



UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

MEMORANDUM

July 31, 2014

FROM: Debra Bridge, Director *Debra Bridge*
Office of Procurement

SUBJECT: Analysis of FY 2012 - Service Contracts Inventory /
Planned Analysis of FY 2013 Service Contracts Inventory

This memorandum contains the United States International Trade Commission's (USITC) analysis of its Fiscal Year 2012 service contract inventory responsive to Section 743 of Division C of the Fiscal Year 2010 Consolidated Appropriations Act, P.L. 111-117.

Following the Office of Federal Procurement Policy's (OFPP) memoranda/guidance documents on service contract inventories, dated November 5, 2010, and December 19, 2011, USITC selected special interest and other functions to include in the study. USITC then evaluated the use of contractors versus government employees for those functions.

A. Scope of Special Interest Functions Studied by USITC

The USITC planned for and analyzed the following Product Service Code (PSC) functions from its Fiscal Year 2012 service contracts inventory:

PSC	Description	Amount Obligated
D302	ADP SYSTEMS DEVELOPMENT SERVICES	\$1,538,592.00
D308	PROGRAMMING SERVICES	\$ 610,000.00
D399	OTHER ADP AND TELECOMMUNICATIONS SERVICES	\$ 543,766.94
R425	SUPPORT-PROFESSIONAL; ENGINEERING/TECHNICAL	\$ 623,115.28

The USITC planned to analyze PSC D399 because the functions performed by the contractor are closely related to the special interest functions on the list. The contract is representative of the types of service contracts routinely utilized by USITC. The contract also represents a significant portion of USITC's total obligations for Fiscal Year 2012.

B. Methodology Used to Support USITC's Analysis of FY 2012 Service Contracts

The analysis of USITC's FY 2012 service contracts was performed by the Director of Procurement. USITC's Acting Chief Financial Officer was given an opportunity to comment on the analysis and report. Data was obtained from the Federal Procurement Data System-Next Generation (FPDS-NG) for funded awards exceeding \$25,000. The inventory included purchase orders, delivery orders, task orders, and contracts.

C. Agency Findings

Pursuant to OFPP's memoranda, USITC made the following findings as a result of its analysis:

1. USITC awarded no personal services contracts in Fiscal Year 2012.
2. USITC closely monitors functions that are closely associated with inherently governmental functions.
3. USITC is not using contractor employees to perform inherently governmental functions. USITC acquisition staff is properly trained and able to identify inherently governmental functions as those functions relate to contractor work.
4. USITC monitors contractor work to ensure that the work does not expand during performance to become inherently governmental.
5. USITC does not use contract employees to perform critical functions in such a way that could affect the ability of USITC to maintain control of its mission and operations.
6. USITC has allocated resources to manage and oversee its contracts effectively. USITC's policies and procedures provide for oversight of contract administration.

D. Actions Taken

Overall, USITC maintains a balance between contract and government employees. USITC's policy is to properly train its acquisition and contract administration staff (CORs) to award and administer its service contracts properly. Although no actions were taken as a direct result of this review, USITC is committed to maintaining excellence in its service contracting efforts.

E. Planned Analysis for Fiscal Year 2013

As requested by the Office of Federal Procurement Policy's (OFPP) memorandum dated December 19, 2011, the USITC has selected the following Product Service Codes from its FY 2013 inventory.

PSC	Description	Total FY 2013 Obligated Dollars
D321	IT AND TELECOM- HELP DESK	\$1,383,030.40
R604	SUPPORT- ADMINISTRATIVE: MAILING/DISTRIBUTION	\$589,539.80