Office of INSPECTOR GENERAL

Audit Report

Review of the Commission Methods Used to Compose Publications

Report No. IG-02-99

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December 24, 1998

I hereby submit a *Review of the Commission Methods Used to Compose Publications,* Report No. IG-02-99. The Commission publishes a number of documents every year as part of its mission. These documents are mostly investigative, trade, or staff reports prepared by the program offices. The narrative portion of the reports are usually prepared using word-processing software, predominantly WordPerfect. Many reports have graphics and/or tables which are created using software such as WordPerfect, Harvard Graphics, Lotus, or Interleaf. Reports were put into final format by the program office or submitted to the Office of Publishing (PUB) for composition in preparation for printing.

The Commission practice is to allow offices to decide whether and which documents will be sent to PUB for composition. Only a third of the recent Commission publications were composed by PUB. The Office of Investigations did not send any reports on title VII investigations, and section 337 reports do not require composition. The Office of Industries was the primary user, mostly for Industry and Trade Summaries and some section 332 reports. The Office of Economics also submitted International Economic Reviews and section 332 reports. The reports not submitted to PUB were formatted by the program staff using word-processing software.

PUB began using Interleaf, a high powered composition software package, in 1986 to convert draft documents into a final format. This composition software is noted for its speed, capabilities, and final look of the product. In recent years, program staff began asking PUB to compose documents using word-processing packages. As a result, PUB used word-processing software to compose about half of the documents published since January 1997.

The objective of this review was to identify the most efficient and cost effective methods to compose Commission documents. We found that the Commission did not have a written policy on which documents are to be submitted to PUB for composition, or the method to be used to compose documents. Further, the

Commission did not have procedures for document preparation and submission. Program staff used multiple software packages to prepare documents with varying degrees of expertise. PUB spent a significant amount of resources "undoing" the format drafted by program staff. Cleaning up documents is part of composition, but minimizing this step makes the process more efficient. PUB was often not involved in the report process until it received a report for composition, and program staff generally had a poor understanding of the composition process.

We believe the Commission practice to allow program offices to format documents is a normal progression as employees gain expertise in using computer software. Office directors should be able to decide to either have their staff format the document, or have PUB provide composition services. In order for the latter option to be efficient for both offices, agreement is needed on a simplified format for draft documents and procedures on submitting documents.

Since the majority of documents were composed using word-processing packages and this method was preferred by most offices, we believe that the Commission should adopt word-processing as the standard method for composing documents.

Recommendations addressing these findings are numbered sequentially in this report and can be found on pages 7, 10, and 12.

A draft report was sent to the Director of Administration on October 2, 1998, for review and comment. He generally agreed with the need for a policy, guidelines, a training program and coordination with the program offices. He strongly disagreed with adopting word-processing as the standard method for composition, and believed some reports should be submitted to PUB for composition. His comments are addressed after each section and presented in entirety as an appendix.

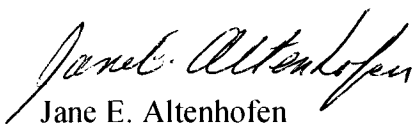

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TABLE OF CONTENTS

Page

INTRODUCTION AND SCOPE 1

BACKGROUND 2

FINDINGS AND RECOMMENDATIONS 4

POLICY FOR PUBLICATION PROCESS 4
- Centralized Composition 4
- Interleaf 5
- Word-processing 6
- Standard Method 6
- Internet Postings 7
- Recommendations 7
- Agency Comments and OIG Response 7

UNIFORM PROCEDURES 8
- Recommendation 10
- Agency Comments and OIG Response 11

TRAINING 11
- Recommendations 12
- Agency Comments and OIG Response 12

STYLE STANDARD 12

Attachments: 1 - UPDATED STATISTICS ON COMMISSION PUBLICATIONS

2 - SECTION 332 REPORTS BY NUMBER OF PAGES

Appendix: Memorandum from the Director of Publishing to the Inspector General, dated December 3, 1998, (PUB-V-01)

INTRODUCTION AND SCOPE

The objective of this review was to identify the most efficient and cost effective methods to compose Commission reports and other documents published by the United States International Trade Commission (Commission).

Our review was conducted from June 10 through July 17, 1998 in Washington, DC. We interviewed representatives concerning the report production and composition process in the following offices: Administration (AD); Publishing (PUB)[1]; External Relations (ER); Industries (ID); Economics (EC); Information Services (OIS); Investigations (INV); and Unfair Import Investigations (OUII). We contacted representatives from the Government Printing Office (GPO) and the Congressional Joint Committee on Printing to discuss printing regulations and reporting requirements.

In addition, we contacted the Federal Reserve Bank and the Office of the Comptroller of the Currency (OCC), two agencies that also prepare official reports for Congress and the Administration, to discuss their production and composition processes. Although these agencies do not have the same statutory requirements as the Commission, both have review processes similar to those of the Commission for document composition and production. Each agency had recently updated its style manual.

We obtained examples of style manuals used by other agencies and industry. The Federal Reserve Bank had an excellent style manual that was used by other governmental agencies as well. The manuals obtained were:

-- Writing in Style at the Federal Reserve, The Federal Reserve Bank (1998);
-- The OCC's Concise Manual of Style, Controller of the Currency (1997);
-- Chicago Manual of Style, fourteenth edition (Chicago, 1993); and
-- APA Style Manual (Washington, DC).

We reviewed the OMS mission and functions statement regarding its responsibility in the publishing and printing activities and PUB weekly workload statistics for the calendar years (CYs) 1996 and 1997, and CY 1998 through June 22, 1998. We reviewed various Commission documents on report preparation, such as writing style guidelines and rules for tables and figures, and section 332 proposed work schedules for CY 1997 and YTD 1998.

We focused on Commission publications for CY 1997 and CY 1998 through June 5 (hereafter referred to as YTD 1998). We categorized the 70 documents published in CY 1997 and 32 published in YTD 1998 by type of investigation or study. We compared different types of Commission documents for consistency between documents and conformity with Commission style guidelines.

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[1]During our field work, the Publishing Division in the Office of Management Services (OMS) was responsible for composition. In a reorganization effective October 1, 1998, OMS was eliminated and the Office of Publishing established. For purposes of this report, the Office of Publishing and the Publishing Division are synonymous.

BACKGROUND

The Commission publishes a number of documents every year as part of its mission. These publications are mostly investigative, trade, or staff reports prepared by the program offices. The narrative portion of the reports is usually prepared using word-processing software, predominantly WordPerfect. Many reports have graphics and/or tables which are created using software such as WordPerfect, Harvard Graphics, Lotus, or Interleaf. These reports are put into final format by the program office or submitted to PUB for composition in preparation for printing.

The decision to submit documents to PUB for composition is made on an office or case-by-case basis, although documents with statutory deadlines are often not submitted. Program offices vary significantly in submitting reports to PUB as follows:

-- INV does not submit reports on title VII investigations.

-- Tariff Affairs and Trade Agreements does not send the Harmonized Tariff System (HTS).

-- EC submits most reports, including the International Economic Reviews (IERs) and section 332 studies for which it is the lead office.

-- ID submits most Industry and Trade Summaries (Summaries), no Industry Trade and Technology Reviews (ITTRS), and some section 332 studies for which it is the lead office.

-- The Office of General Counsel does not submit section 337 reports which consist of documents issued during the investigations, such as orders and Commission opinions, that do not require composition.

Composition in PUB consists of several steps performed by visual design specialists. First, PUB "cleans" the document which involves stripping extraneous codes and inserting correct ones. If applicable, the file is converted from a double space, single column format into a single space, two column format. Any tables, figures, text, and graphics are integrated into the document and the final format, i.e., margins and spacing, is established. The program office reviews the document after composition and whenever revisions are made by PUB.

PUB began using Interleaf, a high powered professional composition software package, in 1986 to convert draft documents into a final format. This composition software is noted for its speed, capabilities, and final look of the product. A major reason for adopting the composition software was the capability to integrate tables and graphics into the text and speed needed to meet extremely tight deadlines. The capability to format using dual columns and proportional spacing increased readability and significantly reduced the size of documents, which was an important factor at a time when the Commission was printing large numbers of documents for mailing. Documents submitted to PUB were composed exclusively in Interleaf until recent years, when PUB also began to use word-processing software.

The following charts show that in CY 1997 and YTD 1998, approximately 35 percent of Commission publications were submitted to PUB for composition. Of those publications, 61 percent were composed on Interleaf and 39 percent on word-processing software.

COMMISSION PUBLICATIONS

	Program Office	PUB	Total
CY 1997	46	24	70
YTD 1998	20	12	32
Total	**66**	**36**	**102**

	CY 1997			YTD 1998		
	Program Office	PUB		Program Office	PUB	
Publication:	WP	WP	INT	WP	WP	INT
Title VII Investigations	18	0	0	9	0	0
Section 337 Investigations	7	0	0	1	0	0
Section 332 Studies	13	4	6	6	0	2
Industry and Trade Summaries	2	3	1	1	6	0
IERs	0	1	7	0	0	2
ITTRs	4	0	0	2	0	0
Miscellaneous*	2	0	2	1	0	2
Total Documents	**46**	**8**	**16**	**20**	**6**	**6**

*Includes the 1998 HTS, a staff research study, the Commission Annual Reports, a publications list, an addendum on a section 1205 investigation, and an information booklet on section 337 investigations.

For information purposes, the above schedules were updated through December 17, 1998, and are presented in Attachment 1.

FINDINGS AND RECOMMENDATIONS

POLICY FOR PUBLICATION PROCESS

The Commission does not have a written policy on which documents are to be submitted to PUB for composition, or the method to be used to compose documents. The Commission practice is to allow the program offices to decide whether and which documents will be sent to PUB for composition, and to request the method to be used for composition. In CY 1997 and YTD 1998, only 35 percent of the publications were submitted to PUB for composition; program office staff formatted the other documents using word-processing software. Documents submitted to PUB were mostly composed on Interleaf (63 percent), and the rest were composed on word-processing software (37 percent).

Centralized Composition

When the procurement of Interleaf was approved in April 1986, the memorandum included a policy statement predicated on the basis that composition would be centralized in PUB. Processing of reports was to be phased in over a one-year period and the majority of reports would be composed on Interleaf. At that time, INV was the largest user of PUB services, for title VII reports, and this was expected to continue. PUB was to develop, produce, and maintain style and format policies.

A Commission policy directive was never prepared, and the anticipated use of Interleaf never fully developed. Further, composition was not centralized in PUB. With the installation of WANG workstations around 1986, program staff began to format documents, and that trend has continued until the present. PUB provides assistance to the staff who are formatting documents, which can range from answering technical questions to preparing tables and graphics on Interleaf. As shown on Attachment 2, PUB assisted on three of the reports formatted in YTD 1998.

In CY 1997 and YTD 1998, most Commission documents were formatted by the program offices using word-processing software. Most statutory reports, including all title VII and most section 332 investigations, were formatted by program staff. Section 332 reports were submitted to PUB at the discretion of the team leader; the decision had minimal relationship to the length and complexity of the report. As shown in Attachment 2, the longest section 332 reports were formatted by the program office, but the remaining reports had no clear pattern.

The documents composed by PUB were primarily research studies, 332 reports, IERs, and Summaries. The latter two categories were self-initiated work and the reports were generally of shorter length and without deadlines (IERs averaged 35 pages and Summaries averaged 54 pages).

We found no convincing basis for changing the decentralized practice that has developed. The products have no discernible difference in visual quality of document content. For documents the Commission wants to look more polished, changes were made in printing, not composition. For example, the covers for the Commission Annual Report and the Operation of the Trade Agreements Program report covers were printed by GPO in order to have better color quality on glossy paper. The pages of the Annual Report were printed by GPO for better clarity on pictures.

Some management officials stated that the program staff spend too much time on format instead of focusing on content. These officials would like to make more use of PUB services, but are reluctant because of bad experiences. The changes discussed in the uniform procedures section of this report should improve the process so that officials will find it more efficient to submit documents to PUB for composition and choose to do so.

PUB concurs that it does not have the resources to compose all of the agency's reports and studies. However, PUB does want to produce "those reports that the agency anticipates will have significant interest to our (Commission) customers as determined by the program offices". Presumably title VII and section 337 reports would be excluded from this policy, even though some of these reports are certainly of significant interest. Section 332 reports would be covered by this policy. Assuming that non-recurring section 332 reports would have significant interest, a policy that these reports must be composed by PUB would have a serious impact. For example, both NAFTA and APEC (see publications numbered 3045 and 3101 in Attachment 2 for full titles) would have been subject to this requirement. Economics was the lead office on both of these reports and, despite a preference for using PUB services, chose not to do so because of time limits and difficulties in standardizing the draft chapters.

Interleaf

Until 1996, documents submitted to PUB were composed on Interleaf. PUB considers Interleaf to be the best production composition package for the types of documents the Commission produces because it gives a polished finish to documents, has more sophisticated graphic capabilities, and is faster. However, some program offices strongly object to Interleaf.

The opposition to Interleaf is closely linked to proofreading, a major point of contention. PUB requested proofreaders as part of the Interleaf procurement process, but none were provided then or in response to subsequent requests. PUB did not have adequate staff and/or time to adequately proofread for format errors before documents were returned to the program office, and sometimes missed format errors, such as incorrect alignment of text or tables. The project leaders objected that the documents had to be proofread repeatedly in entirety, instead of just the changes, after every revision. Thus began the "breakdown" in trust cited in PUB's response to the draft audit report.

The cause of the errors is also contentious. The program offices attributed the errors to Interleaf, and PUB agreed that some errors were generated during the composition process due to software problems with Interleaf. PUB said errors were a result of insertions and changes to the documents after composition was begun, to the extent that PUB staff were inputting hand-written changes at the last minute. PUB also had to reenter data sometimes that was not submitted in a usable electronic format which resulted in errors.

PUB said the Interleaf software problems have been mostly resolved, and the remaining problems are inherent in any composition process. Text changes made during composition are prone to errors, and PUB staff cannot proofread for content. Time constraints prevent using contractors for proofreading services.

Word-processing

The current alternative to Interleaf is word-processing software, primarily WordPerfect. Commission employees use word-processing software to draft documents, and to format documents that are not submitted to PUB. In recent years, project leaders began requesting that PUB compose documents using word-processing software. PUB developed expertise in a variety of software packages in order to be able to compose documents in word-processing, but the process was not efficient and PUB requested guidance from the Chairman.

In response, a pilot project was started in FY 1996 to compose documents using word-processing software. For this project, ID was to prepare documents in a standard near-final format using word-processing software, and submit the documents with a sufficient time-frame for PUB to compose the documents for printing. To facilitate the pilot project, PUB agreed to provide the program office support staff and analysts composition training; create document templates for program staff use; provide on-demand, on-going technical support; and apply high-end desktop publishing skills at the end of the report preparation process for quality control.

Although several individual reports were successful, the overall pilot project was not. ID did not prepare documents in near-final format, and did not submit the reports within the agreed upon time-frame. PUB attributed the failure to the voluntary nature of the project, and ID to circumstances that unavoidably delayed the submission of reports.

Standard Method

PUB currently has to maintain both word-processing and professional-quality composition expertise. Adopting a standard method for composing documents in-house would be more efficient. The majority of documents are composed using word-processing software and this method is preferred by most program offices. PUB will need to have expertise in word-processing regardless of the method used for composition. Accordingly, we believe that the Commission should adopt word-processing as the standard method for composing documents.

The benefits of Interleaf are not significant enough to mandate use. The only discernible visual difference was the two-column format generated on Interleaf which is considered easier to read. The tables and graphics prepared in word-processing and Interleaf appear comparable, although Interleaf has some advanced graphics capabilities such as the scatter plots developed for Investigation No. 332-384. Interleaf is faster, which would be a factor in the longer documents, but the difference would be a matter of hours on most documents.

The disadvantages of word-processing software are not significant. Columns cannot be used in WordPerfect because the footnotes do not work, although the single column format is sometimes compensated for by widening the margins. Some technical problems, such as placement of page numbers, have to be resolved, but this was also true of Interleaf which originally had difficulties with footnotes. For the occasional document requiring sophisticated graphics not currently available in word-processing, the Commission would need to use a contractor which could be time-consuming.

The significant opposition expressed by INV and ID makes it unlikely that Interleaf would be voluntarily accepted. The problems have not been resolved to an acceptable level. For example, a report was submitted to PUB late in CY 1997 and composed on Interleaf. So many format errors occurred, that after several revisions the project leader decided to format the report using word-processing (publication no. 3041).

Discontinuing Interleaf would not have any significant dollar costs or savings. The Commission bought the Interleaf software years ago, and spends about $2,100 annually for software maintenance. Staff attend training every three to four years which costs approximately $3,000 per person. The comparable costs for word-processing software are already being incurred. The significant savings would be in staff resources by eliminating the need to maintain proficiency in two systems.

Internet Postings

The development of the Internet and the Commission's web site has also had an impact on PUB. The Commission posts most public reports on its home page. A report has to be converted into a Print Definition Format (PDF) file before it can be posted. Commission policy does not address which office is supposed to do the conversion. ID usually converts reports composed by program office staff, but some are referred to PUB for conversion. Some of these reports need reformatting after the PDF conversion which can make the appearance inconsistent with the printed report.

Recommendations

We recommend that the Director of Administration:

1. Draft a Commission policy that:

   -- Addresses which documents, if any, are to be submitted to PUB for composition, and the method to be used to compose such documents;

   -- Adopts word-processing as the standard method for composing Commission documents; and

   -- Links responsibility for posting reports on the Commission's web site with the report preparation.

2. Phase-out in-house use of the Interleaf system.

Agency Comments and OIG Response

The Director of Administration stated that combining the statistics for reports other than 332 studies and documents that do not go through the composition process gives a diminished view of the amount of composition work PUB is actually performing.

The scope of the audit as set forth in the notification memorandum was all Commission documents. Separating "reports other than 332 studies and other documents that do not go through the composition process" would eliminate entire categories of reports, such as title VII and section 337, that do not ever use PUB for composition. Other categories, primarily related to research studies, would be included whether or not the reports were submitted to PUB. This approach would be an inconsistent treatment of documents formatted by the program offices. Contrary to the statement that our statistics give a diminished view of the amount of work PUB is actually performing, a total universe is necessary to give a true picture of how documents are produced throughout the Commission.

The Director of Administration stated that historically, the lack of proofreaders is where the breakdown in "trust" began and should be emphasized more in this report.

We acknowledged that proofreading is a major point of contention in the draft report and have added details on the history in the final report. However, the lack of proofreaders is not the current problem. Indeed, PUB said it did not use a contract awarded in FY 1998 for editing and proofreading services because of time constraints.

The breakdown in trust is on both sides. PUB does not trust the program offices to submit documents in a timely manner and near-final format, which means about two weeks in advance of printing with Commission comments already incorporated. The program offices do not trust PUB to return a document without format errors in a timely manner, and increasingly choose to retain control of the document through printing.

Realistic expectations need to be developed. Documents are not ready for composition two weeks in advance, and changes based on Commissioner comments are often made until the last minute possible. The publications process has to be able to accommodate this scenario without introducing format errors.

UNIFORM PROCEDURES

The Commission does not have procedures for document preparation and submission, and office guidelines were not followed. Program staff used multiple software packages to prepare documents with varying degrees of expertise. PUB spent a significant amount of resources "undoing" the format drafted by program staff. A more efficient process would be for program staff to prepare documents in a simple format, and PUB to put the document in final format during the composition process.

The proliferation of the personal computer and simplification of software packages have contributed to a change in how documents are prepared. Professional staff with a varying degree of expertise and personal software preferences were preparing draft reports. Sections of the report were often drafted by different analysts, who were sometimes in different offices with different style preferences. While automation has many benefits, it also created the following problems:

- A wide range of software packages was being used to compose documents. The standard adopted by the Information Resources Management Steering Committee (IRMSC) was WordPerfect 6.1 as set forth in *the Standards for Producing ITC Tables* and ITC Directive 3204.1: *Rules for Tables and Figures*, December 30, 1992. Analysts used WordPerfect 5.0 to 8.0, the latest available version, to compose documents.

- A variety of print drivers were being used throughout the Commission. This resulted in compatibility problems when combining various sections of a report composed by different analysts/program offices into one document.

- Multiple data base, spreadsheet, and graphics software packages were used, e.g. Lotus, Excel, Power Point, Access, and Harvard Graphics. Figures were presented in different styles. The packages were not all compatible with each other, or easily converted for composition. In some cases, PUB had to re-enter or manipulate the document file to make it compatible with the composition software.

- Tables were presented in different fonts and type-size, e.g. Times New Roman or Courier and 12 versus 10 point. Within the same document, and sometimes even within the same table, formatting for titles was not consistent. Similarly, underlining in the body of the tables was not consistent.

- Tables were sometimes linked to a document rather than inserted. PUB did not have access to the linked hard drive and had to re-enter the table if changes need to be made.

- PUB developed standard templates for documents and tables, but these were seldom used. The Office of Economics used the standard template for composing documents, but the Office of Industries did not. Likewise, the program offices developed tables independently rather than using the templates.

- The program offices delivered electronic and/or hard copies of documents to PUB in various stages of preparation, including hand-written copies, indicative of the differing levels of expertise with word-processing and a general lack of knowledge on how to format documents.

PUB had to strip extraneous codes, reformat, and manipulate the documents before putting them in final format. PUB estimated approximately 60 percent of its time was cleaning up the documents compared to 40 percent on composition.

Composition would be greatly facilitated if document preparation was reasonably standardized. Software packages for data bases and spreadsheets should be designated as has been done for word-processing, and draft documents should be prepared using the designated packages. Program offices could choose to format documents in a "vanilla" format. This means basic typing in a standard program, using minimal features such as indent, tab, bold, and underline. An alternative would be to use templates developed in coordination with PUB. Tables, figures, and footnotes would be

submitted with the report, preferably as separate files. If possible, the program offices would use a print driver compatible with the one used by PUB.

This method has been used successfully by EC where a simple, standardized format was followed for most documents. Tables and graphics were submitted separately and inserted by PUB. The final look and style of the document was created by PUB during the composition process. This approach worked to the satisfaction of both offices.

The format of the documents sent to the Commission for review could also be changed to increase efficiency of the process. Documents were submitted in varied formats. For example:

> IND sent a fully formatted version of the report with tables and figures inserted for better readability and presentation.
>
> EC sent a simpler document in which formatting had not been completed and the tables and figures were attached but not yet inserted into the text.

The latter approach has the advantage that changes are easier to incorporate into the document. If a standardized format is adopted, sending a simpler document for Commission review could be considered acceptable.

One reason the pilot project (see page 7) was not successful was that documents were not prepared properly in near-final format. The program offices will need to provide support to program staff who do not have a minimum level of computer expertise, and establish some method to monitor that documents are properly prepared.

Another reason the pilot project was not successful was that documents were not submitted within the agreed upon time-frame. The program offices complete action jackets at the on-set of an investigation which includes a time-line that generally allows two to three weeks for publication (composition and printing). In practice, the time provided was often much less and at times was just a few days. Records were not available to determine exactly when documents were submitted to PUB, but the officials interviewed generally agreed that documents were not submitted in accordance with the scheduled submission dates. New procedures should establish a reasonable time frame for submitting documents.

Recommendation

We recommend that the Director of Administration, in coordination with the Director of Operations:

> 3. Establish guidelines for processing documents that address the use of standardized software as adopted by IRMSC, and form and format of documents, timing, and feedback.

Agency Comments and OIG Response

The Director of Administration stated we should put more emphasis into detailing how the Interleaf process can be successful in other offices, if those offices follow the example of the Office of Economics.

> EC has been successful in using PUB services for composition. We clarified the report section on uniform procedures to indicate that EC is already following many of our recommendations. EC has no preference for either word-processing or Interleaf; PUB elects to compose these documents using Interleaf. Nevertheless, EC did not submit a large, complex report to PUB for composition because the report could not be prepared a sufficient time in advance.

PUB believes that the Director of Operations should demonstrably endorse and oversee the enforcement and implementation of any recommendations that affect his office.

> To date, the Commission has not had a publication policy with which the Office of Operations was required to comply. Once a policy is adopted, as stated on the previous page, the program offices will have to ensure documents are properly prepared.

TRAINING

Program staff generally had a poor understanding of the composition process. The program offices and PUB had minimal interaction from the onset of an investigation through submission of the draft for composition. PUB received a copy of the action jacket which had the estimated dates for submitting the report for composition. Revised dates were not provided. The reports were prepared according to the program staff's capabilities and preferences, and submitted in any format.

In addition to standardizing procedures, we believe educating the program staff on the production process would be beneficial. Staff would then understand how the way the document is drafted impacts on the work necessary for composition. For example, program staff who do not know how to properly use tabs or create tables, are unlikely to know that PUB has to undo this work and redo it properly. Similarly, several versions of WordPerfect are available in addition to the agency standard. Staff can use an older version they are comfortable with, or experiment with the latest version, and not realize that the format is often affected when documents are converted.

Training on the format and/or templates established in the standardized procedures needs to be reinforced with specific on-the-job requirements. PUB should meet with staff as soon as possible to discuss the document format, ensure the staff are familiar with format and how to use various tools, and to answer any questions. Additional meetings may be necessary when documents are consolidated or nearing completion.

The program offices also need feedback from PUB on case-specific problems or trends. Especially until the process is well-known, frequent informal feedback is needed to refine the process. A formal mechanism, such as the project assessment briefings for 332 investigations, could be established.

Even without the standardized procedures, PUB could meet with the staff to discuss job requirements and submission of documents. This would at least improve awareness of the problems and the quality of submissions.

Recommendations

The Director of Administration should instruct PUB to:

4. Develop a training program on document preparation and composition for program staff; and

5. Be proactive in providing input to program staff during the development of the document and feedback on problems.

Agency Comments and OIG Response

The Director of Administration stated that a liaison, most likely from PUB is essential not only for document transition purposes, but for agency-wide training and support purposes, as well.

We agree that a PUB liaison could be used to provide training and assistance throughout the entire document process, which would include insuring that documents to be submitted to PUB for composition conform to general standards and guidelines. Expanding PUB's role to include documents that are not going to be submitted for composition could be a significant expansion of responsibilities depending on how broadly "standards and guidelines" were defined. For example, conformance with procedures on submitting documents for printing would be appropriate, but reviews for conformance with editorial issues would not be appropriate.

STYLE STANDARD

Commission guidelines on writing styles, rules for tables and figures and format guidelines for document preparation are technically out-of-date or not followed. We identified a general lack of consistency in style, both between documents as well as within documents.

We reviewed a cross-section of Commission documents to identify format differences. The documents included the Annual Report and reports for title VII, section 332, and section 201 investigations. Examples of style inconsistencies were:

- The document table of contents varied as to format, font, chapter headings (Part 1, Chapter 1), table and figure designations (1, 2, 3 / I-1, II-1 / 1-1, 2-1) and pagination (ii / 1, 2, / 1-1, 2-1 / I-1, II-1).

- The document outline was inconsistent in presentation, i.e. determination and views of the Commission at times is treated as a prologue to the document and other times as Chapter 1.

- Documents composed using Interleaf were right and left justified; those using a word-processing package generally were left justified only.

The Commission style manual may not be used when composing a document because it is not "user friendly" and was not readily available until recently. The manual did not contain an index or cross references so particular areas of interest were difficult to locate. In addition, the manual did not have clear examples specifically targeted at the most commonly identified composition problems. Staff interviewed were often unaware of the style manual and other documents with related guidance, and none had copies readily available.

In August 1998, the style manual and related guidance, including an update on producing tables, was added to the Commission's Intranet. The ready availability should improve consistency and conformance with Commission style guidance in document preparation.

Consistent style, particularly within a document, helps make a professional presentation. We believe the best way to ensure consistency and conformance with Commission style guidance is to adopt the prior recommendations in this report. Centralizing the formatting function and using templates limits the number of employees who have to be familiar with style details. The Commission style manual could possibly be eliminated or greatly reduced, or a style manual from another government agency or business standard style manuals could be sufficient for the non-report documents.

Attachment 1

UPDATED STATISTICS ON COMMISSION PUBLICATIONS

	Program Office	PUB	Total
CY 1997	46	24	70
***YTD 1998**	47	25	72
Total	**93**	**49**	**142**

	CY 1997			*YTD 1998		
	Program Office	PUB		Program Office	PUB	
Publication:	WP	WP	INT	WP	WP	INT
Title VII Investigations	18	0	0	19	0	0
Section 337 Investigations	7	0	0	3	0	0
Section 332 Studies	13	4	6	13	1	6
Industry and Trade Summaries	2	3	1	1	9	0
IERs	0	1	7	0	0	5
ITTRs	4	0	0	4	0	0
Miscellaneous**	2	0	2	7	0	4
Total Documents	**46**	**8**	**16**	**47**	**10**	**15**

* YTD is January 1 to December 17, 1998.

**In addition to documents listed on page three, includes a handbook on title VII provisions, guidelines for hearings, and a summary of statutes.

Attachment 2

SECTION 332 REPORTS BY NUMBER OF PAGES

Pub.#	CY 1997 Report Title	Program Office	PUB
3045	The Impact of the North American Free Trade Agreement on the U.S. Economy and Industries: A Three-year Review	621	
3050	Fresh and Processed Potatoes: Competitive Conditions Affecting the U.S. and Canadian Industries		356
3051	Shifts in U.S. Merchandise Trade in 1996		337
3031	Advice Concerning the Proposed Modification of Duties of Certain Information Technology Products and Distilled Spirits	336	
3053	General Agreement on Trade in Services: Examination of the Schedules of Commitments Submitted by Asia /Pacific Trading Partners	285	
3023	*Advice on Providing Additional GSO Benefits for Least Developed Countries*		251
3024	*Year in Trade, 1996 Annual Report*		228
3048	Cattle and Beef: Impact of the NAFTA and Uruguay Round Agreements on U.S. Trade	227	
3079	Advice Concerning Possible Modifications to the U.S. Generalized System of Preferences	207	
3067	*U.S.-Africa Trade Flows and Effects of the Uruguay Round Agreements and U.S. Trade and Development Policy, Third Annual Report*		205
3056	Likely Impact of Providing Quota-Free and Duty-Free Entry to Textiles and Apparel from Sub-Saharan Africa	191	
3032	*Publication Sharing: Use of U.S. Components and Materials in Foreign Assembly Operations, 1992-1995*		179
3038	Annual Statistical Report on U.S. Import of Textiles and Apparel: 1996	162	
3041	Recent Trends in U.S. Services Trade 1997	159	

Note: Titles in italics were composed on Interleaf.

3069	*The Dynamic Effects of Trade Liberalization: An Empirical Analysis*		147
3058	*Caribbean Basin Economic Recovery Act: Twelfth Report 1996 & Andean Trade Preference Act: Fourth Report 1996*		138
3077	Publication Sharing: Use of U.S. Components and Materials in Foreign Assembly Operations, 1993-1996		115
3064	Monitoring of U.S. Imports of Tomatoes	48	
3061	Monitoring of U.S. Imports of Peppers	45	
3011	Advice Concerning the Addition of Certain Pharmaceutical Products and Chemical Intermediates to the Pharmaceutical Appendix to the Harmonized Tariff Schedule of the United States		30
3012	Advice on Providing Temporary-Duty Free Entry for Certain Suits and Suit-Type Jackets from Mexico	22	
3030	Nonrubber Footwear Statistical Report, 1996	13	
3028	The U.S. Automobile Industry Annual 1996 Report on Selected Economic Indicators	10	
	Total	2326	1986
	Average	178.92	198.6

Pub.#	YTD 1998 Report Title	Program Office	PUB
*3101	Economic Implications of Liberalizing APEC Tariff and Nontariff Barriers to Trade	619	
3104	Advice concerning the Proposed Expansion of the Information Technology Agreement: Phrase II	336	
3097	Advice Concerning the Proposed Expansion of the Information Technology Agreement: Phrase I	231	
*3105	Recent Trade in U.S. Services Trade, 1998 Annual Report	210	
3103	*The Year in Trade, 1997 Annual Report*		206
3102	Annual Statistical Report on U.S. Imports of Textiles and Apparel: 1997	157	
3110	*Implications for U.S. Trade and Competitiveness of a Broad-Based Consumption Tax*		55
*3094	Nonrubber Footwear Statistical Report	13	
	Total	1566	261
	Average	261	130.5

* Assistance from PUB on graphics and tables.

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DIRECTOR, OFFICE OF
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1998 DEC -8 AM 8:28

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

December 3, 1998 PUB-V-01

MEMORANDUM

TO: Inspector General

THRU: Director, Office of Administration

FROM: Director, Office of Publishing

SUBJECT: Response to Draft Report: Review of Commission Methods Used to Compose Reports

This memorandum is the Office of Publishing's response to Draft Report: Review of Commission Methods Used to Compose Reports. I have reviewed the draft audit report and while I am in general agreement with the findings and recommendations of the audit report, I have several areas of concerns.

Response to the draft audit report:

The areas of concern with the final draft of the IG audit include:

1. The statistics for reports other than 332 studies and other documents that do not go through the composition process have been totaled with the statistics for those reports that do go through the composition process. The scope of the audit is to cover composition, not all reports and studies. **The Office of Publishing believes that combining the statistics gives a diminished view of the amount of composition work the Office of Publishing is actually performing.**

2. The draft audit report supports giving each individual program office maximum flexibility to do whatever they want without any real format, standards, and guidance. We support appointing an agency-wide liaison between the program offices and the Office of Publishing to ensure a smooth transition of documents through the *entire* publishing process. This liaison would also ensure that documents that do not go through the Office of Publishing also conform to general standards and guidelines. **The Office of Publishing believes that a liaison, most likely from the Office of Publishing, is essential not only for document transition purposes, but for agency-wide training and software support purposes, as well.**

3. The section POLICY FOR PUBLICATION PROCESS does not adequately detail the history of the publishing process, including how the lack of proofreaders has intensified the problems of transforming draft, word-processed documents into a final composed format. **The Office of Publishing believes that historically, the lack of proofreaders is where the breakdown in "trust" began and should be emphasized more in this report.**

4. The Office of Publishing believes that overall there is too much emphasis put into why the current Interleaf composition process has not worked for the Office of Industries and not enough emphasis is put on why the current process has worked so well in other offices. The Office of Economics for example, has spent a lot of time training its economists and support staff on the "do's and don't's" of how to prepare documents for Interleaf composition. It has standardized on the Interleaf process, therefore, there is no confusion on the part of the project teams as to how the report will be published. This standardization has provided for a smooth and efficient composition process between the Offices of Economic and Publishing. Similar comments can also be made about the work composed in the Office of Publishing for the Office of External Relations. **The Office of Publishing would like to see more emphasis put into detailing how the Interleaf process can be successful in other offices, if those offices follow the example of the Office of Economics.**

5. On page 6, paragraph 1, the suggestion by the Office of Inspector General for the Commission to discontinue in-house, professional-quality composition services and use a contractor for documents requiring a more polished appearance, is not a viable option. The Joint Committee on Printing's regulations defines composition as a part of printing and all printing that is not achieved at the ITC must be contracted through the Government Printing Office. The normal turn-around time for work produced through GPO is 4-6 weeks. The ITC was approved to operate it's own print shop several decades ago by the Joint Committee on Printing for reasons that are still viable today (i.e., statutory deadlines and compressed investigation schedules). Without this approval, all printing and professional composition work would be required to be produced through GPO. Additionally, the work returned from GPO would require proofreading and revisions identical to the in-house process. Each draft thereafter would be assigned a 4-6 week turn around, although revisions would more than likely be processed sooner. **The Office of Publishing believes that there would be NO benefits to contracting professional composition work through the Government Printing Office.**

6. As stated in previous discussions with the Office of Inspector General, the Offices of Administration and Publishing both believe that successful implementation of the recommendations that will ultimately come from this report will depend on enforcement. While the Director, Office of Administration can set standards for submission of work to the Office of Publishing, implementation and enforcement must take place in the program offices. **The Office of Publishing believes that the Director, Office of Operations should demonstrably endorse and oversee the enforcement and implementation of any recommendations that affect his office.**

Over the past twelve years, the Office of Publishing has successfully demonstrated that its selection and implementation of the centralized, in-house, composition program using the Interleaf system has

not only produced high-quality, professional results, but has been both cost and time efficient. Recurring costs of the system are minimal and the current configuration continues to serve all of the agency's publishing requirements. Additionally, using the current system, the agency has never missed a scheduled deadline because of fault or limitations of Publishing's resources.

Office of Publishing is not proposing that it compose all of the agency's reports and studies. The Office of Publishing simply does not have the resources to do that. However, it is my opinion that the Office of Publishing produce those reports that the agency anticipates will have significant interest to our customers as determined by the program offices. Additionally, it is my opinion that the Office of Publishing can be instrumental in assisting the program offices in producing documents that they decide to compose within their own offices. The Office of Publishing assistance would include creating standards and policy, including templates and sample documents, providing technical support and assistance in applications software, and training program office staff in producing the work using standard formats.

The Interleaf system is firmly integrated into both the enterprise and publishing networks and also serves as a major front-end system for file conversions for the Internet. I can not recommend that the agency abandon a successful system in exchange for the freedom and flexibility that would be afforded by decentralized composition. I strongly believe that using word processing software and decentralizing composition, will generate losses in productivity and quality.

What I would like to see come for this audit is a constructive plan that will ensure that the agency consistently produce documents of the highest quality, both in content and appearance, in a timely manner, by professionals working optimally within their own areas of expertise.

Response to Recommendations of the Inspector General:

The IG recommends that the Director of Administration:

1. **Draft a Commission policy that:**

   a. **Defines general responsibilities of program offices to either compose the final report or submit draft documents to OMS-PD for composition in accordance with established procedures:**

   Response: Agree with clarification.

   OPUB proposes: Develop Commission policy on the method(s) to be used to compose documents.

   b. **Adopts word-processing as the standard method for composing Commission documents and identifies criteria for limited exceptions which would be sent to contractors for professional composition; and**

   Response: Strongly Disagree

   OPUB proposes: Use Interleaf as the method to compose all 332 studies of significant interest that are released to the public and the ITC Annual Report; allow the use of WordPerfect for confidential reports, internal documents, the ITTR, staff papers and recurring statistical studies (i.e. footwear)

c. **Links responsibility for posting reports on the Commission's web site with the responsibility for report composition.**

Response: Agree. Give responsibility for posting files to the Internet to the Office of Publishing for those reports it composes.

2. **Phase out in-house use of the Interleaf system.**

Response: Strongly Disagree.

3. **Establish guidelines for processing reports that address standardized software, and form and format of documents, timing, and feedback.**

Response: Agree with clarification. The Office of Publishing agrees that it should establish guidelines for form and format of documents, timing and feedback and the use of standardized software as adopted by the IRMSC.

4. **Develop a training program on report preparation and composition for program staff; and**

Response: Agree. The Office of Publishing would develop a training program on report preparation for program office staff that is maintained and administered by the Office of Publishing.

5. **Be proactive in providing input to program staff during the development of the report and feedback on problems.**

Response: Agree.

Approve: ✓ Disapprove: _____

subject to the attached understanding

Lynn M. Bragg

Lynn M. Bragg, Chairman

12/17/98

Date

cc: The Commission
Office of the General Counsel

I am approving the Office of Publishing's response to the draft report, subject to the following:

I believe that the absence of formal Commission policy has contributed significantly to the concerns identified in the Inspector General's report. Therefore, I believe that the decision on the method for composing documents should be made as part of the directive process. This will enable the Office of Administration to draft and propose the policy it prefers, but will enable all office directors, including the Inspector General, to comment, including the Commission. I expect the Director, Office of Operations to work closely and actively in the development of this directive and its approval, since, in my view, the involvement and commitment of program staff to addressing these concerns is critical to resolving this management weakness.

It is my preference that this process be completed as soon as possible, and in advance of the usual six-month deadline usually provided for closing out such recommendations. I would appreciate appropriate status reports as well.

It is my understanding that the Inspector General would concur with this approach as reaching management agreement.