



United States

International Trade Commission

Strategic Plan

FY 2022–2026



About Us

The U.S. International Trade Commission (USITC or Commission) is an independent, nonpartisan, quasi-judicial federal agency established by Congress with a range of trade-related mandates. The Commission:

- adjudicates whether: (1) dumped or subsidized imports injure a domestic industry; (2) surges of imports injure a domestic industry; and (3) imports infringe a domestic intellectual property right or otherwise unfairly injure a domestic industry;
- provides independent, objective, and timely analysis of trade and competitiveness issues to the President and Congress; and
- maintains the Harmonized Tariff Schedule of the United States.

The USITC is headed by six Commissioners who are nominated by the President and confirmed by the U.S. Senate. The Commissioners' terms are set at nine years by statute and are staggered such that a different term expires every 18 months. However, a Commissioner may serve until replaced. As such, a Commissioner may begin serving after the nine-year term has begun and may continue to serve after the term has expired.

The Commission's structure supports its responsibility to make unbiased determinations and objective, balanced, fact-based analysis. No more than three Commissioners may be members of the same political party. The Chair and the Vice Chair are designated by the President and serve for a statutory two-year term in those roles. The Chair may not be of the same political party as the preceding Chair, nor may the President designate two Commissioners of the same political party to serve as the Chair and Vice Chair.

To support its mission, the USITC maintains a professional staff of trade and nomenclature analysts, investigators, financial analysts, statisticians, attorneys, economists, information technology specialists, and administrative support personnel. The diverse staff are experts in their respective mission areas, work in multidisciplinary teams, and adapt to evolving workload challenges.

This document sets forth the strategic goals and objectives that will underpin the Commission's work over the next five years. In its second century, the Commission will continue to provide high-quality, cutting-edge analysis of international trade issues to the President and the Congress, and to remain a highly regarded forum for the adjudication of trade disputes.

Overview

International trade and investment increasingly shape the U.S. and global economies. Trade in goods and services and foreign investment affect U.S. firms, workers, and consumers. As tariff rates have fallen over time, nontariff measures and other policies have become more prominent, influencing the level and composition of U.S. investment and trade. In addition, changes in technology have allowed firms to expand their supply chains in the United States and abroad. Trade and investment policy changes have had significant local impacts on industries and workers, affecting the overall economy.

The International Trade Commission pursues its mission in three areas of U.S. international trade: adjudication, research and analysis, and maintaining the Harmonized Tariff Schedule.

Adjudication

The Commission has specific responsibilities in the adjudication and enforcement of U.S. trade laws. As the influence of trade in the U.S. and global economies has grown, the role we play in applying these laws to allegations of unfair and/or injurious trade practices involving imports has remained a mechanism on which U.S. firms can rely to ensure foreign firms are competing fairly. Our provision of sound and timely import injury determinations is critical to maintaining the confidence of U.S. companies and workers in a fair and impartial international trading system. We provide objective, transparent investigation and adjudication of complaints concerning unfair acts in import trade, such as the importation of goods that infringe U.S. intellectual property rights, as well as complaints alleging injury from dumped or subsidized imports or from a surge in imports. Timely resolution of these disputes can be of paramount economic importance to U.S. industries. We provide support to U.S. Customs and Border Protection (CBP), as needed, to enable effective enforcement of antidumping and countervailing duty (AD/CVD) orders and exclusion orders.



Research and Analysis

The Commission plays an important role in analyzing how changes in U.S. and foreign trade and trade-related policies affect U.S. economic growth, employment, and competitiveness. As an independent, nonpartisan agency, we fulfill our mandate to provide the House Committee on Ways and Means, the Senate Committee on Finance, the President, and, by delegation, the U.S. Trade Representative (USTR) with independent, objective, and timely



analysis on many, often critical, trade issues. We continue to develop and hone substantive expertise so that we can supply accurate, cutting-edge insights to Congress and the Administration. Our reports reflect our expanding abilities to analyze and explain the effects of policy changes on producers, workers, consumers, and the U.S. economy as a whole.

Maintaining the Harmonized Trade Schedule

Since its founding in 1916, the Commission has had a major role in maintaining and analyzing the nation's tariff schedule. Since 1988, we have been responsible for maintaining the official legal document that specifies the tariffs, if any, that apply to all imported goods. We ensure that the tariff schedule is up to date and accurate, reflecting all implemented trade agreements. We also chair the interagency Committee for Statistical Annotation of the Tariff Schedules. These efforts facilitate international trade by contributing to efficient clearance of goods through the nation's 328 ports of entry, enabling the accurate collection of tariff revenues, and permitting the collection and reporting of the nation's trade statistics. In an environment of rapidly changing technology and products, our representation of the United States at the World Customs Organization and our timely maintenance of the U.S. tariff schedule improve the quality of trade information and ensure that the nomenclature (or classification) system serves the interests of U.S. firms.



Our statutory responsibilities present both great opportunities and significant challenges. Key statutory responsibilities are shown in box 1.1.

Box 1.1 Key statutory responsibilities

Tariff Act of 1930

Under Title VII of the Tariff Act of 1930, the Commission and the U.S. Department of Commerce (Commerce) are responsible for conducting antidumping (AD) and countervailing duty (CVD) (subsidy) investigations and five-year (sunset) reviews. Commerce determines whether imports under investigation are dumped or subsidized, and if so, the margin of dumping or amount of subsidy. The Commission determines whether a U.S. industry is materially injured or threatened with material injury by reason of the imports under investigation. If both Commerce and the Commission reach affirmative final determinations, Commerce will issue an antidumping duty order to offset the dumping or a countervailing duty order to offset the subsidy. (See Title VII, Tariff Act of 1930, 19 U.S.C. § 1671 et seq.)

Under section 337, the Commission investigates unfair methods of competition and unfair acts involving imported articles, including infringement of U.S. patents, trademarks, and copyrights. If a violation is found, the Commission may issue one or both types of remedial orders authorized by the statute. Exclusion orders direct U.S. Customs and Border Protection (CBP) to prohibit the importation of infringing articles. Cease and desist orders prohibit, among other things, the sale, marketing, or distribution of infringing articles. (See section 337, Tariff Act of 1930, 19 U.S.C. § 1337.)

Under section 332, the Commission investigates a wide variety of trade matters. Upon request from the House Committee on Ways and Means, the Senate Committee on Finance, or the President, and, by delegation, the U.S. Trade Representative (USTR), or upon its own motion, the Commission conducts factfinding investigations and prepares reports on matters involving tariffs, trade, and competitiveness. (See section 332, Tariff Act of 1930, 19 U.S.C. § 1332.)

Under section 484, the Commission also cooperates with the Secretary of the Treasury and the Secretary of Commerce to establish statistical subdivisions of the Harmonized Tariff Schedule (HTS) for articles imported into the United States and seeks to ensure that these statistical subdivisions are compatible with domestic statistical programs. (See section 484(f), Tariff Act of 1930, 19 U.S.C. § 1484(f).)

Trade Act of 1974

At the request of the President, the Commission provides advice as to the probable economic effect on domestic industries and consumers of modification of duties and other barriers to trade that may be considered for inclusion in any proposed trade agreement with foreign countries. (See section 131, Trade Act of 1974, 19 U.S.C. § 2151.)

At times, certain articles may be designated as eligible for duty-free treatment when imported from designated developing countries. The Commission advises the President as to the probable economic effect on the domestic industry and on consumers of such designations. (See sections 131 and 503, Trade Act of 1974, 19 U.S.C. § 2151, 2163.)

The Commission conducts “safeguard” investigations under sections 201–204 of the Trade Act of 1974. The Commission conducts investigations under section 202(b) to determine whether an article is being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or the threat thereof, to the domestic industry producing a like or directly competitive article. If the Commission finds serious injury or threat, it recommends to the President the action that would address the serious injury or threat thereof and be most effective in facilitating the efforts of the domestic industry to make a positive adjustment to import competition. The President makes the final decision on whether to take an action and, if so, the form, amount, and duration of the action. During the time that a remedy action is in effect, the Commission, under section 204(a)(1), monitors developments within the domestic industry and, under section 204(a)(2), may be required to provide a report to the President and the Congress on its monitoring. The Commission may also be required under section 204(a)(4) to provide advice to the President regarding a modification of the action and, under section 204(c), investigate to determine whether the action should be extended. After the action terminates, the Commission, under section 204(d), must evaluate the effectiveness of the action and submit a report to the President and the Congress. (See sections 201–204, Trade Act of 1974, 19 U.S.C. § 2252–2254.)

In addition, the USTR, following receipt of a request from a domestic industry that produces a perishable agricultural product or citrus product, may request the Commission to monitor and investigate imports of the concerned product under section 332(g) of the Tariff Act of 1930 (19 U.S.C. 1332(g)) for the purpose of expediting an investigation under section 202(b) of the Trade Act with respect to imports of such perishable agricultural product or citrus product. (See section 202, Trade Act of 1974, 19 U.S.C. § 2252.)

Omnibus Trade and Competitiveness Act of 1988

The Commission is responsible for compiling and publishing the HTS and for keeping it under review. The Commission is also responsible for recommending to the President modifications it considers necessary or appropriate to conform the HTS with amendments to the HS Convention, to ensure that the HTS is kept up to date, and to relieve unnecessary administrative

burdens. (See section 1205, Omnibus Trade and Competitiveness Act of 1988, 19 U.S.C. § 3005.)

Along with the Departments of Treasury and Commerce, the Commission is responsible for representing the U.S. government concerning the activities of the World Customs Organization Council (WCO) relating to the Harmonized System (HS) Convention covering the international classification of traded goods. We also work with the Departments of Treasury and Commerce to formulate U.S. government positions on technical and procedural issues relating to the Convention. (See section 1210, Omnibus Trade and Competitiveness Act of 1988, 19 U.S.C. § 3010.)

Bipartisan Congressional Trade Priorities and Accountability Act of 2015

Under the Bipartisan Congressional Trade Priorities and Accountability Act of 2015, the Commission provides the President and the Congress with reports that assess the likely impact of trade agreements entered into with foreign countries, such as the USMCA. The President's authority to enter into trade agreements expired on June 30, 2021. Section 105(f) of the Act required the Commission to submit to the House Committee on Ways and Means and Senate Committee on Finance two reports, one in 2016 and a second in 2021, on the economic impact of trade agreements with respect to which Congress has enacted an implementing bill under trade authorities' procedures since January 1, 1984. (See section 105(c), Bipartisan Congressional Trade Priorities and Accountability Act of 2015, 19 U.S.C. § 4204.)

American Manufacturing Competitiveness Act of 2016

The American Manufacturing Competitiveness Act of 2016 (AMCA) established a process under which the Commission, in accordance with a procedure and timetable set out in the statute, would request and receive petitions for temporary duty suspensions and reductions, seek public comment on petitions received and input from the Department of Commerce and U.S. Customs and Border Protection, and place each of the petitions into one of six categories based on the requirements of the Act.

The statute authorized two petitioning cycles, with reports due to the House Committee on Ways and Means and Senate Committee on Finance in August 2017 and August 2020, respectively. A miscellaneous tariff bill based on the Commission's first report was enacted in 2017 and expired at the end of 2020. No bill has been enacted in response to the Commission's 2020 report. (See AMCA, 19 U.S.C. § 1332 note.)

United States-Mexico-Canada Agreement Implementation Act

The United States-Mexico-Canada Implementation Act provided new responsibilities for the Commission:

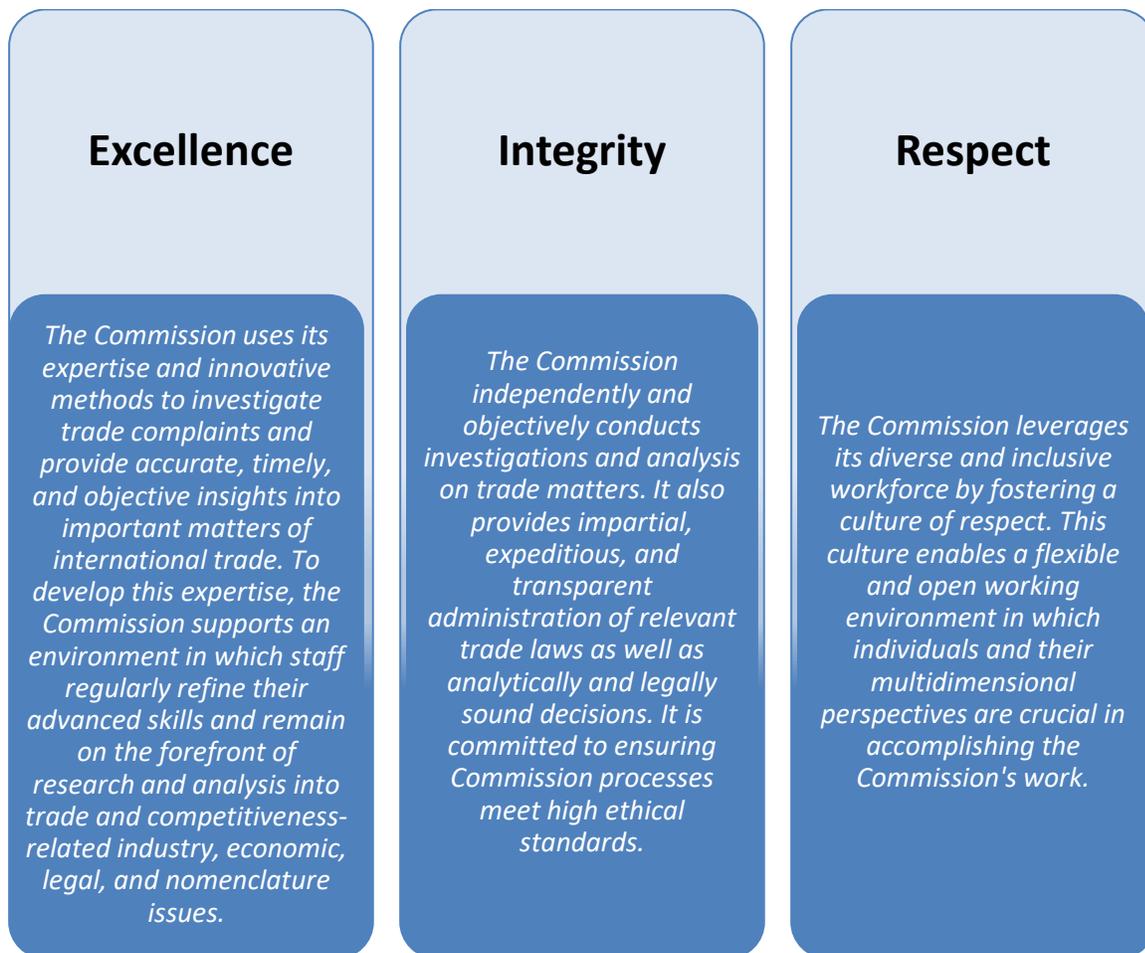
Under section 322 of the United States-Mexico-Canada (USMCA) Implementation Act, the Commission must conduct investigations and make determinations with respect to whether grants of authority, received or requested by Mexican trucking firms or drivers to provide long-haul trucking services in the United States, cause or threaten to cause material harm to U.S. long-haul trucking firms and drivers. (See section 322, USMCA Implementation Act, 19 U.S.C. § 4501 note)

Section 202(A) of the USMCA Implementation Act created special rules for automotive goods. That section created an interagency committee, of which the Chair of the Commission is a member, that advises on and reviews matters concerning the USMCA automotive rules of origin. The Commission also is tasked with preparing biennial reports concerning the economic impact of those rules of origin. (See section 202(A) of USMCA Implementation Act, 19 U.S.C. § 4501 note)

Mission

Investigate and make determinations in trade remedy proceedings; analyze and provide information on tariffs, trade, and competitiveness; update and maintain the U.S. tariff schedule; and execute the agency's mission with independence, integrity, trust, and transparency.

Vision and Values



Policymaker and Stakeholder Engagement

The Commission has identified two mission-specific strategic goals, as discussed below. These goals reflect the interests of policymakers and stakeholders: the President, and, by delegation, the USTR, committees of jurisdiction in Congress, and U.S. industries, workers, and the general public.

In developing this Strategic Plan, the Commission consulted with appropriate congressional committees and the USTR. The Commission also posted the draft Strategic Plan on its website for public comment.

The Commission regularly, both formally and informally, conducts outreach and solicits feedback from policymakers and its key stakeholders. The Commission uses formal feedback tools such as *Federal Register* notices and surveys to solicit performance assessments and process suggestions. Commission staff also engages stakeholders at key points during the process of developing requested analysis and information, per agency protocols. The Commission allows the public to stay updated on its activities through the agency's website and mailing lists. Information received from stakeholders is regularly reviewed and integrated as necessary into process and communication improvement efforts. Regular policymaker and stakeholder engagement is also used to identify emerging areas of interest to Commission requestors and the public.

Strategic Goal 1

Investigate: Conduct Reliable and Thorough Investigations

Commission determinations in its investigative proceedings can have significant impacts on competitive conditions, profitability, and employment in affected U.S. industries. Moreover, policymakers require expert information on a timely basis to inform and support decision-making. The Commission’s investigations often involve products or industries that are important for U.S. productivity, innovation, and competitiveness, and policymakers and businesses may make important decisions based on Commission analysis and determinations.

The Commission administers and applies U.S. laws concerning allegations of subsidized and dumped imports that injure a domestic industry, surges of imports that allegedly injure a domestic industry, and imports that allegedly infringe domestic intellectual property rights or are otherwise unfairly imported. U.S. laws, court decisions, and U.S. international obligations require the Commission, and Administrative Law Judges in section 337 unfair import investigations, to conduct thorough investigation and sound factfinding. The record in each investigation must be examined in an objective manner, and the resulting determinations must be well-reasoned, timely, and consistent with the law.

The Commission provides relevant and independent information, analysis, and data to the Congress, the President, and the United States Trade Representative on a timely basis to inform and support decision- and policy-making to address increasingly complex trade and competitiveness issues. Achieving this goal assists policymakers with decisions related to trade negotiations, enacting legislation, or taking other policy actions that affect U.S. workers and the competitiveness of U.S. industries and the overall U.S. economy. The Commission does this under its statutory responsibilities and in response to formal and informal requests. The Commission’s specialized ability to collect and synthesize primary data and information and provide multidisciplinary analysis supports the development of sound trade policy.

Also under its statutory mandate, the Commission publishes and maintains the Harmonized Tariff Schedule of the United States (HTS), which serves as the legal basis for the collection of customs duties and the compilation of trade data. The HTS is vital to U.S. businesses, government agencies, and others involved in trade.

The increasing complexity of the Commission’s investigations, the variable and increased case load, and resource constraints challenge the Commission’s ability to make decisions and provide information and analysis in a timely manner. The Commission must balance the competing goals of timeliness, transparency, due process, and thorough and high-quality determinations and reports.

Strategic Objective 1.1

Reliable: Conduct expeditious and transparent proceedings

Commission investigations involve many different industries, product markets, and parties, often representing a broad array of interests. From single inventors (as in some section 337 investigations) and corporations with revenues of less than one million dollars, to the largest multinational corporations and unions representing thousands of workers, parties to Commission proceedings benefit from reliable processes that ensure fair, timely, and transparent decisions, consistent with applicable U.S. laws.

The Commission's governing statutes set specific deadlines for determinations in import injury and require that unfair import (section 337) investigations be resolved at the earliest practicable time. In addition, each factfinding investigation has a deadline set by the requester of the study or by statute. Timely decisions and analyses are critical to domestic industries who are injured due to unfairly priced or subsidized imports or surges of imports, U.S. businesses whose intellectual property rights are infringed or who are otherwise injured by unfair practices in the importation of goods, and to policymakers trying to better understand the impact of trade on competitive conditions in the United States and foreign markets.

Transparency is also critical to ensuring reliable proceedings. The Commission continually seeks to promote greater transparency and understanding of its proceedings by ensuring that accurate public information is readily available. The aim of providing complete information in a timely and transparent manner, however, must be balanced against the legal requirement to protect proprietary, confidential unclassified, and national security information from disclosure. Such protection is also necessary to ensure that individuals and entities are willing to provide the information needed to build a full record in future investigations.

The expertise of the agency's staff is a necessary element of the Commission's obligations to fulfill its mission. The Commission continues to use technology to improve its ability to present information that is clear, searchable, and easy to navigate. The Commission continues to ensure the timely flow of information to interested parties and the public, including through providing information on EDIS and IDS.

The increasing complexity of investigations has brought challenges to the ability of the Commission to meet its timeliness goals. In recent years the complexity of all investigations has increased, whether it is the number of countries involved in an import injury investigation, the types of allegations and technology presented in an unfair import investigation, or the questions presented for factfinding investigations.

The Commission’s long-term performance goals that support the above-described objective include:

- Improving timeliness by reducing the average length of section 337 investigations
- Improving the timeliness of completing post-remedial order ancillary proceedings in Section 337 and assessing the timeliness of advisory and modification proceedings under a Commission pilot program
- Ensuring that the Commission meets statutory and external deadlines in factfinding investigations
- Delivering all import injury reports by the statutory deadline and all court documents by mandated deadlines
- Posting on a timely basis information related to import injury investigations on the Commission website, documents on the docketing system and public versions of various Commission opinions
- Providing timely tariff and customs information in response to emails submitted through the online help system

Strategic Objective 1.2

Thorough: Engage the public, including stakeholders and experts, and collect all relevant data to inform and support investigations

The Commission’s independence, nonpartisan reputation, and integrity depend in part on transparent and inclusive investigative activities across all mission areas. To better understand and address increasingly complex trade and competitiveness issues, policymakers turn to the Commission for objective, expert, and relevant information and analysis. The Commission regularly communicates with its requestors to understand their priorities and uses this feedback to anticipate requests and be prepared to provide information and analysis for shifting public policy goals. Regular engagement with our requestors and stakeholders supports effective use and prioritization of available resources.

Substantive engagement of all stakeholders, including the public, is critical to the successful accomplishment of our adjudicative-, factfinding-, and tariff schedule-related mandates. This engagement and information collection, through a wide variety of means and vehicles, provides the foundation that ensures the Commission meets its statutory responsibilities while upholding its vision and values. Stakeholder engagement and the thorough collection of relevant information for our adjudicative-focused activities is essential to maintaining the trust

of U.S. companies and workers in our proceedings and determinations. Broad engagement of the public and comprehensive information and data collection for our factfinding-focused activities ensures fulsome analysis of complex trade and competitiveness-related issues that are critical to decisions affecting U.S. trade, investment, and economic growth. Regular engagement of U.S. and international legal and technical experts ensures that the HTS, a critical foundation for statistical requirements and financial decisions and compliance, is accurate and reliable.

Public engagement and access to agency information and processes promote transparency and stakeholder understanding of Commission proceedings. Stakeholders in import injury, section 337, and factfinding investigations benefit from greater access to information that is relevant to Commission decision-making and factfinding. The Commission views stakeholders broadly to include U.S. industries, workers, and the general public. For factfinding investigations, the Commission may also engage with other government agencies, international organizations, and technical experts, among others. The Commission's processes in import injury and section 337 investigations are guided by the concepts of due process, notice, and the opportunity to be heard (and section 337 investigations are governed by the Administrative Procedure Act).

The Commission regularly, both formally and informally, provides outreach and solicits feedback from its requestors and key stakeholders. The Commission uses formal tools such as Federal Register notices, surveys, briefings, etc. to solicit feedback and process suggestions and to identify emerging areas of interest from stakeholders and private parties. Commission staff also engages stakeholders at key points during proceedings and the process of developing requested analysis and information, per agency protocols and regulations. The Commission also at times seeks general input and feedback on procedural matters from organizations representing attorneys, economists, and other professionals active before the Commission. Information received from stakeholders is regularly reviewed and integrated as appropriate into investigation proceedings, as well as process and communication improvement efforts.

To meet this strategic objective, the Commission will employ several strategies to ensure ongoing and substantive engagement that contributes to the collection of relevant data to inform and support investigations:

- Focusing on feedback from the agency's decision-makers, stakeholders, reviewing courts, and dispute resolution panels, and looking for opportunities for improvements
- Conducting outreach to provide information regarding the Commission's investigatory processes

- Leveraging existing technologies (such as email listservs) and developing innovative IT approaches to improve the flow of information and Commission work products to interested parties and the public across diverse platforms (including HTS, IDS, and USITC Internet) to promote transparency and a greater understanding of Commission activities
- Maintaining and enhancing relationships with requestors to anticipate their needs and build the expertise and tools required to meet statutory mandates and requests for assistance
- Engaging and collaborating with U.S. and international external experts to gather information, stay at the forefront of research, and to incorporate a diversity of perspectives regarding important and emerging trade-related matters
- Working with other federal agencies and represent the United States at the World Customs Organization to ensure that the HTS is aligned with the international Harmonized System

Strategic Goal 2

Inform: Develop Sound and Informed Analyses and Determinations

The global trading environment continues to evolve and become increasingly complex and interconnected. In the face of this increase in complexity, U.S. industries and firms, policymakers, and stakeholders rely on the Commission to provide sound and informed decisions and to provide reliable, rigorous, and expert analysis and information. U.S. industries and policymakers depend on the Commission’s ability to have or quickly develop deep expertise on a variety of topics. These topics include complex industry structures and competitiveness; technology and intellectual property; and a broad range of trade policy-related issues such as expansion of international trading relationships and agreements, evolution of supply chains within and across borders, and the multifaceted impact trade has on issues and economic factors such as employment, wages, and the environment. To meet their need for sound and informed analysis and determinations, the Commission identifies innovative approaches to understanding the wide-ranging issues and applies objective methods and approaches to data collection and analysis. These include developing comprehensive and up-to-date records, scrutinizing various sources of information, developing industry expertise and keeping abreast of emerging competitiveness and technology issues, and refining economic models, databases, and analytic skills.

Strategic Objective 2.1

Sound: Apply Innovative analysis and make objective determinations

The Commission applies innovative and objective information and analysis in providing its advice and in making determinations. Our statutory requestors regularly ask for information and analysis on trade agreement provisions, such as rules of origin, labor, and environment, as well as how U.S. domestic policies impact our trade and competitiveness in global markets. In both our adjudicatory and factfinding investigations, in-depth analysis is also required on the production and trade performance of specific markets and industries, as well as how imports impact the U.S. domestic market for certain products. To continually strengthen its technical expertise, the Commission identifies priority research areas related to new developments in trade, industry competitiveness, and the U.S. and global economies. Increasingly, our analysis in factfinding investigations is broadening into areas such as labor and environment in response to requestor interests. The Commission continues to advance data collection analysis and vehicles to address the increasing levels of complexity driven by evolving industry structures, large number of countries involved in a proceeding, and new and emerging products and industries to maintain record integrity essential to reliable and objective determinations.

Innovative analysis and objective determinations depend on the active and engaged efforts of our staff. Because the Commission's workload is unpredictable and varies in scope and complexity the Commission must develop and maintain expertise to respond quickly and effectively to policymakers and to petitions filed with the Commission. To ensure that the Commission's staff and work product remain at the forefront of research, the Commission's strategies for meeting these goals include identifying priority research areas and strategic investment in analytic tools and staff skills based on anticipated policy priorities and trade needs. The Commission will also continue to meet its workload challenges by deploying multidisciplinary teams of investigators, economists, industry and financial analysts, statisticians, and attorneys drawn from across the Commission, leveraging diverse skills and backgrounds, expertise, and innovative approaches to problem solving.

Regarding its quantitative analysis, the agency endeavors to keep on the cutting edge of economic modeling and methods to analyze the effects of international trade and trade policy. Our analytical capabilities include the use of general and partial equilibrium modeling and advanced econometric approaches to evaluate the impacts of trade-related policies and trade agreements at an economywide and sector-level. We will continue to advance our quantitative analytical techniques to enable Commission analysis to expand into new areas, such as the distributional impacts of trade on different types of workers and groups within the economy.

The Commission seeks to make reliable and objective determinations and produce objective work products that support expeditious, efficient, and technically sound decisions. Our investigations require diverse types of input from a broad range of stakeholders to ensure balance and objectivity in our determinations.

The Commission’s long-term performance goals that support the objective of applying innovative analysis and making objective determinations include:

- Enhancing capabilities to analyze priority issues in trade and industry competitiveness to respond effectively to policymakers
- Incorporating new capabilities and improved analytical tools in statutory work products
- Leveraging technology to more effectively identify, collect, and analyze accurate domestic industry and subject product data in import injury proceedings

Strategic Objective 2.2

Informed: Provide clear, relevant, and accurate information in Commission work products

To fulfill its mission, the Commission must provide clear, relevant, and accurate information and analysis to its statutory requestors and stakeholders in a timely manner. Transparency and accuracy also underpin the Commission’s reputation as an objective and unbiased adjudicator of import injury and unfair import complaints. The Commission will continue to use technologies to improve its ability to present information that is clear, searchable, and easy to navigate. The Commission is expanding its use of interactive graphics and other ways to improve the accessibility and availability of data used in Commission reports. The Commission is also exploring ways to modernize the electronic publication of its reports to maintain user-friendliness for general readers while making the data more accessible for technical users.

Policymakers require expert, independent information and analysis on a timely basis to inform and support decision-making. Achieving this goal assists our requestors with decisions related to trade negotiations, enacting legislation, and taking other policy actions that affect the competitiveness of U.S. industries and workers as well as the overall U.S. economy and have distributional effects across different groups. The Commission provides objective and independent advice, analysis, data, and other information to the Congress, the President, and USTR. It does this under its statutory responsibilities and in response to formal and informal requests. The Commission’s specialized ability to collect, develop, and synthesize primary data and information and provide multidisciplinary analysis supports the development of well-informed trade policy and reliable and trustworthy import injury and unfair import

adjudications. The Commission continually seeks to provide clear, relevant, and accurate information in its factfinding reports and in its trade remedy investigative records and determinations. By providing public access to Commission documents and statistical information and the underlying data that support its products or determinations (subject to the legal requirements to protect information noted above), the Commission helps ensure that its data, information, and determinations can withstand public and judicial scrutiny.

Also under its statutory mandate, the Commission maintains, updates, and publishes the Harmonized Tariff Schedule of the United States (HTS). As the primary resource for determining tariffs classifications for goods imported into the United States, the HTS serves as the legal basis for the collection of customs duties and the compilation of trade data. The HTS provides critical product-specific information for the public, and serves as an integral part of other government agencies' work, enabling the accurate collection of tariff revenues and data on trade flows. The Commission plays a significant role in maintaining and updating the HTS and the international Harmonized System (HS) nomenclature for traded goods, and in drafting classification provisions at the national level. The Commission also guides the development of the statistical categories used to monitor trade. Enhancing the functionality of the HTS continues to be a major focus of the Commission. Timely updates to the HTS and improved functionality for internal and external users enable the accurate collection of tariff revenues.

The Commission strategies for meeting these goals include continuously assessing the accuracy and accessibility of Commission products and information as well as identifying tools and distribution strategies to enhance these products.

The Commission's long-term performance goals that support the provision of clear, relevant, and accurate information in Commission work products include:

- Improve the utility of tariff and trade information for requestors and the public by developing and producing clear and relevant digital and interactive Commission products by FY 2026
- Continue to improve the capabilities of HTS Search and the HTS data management system to provide clear and accurate tariff information
- Improve processes to identify and correct errors at the prepublication stage for HTS files through 2026 to ensure that the information is accurate
- Improve the transparency of Commission factfinding investigations by providing relevant and accurate information underlying its analysis when appropriate

- Continue to increase accessibility of Commission work product through improved compliance with Section 508 of the Rehabilitation Act of 1973 to provide clear and accurate information
- Evaluate internal factfinding procedures for reviewing Commission work product for accuracy, clarity, and relevance, and implement ways to make this process more efficient and effective

Strategic Goal 3

Perform: Execute and Advance Organizational Excellence

Effective and efficient management increases the agency’s ability to meet its mission and better leverage all of its assets to achieve its strategic goals. To execute and advance organizational excellence in all mission activities, the Commission has established strategic goal 3 and its corresponding objectives. Additionally, each year the Commission’s Annual Performance Plan addresses the major management challenges identified by the agency’s Inspector General in her most recent semiannual report to Congress.

Strategic Goal 3 underpins the Commission’s commitment to continuous process improvement and support for the Commission’s other strategic goals and mission. The Commission has established five strategic objectives in support of this goal. The objectives align with five areas: human resources; budget, acquisitions, and finance; information technology; data governance; and operational effectiveness. The goal promotes collaboration and shared responsibility.

Strategic Objective 3.1

People: Attract, develop, and retain a skilled, diverse, and versatile workforce

The Commission’s workforce is integral to mission accomplishment. The Commission’s mission is entirely accomplished by and dependent on its people. The diversity, expertise, and versatility of the Commission’s workforce drive its ability to meet policymaker and stakeholder needs, leverage opportunities, and address challenges through creativity, innovation, and collaboration.

During the next five years, a substantial portion of the agency’s workforce will be eligible to retire. Approximately ten percent of the agency’s workforce turns over every year. In recent years, the agency’s overall workload has grown in terms of quantity and complexity putting additional strains on the agency’s workforce. To accomplish its mission, the Commission

requires staff with highly specialized knowledge in areas including trade analysis; nomenclature systems; analytic methods; and government policies, laws, and regulations affecting trade. Commission staff must also be flexible and adaptable, with the ability to perform in different roles to meet fluctuations in the composition and volume of workload. Further, the number of employees must be adequate to perform the increased workload.

To support the agency's strategic and management goals the Commission will focus on efficient and effective recruitment of diverse and flexible human capital. The Commission will also need robust succession planning and training in the necessary workforce skills that develop exceptionally competent, engaged, and diverse managers, team leaders, and staff. Finally, in an environment of increasing management and reporting requirements and the prospect of new statutory obligations, it is critical to implement accurate, innovative, and efficient human capital management systems and processes that help support the agency's strategic goals.

This human capital objective ensures that the Commission attracts, develops, motivates, and retains an exceptionally skilled and diverse workforce. The support and collaboration of all functional areas is necessary to develop recruiting, hiring, training, retention, and succession plans. When considering strategies to carry out this objective, the Commission faces internal and external challenges that shape the business environment in which the Commission carries out its mission. These challenges include budget constraints, difficulty in attracting qualified candidates in specific occupations due to disparities between public- and private-sector pay, and adjusting to changing working environments due to the pandemic. These challenges pose a risk to mission accomplishment. They require the development and implementation of targeted strategies, including:

- Transparent evaluation of the Commission's short-term and long-term human capital needs and implementation of processes that will enable the Commission to quickly recruit, develop, and retain an exceptionally qualified, flexible, and diverse workforce best able to support the Commission's strategic goals
- Development of recruiting, succession, and training plans that focus on developing world-class technical, leadership, management, and communication skills

A more diverse and inclusive culture encourages collaboration, flexibility, and a work environment where individuals are respected and employees can contribute to their full potential. As such, the Commission is determined to expand employee engagement and leadership and training initiatives that recognize the value of a full range of views and talents. Through the hiring and training processes, management will foster a diverse and inclusive workplace. Long-term goals that contribute to this objective include:

- Improving training and development opportunities for staff throughout the Commission to foster an inclusive workplace
- Increasing management and staff satisfaction with recruitment and retention efforts by approving new programs such as a student loan repayment program, a formal agency-wide internship program, and increased opportunity for telework and flexible work
- Improve equitable treatment in access, opportunity, and advancement for individuals; and identify and eliminate barriers to equitable treatment for underrepresented groups
- Provide training for virtual or hybrid environments to capture productivity enhancements developed during the pandemic and prepare for future success

Strategic Objective 3.2

Money: Ensure good stewardship of taxpayer funds

The Commission must make effective use of limited financial resources to carry out its strategic goals. Managing the budgetary, acquisition, and financial processes effectively is essential to that effort. Stewardship of appropriated funds and financial oversight are fundamental to establish the accountability and transparency that taxpayers demand and the President has directed Federal agencies to improve. Although always a top priority of the agency, careful management of taxpayer funds is even more important under continuing budget constraints.

To accomplish this objective, the Commission will continually evaluate and improve the agency's budget formulation and execution, acquisition activities, accounting operations, internal controls, internal rules, and the identification and consideration of organizational risks. This strategic objective promotes consistency and integrity throughout the organization as the Commission makes effective and efficient use of limited resources.

It is only possible to achieve this strategic objective through the support and collaboration of all functional areas entrusted to use public funds. The key strategies to implement this objective include:

- Evaluating the need for resources across agency activities, aligning funds to strategic goals and objectives through analysis and prioritization of risks, and incorporating the information in budget preparation and execution
- Promoting the use of outcome-based metrics when evaluating acquisition requests, and ensure that requests align with strategic goals
- Accelerating the integration and automation of the budgetary, procurement, and financial processes, while continually improving financial internal controls and processes

Changes in funding levels and other government-wide financial management requirements could affect the implementation strategy for this objective.

Ensuring good stewardship of taxpayer funds is a shared responsibility, spread throughout all offices in the Commission. Meeting this objective will take partnership between management and staff to ensure that every asset, from the ordinary to the complex, is used efficiently and effectively to fully support the other objectives outlined in this Strategic Plan.

A long-term performance goal in support of this objective is to maintain an annual unqualified financial audit opinion. This goal ensures the Commission's funding is fiscally monitored and accurately reported. The financial statement audit determines whether the financial statements are presented fairly in conformance with generally accepted accounting principles, there are effective internal controls over financial reporting, and the Commission is in compliance with laws and regulations. This performance goal demonstrates the Commission's commitment to ensure good stewardship of taxpayer funds.

Strategic Objective 3.3

Technology: Implement reliable and secure systems that promote resilience, innovation, and efficiency

Reliable and secure IT services are crucial to accomplishing the agency's mission. The Commission will continue to provide and enhance the technologies, security, infrastructure, and IT management resources necessary to support the Commission and government-wide goals and objectives.

The Commission will provide technology leadership, strategy, resource management, and processes necessary to ensure success. It will ensure that all IT activities properly align with priorities, strategic goals, and strategic objectives, both Commission- and government-wide. It will communicate within the agency regarding IT activities and continuously advance communication, coordination, and service delivery to external and internal stakeholders.

The key strategies to implement this objective include:

- Implementing reliable IT solutions and programs that promote resilience. This will be accomplished by ensuring the availability and accessibility of networks and applications
- Promote innovation and resilience by providing modern technology solutions that align with and support the Commission's business environment, policy goals, and statutory requirements

- Continuously enhancing the Commission’s technical architecture to support the automation of business processes to improve efficiency and productivity
- Capitalizing on its risk-based information security program to predictively protect the infrastructure and information assets entrusted to the Commission
- Maintaining a sustainable balance between performance, security, availability, and accessibility
- Maturing IT management using best practices to improve collaboration with stakeholders, continuously implementing strengthened IT controls through effective policies and procedures, and promoting transparency in budgeting for IT resources

To monitor the success of these strategies, measurable performance goals will be established and tracked. These goals include:

- Ensuring a robust security posture by successfully implementing capabilities consistent with government-wide cybersecurity priorities
- Improving the delivery of IT solutions to better support Commission users
- Using cloud services where feasible to reduce infrastructure resource requirements, increase flexibility to scale solutions, and expand solution options for Commission users

Strategic Objective 3.4

Data: Manage and leverage data as an asset

Managing and leveraging data as an asset is critical to accomplishing the agency’s mission. To support Commission and government-wide goals and objectives, the Commission will continue to enhance its data governance policies and practices.

The Commission’s mission is to investigate, make determinations, and provide information to policymakers on tariffs, trade, and competitiveness. The Commission pursues its mission by ensuring its independence, integrity, trust, and transparency. Data is essential to all of the Commission’s work, yet there has not yet been a fully cohesive data-centered approach to supporting the agency’s mission. Over the course of this strategic plan, the Commission will institute and apply government-wide data governance best practices.

In doing so, the key strategies to implement this objective include:

- Strengthening agency-wide data governance by establishing enterprise-wide strategies, objectives, and policies for managing data. The Commission requires sound data

governance processes to administer the data that it uses to meet operational needs, answer important questions, and comply with legal requirements. Public trust is paramount, and data governance must support transparency while protecting privacy and confidentiality. The Commission recognizes the strategic and critical need for consistent governance and management of its data assets. This objective seeks to strengthen data governance by establishing and evolving foundational data governance processes across the agency. It seeks to improve coordination and planning of agency-wide data initiatives, and it mandates and provides mechanisms for escalating data-policy issues to ensure holistic strategies for resolution. Importantly, the Commission will emphasize elevating data maturity across the organization.

- Advancing the agency's strategic use of data. The Commission's strategic use of data depends on its ability to leverage insights from data and analytics to drive better policy, program, and operational decision-making. Key information may come from a variety of sources, including data internal to the agency, data sourced from the private sector, and data from other agencies. This objective seeks to improve the agency's strategic use of all data to support and communicate insights, program evaluation, and operational management. The Commission must be able to connect fragmented data from disparate sources if it is to successfully answer its most critical questions and effectively make sound decisions.
- Improving data access, transparency, and protection. To effectively leverage data as a strategic asset, it must be discoverable. To ensure that all data is discoverable, the Commission will deploy appropriate data search and data extraction tools; ensure that data assets are identified, described, documented, and inventoried; ensure that data search and extraction tools are maintained and periodically upgraded; foster transparency by developing and deploying cutting-edge technologies to improve the flow of information; and develop controls to ensure data is appropriately protected from creation through destruction.

To monitor the success of these strategies, the agency will establish and track measurable performance goals. These goals pertain to:

- Issuance and management of data governance policies that implement governmentwide best practices
- Advancement of the strategic use of data in decision-making by deploying effective business intelligence tools that enable decision-maker to answer priority questions

- Improvement of data access, transparency, and protections by deploying appropriate data systems that safeguard data while making it discoverable

Strategic Objective 3.5

Ongoing Operational Improvements: Evaluate and improve processes and communications

The Commission’s operational effectiveness depends on continually improving our business processes and communication efforts to deliver better results. To accomplish this, managers lead and control the activities within the agency, and continually measure and improve the processes for which they are responsible.

To make progress on this objective, the Commission will continue to conduct internal evaluations of its processes and use its enterprise risk management (ERM) process to prioritize areas for improvement. The agency will also focus efforts to more effectively manage agency-wide policy development and continue to invest in and modernize its IT infrastructure and management systems. The Commission recognizes that resource constraints, unexpected external requirements, and other priorities may slow efforts to fully accomplish all planned initiatives in the near future. However, we believe that recent developments—in particular, expanded IT capabilities both within and outside of the OCIO, and increased managerial focus on this and related issues—may mitigate these constraints.

In addition to investments in IT capabilities, in recent years the Commission has made significant improvements in the management of its administrative and program operations. These IT and administrative improvements allowed us to quickly shift to successfully operating in a remote environment. Over the next four years, our goal is to enhance overall efficiency and effectiveness by improving resource and performance management information and identifying additional activities that can be more efficiently conducted using electronic processes. We have made, and continue to make, incremental improvements in our ability to capture and report financial and operational data that meets the needs of our managers.

The Commission will also focus on further integrating ERM into its strategic planning, performance management, and budget processes. The agency will continue its efforts to modernize its administrative policies and procedures, guidance, and other administrative materials related to the activities of the agency to reduce resources required to maintain this information and improve its accessibility. The Commission is also committed to maintaining a safe and secure operating environment for all its employees and will ensure that employees have the appropriate clearances to perform their duties. Further, the Commission will continue its efforts to ensure information security.

The Commission will continue to use feedback from the public on the functionality and usefulness of information it provides through its website and web applications. Increasingly, the website is the primary vehicle to provide information to the public. In addition, participants in the agency's various types of investigations increasingly make use of web applications such as the Electronic Document Information System (EDIS), which is used both for submissions to the Commission and for information access. The Commission will use the feedback it receives to improve the content and functionality of its web-based systems.



500 E Street, SW
Washington, DC 20436