October 29, 2018

MEMORANDUM FOR: Daniel O. Hill
Acting Under Secretary of Commerce for Industry and Security
Bureau of Industry and Security

Gilbert B. Kaplan
Under Secretary of Commerce for International Trade
International Trade Administration

FROM: Carol Rice
Assistant Inspector General for Audit and Evaluation

SUBJECT: Audit of BIS and ITA Processes and Procedures for Reviewing and Adjudicating Section 232 Exclusion Requests (#2019-333)

We are initiating an audit of the Bureau of Industry and Security's (BIS') and the International Trade Administration's (ITA's) processes and procedures for reviewing and adjudicating product exclusion requests for aluminum and steel tariffs, as prescribed by Presidential Proclamations 9704 and 9705, respectively, under the authority of Section 232 of the Trade Expansion Act of 1962.

The audit objectives are to determine whether (1) BIS and ITA adhere to the processes and procedures in place to review Section 232 product exclusion requests, and (2) exclusion request decisions are reached in a consistent and transparent manner.

We will contact your respective audit liaisons to schedule an entrance conference, at which time we will discuss this audit in further detail. If you have any questions about this audit, please contact me at (202) 482-6020 or Terry Storms, Division Director, at (202) 482-0055. We thank you in advance for your cooperation during this audit.

cc: Sarah Kemp, Acting Deputy Under Secretary of Commerce for International Trade, ITA
     Richard Ashooh, Assistant Secretary for Export Administration, BIS
     Nazak Nikakhtar, Assistant Secretary for Industry and Analysis, ITA
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