



UNITED STATES INTERNATIONAL TRADE COMMISSION

Washington, DC 20436

MEMORANDUM

DATE: February 22, 2016

FROM: Debra M. Bridge, Director
Office of Procurement

SUBJ: Analysis of FY 2014 Service Contracts Inventory /
Planned Analysis of FY 2015 Service Contracts Inventory

This memorandum contains the United States International Trade Commission's (USITC) analysis of its FY 2014 service contracts inventory, responsive to Section 743 of Division C of the Fiscal Year 2010 Consolidated Appropriations Act, P.L. 111-117. Following the Office of Federal Procurement Policy's (OFPP) memoranda on service contracts inventories, dated November 5, 2010 and December 19, 2011, USITC selected special interest and other functions to include in the study. USITC then evaluated the use of contractors versus government employees for those functions.

A. Scope of Special Interest Functions Studied by USITC

The USITC planned for and analyzed the following Product Service Code (PSC) functions from its FY 2014 service contracts inventory:

PSC	Description	Action Obligation
D302	IT and Telecom – Systems Development	\$1,997,866.44
D321	IT and Telecom – Help Desk	\$1,387,404.80
R431	Support: Professional, Human Resources	\$ 311,989.32

B. Methodology Used to Support USITC's Analysis of FY 2014 Service Contracts

The analysis of USITC's FY 2014 service contracts was performed by the Director of Procurement. Data was obtained from the Federal Procurement Data System-Next Generation (www.FPDS.gov) for obligations exceeding \$25,000. The service contracts inventory included purchase orders, delivery orders, task orders, and contracts.

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 2014.
2. USITC closely monitors functions that are 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 expand during performance to become inherently governmental.
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 policy 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 2015

As directed by OFPP's memorandum dated December 9, 2011, the USITC has selected the following Product Service Codes from its FY 2015 inventory.

PSC	Description	Action Obligation
D302	IT and Telecom – IT Help Desk	\$1,997,768
D321	IT and Telecom – Systems Development	\$1,681,646
R425	Support – Professional: Engineering/Technical	\$696,307

USITC Point of Contact

Questions regarding this analysis may be directed to Debra Bridge, Office of Procurement, at (202) 205-2004, or debra.bridge@usitc.gov.