



UNITED STATES INTERNATIONAL TRADE COMMISSION

Washington, DC 20436

REPORT ON FY 2017 SERVICE CONTRACTS INVENTORY AND PLANNED ANALYSIS OF FY 2018 SERVICE CONTRACTS INVENTORY

This report contains the United States International Trade Commission's (USITC) analysis of its FY 2017 service contracts inventory, responsive to Section 743 of Division C of the Fiscal Year 2010 Consolidated Appropriations Act, P.L. 111-117.

Pursuant to the Office of Federal Procurement Policy's (OFPP) memoranda on service contracts inventories, dated November 5, 2010 and December 19, 2011, and Notice dated September 7, 2018, the USITC selected special interest function(s) to include in the study. USITC then evaluated the use of contractors versus government employees for purposes of determining if contract labor is being used in an appropriate and effective manner, and if the mix of federal employees and contractors is effectively balanced.

A. Analysis

The USITC planned for and analyzed the following Product Service Code (PSC) function from its FY 2017 service contracts inventory:

PSC	Description	Action Obligation	# of Contracts Reviewed	% of Obligations within PSC
D319	IT and Telecom- Annual Software Maintenance Service Plans	\$718,258	6	100%

USITC chose to analyze this PSC because it is one of the Commission's largest contract dollar obligation for contracted services in FY 2017, and has not previously been evaluated under the Service Contracts Inventory Analysis.

B. Methodology

The analysis of USITC's FY 2017 service contracts was performed by the Director of Procurement. The service contracts inventory included purchase orders, delivery orders, task orders, and contracts, using data obtained from the Federal Procurement Data System-Next Generation (FPDS-NG).

C. Agency Findings

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

1. USITC awarded no personal services contracts in Fiscal Year 2017.
2. USITC monitors functions that are closely associated with inherently governmental functions.
3. USITC is not using contractor employees to perform inherently governmental functions. USITC's acquisition staff is properly trained and able to identify inherently governmental functions as they relate to contractor work.
4. USITC monitors contractor work to ensure that the work does not change or expand during performance to become inherently governmental. Contractor employees performing work in the area of Information Technology (IT) professional support, a category that routinely consists of larger contract dollar obligations for the Commission, remains appropriate and balanced to that performed by federal employees.
5. USITC does not use contractor employees to perform critical functions in such a way that could affect the ability of USITC to maintain control of its mission and operations.
6. USITC has allocated resources to manage and oversee its contracts effectively. USITC's policies and procedures provide for oversight of contract administration. Both Contracting Officers and Contracting Officer's Representatives are properly trained and certified to manage and oversee contracts.

D. Summary / Action Taken

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

E. Planned Analysis for Fiscal Year 2018

As directed by OFPP's Notice dated September 7, 2018, the USITC has selected the following Product Service Codes from its FY 2018 inventory.

PSC	Description	2018 Action Obligations
R604	Support – Administrative Mailing and Distribution Services	\$338,185

USITC chose to evaluate this PSC because it is one of the USITC's largest contract dollar obligations for contracted services in FY 2018.

USITC Point of Contact

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