/9

The Junior Contract Specialist performs both professional and technical contracting functions: executing simplified acquisitions, conducting market research, modifying contracts, terminating contracts, and closing contracts. The Junior Contract Specialist also serves as a purchase card holder for the agency.

Office of Administrative Services (OAS)

Chief Administrative Officer (SES)

The Chief Administrative Officer (CAO) establishes and maintains effective working relationships with senior Commission executives, including the Chairman, Commissioners, and other members of the SES Corps. The CAO serves as a senior authority on administrative programs and policies, as well as a senior advisor on administrative program performance and outcomes. He or she directs, coordinates, and oversees working groups throughout the agency, ad-hoc committees and task forces on behalf of the Commission, which deal with matters of Commission-wide scope and impact. As a senior official, he/she promotes a better understanding, acceptance, and integration of administrative programs and services in support of the operational mission. The CAO directs, manages, and provides policy guidance and oversight of administrative, docket services, and human resources programs. The CAO oversees the administration of crosscutting agency-wide programs or operations to achieve specified goals and objectives. He/she evaluates current and proposed programs and operations and recommends actions to initiate, modify, or discontinue projects as needed. The CAO possesses delegated responsibility to successfully lead and manage projects and initiatives through strategic planning, development, implementation, and oversight phases of complex, highly visible transformational initiatives that result in superior proactive approaches and solutions to accomplishing the agency's mission, objectives, goal setting, and prioritization.

Senior Program Analyst GS 13/14

The Senior Program Analyst serves as a senior technical advisor to the Chief Administrative Officer on a wide range of issues related to the organization and managerial policies, theories, practices, and procedures governing administrative programs. The analyst applies expert level knowledge in the conduct of special studies, applying both technical and administrative expertise. He or she provides authoritative technical guidance and advice on all business process re-engineering matters.

The senior analyst analyzes feedback directly from customers for input into efficiency and process studies. The analyst conducts briefings to communicate findings, advice, and recommendations on course of action, implementation plans, directives and guidelines. Specifically, he or she conducts in-depth analytical studies and/or projects and analyzes project data, requirements, and impact to identify problem areas and determine how to resolve substantive problems or improve effectiveness and efficiency of administrative programs.

Internal Control Program Manager GS 13/14

The Internal Controls Program Manager is responsible for gathering and analyzing data for internal audits; monitoring compliance; maintaining expertise in all applicable Federal laws, regulations and standards; providing liaison with the auditors; assisting in the implementation of recommendations from internal audit; communicating results of internal audit to stakeholders; establishing quarterly audit plans and audit programs; and following-up on audits for the implementation of recommendations. Internal audit responsibilities include internal controls, Inspector General, GAO, and any other audits applicable to the Commission.

Staff Advisor GS 11/12/13

The Staff Advisor provides legal and program advice to the CAO on the full range of functions within the organization. The Staff Advisor maintains expertise in laws, regulations, and standards applicable to all programs in OAS, providing advice on issues involving policy and operations, human capital management, labor relations, collective bargaining, grievances and arbitration, security and safety operations, logistics, information technology operations, and procurement. He/she maintains a Commission-wide system of internal rules, including developing directives and administrative orders. He/she provides research, analytical and writing support to the CAO on the full range of administrative functions.

Cost Center Management Analyst GS 11/12 /13

The Cost Center Management Analyst assists the Director in (1) budget formulation, (2) budget execution, and (3) day-to-day management of the cost center. The analyst ensures that all customers' budget requests for administrative services and equipment are properly

reflected in the budget formulation exercise, and assists customers in formulating their requests. The analyst performs monthly reconciliations of cost center activity and accrual data, and participates in deobligation procedures. He/she assists the Internal Controls Program Manager during the annual financial audit. The analyst monitors the day-to-day transactions that affect the various budget codes assigned to the cost center, and advises the Director of the need to make funding adjustments

Program Analyst GS 11/12/13

The Program Analyst performs operational reviews and comprehensive program analyses to evaluate the effectiveness of programs, and monitors compliance with applicable internal controls, laws, regulations and standards. The analyst analyzes feedback from customers for input into efficiency and process studies. The analyst conducts briefings to communicate findings, advice, and recommendations on course of action, implementation plans, directives and guidelines. Specifically, he or she conducts in-depth analytical studies and/or projects and analyzes project data, requirements, and impact to identify problem areas and determine how to resolve substantive problems or improve effectiveness and efficiency of programs. The analyst tracks any audit findings and recommendations and coordinates audit response with the Internal Controls Program Manager. The analyst also coordinates mandatory reporting requirements to outside agencies.

Office of Human Resources

Director of Human Resources GS 14/15

The Director is responsible for planning, developing and directing a comprehensive human resources management program. He/she exercises wide latitude of independent judgment and initiative in developing, executing and directing human capital management, particularly serving the needs of senior leadership. The director provides oversight for external reporting and response to audit recommendations. He/she solicits customer feedback and manages regular customer outreach efforts. He/she acts as the cost center manager on OPM contracts and is the principal customer of OPM services. Responsibilities include management and oversight of the HR staff and functional areas of staffing and recruitment, classification and position management, training, labor relations and employee relations, performance management, SES certification, ERB/PRB duties, recruitment of senior management positions (SES, ALJs), liaison with OPM, benefits, awards, payroll, records, and related functions.

Deputy Director of Human Resources GS 13/14

The Deputy is a partner to Director in managing the human resources programs, while performing analysis of programs and customer requirements and presenting options for future action. The Deputy assumes day-to-day responsibility for the organization, specifically in relation to technical guidance to junior staff. He/she provides expert advice and guidance to senior agency managers on the full range of human resources management issues. The Deputy is the program manager for performance management and pay and compensation.

Training Officer GS 13/14

The training officer reviews all IDPs, meets annually with every employee to review their training plan and IDP, advises managers on appropriate training, develops and maintains a management development program, and prepares an agency wide training program for basic training needs. He/she serves as the agency's technical authority on training, career development and succession planning, ensuring consistency with government-wide requirements and standards and consideration of current state-of-the art practices. The training officer also adopts or develops an instructional design system appropriate for the USITC environment.

Three (3) Human Resources Specialists GS 12/13

The human resources specialists are staff advisors and consultants on a diverse spectrum of human resources functions for the Commission. The specialists carries out the day to day functions of recruitment, delegated examining, position classification and compensation, position sensitivity/risk (security) designations, benefits counseling, employee relations, labor relations, customer service/advisory services, FPPS/BlueZone/Datamart/HR reporting, HR documentation/internal controls, and audit closeout.

Two (2) Human Resources Assistants GS 7/9

The Human Resources Assistants perform both substantial and procedural human resources work associated with recruitment, qualifications analysis, appointing authorities, benefits programs and automated human resources processing systems.

Office of Security and Support Services

Director of Security and Support Services GS 14/15

The Director is responsible for directing a comprehensive personnel and physical security program, including continuity of operations and all office activities and special projects, the planning/coordination of Commission wide administrative support services. He or she oversees outreach to USITC customers, supervision and staff development, policy and procedure development, and management of the Administrative Services Cost Center (including budget formulation and execution). He/she will manage and provide oversight for audit response and external mandatory reporting for personnel and physical security and administrative support programs. Administrative support services include mail management, property management, supply management, space management, transportation management, work life programs, temporary contract support, facilities and equipment maintenance, occupational safety and health, personnel and physical security, and destruction of sensitive information.

Support Services Manager GS 13/14

The Support Services Manager (SSM) is a partner to the OSSS Director in managing administrative support services to the Commission. Specifically, the SSM is responsible for providing day-to-day guidance to subordinate staff (exclusive of security staff) within OSSS. Administrative support services include mail management, property management, supply management, space management, transportation management, work life programs, temporary contract support, facilities and equipment maintenance, and occupational safety and health. He or she performs analyses of programs and customer requirements and presents options for future action. The SSM provides technical direction to staff and offers expert advice and guidance to senior agency managers and customers. This position entails similar responsibilities to what had existed in the position of Director of Facilities Management, which is vacant. Currently, an internal detail serves as an Administrative Services Manager.

Continuity Response Officer GS 13/14

The Continuity Response Officer is responsible for the development of advance arrangements and procedures to ensure the Commission can respond effectively to an emergency or disaster with minimal interruption to its critical functions. The COOP Coordinator maintains continuity plans through periodic updates, coordinating with the Commission's FISMA Program Manager to ensure the COOP plan conforms to statutory requirements and reflects best security practices, organizing training for staff with COOP-related responsibilities, conducting tests and exercises of the COOP plan within the Commission, and representing

the Commission in external COOP exercises and initiatives. The incumbent will also coordinate and participate in management of the Commission response in any actual disaster or recovery scenario.

NSI/CUI Security Officer GS 13/14

The NSI Program Manager's core responsibilities include overseeing and managing the collection, processing, and handling, storage, safeguarding, and disposing of NSI data in accordance with federal requirements. The NSI Program Manager provides oversight for the NSI Orientation Training and Awareness Program, the Commission's self-monitoring program, and reporting all NSI compromises and/or violations.

The NSI PM is responsible for establishing, documenting, and enforcing standard security procedures in accordance with the, Director of Central Intelligence Directives (DCID) 6/3, CNSS, and applicable sections of the National Industrial Security Program Operating Manual (NISPOM). The NSI PM coordinates with ITC operational units and professional staff on system security compliance, as it relates to classified materials. The NSI PM ensures all software, hardware and firmware changes are recorded as required by established configuration management and change control procedures. The NSI PM performs IT security in- and out-briefings to authorized individuals prior to those users gaining access to classified information systems and before their departure from USITC, respectively. The NSI PM is also heavily involved in documentation and analysis of security plans, policies and procedures, and will ensure compliance with Executive Order 13292 *Classified National Security Information*, and all other applicable Federal laws, directives and guidance regarding information security for classified systems.

Administrative Staff Assistant for Security GS 7/9/11

The Administrative Staff Assistant for Security coordinates internal and personnel security activities including inspections and security classification assignments for all office personnel as required by regulations.

Personnel Security Officer GS 12/13

The Personnel Security Officer (PSO) provides comprehensive personnel security services to agency customers. Such services include fingerprinting, sending suitability and national security investigations (clearance) questionnaires electronically to OPM, granting interim access and issuing PIV cards and Kastle keys, and adjudicating investigations under HSPD-12. The PSO provides guidance on security procedures to agency management and employees, and develops policies and procedures in the personnel security area. The PSO

also conducts reinvestigations of all employees at appropriate intervals. He/she is responsible for responding to audit recommendations, and coordinating external reporting requirements with the Program Analyst.

Physical Security & Safety Officer GS 13/14

The Physical Security & Safety Officer (PSSO) is responsible for building security and is the COTR for the security guard contractors' contract. The PSSO is also responsible for developing and maintaining an emergency shelter in place and evacuation program and ensuring regular testing. He/she manages the occupational safety and health program, chairs the OSH Committee, participates in inspections and prepares reports. The PSSO maintains regular outreach to USITC customers regarding safety and health and emergency preparedness issues. He/she monitors all laws and regulations pertaining to emergency preparedness, building safety, and occupational safety and health. He/she coordinates external reporting requirements and responds to audit findings and recommendations, coordinating with the Program Analyst and the Internal Controls Program Manager.

Building Management Officer GS 12/13

The Building Management Officer (BMO) is responsible for assisting the Director in space management planning, including outreach to customers to solicit their requirements, ensuring compliance with laws and regulations, and liaison with customers and GSA/Boston Properties regarding cost estimates, timeframes, design plans and permits. He/she is the COTR for the Unit Price Agreement with Boston Properties, originates work orders, tracks invoicing against obligating documents, and is responsible for tracking all building maintenance issues. He/she also performs a weekly building check to monitor contract performance with cleaning and maintenance services on all floors, preparing a report on findings to the Director for communication with customers and Boston Properties. He/she acts as COTR for all renovation projects, monitors contractor performance, tracks invoicing against obligating documents, and tracks such projects for capital asset financial management. The BMO is the COTR on all heating ventilation and air conditioning contracts and is on call evenings and weekends to meet the contractors for all HVAC maintenance issues. He/she maintains a property management system of more than 5,500 items, conducting an annual wall-to-wall inventory and bi-annual employee inventory certifications.

Two (2) Administrative Services Coordinator GS 11/12

The Administrative Services Coordinators (ASC) are responsible for consulting with customers regarding their requirements and preparing requisitions for Commission supplies, equipment, and furniture (unrelated to IT projects and systems). The ASC tracks and maintains an inventory of Commission supplies and equipment. He/she also prepares requisitions services associated with the Administrative Services cost center. The ASC

maintains a warrant and related certification and training to support a government wide commercial purchase card. The ASCs serves as a COTR for over a dozen contracts for the administrative services area. He/she is COTR for the mail room contractors, involving seven on-site contractors and periodic additional staffing and/or manages the warehouse and the disposal function of the property management system. The ASC manages the fleet car program and is financially responsible for the fleet purchase cards. They provide technical expertise to customer's offices in the configuration, purchase, and installation of regular and modular furniture. They are responsible for customer outreach on work life issues. They are responsible for internal controls over programs with substantial documentation and financial reporting responsibilities, and coordinates with the Internal Controls Program Manager to respond to audit findings and recommendations. The ASCs coordinate with the Program Analysts to assist in responding to external reporting requirements. The ASOs act as COTRs for the temporary support services contractors and other service contractors.

Two (2) Junior Administrative Services Coordinator GS 9/11

The Junior Administrative Services Coordinators (JASC) are responsible for work life programs, including telework, health and fitness subsidy reimbursement, mass transit and parking/carpool subsidies, and wellness programs. The JASCs are responsible for customer outreach on work life issues. They ensure internal controls over programs with documentation and fulfill reporting responsibilities, and coordinate with the Internal Controls Program Manager to respond to audit findings and recommendations. They also coordinate with the Program Analysts to assist in responding to external reporting requirements.

Office of the Secretary

Secretary GS 14/15

The Secretary manages Commission rules and regulations relating to filing documents with notice of decisions from the Commission. The Secretary speaks for the Commission on matters relating to rules of confidentiality and works intimately with the Commission in scheduling and conducting Commission meetings and hearings and maintaining Commission voting records. The Secretary possesses a comprehensive knowledge of Commission procedures and practices and technical expertise related to disclosure of information, FOIA regulations, and Privacy Act rules. He/she is responsible for issuing seizure and forfeiture orders, receives bonds, and handles rescissions of orders in Section 337 investigations. The Secretary is responsible for agency wide case management, investigative records management, and other services.

Hearings and Information Management Division

Hearings and Information Management Officer GS 13/14

The Hearings and Information Management Officer is the principal advisor responsible for managing hearings and provides independent advice to the Commission's leadership on all aspects including interpreting related administrative rules. He or she also directs and/or supports a significant part of the Commission's Records Management, FOIA, and Privacy Act programs and actively works to streamline service delivery and improve customer service using technology whenever possible. The Hearings and Information Management Officer conducts meetings and hearings and maintains the voting record of the Commission in the absence of the Secretary. He/she prepares the official minutes of Commission actions, acts as a control point for executive correspondence and all other documents circulated through the Commission, and generally acts in the Secretary's absence in a number of administrative matters. He or she also is the COTR on the Court Reporting contract.

Records Management Specialist GS 11/12

Records Management Specialist is responsible for the planning, development, controlling, organizing, training, promoting, assessing and administration of the office records management program, including destruction of all materials filed into EDIS after a minimum of three internal checks to verify the accuracy of the information. He/she also monitors database accuracy for FOIA, publications, and CISP. He/she processes FOIA requests, handles reporting requirements, and is responsible for special projects.

Hearings and Meetings Assistant GS 7/9

The Hearings and Meetings Assistant is responsible for backup support for all administrative functions in the Office of the Secretary, including the Case Management Division. The functions of the position primarily relate to providing clerical support for Commission hearings, maintaining/reviewing official records, processing/reviewing requests for assistance, preparing correspondence, recordkeeping, distributing mail, reporting requirements, word processing support, managing, designing and distributing reports, and providing clerical assistance to the staff. He/she is the timekeeper and maintains the related files.

Two (2) Information Assistant GS 7/8

The Information Assistant is responsible for ensuring compliance with all requirements for access and handling of business proprietary information. He/she reviews all Federal Register notices, letters, and other documents for the Secretary's signature.

Case Management Division

Supervisory Attorney GS 13/14

The Supervisory Attorney is responsible for leading office staff in maintaining a comprehensive legal document processing system (EDIS) for Title VII and 337 investigations material, including internal controls, security, document maintenance and disposal. The Supervisory Attorney manages policy and procedure development to implement the legal requirements in USITC filings and hearings. He/she also manages the Section 337 Mediation Program, under the oversight of the Chairman and in consultation with the chief Administrative Law Judge and the General Counsel. He/she directs legal quality assurance, ensuring that the office processes comply with applicable rules. The Supervisory Attorney reviews all publications and guidance for the public involving EDIS and all draft Institution Memoranda and Certified Lists prepared by Case Managers. He/she performs systems analysis to troubleshoot problem documents and resolves issues. The Supervisory Attorney is responsible for the full range of HR, financial and administrative responsibilities for the unit and its staff.

Attorney Advisor GS 12/13

The Attorney Advisor directs the Division's legal quality assurance activities. He or she reviews and enhances quality assurance processes and manages workflow. He or she reviews the case managers work, spot checks queues to for appropriate workflow, designates back-ups when necessary and prepares weekly reports regarding metrics and document workflow. The attorney advisor also assists with managing the Mediation Program and guides the development and maintenance of operating procedures for the office.

Seven (7) Case Managers GS 9/11

The Case Managers are responsible for document intake, processing, filing, review and publication to EDIS, in addition to training the public in all aspects of the USITC docketing system. Two (2) Title VII Case Managers have additional responsibilities for coordinating with the Office of the Secretary and the OINV, ensuring that Action Requests are handled properly. He/she reviews questionnaire responses for accuracy and works closely with OINV to ensure that releases of confidential business information (CBI) under Administrative Protective Orders (APO) are handled properly. Three (3) Section 337 Case Managers are assigned to two (2) individual judges each so that the public has a person to contact for information about each case before the ALJs. They are responsible for processing all orders, tracking motions, and service of the judges' rulings. They are also responsible for the EDIS Help Desk, preparing Institution Memoranda for OUII for new complaints, and preparing certified lists for the Court of Appeals for the Federal Circuit for investigations on appeal.

Legal Document Assistant GS 6/7/8

The Legal Document Assistant reviews and processes hard-copy over-the-counter filings for compliance with applicable rules, e.g., Title VII, 332, 204, 22, 131, 303, 406, 503, 751(b &c), 1205, and 201; and regarding Section 337 cases, protective orders under Title VII and NAFTA. He or she is responsible for the tracking, distribution and collection of documents for internal customers. The Legal Document Assistant performs some case manager duties including processing and reviewing all filings for pre-institution complaints and unassigned Section 337 investigations in the Electronic Document Information System (EDIS). He or she assists the Title VII case managers in processing and preparing APO releases, and also assists in the collection of Section 337 and Title VII data. He or she responds to information requests from internal and external parties and serves as an authoritative technical resource regarding the release of confidential business information (CBI) and Business Proprietary Information (BPI). Once e-filing is implemented, this position will handle the residual over-the counter document scanning.

Office of the Chariman

Deputy Chief of Staff GS 13/14/15

The Deputy Chief of Staff (DCOS) is responsible for management oversight of the Commission's administrative operations, as assigned by the Chairman. The DCOS is well versed in government-wide administrative regulations and the agency's policies and procedures. As a member of the senior staff, he or she collaborates with Commission management on strategic planning, policy development, and problem resolution to refine the structure and practices of the agency's administrative operations to improve service delivery. He or she partners with others to analyze the implications and impact of current and proposed policies, programs, and practices, with broad discretion to identify feasible solutions and to approve courses of action. The DCOS manages the Commission's administrative priorities, including the design and/or execution of plans to meet agency goals. He or she serves as the USITC's audit follow-up official and liaison between management and the Office of the Inspector General.

Staffing for Reorganization of Agency-wide Administrative Functions

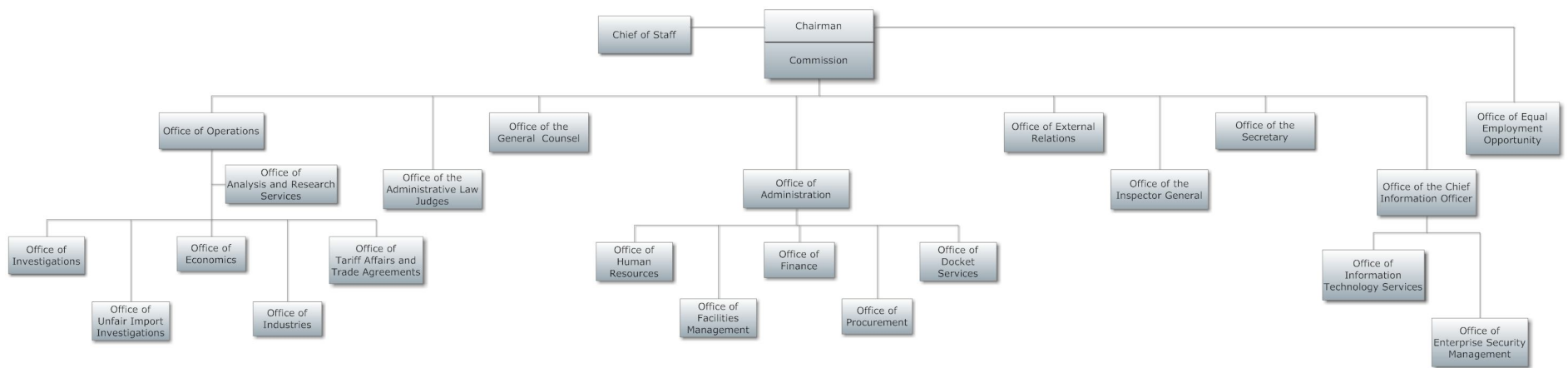
	Administration	Chief Financial Officer	Secretary	CIO (Security-Related Positions)	Office of the Chairman ¹	Total
Current State	44 FTEs; 2 Terms; 1 Detail; plus Contractor Support	0	7 FTEs	3 FTEs	6 FTEs	60 FTEs; 2 Terms; 1 Detail; plus Contractor Support
Interim State	59 FTEs; 2 temporary over hires; 2 Terms; plus Contractor Support	0	0	0	6 FTEs	65 FTEs; 2 temporary over hires; 2 Terms; plus Contractor Support
Future State	42 FTEs; plus Contractor Support	20 FTEs	0	0	7 FTEs	69 FTEs; plus Contractor Support
Net Gain						9 FTEs

¹ While the Chairman and his or her aides have increased responsibilities for administration of the agency, they do not spend all of their time on administrative matters as all of them also spend time on programmatic matters, too.

Current State



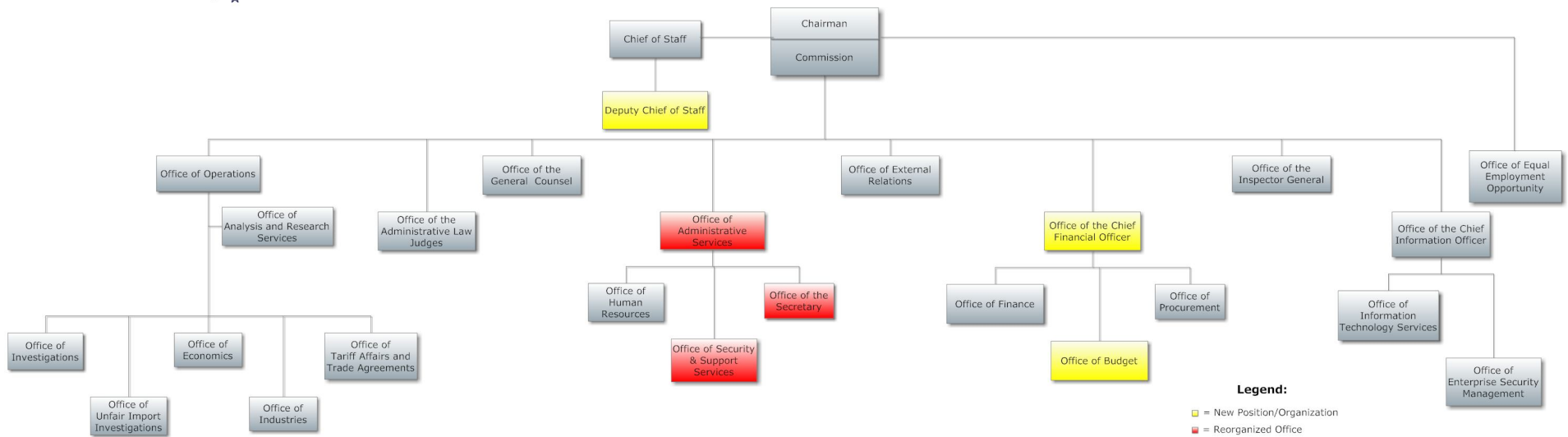
United States International Trade Commission's Office-Level Organization Chart



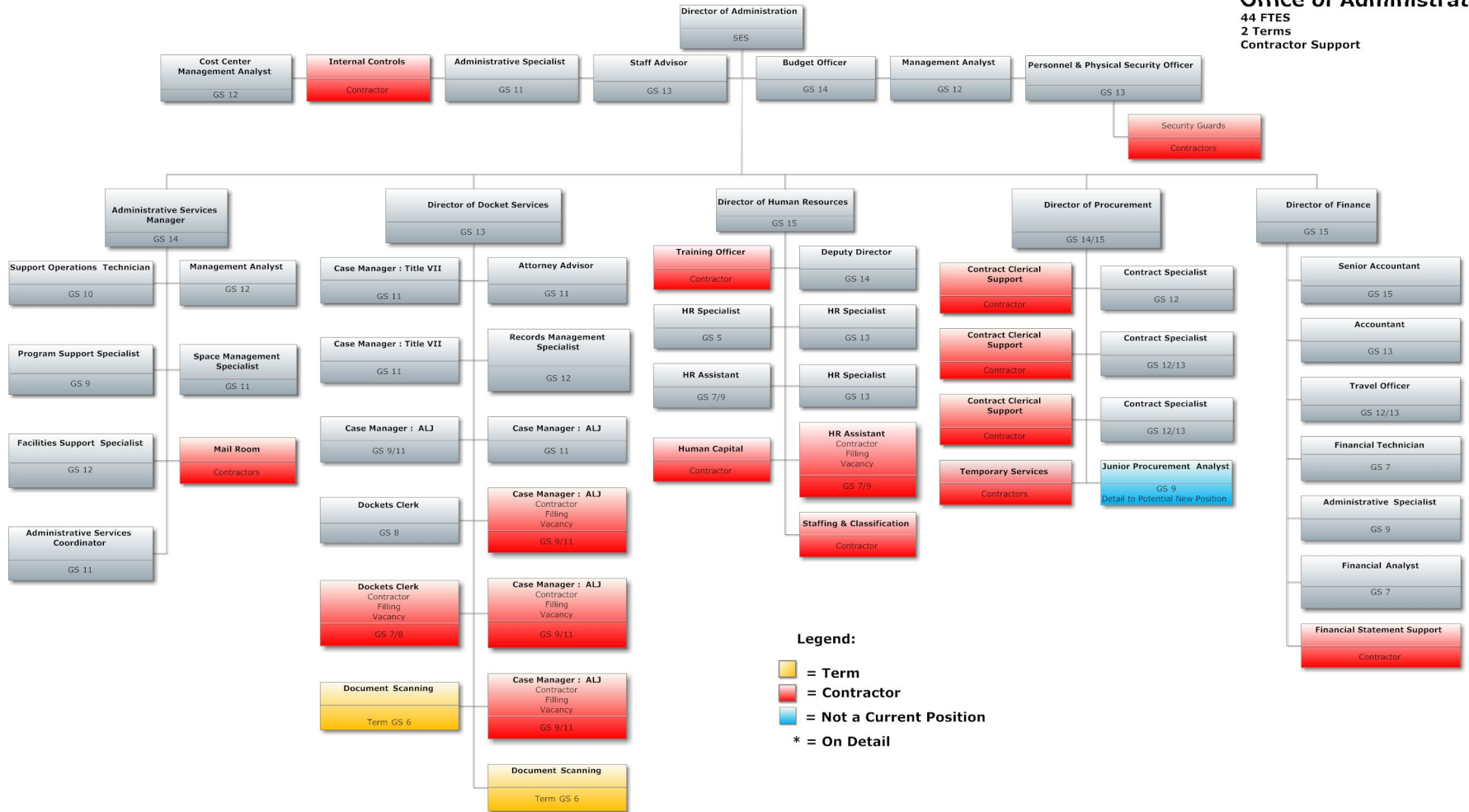


Future State

United States International Trade Commission's Office-Level Organization Chart



Current State:
Office of Administration
 44 FTES
 2 Terms
 Contractor Support

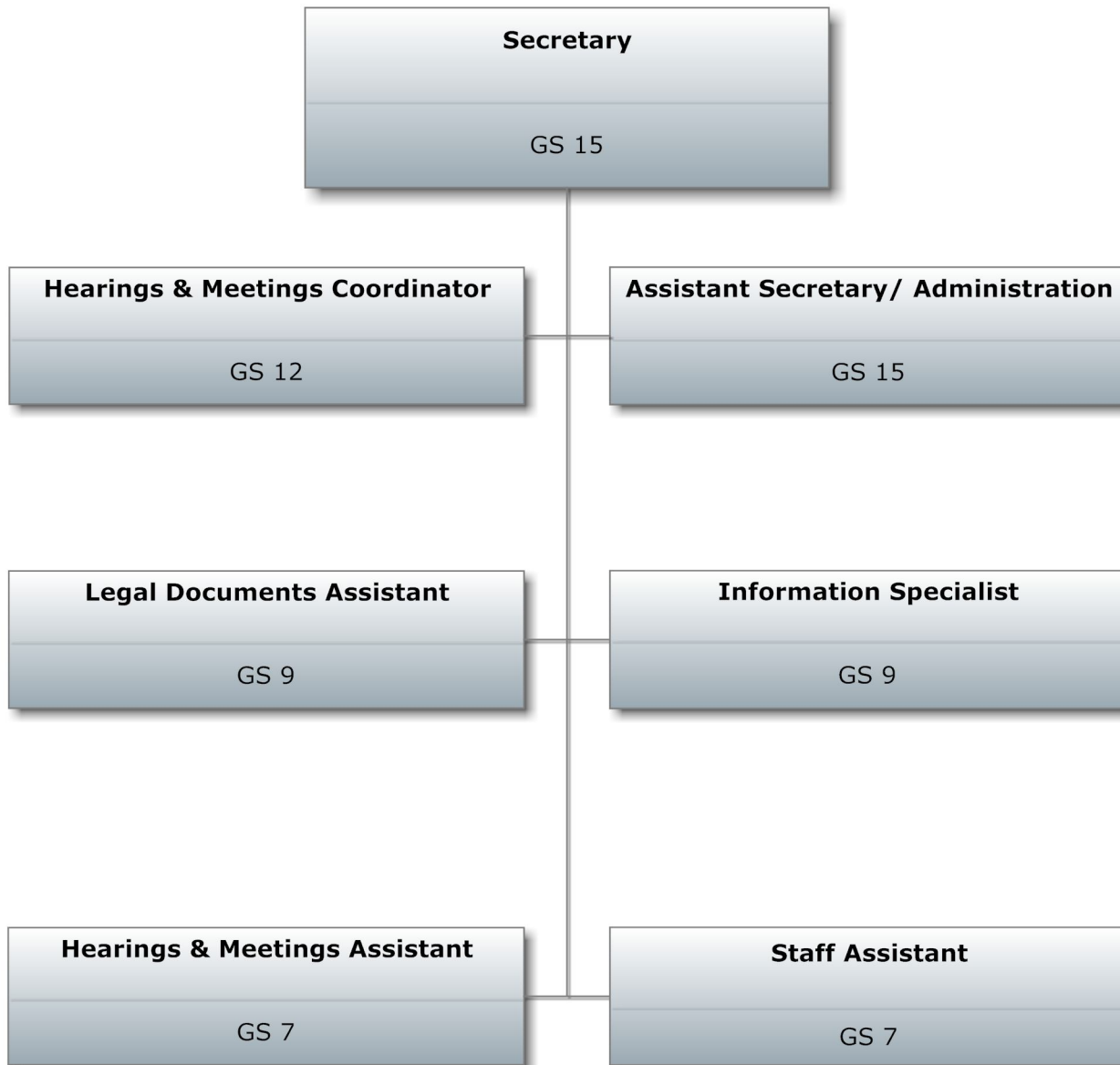


Legend:

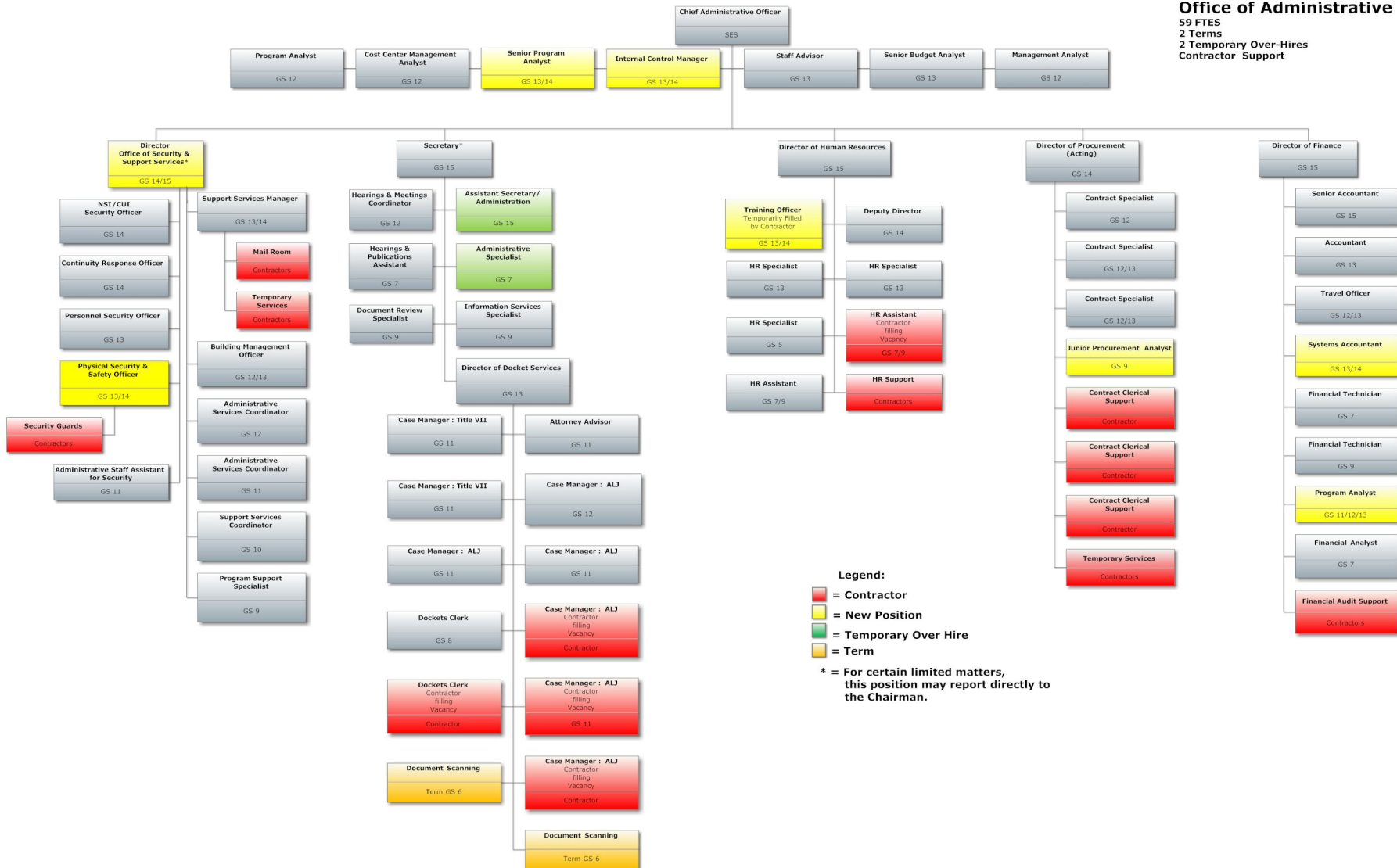
- = Term
- = Contractor
- = Not a Current Position
- * = On Detail

Current State: Office of the Secretary

7 FTES

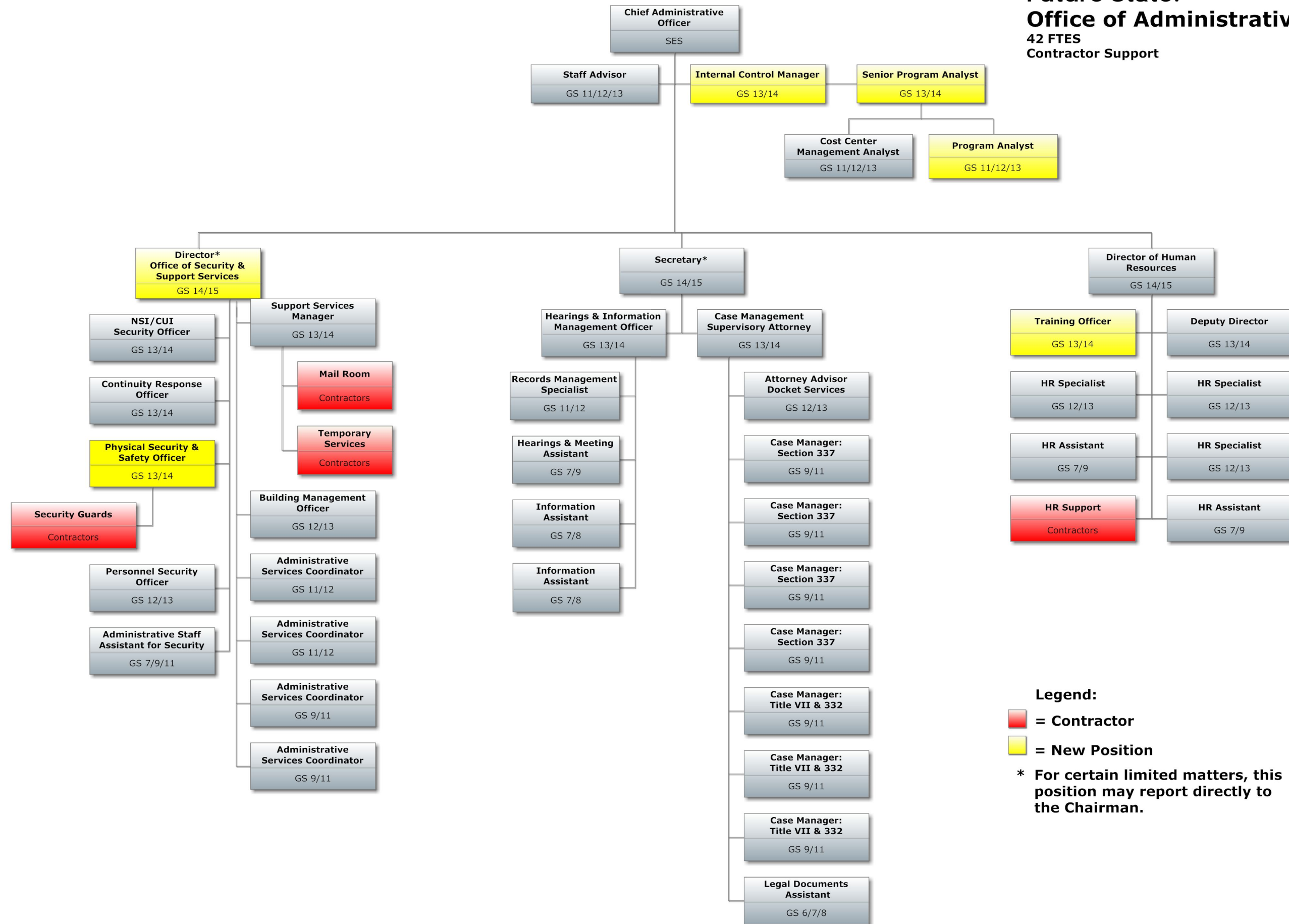


**Interim State:
Office of Administrative Services**
59 FTEs
2 Terms
2 Temporary Over-Hires
Contractor Support



Legend:
 ■ = Contractor
 ■ = New Position
 ■ = Temporary Over Hire
 ■ = Term
 * = For certain limited matters, this position may report directly to the Chairman.

**Future State:
Office of Administrative Services**
42 FTES
Contractor Support



Legend:
■ = Contractor
■ = New Position
 * For certain limited matters, this position may report directly to the Chairman.

**Future State:
Office of the Chief Financial Officer
20 FTES**

