

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

October 23, 2001 OP-Y-32

MEMORANDUM

TO: Jonathan Womer, OMB/OIRA

FROM: Robert A. Rogowsky, Senior Official for IRM

SUBJECT: The USITC's Updated GPEA Strategy

The U.S. International Trade Commission ("the Commission") is pleased to provide this updated Plan for meeting the objectives of the Government Paperwork Elimination Act (GPEA), in accordance with OMB Memorandum M-00-10 (*OMB Procedures and Guidance on Implementing the Government Paperwork Elimination Act*). Our Commissioners and staff are enthusiastic about improving service to our customers and meeting the challenge set by the GPEA.

The Commission has always been committed to excellence in carrying out its missions of administering U.S. trade remedy laws in a fair and objective manner and providing the President, USTR, and the Congress with independent quality advice and information on matters of international trade and competitiveness. With the arrival of the Internet, achieving excellence has meant exploiting this new medium to improve and extend the scope of services to our customers and partners in government and the private sector. We have had some notable successes already: we make public reports available via the Web at http://www.usitc.gov, and our electronic document system provides Web access to all public documents (including reports) submitted since 1996 in connection with Commission investigations. We also made our award-winning DataWeb interactive warehouse of U.S. international trade and tariff data available as a regular free public service in June of this year, several months ahead of the GPEA Plan schedule we submitted last year.

GPEA Strategy

Our strategy for implementing GPEA is integrated into our agency strategic and performance planning, and our strategic information resources management (IRM) plan. In our FY 2001/2002 Performance Plan, we added a new agency-wide strategic goal: "By the end of FY 2003, the Commission will offer its customers, business partners, and suppliers practical options to conduct their business with the agency electronically." Our IRM Strategic Plan for FY 2001-2003 likewise reflects GPEA principles in its technology vision:

"... we are able easily to share information and collaborate with each other, outside partners and customers, with assurance that confidential information is protected. Agency customers and the public are able to locate our services and research, and may conduct their business with the agency electronically if they prefer."

As documented in this submission, we see many opportunities to further re-design our work processes and customer interactions using electronic means. Several of these opportunities, as well as the security and other infrastructure improvements required to support them, are included in our FY 2002 budget request and FY2003 budget planning. Over their life cycles, most of these projects will generate significant value for external customers and may also, towards the end of their life cycles, generate operating savings for the Commission. However, because there is no mandate to eliminate paper-based systems, we do not expect significant internal savings to materialize through 2003. Moreover, some of the proposed projects constitute service enhancements or totally new services. To accomplish these projects without risking our ability to carry out our basic mission, the Commission will need significant new funding, over and above the funding increases we would otherwise anticipate receiving during FY 2002 - FY 2003.

Plans for transactions with customer and partner groups

In developing our GPEA Plan last year, we conducted a review of all our major information transactions with organizations and persons outside the agency. While we focused on identifying paper-based transactions, we also considered other interactions like witness testimony in our investigative hearings. Last year's Plan represented the Commission's assessment of the best projects to undertake, taking into account practicality, mission impact and benefit to private and corporate citizens.

Government-to-business

By far the largest category of the Commission's service transactions is Government-to-Business (G2B). Parties to our investigations are mainly U.S. and foreign manufacturers and their representatives (law firms and economic consulting firms). Likewise our information collections are directed almost exclusively to businesses. Thus our largest e-Government projects involve providing an option for electronic filing and information access to these businesses.

Another G2B transaction is our publication of the Harmonized Tariff Schedule of the United States (HTS.) This information on customs treatment of U.S. imports is updated several times each year as a result of Presidential Proclamations implementing trade agreements or other trade policy decisions, or by legislation. We currently publish the HTS in hard-copy and in PDF format on our main Web site. The "On-Line HTS" project in our GPEA Plan is aimed at making this information more valuable, and at streamlining our internal process for updating this information resource.

Government-to-government

Our transactions with other government organizations are mainly to provide technical information, analysis, and advice on complex economic and legal issues. While we are looking for opportunities to use the Internet to enhance delivery of technical information and analysis to these organizations, for the most part such information, as well as our advice, is not what is commonly thought of as a transaction service. A major exception is the Tariff and Trade DataWeb, which permits self-service interactive analysis of U.S. tariffs and associated international trade data. This free service is heavily used by our Government clients, and also by businesses and citizens. Per the Plan submitted last year, we have upgraded the capacity of this system to provide free service to the public without compromising service to our Government clients and our own staff analysts.

The HTS, mentioned above under G2B transactions, also has a G2G component. HTS data are a key input into the U.S. Customs Service's system for assessment of duties on goods imported into the country. The Commission is working with Customs in the context of the International Trade Data System (ITDS) development program, and is examining the possibility of providing HTS data electronically via file transfer in the future. Additional work to speed and simplify this update may be included as part of the "On-Line HTS" project included in this Plan.

We have no regular transactions with U.S. state or local governments.

Government-to-citizen

Our transactions with individual citizens are less extensive than the efforts described above, and consist mainly of standard administrative matters like human resources (job announcements and applications), a small volume of acquisition work, Freedom of Information Act (FOIA) and Privacy Act requests, service to the public via our main and other specialized Web sites (e.g., the DataWeb), and responses to information requests from the public via telephone or correspondence. Our GPEA Plan includes small projects to provide electronic options for administrative transactions, with FOIA request processing on track to be completed this fiscal year.

Internal efficiencies

Regarding our plans to address internal efficiencies, we are continually looking for quick-payoff automation or other process-improvement opportunities. For example, we recently set up an internal Web-based system to let program managers record their individual task orders against blanket-purchase agreements (BPA's). This system eliminates the need for providing paper copies of BPA logs to reviewers. However, we try to focus most investment on enhancing our strategic work processes that provide services to external customers, particularly projects that meet the objectives of GPEA. One major project that addresses internal efficiencies is a financial data warehouse, which we hope will provide faster, more accurate information for budget planning and execution, while saving time for managers with cost-center responsibilities.

Relationship between the GPEA plan and enterprise architecture

The Commission's IRM Strategic Plan relates the agency's business requirements to its technology strategy and to the target information architecture required to support strategic goals. The major projects listed in the present GPEA Plan are among those identified in the IRM Plan, and the target architecture therefore takes into account the infrastructure and interface requirements of these projects. For example, the target architecture includes a requirement for a global extranet access management capability to support the complex security requirements of making non-public information available via the Internet.

During IT investment review, GPEA project proposals (like other IT proposals) are examined for consistency with the agency technical reference model and established technical standards.

Customer relationship management (CRM)

The Commission's business is not characterized by a large base of public customers for whom we maintain accounts, so implementation of a full-featured commercial CRM product has not been a strategic priority. Within our vision for GPEA we see a need for the agency to have a unified and consistent view of its customers and partners, particularly to help us assure appropriate access to non-public information. Our IRM Strategic Plan and budget planning therefore include implementing an extranet access management infrastructure. We have already implemented controls to make sure accessibility issues are addressed as part of our IT investment review process.

Supply-chain management

The nature of the Commission's business does not justify making supply-chain management a strategic priority. However, we have implemented many incremental process changes to speed our acquisition and internal distribution of research

materials, and our GPEA Plan includes increased use of electronic means to deal with all our suppliers.

Enterprise information management

The Commission has already implemented centralized management and quality control of its main analytical data sources on international trade and tariffs via the USITC DataWeb. We have projects under way or planned to improve management of our other two key information collections—Title VII investigations questionnaires and legal documents filed in Commission proceedings (see Investigations Questionnaires and EDIS-II items in Attachments A and B.) We have also centralized acquisition and distribution of our considerable collection of research materials (whether electronic or paper-based) in the Main Library, so that re-use is maximized and duplicative coverage is minimized. The Library's collection catalog is on the agency's Web site so that its utility to the public is enhanced.

Using Information Technology to Unify and Simplify Transactions

The Commission's technology strategy emphasizes making all of its systems accessible from anywhere, as well as adopting a self-service approach to transactions. These strategies make it very cost-effective to provide service to customers and the public via the same systems we use internally. The Tariff and Trade Dataweb is a great example of how a Web-based self-service system developed for internal use was easily expanded to serve researchers outside the Commission. Using the same systems to serve internal and external clients reduces overall cost and speeds system development while eliminating redundant data entry and errors that may be generated by such entry. Designing for self-service promotes the discipline of making easy-to-use systems that require no training. The Commission's plans for developing a advanced Extranet access management system as a common security infrastructure for GPEA applications will also help unify and simplify agency systems, by maintaining a single consistent profile of customer privileges and preferences.

Prioritization of GPEA-related projects

While the Commission has made GPEA and electronic government a specific agency goal, mission accomplishment remains the agency's focus. GPEA-related projects are quite consistent with overall agency mission goals, but, of course, must compete for funds and management attention with other strategic goals and changing workload demands. The Commission reviews all proposed IT investments—and indeed all demands for resources—in its annual budget process, and allocates available investment funds to projects that promise the greatest contribution to strategic goals.

The Commission has established an IT Investment Review process for selecting and managing investments based on Clinger-Cohen principles and OMB guidance. An

important part of this review is development of a cost-benefit analysis that quantifies (insofar as possible) expected benefits of a project proposal. Consistent with OMB guidance, we take into account benefits accruing to organizations and persons outside the agency: citizens, businesses and governments. We also consider non-quantifiable benefits, including congruence with Federal policies regarding the promotion of e-government, and assessment of risk. This evaluation provides a clear picture of the planned benefits of proposed individual investments.

Our annual budget review allows us to examine our capital assets and prioritize all proposed and existing spending. Our Budget Committee considers IT expenditure proposals that have been cleared by our IT Investment Review board, and makes budget priority recommendations for the upcoming and budget-request years in light of requirements for meeting Strategic Plan goals, changes in workload demands and funds availability.

Barriers to implementation

The primary challenge facing our agency programs for GPEA implementation is the tradeoff between increasing openness of government and maintaining our customers' confidence that we securely handle their trade secrets and confidential business information. We simply cannot perform our mission without their cooperation. To achieve additional gains from automation, we must be able to receive, process, store and transmit confidential data. To do that, we must build a highly reliable security infrastructure based on encryption and electronic signatures. Equally important, we must be able to convince our business customers and other submitters of confidential information that their data remains safe with us when we begin to handle it electronically. Our ability to execute the enclosed GPEA plans will depend largely on how effectively we can manage information security risks.

An unanticipated challenge we've already encountered in undertaking GPEA-related projects is their demands on our management resources. Since these projects are typically fairly expensive, have high visibility, and have significant work-process impact, they are forcing us to formalize our life-cycle project-management processes. Lack of trained and experienced IT project managers has become the bottleneck in our ability to advance GPEA initiatives. We have recently hired the agency's first trained IT project manager, and we are also acquiring project-management support via contract. At the same time we use these resources to advance already planned GPEA projects, we will be building and learning to operate new processes and procedures to institutionalize system life-cycle management and integrate it into our investment management, budget and performance management processes. In addition to this "learning curve", our experience so far is that change management and life-cycle management services add as much as 1/3 to the total cost of these projects.

Status of implementation of GPEA Plan projects

Compared with last year's Plan, the current Plan shows several schedule changes. One major item—DataWeb—has been completed ahead of schedule.

Significant schedule slippage has occurred in the EDIS project, where the target for accepting electronic filing of case documents not containing CBI is now 9/2002 instead of 1/2002. Last year's target was set at a very preliminary stage in project planning, and the complexity of process redesign and system acquisition was underestimated. We now have a project-management structure in place that we expect will control additional schedule slippage.

Minor slippage has occurred in the small "FOIA requests" project, which is now expected to be ready by 12/2001 versus the 9/2001 date estimated last year. This was allowed to occur because of competing workload priorities.

If you have questions on this submission please contact me or Martin Smith, Director of Information Services, at (202) 205-3258 or msmith@usitc.gov.

cc: The Commission

Attachments: A & B

Attachment A Information Collections under Paperwork Reduction Act, by Planned Completion Date												
Agency	Bur- eau	Name	Description	Cust Grp	Description of respondents	Number of Respondent s	OMB Control Numbers	Uniq. Projec t ID	Trans. Status	Completion Date	Post 10/ 2003	Electronic Signature
USITC		Customer surveys	Provide on-line survey forms to solicit customer response to various USITC services	G2B	Law firms, press, public, Federal officials who use USITC services	500 per year (estimate)	3117-0188, 3117-0190, 3117-0192, 3117-0196	N/A	1	09/2002		NO
USITC		Import Injury Informatio n Collection s	Surveys to gather data used to determine economic injury from imports under various US trade laws, & responses to institution notices	G2B	U.S. and foreign firms that produce, import or purchase products covered by an investigation	Depends on number of petitions received and other factors; estimate 4,375 per year	3117-0016	N/A	3	09/2003 (depending on funding & satisfactory resolution of all risk/security concerns)		YES

^{**} Transformation status coding: 1 = electronic forms only; 2 = electronic transactions; 3 = process streamlining; 4 = unify organizations or information technology.

Attachm	ent B.	Informatio	n Disseminations a	nd othe	er Transactions, by Pla	nned Completion D	ate				
Agency	Bur- eau	Name	Description	Cust Grp	Description of Partners	Number of Respondents	Uniq Project ID	Trans. Status	Completion date	Post 10/ 2003	Electronic Signature
USITC		DataWeb	Interactive database of U.S. tariff and international trade datamake existing system available to the public	G2B	Firms involved in international trade; academic researchers, individuals	20,000-plus, based on pilot test and the first 3 months of full operation	N/A	2	6/2001 (was 10/2001)		NO
USITC		FOIA requests	Accept FOIA requests via Web page form	G2C	Law firms, business firms, vendors, and individuals	Average of about 70 requests per year received in recent years	N/A	1	12/2001 (was 9/2001)		NO
USITC		Electronic Document Imaging System (EDIS)	Filings and distribution of official record documents related to cases before the USITC. Includes confidential business information (CBI)	G2B	Business firms that are a party to cases before the USITC, and their representatives (law firms); academics, the public, the press	Estimated 5,000 to 10,000 per year	N/A		09/2002 for initial phase of document filing (was 01/2002); 9/2003 for distribution of CBI (both parts depending on funding & satisfactory resolution of all risk/security concerns)		YES
USITC		Job applica- tions	Accept job applications in electronic form	G2C	Individuals	Estimated 900 per year	N/A		09/2002 (We expect OPM will establish a Government-wide policy that may supercede anything we establish for the USITC.)		YES
USITC		myITC	Customizable, self-service access portal to USITC services and products	G2B	Business firms, law firms, press, public, other Federal, local and foreign government agencies and international organizations	Estimated 600,000 visits per year, based on current Web site statistics	N/A	4	09/2002 (depending on funding)		YES

Attachment B Information Disseminations and other Transactions, by Planned Completion Date											
Agency	Bur- eau	Name	Description	Cust Grp	Description of Partners	Number of Respondents	Uniq Project ID	Trans. Status	Completion date	Post 10/ 2003	Electronic Signature
USITC		On-Line HTS	Searchable access to U.S. Harmonized Tariff Schedule	G2B	Business firms involved in international trade, U.S. Customs officials, academics	28,000 copies of the HTS printed annually; estimated 40,000 downloads or viewings per year of on-line HTS chapters; estimated 185,000 lookups per year of individual items in the on-line Tariff Database.	N/A	2	09/2002 (depending on funding)		NO
USITC		Rule- making	Provide comment to the USITC concerning proposed rules relating to cases	G2B	Law firms mainly	Depends on the number and nature of rule changes proposed.	N/A	2	09/2002 (depending on funding)		NO
USITC		Vendor invoices	Accept invoices from vendors	G2B	Vendors	3,795 invoices received in most recent year	N/A	1	09/2003		YES
USITC		Procure- ment- related transac- tions	Accept responses to RFPs, RFQs, etc. from vendors	G2B	Vendors	Several dozen to several hundred transactions per year	N/A	1	09/2003 (depending on funding)		YES

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