



*Office of Inspector General*  
*Export-Import Bank of the United States*

# **Fiscal Year 2024**

## **Agency Performance Report**

OIG-O-25-02  
October 2024



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## ABOUT OUR ORGANIZATION

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**THE EXPORT-IMPORT BANK OF THE UNITED STATES** (EXIM or agency) is the official export credit agency (ECA) of the United States. EXIM supports the financing of U.S. goods and services in international markets to support American jobs. The agency assumes the credit and country risks that the private sector is unable or unwilling to accept. EXIM also helps U.S. exporters remain competitive by countering the export financing provided by foreign governments on behalf of foreign companies.

For more information, please see [EXIM's website](#).

**THE OFFICE OF INSPECTOR GENERAL** (OIG) is an independent oversight office within EXIM. EXIM OIG's mission is to promote the integrity, transparency, and efficiency of EXIM programs and operations by conducting and supervising audits, investigations, inspections, evaluations, and reviews related to agency programs and operations and preventing and detecting fraud, waste, abuse, and mismanagement. OIG's oversight work is conducted by the Office of Audits (OA), the Office of Investigations (OI), and the Office of Special Reviews (OSR) with the Immediate Office of the Inspector General, the Office of General Counsel, and the Office of Management (OM) providing leadership, legal, and administrative support, respectively.

OIG is dedicated to being an agent of positive change to help EXIM improve its efficiency and effectiveness. It keeps EXIM's President and Chair and Congress fully informed about any problems and deficiencies along with positive developments relating to EXIM administration and operations.

Find more information about EXIM OIG, including reports of audits, inspections, evaluations, reviews, and press releases on our [website](#). For more information on Inspectors General in the U.S. Government, please see the [Council of the Inspectors General on Integrity and Efficiency](#) (CIGIE) and CIGIE's [Oversight](#) websites.

## A MESSAGE FROM THE INSPECTOR GENERAL

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In accordance with the Government Performance and Results Modernization Act of 2010, I am pleased to present the Office of Inspector General (OIG) for the Export-Import Bank of the United States' (EXIM) Fiscal Year 2024 Agency Performance Report.

Our office provides independent oversight of the agency's programs and operations. Through audits, evaluations, inspections, investigations, and reviews, we make impactful recommendations to improve the efficiency and effectiveness of EXIM programs and operations. Our engagements also support accountability by detecting, deterring, and prosecuting fraud.

This Agency Performance Report reflects OIG's accomplishments throughout fiscal year (FY) 2024. These accomplishments were achieved through metrics rooted in OIG's [Strategic Plan for Fiscal Years 2023-2027](#)<sup>1</sup> and [Agency Performance Plan for FY 2024](#).<sup>2</sup>

FY 2024 was a transformational year for OIG as we onboarded roughly half of our workforce and showed 55% increase in published products over FY 2023 levels—which, in itself, was a marked 50% increase over FY 2022 published products. Overall, OIG met and exceeded all 31 of its stated subobjectives for FY 2024.

I would like to thank all our OIG personnel for their dedication to OIG's mission and the work they do every day on behalf of American taxpayers. I look forward to FY 2025 and the future of our organization.

**Parisa Salehi**  
Inspector General

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<sup>1</sup> OIG, [Strategic Plan for Fiscal Years 2023 – 2027 Revised](#) (September 2024).

<sup>2</sup> OIG, [Agency Performance Plan FY 2024](#) (OIG-O-24-04, February 2024).

## INTRODUCTION

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The purpose of this annual agency performance report is to advise and assist OIG leadership to ensure that the mission and goals of the agency are achieved through strategic and performance planning, measurement, analysis, regular assessment of progress, and use of high-quality performance information and other evidence to improve results. This includes driving performance improvement efforts across the OIG by using goal setting, measurement, analysis, evaluation and other research, data-driven performance reviews on progress, collaboration, and personnel performance appraisals aligned with organizational priorities.

In accordance with the [Office of Budget and Management Circular No. A-11 \(2024\)](#), federal managers have an important obligation to ensure that every dollar spent delivers results for the American people, which is accomplished by implementing performance management systems for leaders to regularly review progress.<sup>3</sup> An effective performance management system ensures active leadership engagement, which fosters a high-performance culture and empowers employees at all levels. OIG uses such a system derived from its strategic plan goals and objectives.<sup>4</sup> Senior leaders and, by extension, OIG's component offices, are assigned performance metrics, which, in turn, are then tied to individual performance plans. Each metric in FY 2024 links to a strategic goal and objective as presented in the [Agency Performance Plan for FY 2024](#),<sup>5</sup> and OIG reviews and updates the plan on a quarterly basis to track agency performance and make changes, if needed, based on performance metrics.

EXIM OIG is a performance-based organization, as defined by [OMB Circular No. A-11 \(2024\)](#). A performance-based organization commits to managing toward specific, measurable goals, derived from a defined mission, using performance data to enhance operations. This report provides the summary of OIG's agency performance results from FY 2024 based on OIG's [Fiscal Years 2023-2027 Strategic Plan](#).

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<sup>3</sup> See [OMB Circular No. A-11 \(2024\)](#), "Preparation, Submission, and Execution of the Budget," Part 6 – Executive Summary, *Delivering a High-Performance Government*."

<sup>4</sup> OIG, [Strategic Plan for Fiscal Years 2023 – 2027 Revised](#) (September 2024).

<sup>5</sup> OIG, [Agency Performance Plan FY 2024](#) (OIG-O-24-04, February 2024).

## PERFORMANCE RESULTS

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### Results Summary

EXIM OIG began the fiscal year with four strategic goals, twelve key objectives, and 31 subobjectives focused on promoting integrity, economy, efficiency and effectiveness in EXIM's management, decision-making, and accountability in FY 2024. The report presents performance tied to each subobjective and measures organizational success for the fiscal year. OIG's results for FY 2024 showcase how the organization has improved its internal operations and increased its independence. The results are a testament to OIG's dedication to its mission, strategic vision, and ability to deliver results with an elevated level of internal organizational change.



## GOAL 1 – Conduct independent oversight that improves EXIM programs and operations.

### *OBJECTIVE 1.1 – Perform high-quality audits, evaluations, inspections, and reviews in accordance with professional standards and best practices.*

- Publish impactful oversight reports in accordance with statute, government standards (where applicable), and internally agreed deadlines.
  - OIG issued 17 reports: 7 from OA, 9 from OSR, and 1 from OI. This represents a 55% increase in published products over FY 2023 levels and the first time OI published a report on behalf of OIG.
- Support the timely resolution and agreement of new recommendations.
  - OIG issued 69 recommendations, all but two of which EXIM agreed to a report issuance. Subsequently, OIG engaged EXIM to underscore the importance of identifying an audit resolution official. EXIM's President and Chair identified one in September 2024, and EXIM agreed to the two unresolved recommendations accordingly. Therefore, 100% of OIG recommendations were agreed to (resolved) in FY 2024.
- Conduct high quality legal opinions and sufficiency reviews on OIG reports.
  - OIG's practices require that all reports be reviewed for legal sufficiency. All reports issued in FY 2024 were subject to such review, and many involved complex legal considerations, including OIG's report on Non-Disclosure Agreements, ethics considerations related to EXIM's annual conference, as well as agency proposed redactions to OIG reports.

### *OBJECTIVE 1.2 – Investigate allegations of wrongdoing by EXIM employees, program participants, and external parties who target or exploit EXIM programs.*

- Ensure open and active investigations are well documented, timely completed, and accurately reported.
  - OIG documented 5,194 investigative actions in support of open and active investigations. The number may be larger in FY 2024 due to the digitalization of legacy paper investigative files and transition to a fully electronic case management system to track investigative activity.
- Promptly intake complaints through the OIG Hotline and Office of Investigations' investigative case management system.
  - OIG documented 65 Hotline complaints into its Case Management Tracking System. As a result, OI adjudicated the complaints with an average of 6.2 days from the date of initiation.
- Improve adjudication processes to ensure efficient resolution of complaints made to OIG.

- OIG launched its new website that includes a Hotline complaint submission form. This allowed OIG to collect more information on each Hotline complaint. Since the launch of the new complaint form, OIG has received 36 submissions.
- Comply with the deadlines set forth in the Executive Order on Advancing Effective, Accountable Policing and Criminal Justice Practices to Enhance Public Trust and Public Safety.
  - OIG met all applicable deadlines for reporting on the EO as well as reporting related to use of force and other metrics required by the Attorney General. In addition, OIG obtained access to the National Law Enforcement Accountability Database (NLEAD) created pursuant to E.O. 14074 and is complying with Department of Justice guidance on use of the database. OI is 100% compliant with the deadlines with the Executive Order on Advancing Effective, Accountable Policing and Criminal Justice. Additionally, OI complied with NLEAD responsibilities in FY 2024 as well as assisted in developing OPMs “Action Plan for Strengthening Officer Recruitment, Hiring, Promotion, and Retention” which outlines specific directives for agencies to improve policy and training, promote accountability, increase transparency, and ensure equal treatment and respect for the dignity of all individuals within the jurisdiction of Federal law enforcement.

***OBJECTIVE 1.3 – Ensure OIG oversight targets EXIM’s highest-risk programs and activities.***

- Propose high quality oversight engagements for the FY 2025 work plan and prioritize engagements using a risk assessment tool to ensure OIG oversight is directed at EXIM's highest risk programs and operations.
  - In February 2024, the IG issued guidance on work planning, including risk-based priorities for OIG's planned oversight engagements in FY 2025. During the process, OA submitted 17 proposals and OSR submitted 16 proposals. For the risk assessment tool, see results under objective 1.3, subobjective 3.
- Publish OIG reports and disseminate to the appropriate external stakeholders, when applicable and consistent with statutory requirements.
  - OIG continued to meet its obligations under the IG Act to disseminate reports and make them available to stakeholders. OIG's new website, launched in FY 2024, allows reports to be posted to the Internet without EXIM involvement. OIG also formalized its process for sharing reports containing redactions and worked proactively with EXIM to seek maximal release of information in OIG reports, consistent with applicable law. Finally, OIG expanded its routine distributions to include key stakeholders on OIG reports, including OMB, congressional appropriators, and all Members of EXIM's Board of Directors.
- Develop OIG's FY 2025 work plan using a risk assessment tool to ensure oversight of EXIM's highest risk programs.
  - OIG employed a quantitative risk scoring process to refine the proposals in March 2024 and inform the final development of OIG's FY 2025 work plan.



- Issue EXIM's FY 2024 major management challenges report.
  - OIG published its FY 2024 Major Management Challenges Report on September 30, 2024. OIG conducted interviews with 24 senior EXIM officials, including the President and Chair, other members of the Board of Directors, officers at the senior vice president level, and other officials in positions of senior responsibility. The report identified a new management challenge facing EXIM related to managing agency operations and highlighted continuing challenges related to organizational culture, advancing U.S. economic and strategic interests and addressing portfolio risk.

## GOAL 2 – Leverage strategic communications to expand outreach to OIG stakeholders.

### *OBJECTIVE 2.1 – Enhance EXIM’s awareness of OIG’s role and oversight results.*

- Educate EXIM employees about OIG's role and whistleblower protections through outreach, including new employee orientation briefings and agency-wide meetings.
  - OIG continued to hold bi-weekly briefings for new hire employees to brief them on OIG and educate them on whistleblower protections. OIG's new website contains a dedicated page related to the whistleblower protection ombuds program. In addition, in July 2024, the IG and EXIM Chair issued a joint message on National Whistleblower Protection Day, underscoring whistleblower rights. Finally, OIG issued a report to EXIM on its use of Non-Disclosure Agreements and recommended that EXIM include required language advising signers of their whistleblower rights in such agreements.
- Conduct investigative outreach through fraud awareness briefings, law enforcement liaison meetings, or other mechanisms.
  - OIG's OI documented 50 outreach activities in FY 2024, including 10 presentations to delegated lenders of the bank, aimed at educating them on OIG’s role and OI’s investigative focus on fraud against the agency’s programs and operations. OI management also attended CIGIE AIGI quarterly meetings with law enforcement counterparts from the OIG community. Additionally, OI participated in key events such as the FDIC/DOJ Financial Crimes Annual Conference, the IAFCI Annual Conference, as well as two EXIM Annual Conferences reinforcing the importance of collaboration in our fraud prevention and investigative efforts. As a result, hotline intake has increased by 40% compared to the previous fiscal year, with OI referrals rising by an additional 41%. Additionally, the Office of Investigations initiated 50% more criminal investigations in FY 2024 compared to the prior fiscal year.

### *OBJECTIVE 2.2 – Strengthen relationships with Congress and other stakeholders to assess priorities and promote accountability and transparency.*

- Provide accurate and timely responses to information requests, including congressional inquiries and requests, Executive Order data calls, Office of Management and Budget requests, and Freedom of Information Act requests.
  - OIG met all established timelines, including submission of its FY 2025 budget request to OMB. As described in under the 1.2, subobjective 4, OIG also met its requirements for law enforcement reporting. For FOIA, OIG completed processing of its FOIA requests in 20 days or less, within the statutory time period to respond to such requests.
- Establish recurring outreach meetings with congressional staff and other stakeholders.
  - OIG conducted four briefings for all congressional committees of jurisdiction. In addition, OIG expanded outreach to non-governmental stakeholders. In May

2024, the IG provided written testimony before the U.S. Senate Committee on Appropriations at the committee's request.

- Host or participate in external outreach through meetings or events across government and other external stakeholders.
  - OIG presented information on the mission to more than 1800 attendees at both EXIM Annual Conferences. The IG was invited to brief TXF Africa 2023 at their conference in October 2023. OIG participated in the Berne Union in Oslo as part of its activities to further understand EXIM's impact export credit agency community. OIG also arranged to have our staff briefed by a Department of Commerce official on export control compliance.
- Produce OIG's Semi-Annual Reports to Congress within established statutory timelines.
  - OIG published its two required Semi-Annual Reports to Congress on schedule and briefed stakeholders accordingly.

***OBJECTIVE 2.3 – Collaborate across the oversight community to identify and implement leading practices that enhance OIG oversight.***

- Participate in CIGIE workgroups and outreach activities relevant to OIG's oversight mission to foster consistency in approach and share best practices.
  - The IG serves as a member of the CIGIE Executive Council and is the Chair of the Small/Unique OIGs working group. In addition, each OIG component office participates in CIGIE committees relevant to their work, the AIG for Audits is the co-chair of one CIGIE subcommittee and each audit staff member participates in a committee, and OGC has worked to partner with peer-government corporation OGCs on legal cooperation.
- Partner with other OIGs that oversee federal lending programs and report on oversight good practices.
  - OIG convened a group of OIGs that work to conduct oversight of federal lending and developed an initial draft report to capture oversight good practices related to such lending programs. OIG will circulate and publish the report in FY 2025.
- Participate in meetings and events with Federal oversight officials—as well as foreign partners engaged in oversight activities—to facilitate communication and coordination.
  - OIG traveled to Romania in late February 2024 to present the IG's oversight function and share leading practices and standards in conducting effective oversight work. In addition to visiting the U.S. Embassy in Bucharest, OIG staff participated in a series of bilateral meetings with Romanian officials. EXIM OIG will continue its collaboration with the Romanian oversight community in FY 2025. The collaboration with the Romanian government further expands the U.S. government's outreach with its allies and it enhances EXIM OIG's understanding of the global landscape as it pertains to EXIM's operations.
  - As the CIGIE lead U.S. delegate, the IG, along with our AIGSR and AIGI, continued to advanced OIG's oversight mission as part of the International Public Sector Fraud Forum (IPSFF). Alongside other CIGIE representatives, as well as representatives from GAO and OMB, OIG participates as a key member of the

IPSFF, which brings together representatives from across the U.S., United Kingdom (UK), Canada, Australia, and New Zealand to share best and leading practice in fraud management and combating public sector fraud.

- In furtherance of OIG’s mission and in promoting the role of OIGs in government oversight, our AIGSR, along with other OIG colleagues, participated in CIGIE-hosted meetings with various foreign delegations from the United Kingdom, Republic of Korea, and Uzbekistan.

## GOAL 3 – Build and expand the diverse workforce necessary to conduct oversight of EXIM.

### *OBJECTIVE 3.1 – Advance strategic recruitment, succession, and retention planning.*

- Recruit and retain qualified personnel to properly oversee and advance the effectiveness and efficiency of EXIM’s programs and operations.
  - OIG increased the size of its staff by 41%, reorganized its structure, and filled more than 11 positions from a pool of more than 1,500 applicants during the second half of the fiscal year.

### *OBJECTIVE 3.2 – Promote a culture of inclusiveness that centers on diversity, equity, inclusion, and accessibility.*

- Participate in CIGIE’s Diversity, Equity, Inclusion, and Accessibility committee and contribute to development of standardized approaches to fostering an inclusive workplace.
  - OIG contributed to the working group’s documents and helped publish "The Ally." OIG tracked and monitored its own efforts to foster a diverse and inclusive workforce.
  - OIG exceeded its affirmative employment goals with the hiring of women, minorities, veterans, and the disabled during the fiscal year and is seen in the community as a champion for Diversity, Equity, Inclusion, and Accessibility.
  - OIG hired a Chief of Staff to develop and oversee special programs tailored to employee health and engagement.

### *OBJECTIVE 3.3 – Provide opportunities for continuous development and professional growth to meet current and future OIG mission needs.*

- Comply with training requirements for oversight professionals, including those prescribed by the U.S. Government Accountability Office and CIGIE.
  - OI, OA, and OSR ensured their staff met training requirements for their respective professions.
    - OI has completed and documented all of its annual criminal investigator training requirements prescribed under OIG policy, the Attorney General guidelines for OIGs with Statutory Law Enforcement Authority and the CIGIE Quality Standards for Investigations.
    - OA complied with the training requirements of the Government Auditing Standards. These standards require each staff member working on Audits to complete a minimum of 80 continuing professional education hours within a two-year cycle. All OA staff members complied with this requirement. This was confirmed during the most recent External Peer Review of OA’s operations, issued on January 22, 2024.

- OSR requires staff to complete a minimum of 40 hours of training every two years, on a calendar-year basis, to ensure compliance with CIGIE Quality Standards for Inspection and Evaluation. All OSR staff have either completed, exceeded, or are on track to meet this requirement, or an adjusted requirement based on start date, within the two-year period. (Note: An adjusted calculation will apply based on when staff began working in OSR.)
- Ensure required training is completed and properly documented.
  - OIG initiated an internal training CPE policy to expand credit opportunities available for staff to meet their periodic requirements. OIG also migrated its training program to the U.S. Department of Agriculture’s AgLearn system for improved automation and tracking of training requests, costs, and completion dates.

## GOAL 4 – Optimize the efficiency and effectiveness of OIG operations through sound management, stewardship, and innovation.

### *OBJECTIVE 4.1 – Strengthen the independence of OIG management functions.*

- Enhance OIG independence in areas related to information technology and human capital.
  - OIG successfully migrated to an HR shared services provider in FY 2024. OIG launched its independent website. OIG worked with EXIM IT on an MOU for agreed upon IT issues that will be signed in FY 2025. OIG worked with OCIO and EXIM OGC regarding processes for accessing OIG data.
- Establish memorandum of agreement with EXIM Bank to document baseline management functions, roles, and responsibilities.
  - OIG built upon its agreement with EXIM for baseline services with MOUs pertaining to the Office of Ethics Delegation of Authority and Human Resource Authorities and Services. In particular, the Human Resources Authorities and Services agreement enabled OIG to transition to a HR shared service provider independent from EXIM for the first time.

### *OBJECTIVE 4.2 – Improve internal business processes related to the management of financial resources, information technology, human capital, and performance.*

- Identify requirements for the development, revision, or rescission of OIG policies and execute against agreed priorities.
  - Accomplishment: OIG refreshed seven and released five OIG-wide policies, including a policy on policies in FY 2024. OI completed a refresh of all 18 investigative-specific policies.
- Document internal management and administrative standard operating procedures, work instructions, and job aids to ensure repeatable outcomes.
  - OIG worked with the U.S. Office of Personnel Management to separate and redesign the USA Performance system for 2024. OM led working groups to re-write and reduce the number of critical elements, making them more job specific. In addition, OIG designed and implemented separate performance systems for SL and GS employees of the EXIM OIG Received OPM and OMB certification for SL performance system.
- Enhance and document OIG's strategic planning, performance planning, and budgeting processes, consistent with OMB Circular A-11.
  - OIG reviewed and updated its Strategic Plan in June 2024; the process was collaborative and inclusive. OIG published its FY 2024 performance plan on schedule, and FY 2025 performance plan, and distributed its FY 2023 performance results. OIG complied with all OMB requirements for the rollout of the FY 2025 budget and initial FY 2026 budget request.

***OBJECTIVE 4.3 – Leverage technology to secure and improve the efficiency of OIG operations.***

- Use information technology to automate core OIG processes and improve efficiency.
  - OIG digitized all paper records in accordance with [OMB M-23-07, Update to Transition to Electronic Records](#). OSR began transitioning to using TeamMate+ for programmatic work. OIG began moving to cloud storage services instead of legacy network storage.
- Enhance OIG’s public website to promote transparency with stakeholders.
  - OIG launched its new website, designed to enhance transparency and foster stronger relationships with our stakeholders. The platform provides easy access to important information, ensuring open communication and trust.



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If you fear reprisal, contact EXIM OIG's Whistleblower Protection Coordinator at  
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For additional resources and information about whistleblower protections and unlawful retaliation, please visit [the whistleblower's resource page](#) at [oversight.gov](https://www.oversight.gov).