



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

Fiscal Year 2025

Agency Performance Report

December 2025



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ABOUT OUR ORGANIZATION

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.

INTRODUCTION

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 across 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 Management and Budget Circular A-11, 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.¹ 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.² 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 2025,³ 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 A-11. 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 2025 based on OIG's [Fiscal Years 2023-2027 Strategic Plan](#). Currently, EXIM OIG is in the initial stages of developing its Strategic Plan for Fiscal Years 2028-2032. This strategic plan will be published during the FY 2028 OMB budget cycle.

¹ See [OMB Circular No. A-11 \(2024\)](#), "Preparation, Submission, and Execution of the Budget," Part 6 – Executive Summary, *Delivering a High-Performance Government.*"

² OIG, [Strategic Plan for Fiscal Years 2023 – 2027 Revised](#) (September 2024).

³ OIG, [FY 2025 Performance Plan \(OIG-O-24-04\)](#) (February 2024).

PERFORMANCE RESULTS

Results Summary

EXIM OIG began the fiscal year with four strategic goals, eleven key objectives, and 26 subobjectives focused on promoting integrity, economy, efficiency and effectiveness in EXIM's management, decision-making, and accountability in FY 2025. The report presents performance tied to each subobjective and measures organizational success for the fiscal year. OIG's results for FY 2025 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 13 reports: 6 from OA and 7 from OSR
- Support the timely resolution and agreement of new recommendations.
 - OIG issued 39 recommendations.
- 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 2025 were subject to such review, and many involved complex legal considerations, including OIG's report on aircraft concentration risk, ethics considerations related to EXIM's annual conference awards, 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.
 - An OIG investigation was successfully concluded resulting in five individuals pleading guilty to conspiracy to commit wire fraud involving EXIM's export credit insurance program. During FY 2025, four of the defendants were sentenced, resulting in nearly \$650,000 in court-ordered restitution and assessments, 41 months of prison time, and 42 months of probation.
 - Another OIG investigation led to the successful prosecution of a Miami, Florida man who engaged in a fraud scheme impacting EXIM's export credit insurance program. Sentencing is expected before the end of calendar year 2025.
- Promptly intake complaints through the OIG Hotline and Office of Investigations' investigative case management system.
 - OIG currently has 17 open matters in judicial districts across the country. Of these cases, three were initiated in FY 2025. The investigations cover multiple program areas, including loan guarantees, export credit insurance, falsification and misuse of EXIM's name and documentation, and procurement fraud. Three of the seventeen investigations are being conducted as part of a memorandum of understanding with the Pandemic Response Accountability Committee (PRAC) to assist with investigating fraud against pandemic-related programs.
- Improve adjudication processes to ensure efficient resolution of complaints made to OIG.
 - OIG received 52 complaints through its hotline during FY 2025. All have been reviewed by OI staff. Three were converted into formal investigative matters.

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

- Propose high quality oversight engagements for the FY 2026 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 April 2025, 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 22 proposals and OSR submitted 9 proposals, along with one joint OA, OSR and OI proposal.
 - OIG employed a quantitative risk scoring process to refine the proposals in April 2025 and inform the final development of OIG's FY 2026 work plan.
- 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
- Issue EXIM's FY 2025 major management challenges report.
 - OIG published its FY 2025 Major Management Challenges Report on September 30, 2025. The report was a truncated version of the typical document issued, as EXIM Bank was still awaiting confirmation of its Chairman and appointment of incoming staff at that time, and EXIM OIG had not had the opportunity to formally meet with the Chairman and his senior staff to discuss challenges and major issues. EXIM OIG will revert to the long form Major Management Challenges document in September 2026.

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 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. EXIM OIG also expanded awareness through social media posts and emails on fraud awareness to EXIM workforce.
- Conduct investigative outreach through fraud awareness briefings, law enforcement liaison meetings, or other mechanisms.
 - OIG’s OI documented 37 outreach activities in FY 2025, including 6 presentations to delegated lenders, aimed at educating them on OIG’s role and OI’s investigative focus on fraud against the agency’s programs and operations.

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 2026 budget request to OMB and FY 2026 Agency Performance Plan. For FOIA, OIG completed processing of its FOIA requests in 20 days or less, within the statutory time period to respond to such requests.
- Expand and deepen relationships with congressional staff and stakeholders through regular briefings to address legislative priorities.
 - OIG conducted five briefings for congressional committees of jurisdiction.
- Host or participate in external outreach through meetings or events across government and other external stakeholders.
 - OIG presented information on the organization’s mission to more than 800 attendees at the EXIM Annual Conference in May 2025. OIG also participated in the Berne Union spring meeting as part of its activities to further understand EXIM’s impact export credit agency community.
 - The AIGA led cross cutting CIGIE audit subcommittee meetings and panels
 - Led by the AIGSR, EXIM OIG led writing trainings with other U.S. Government OIGs.
- 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.
 - During the performance year, the then-Inspector General served as a member of the CIGIE Executive Council and is the Chair of the Small/Unique OIGs working group.
- Partner with other OIGs that oversee federal lending programs and report on oversight good practices.
 - Shared best practices, templates, and lessons learned on EOIs with no less than five other OIGs and participated in meetings and events with Federal oversight officials as well as foreign partners engaged in oversight activities to facilitate communication and coordination.
 - Participated in the International Public Sector Fraud Forum (IPSFF) in FY 2025
 - Met with OECD planners to discuss participation on an international fraud event panel.
 - Participated in Working Group to provide implementation guidance and templates for the recently adopted Administrative False Claims Act.
 - As the CIGIE lead U.S. delegate, the IG, along with our AIGSR and AIGI, continued to advance 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.

GOAL 3 – Build and expand the high-performing 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 completed all approved hiring actions.

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 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.
 - 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.
 - 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 completed 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 – independent of EXIM’s training platform.

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 completed migration of all HR systems and platforms to an independent shared service provider in FY 2025. Additionally, EXIM OIG migrated its personnel security functions away from the agency; it is now led by EXIM OIG's Office of Management and implemented by the shared services provider. All HR and operations are fully independent of EXIM.
- Establish memorandum of agreement with EXIM Bank to document baseline management functions, roles, and responsibilities.
 - OIG is currently working with EXIM to finalize an MOU detailing roles and responsibilities over EXIM OIG's IT platform.

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 recission of OIG policies and execute against agreed priorities.
 - OIG refreshed five and released three OIG-wide policies, including an updated purchase card policy.
- Document internal management and administrative standard operating procedures, work instructions, and job aids to ensure repeatable outcomes.
 - OIG updated its SOPs for proper use of passports and disposition of used travel documents, as well as its SOP for the use of government purchase cards.
- Enhance and document OIG's strategic planning, performance planning, and budgeting processes, consistent with OMB Circular A-11.
 - OIG published its FY 2026 performance plan on schedule and distributed its FY 2024 performance results. OIG complied with all OMB requirements for the rollout of the FY 2026 budget and initial FY 2027 budget request. EXIM OIG has created a cross-cutting team to review its strategic plan and will publish a new document for fiscal years 2028-2032 during the FY 2028 OMB budget process. EXIM OIG will ensure the new strategic plan addresses the new guidelines and requirements set forth by the 2024 OMB Circular A-11.

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.

- In FY 2025, EXIM OIG built a new budget execution financial database along with a Microsoft Power BI solution to better track and present budgeting and accounting information.

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If you fear reprisal, contact EXIM OIG's Whistleblower Protection Coordinator at
oig.whistleblower@exim.gov

For additional resources and information about whistleblower protections and unlawful
retaliation, please visit [the whistleblower's resource page](#) at [oversight.gov](#).