



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

SEMIANNUAL REPORT TO CONGRESS

April 1, 2020 to September 30, 2020

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About Our Organization

THE EXPORT-IMPORT BANK OF THE UNITED STATES (EXIM or the Agency) is the official export credit agency (ECA) of the United States (U.S.). EXIM supports the financing of U.S. goods and services in international markets, turning export opportunities into actual sales that help U.S. companies of all sizes to create and maintain jobs in the United States. 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. Approximately 90 percent of the Agency's transactions were made available for the direct benefit of U.S. small businesses in recent years.

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

THE OFFICE OF INSPECTOR GENERAL (OIG), an independent oversight office within EXIM, was statutorily authorized in 2002 and organized in 2007. The mission of EXIM OIG is to promote the integrity, transparency, and efficiency of EXIM programs and operations by conducting and supervising audits, investigations, inspections, and evaluations related to agency programs and operations; providing leadership and coordination, as well as recommending policies that promote economy, efficiency, and effectiveness in such programs and operations; and preventing and detecting fraud, waste, abuse, and mismanagement.

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

Find more information about EXIM OIG, including reports of audits, inspections and evaluations, 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

In the second half of fiscal year (FY) 2020, EXIM OIG continued its work in advising EXIM management and Congress on recommendations for improving EXIM operations, as well as detecting, preventing, and prosecuting fraud. This semiannual report details that work and includes EXIM OIG's annual assessment of the major management challenges facing the Agency. In our semiannual report for the period ending March 31, 2020, we reported that Congress passed a law reauthorizing EXIM for seven years, which was signed by the President on December 20, 2019. The law contained several provisions maintaining, expanding, and restricting the Agency's general operating authority. We also reported the organizational shift to remote work operations for both EXIM and EXIM OIG in early March due to the ongoing public health emergency, the novel coronavirus (COVID-19). Consequently, the top management challenges facing EXIM in the upcoming year have evolved to include: (1) operational challenges arising from the coronavirus pandemic; (2) human capital management challenges; and (3) internal controls.

During this semiannual period, the OIG published two audit reports that addressed improper payments and the processing of suspensions and debarments. In addition, our office continued its focus on investigating fraud related to EXIM and EXIM transactions. Over the past six months, the Office of Investigations (OI) worked with local authorities to arrest an exporter who received payment for an EXIM-insured sale to a foreign buyer, but deceived a third party lender about the payment, causing the lender to file a false claim with EXIM. Another exporter was sentenced for her role in a scheme to defraud the lender in an EXIM-backed Working Capital Guarantee loan. The exporter was sentenced to 12 months in prison and 36 months of supervised release. The exporter was also ordered to pay EXIM nearly \$3 million in restitution.

None of these accomplishments would be possible without the hard work, professionalism, and dedication of our staff, who continue to provide independent and objective oversight through timely, accurate, and credible information to aid EXIM officials and Congress in addressing important issues facing the public and the Agency.

Jennifer Fain

Acting Inspector General

Highlights

The **Office of Audits and Evaluations (OAE)** completed two audits:

Independent Auditors' Report on EXIM's FY 2019 Payment Integrity Annual Reporting Compliance with Improper Payment Laws

([OIG-AR-20-05](#), May 11, 2020)

Under a contract overseen by OAE, an independent accounting firm performed an audit of EXIM's compliance with the reporting requirements of the improper payments laws for FY 2019. The independent accounting firm determined that the Agency's FY 2019 payment integrity annual reporting fully complied with all reporting requirements of the improper payments laws as stipulated in the Office of Management and Budget (OMB) Circular A-123. In addition, EXIM implemented corrective actions to address all three of the FY 2018 risk assessment recommendations from the prior audit ([OIG-AR-19-04](#), May 20, 2019). There are no recommendations in the latest report.

Audit of EXIM's Suspension and Debarment Program

([OIG-AR-20-06](#), September 30, 2020)

We completed an audit of EXIM's Suspension and Debarment (S&D) program. The objective of the audit was to determine whether the S&D program is operating and performing in accordance with applicable (1) EXIM policies and procedures and (2) federal laws, regulations, and guidelines. We determined that the S&D program effectively resulted in the suspension and/or debarment of parties from entering into contracts or participating in programs involving the U.S. government. However, we found delays in: (1) the actions taken for suspension and/or debarment, (2) the time between the Suspension and Debarment Official's decision and notification sent to the affected parties, and (3) the entry of excluded parties in the System for Award Management (SAM). We made two recommendations to improve the effectiveness and efficiency of EXIM's S&D program.

The **Office of Investigations (OI)** completed the following actions:

Sentencing

OI continued its focus on investigating fraud related to EXIM transactions. In July, a Los Angeles-area exporter was sentenced to one year in prison and ordered to pay restitution to EXIM of approximately \$3 million for her role in a scheme to defraud the lending institution in an EXIM-backed Working Capital Guarantee loan. She committed the fraud by submitting inflated and fictitious purchase documents to her bank on behalf of her company in order to draw down funds for illicit purposes.

Charged

In August, EXIM OIG agents and Miami-Dade County police arrested a Miami-area exporter after obtaining a warrant charging him with grand larceny for causing an enhanced assignee in an EXIM-insured transaction to file a false claim with EXIM. After exporting automotive parts under the approved transaction, the exporter borrowed from the assignee using the receivables as collateral. The exporter is alleged to have received full payment from the buyer, then falsely

certified to the lender and EXIM that his company had not been paid, causing the enhanced assignee/lender to file a claim against the EXIM policy.

Suspension and Debarment

During this reporting period, four matters were referred to the EXIM suspension and debarment official for consideration. Additionally, two entities were suspended from doing business with the federal government.

EXIM Management Challenges

The Reports Consolidation Act of 2000 (Pub. Law No. 106-531) requires Inspectors General “to summarize the most serious management and performance challenges facing [their respective agencies] and briefly assess the agenc[ies’] progress in addressing those challenges.” This requirement conforms with EXIM OIG’s statutory authority to conduct audits, inspections, evaluations and investigations to promote economy, efficiency, and effectiveness in EXIM programs and operations.¹ Since our last report on management and performance challenges, the Senate confirmed three of the five pending Board nominations, establishing a quorum, and Congress reauthorized EXIM for seven years through December 31, 2026.² Consequently, this mitigated prior challenges associated with managing uncertainty and the reauthorization, but raised other issues discussed below that are further complicated by COVID-19. The following topics represent EXIM OIG’s perspective on the critical issues and challenges facing EXIM that may pose a risk to the Agency’s ability to meet its mission efficiently and effectively.

Operational Challenges Arising from the Coronavirus Pandemic

In early March, a world-wide outbreak of COVID-19 led the World Health Organization to declare a global pandemic. Soon thereafter, the President issued a memorandum [declaring](#) the COVID-19 pandemic a national emergency and OMB issued guidance encouraging executive agency heads to temporarily maximize telework flexibilities for all federal employees. Consistent with this guidance, EXIM issued an evacuation order limiting on-site access to essential staff and began full-time remote operations on March 16, 2020. The national emergency declaration was extended in [April 2020](#), [July 2020](#) and [October 2020](#), and remains in effect through January 31, 2021. EXIM OIG accordingly anticipates that the challenges caused by the pandemic in FY 2020 will continue to persist in the upcoming fiscal year, especially as agencies determine how and when it will be safe for the workforce to return to physical facilities.

The rapidly evolving pandemic causes a number of unique challenges, including: (1) protecting employee health and safety, (2) maintaining operations and mission success, (3) cybersecurity, and (4) responding to increased fraud risk. These challenges will likely be heightened by budget uncertainty, as EXIM must restrict resources to account for the continuing resolution that expires on December 11, 2020.

Protecting Employee Health and Safety

While federal agencies typically prioritize health and safety, the COVID-19 pandemic has raised a number of critical issues and created unique challenges, such as preventing virus transmission in federal facilities and between employees and other individuals.

EXIM has undertaken significant efforts to prioritize the health and safety of its workforce. At the beginning of the pandemic and prior to OMB’s guidance, EXIM worked to ensure that all of its employees supplied necessary documentation to support their eligibility for telework should

¹ See [Inspector General Act of 1978, as amended](#) (5 U.S.C. app. §§ 2, 4, 5 and 6).

² See [Congressional Record Vol. 165, No. 76, p. S2749 \(May 8, 2019\)](#) and the Further Consolidated Appropriations Act 2020, Division I, Title VI, §§ 401-409, [\(Pub. L. No. 116-94\)](#) (Dec. 20, 2019).

a government-wide telework order come into effect. EXIM also established various COVID-19 working groups to address the rapidly evolving circumstances surrounding the pandemic. As described above, to minimize virus transmission risk while maintaining agency operations, EXIM shifted to a maximum telework status on March 16, 2020. Additionally, the Agency implemented guidance from the Centers for Disease Control and Prevention and Occupational Safety and Health Administration in its facilities management to protect employees with mission-critical work that could not be performed remotely.

Although EXIM has made progress in protecting employee health and safety, this issue will remain a significant challenge not only for EXIM, but for all federal agencies in light of increased demand for supplies, such as personal protective equipment, and budgetary restrictions. These challenges may become more complex in the upcoming year as it relates to EXIM, in particular, which shares physical facilities with the U.S. Department of Veterans Affairs.

Maintaining Operations and Mission Success

As the U.S.'s official ECA, EXIM's fundamental mission is to support American jobs by facilitating the export of U.S. goods and services through financing and insurance programs. The Agency's core financing programs include direct loans, loan guarantees, export credit insurance, and working capital loans and guarantees. In the most recent reauthorization, Congress expanded EXIM's statutory mandate by, among other things, increasing the small business threshold to 30 percent beginning on January 1, 2021, and establishing a China and Transformational Exports program to reserve 20 percent of EXIM's exposure cap for financing exports that compete directly with China or other countries.

The COVID-19 pandemic causes overarching challenges to maintaining operations and mission success. In order to protect the workforce, EXIM shifted operations from in-person to a virtual business model. While EXIM flexibly adapted to these operational changes, some activities (such as training new staff or soliciting new business) may be hampered by a remote environment. Although EXIM has streamlined its operations to perform functions remotely, concerns still persist among EXIM management and staff about its ability to perform all essential functions effectively during the pandemic.

Employees face a number of personal challenges associated with the pandemic. EXIM management cited school closures as an example, which has forced employees to monitor and manage their children's education from home during work hours. Additionally, a number of EXIM employees provide care for family members affected by COVID-19. These challenges can interfere with employees' ability to perform the Agency's mission. Reflecting the need to address such concerns, OMB published guidance encouraging executive agencies to provide maximum flexibilities to assist employees in balancing their personal and professional needs. However, EXIM OIG anticipates these challenges will persist throughout the pandemic.

Cybersecurity

Cybersecurity is a long-standing management challenge within the federal government that has become more urgent during the COVID-19 pandemic. Implementing EXIM's Continuity of Operations (COOP) plan continuously over long-term periods raises new technological and operational challenges, requiring EXIM to adapt its network to support a primarily virtual workforce and provide an unprecedented number of remote employees with a reliable means to access critical applications and data. There is a risk that EXIM's Information Technology (IT) may become overtaxed by a heightened need for services that may exceed information system capacity levels, as well as by the deployment of new tools and technology. Unprecedented levels of remote access also create additional targets for cyberattacks, increasing the risk of security breaches as EXIM staff now routinely conduct business and access information outside of secure facilities. Similarly, EXIM OIG anticipates that EXIM may face increased risk of cybercrimes in the virtual workplace, such as phishing, email fraud, and cyberattacks on third-party service providers. Consequently, key areas of concern include safeguarding systems against cyberattacks and insider threats, modernizing and managing IT systems, and ensuring continuity of operations.

Responding to Increased Fraud Risk

Typically, financial fraud (such as bank fraud, bribery, embezzlement, investment schemes, and falsification of financial records) dramatically increases during periods of economic crisis, such as the savings and loan crisis in the late 1980s and the 2008 financial collapse. Fraudsters may target guaranteed-loan programs, for example, where defaults are insured by the federal government. In fact, agencies implementing pandemic related guaranteed-loan programs have already encountered substantial increases in financial fraud and criminal activity.³ Accordingly, the current climate poses a risk of increased fraud which may be exacerbated by the change in operations caused by the pandemic.

During the pandemic, EXIM announced relief measures including waivers, deadline extensions, streamlined processing, and flexibilities regarding documentation and claims analysis. However, these adjustments could create new risks for EXIM in identifying or addressing noncompliance. Accordingly, EXIM may face challenges to maintain a robust due diligence and enforcement program while attempting to fulfill its mission. These challenges will require continued attention and vigilance by EXIM for the foreseeable future.

Human Capital Management

Human capital management remains a government-wide high-risk area for nearly all federal agencies.⁴ EXIM's human capital management challenges are comprised of a variety of interrelated issues, most notably: (1) inadequate resources, especially in light of new statutory

³ For example, see <https://www.justice.gov/opa/pr/nine-charged-24-million-covid-relief-fraud-scheme>; <https://www.baynews9.com/fl/tampa/news/2020/09/10/u-s--has-charged-57-people-with-alleged-ppp-fraud--doj-says>.

⁴ See U.S. Government Accountability Office, [HIGH-RISK SERIES Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas](#), GAO-19-157SP (March 6, 2019).

mandates; (2) recruitment and retention; and (3) staff attrition and a lack of succession planning.

Inadequate Resources

The lack of adequate, predictable funding and staffing can negatively affect an agency's ability to meet its performance goals and fulfill its mission. For example, EXIM OIG recently identified limited staff resources as a contributing factor to EXIM's untimely processing of suspension and debarment actions, exposing the Agency and the federal government to increased risk. Although Congress expanded EXIM's statutory mandates in its most recent reauthorization, EXIM's budget has remained at the same level as prior years, straining available resources. Most illustrative of these concerns is the China and Transformational Exports Program created by the 2019 reauthorization. According to EXIM management, the program relies almost exclusively on existing agency staff to support its additional activities.

Recruitment and Retention

According to EXIM management, recruiting and retaining highly skilled employees is difficult because the Agency must compete not only with the private sector, but also with other financial regulatory agencies that compensate employees pursuant to FIRREA-based pay systems that award higher salaries for commensurate GS levels.⁵ The Agency has attempted to address the discrepancies through administratively determined pay for qualified individuals, but has reported continuing challenges due to salary limitations. EXIM management has also expressed concerns that recruitment and retention may become more challenging as the private sector reimagines long-term operations such as a permanent shift to remote work.

In addition to hiring and retaining employees, the Agency must ensure staff are adequately trained. EXIM is making progress by reviewing skill gaps and competencies to develop comprehensive training programs. Nonetheless, training remains a challenge due to restricted operations and prior staff attrition.

Staff Attrition and Succession Planning

As identified in prior reports, EXIM experienced a significant attrition of human capital when it lacked a Board quorum for several years and its authority lapsed. This resulted in a high concentration of retirement-aged employees, which was further exacerbated by issues with succession planning. As explained in CIGIE's 2018 Annual Report to the President and Congress, "[a]gencies without institutionalized succession planning are at a disadvantage and lack 'feeder' systems to identify high-performing employees who may succeed in senior leadership positions. In addition, high turnover rates create sustained financial costs for agencies competing for the best talent in a tight national labor market."⁶

⁵ In past economic crises, the federal government has typically experienced an increase in demand for jobs; however, EXIM's competitor employers have not experienced the same economic downturn as other industries and the Agency has not yet identified any increased demand in its positions.

⁶ See https://www.oversight.gov/sites/default/files/oig-reports/CIGIE_Top_Challenges_Report_April_2018.pdf.

Currently, approximately 30 percent of EXIM’s workforce is eligible to retire by FY 2022. These retirements portend future gaps in leadership and institutional knowledge and exacerbate existing skill gaps. Succession planning for such retirements forms an integral part of workforce planning and helps ensure an ongoing supply of qualified staff to fill leadership and other key positions. According to EXIM management, the Agency is making progress to address staff attrition by acknowledging succession planning as an essential tool to deal with attrition and prioritizing the transfer of employee knowledge widely across the organization to reduce the risks of single points of failure. However, continued efforts implementing the Agency’s succession planning remain necessary.

Internal Controls

We are pleased to report that EXIM continues to make significant progress in improving internal controls in the Agency’s programs and operations.

Office of Audits and Evaluations

OAE conducts and oversees independent and objective audits, inspections, and evaluations to assess the efficiency and effectiveness of EXIM’s programs, operations and transactions. OAE staff may also perform reviews or assessments; conduct research projects; provide advisory or consulting services to EXIM management; or provide information, comments and other services to outside parties. All audits, inspections, and evaluations are performed in accordance with the requisite standards—the *Government Auditing Standards* issued by the Comptroller General of the United States and the CIGIE *Quality Standards for Inspection and Evaluation*. OAE works in tandem with OI whenever appropriate and refers any irregularities and other suspicious conduct to OI for investigative consideration.

Summary of Activities

During this semiannual reporting period, OAE completed two audits:

- Independent Auditors’ Report on EXIM’s FY 2019 Payment Integrity Annual Reporting Compliance with Improper Payment Laws
- Audit of EXIM’s Suspension and Debarment Program

At the end of the reporting period, OAE had three audits and a risk assessment in progress:

- Audit of EXIM’s FY 2020 Financial Statements
- Audit of EXIM’s Compliance with FISMA for FY 2020
- Audit of EXIM’s Cybersecurity Program
- Risk Assessment of EXIM’s Purchase Card Program

Reports Issued

Independent Auditors’ Report on EXIM’s FY 2019 Payment Integrity Annual Reporting Compliance with Improper Payment Laws

([OIG-AR-20-05](#), May 11, 2020)

An improper payment is any disbursement or transfer of federal funds to any non-federal person, non-federal entity, or federal employee that is made by a federal agency, contractor, grantee; or a governmental or other organization administering a federal program or activity that should not have been made or that was made in an incorrect amount (either overpayments or underpayments). The Improper Payments Information Act of 2002 (IPIA), as amended by the Improper Payments Elimination and Recovery Act of 2010 (IPERA) and the Improper Payments Elimination and Recovery Improvement Act of 2012 (IPERIA) requires each agency’s Inspector General to perform an annual review of the agency’s compliance with improper payments reporting requirements.

Under a contract overseen by OAE, an independent accounting firm conducted an independent audit to determine whether EXIM was in compliance with the reporting requirements of the improper payment laws for FY 2019 reporting. In addition, the audit assessed the Agency’s accuracy and completeness of improper payment reporting, performance in reducing and recapturing improper payments, and implementation of the prior year audit recommendation. The independent accounting firm determined that EXIM complied with the reporting

requirements of the improper payment laws for FY 2019 reporting. The report did not include recommendations.

Audit of EXIM's Suspension and Debarment Program

([OIG-AR-20-06](#), September 30, 2020)

OAE conducted an audit to determine whether EXIM's Suspension and Debarment (S&D) program is operating and performing in accordance with applicable (1) EXIM policies and procedures and (2) federal laws, regulations, and guidelines. The audit was conducted in accordance with generally accepted government auditing standards.

EXIM's S&D program effectively resulted in the suspension and/or debarment of parties from entering into contracts or participating in programs involving the U.S. government. We determined that EXIM generally conducted S&D proceedings in accordance with Agency policies and procedures, and federal requirements. However, referrals for S&D were not processed in a timely manner. Specifically, there were delays in: (1) the actions taken for suspension and/or debarment, (2) the time between the SDO decision and notification sent to the affected parties, and (3) the entry of excluded parties in SAM. We made two recommendations in the report to improve the efficiency and effectiveness of the S&D program, one of which was closed at report issuance.

- 1) Update, finalize, and implement internal procedures to ensure that S&D referrals are processed consistently and in accordance with a designated time-frame. The internal procedures should require but are not limited to:
 - a. Establish preliminary and SDO review timelines for processing of referrals differentiated by case types.
 - b. Implement a process to alert responsible staff to send timely notification of suspension, proposed debarment, and debarment decisions to affected parties.
 - c. Require entry of excluded individuals into SAM within 3 business days as required and sending timely notification of decisions to the affected parties.
 - d. Include controls and process validation for the various phases and steps involved (e.g., queues by case type, milestones or follow-up dates for phase and step(s) completion, monitoring reports, and periodic reconciliation of exclusion information to SAM). (Status – Open)
- 2) Develop and implement a record keeping system that provides for a complete historical record of S&D actions. (Status – Closed)

Ongoing Projects

Audit of EXIM Bank's Fiscal Year 2020 Financial Statements

An independent public accountant, working under OAE supervision, is conducting an audit to issue an opinion on the accuracy and completeness of EXIM's financial statements for FY 2020, which will be issued in the semiannual period ending March 31, 2021. A related management letter report will also be issued in the semiannual reporting period ending March 31, 2021.

Audit of EXIM's Compliance with FISMA for FY 2020

Under a contract overseen by OAE, an independent public accounting firm is conducting an audit to determine whether EXIM developed adequate and effective information security policies, procedures, and practices in compliance with Federal Information Security Modernization Act (FISMA). The report will be issued in the semiannual reporting period ending March 31, 2021.

Audit of EXIM's Cybersecurity Program

The objective of this performance audit is to assess the effectiveness of EXIM's Cybersecurity Program and its implementation, including compliance with federal laws, regulations, EXIM policies and procedures, and documented baseline security configurations. The report will be issued in the semiannual period ending March 31, 2021.

Risk Assessment of EXIM's Purchase Card Program

The objective of this risk assessment is to determine the scope, frequency, and number of audits of this program. The memorandum report will be issued in the semiannual period ending March 31, 2021.

Office of Investigations

OI conducts and coordinates investigations relating to alleged or suspected violations of federal laws, rules, or regulations occurring in EXIM programs and operations, which may result in criminal or civil prosecution and/or administrative sanctions. The subjects of OI investigations may be program participants, contractors, agency management or employees. OI’s investigations are supported by Investigative and Financial Analysts who conduct tactical and strategic intelligence analysis in support of OI’s investigations.

Summary of Investigations

OI evaluates all reports of possible fraud or illegality affecting EXIM programs and activities. Such reports are received from a variety of sources including agency employees, EXIM’s Office of General Counsel (OGC), participants in agency transactions, other government agencies, and the EXIM OIG Hotline. Evaluations that identify reasonable indications of fraud or illegality result in an investigation. These investigations are summarized in the table below.

Activity	Investigations
Open as of April 1, 2020	27
Opened during period	3
Closed during period	10
Open as of September 30, 2020	20

Of the 20 current open investigations, the following table depicts the category of EXIM program affected by the investigation based on the allegations received:

Program	Number of Investigations
Export Credit Insurance	10
Loan Guarantee	3
Working Capital	4
Letter of Interest	2
Employee Integrity	0
Other (i.e., proactive investigations)	1

Investigative Results

OI obtained the following investigative actions during this reporting period:

Description	OIG	Joint Activities*	Total
Matters Referred for Prosecution Consideration	5	0	5
Matters referred for State and Local Consideration	1	0	1
Criminal Indictments, Informations, Complaints	1	0	1
Guilty Pleas Entered	0	0	0
Criminal Judgments	1	0	1
Civil Actions	0	0	0
Civil Recoveries	0	0	0
Prison Time (months)	12	0	12
Probation (months)	36	0	36
Court Ordered Fines, Assessments, Restitutions, and Forfeitures	\$3,000,075	\$0	\$3,000,075
Administrative Actions**	0	0	0
Administrative Employee Actions***	0	0	0
Administrative Cost Savings and Repayments	\$0	\$0	\$0
Suspensions and Debarments	2	0	2

* Joint investigations with other law enforcement agencies.

** Administrative actions are responses by EXIM to stop transactions, cancel policies, or protect funds at risk based on investigative findings.

*** Administrative employee actions are responses by EXIM to terminate or discipline Bank employees based on investigative findings.

The metrics used in this report were obtained from a system of records entitled, "EIB-35-Office of Inspector General Investigative Records" also known as "CMTS". CMTS is a Structured Query Language (SQL) database used by OI to store its records related to criminal, civil, and administrative investigations. The database contains assignments, allegations, investigative activities, actions, dates, and identifying information about potential subjects and individuals related to these investigations. The system is able to generate metrics reports, which track judicial, administrative, and other investigative actions and activities. The database generates statistical reports on a variety of OI products including: Hotlines, Complaints, Subpoenas, and Investigations.

Investigations

During the reporting period, successful criminal fraud investigative efforts involving EXIM programs include the following:

Exporter Sentenced for Submission of Inflated Sales Contracts and Purchase Orders (Working Capital Guarantee)

On July 14, 2020, Haiyan "Tina" Tang of Arcadia, CA was sentenced in U.S. District Court for the Central District of California after pleading guilty in January 2020 to one count of 18 U.S.C. § 1014 (Providing False Statements to a Financial Institution). In December 2014, Tang applied for and received a \$3 million working capital line of credit from GBC International Bank (GBC) on behalf of her company, 3T Holding, Inc. (3T), which was guaranteed by EXIM. In order to

draw down on the line of credit, Tang submitted to GBC substantially inflated sales contracts and purchase orders. 3T ultimately defaulted on the loan, causing GBC to file a \$3 million claim with EXIM. Tang was sentenced to serve 12 months in prison followed by 36 months supervised release. Tang was also ordered to pay EXIM restitution of \$2,999,975 and a special assessment of \$100.

Exporter Charged with Grand Larceny in Miami-Dade County for Causing False Claim (Export Credit Insurance)

On August 11, 2020, Romel Duran Martinez (Duran) of Miami, FL was arrested and charged with section 812.014(2)(A) of the Florida Criminal Code, Grand Larceny. Through his company, Deoca Manufacturing Co. (Deoca), Duran exported automotive parts to a buyer in Colombia under an EXIM Short Term Multi-Buyer Credit Insurance policy. EXIM approved a third party to finance up to \$150,000 against Deoca's receivables. Under the conditions of the policy, Duran was required to instruct Deoca's buyer to make payments directly to the third party financier. Duran is alleged to have received payment in full from the buyer, but falsely certified to the lender and EXIM that the buyer defaulted on payments, causing the financing company to file a false claim with EXIM in the amount of \$142,472. The criminal case against Duran is pending in Florida's Eleventh Judicial Circuit.

Other Investigative Results

The COVID pandemic has substantially disrupted judicial activity in many federal judicial districts. A number of EXIM OIG criminal and civil cases are pending before courts that have been forced to temporarily close or alter operations because of the pandemic. In addition, many federal grand juries have postponed proceedings, preventing the issuance of indictments in pending criminal matters, essentially putting them on hold until pandemic concerns are resolved.

Historically, much of the program fraud EXIM OIG successfully prosecuted stemmed from the Agency's short and medium-term export credit programs and working capital guarantee programs. A lag in time often occurs between the initial transaction, the later fraud, and eventual detection of the fraud, most often culminating in false claims to EXIM. Typically, defaults and subsequent claims in these programs do not surface for one to five years after the transaction is in effect, though it is important to note that defaults can be a normal part of business operations and are not necessarily indicative of fraud. Consistent with past experience, EXIM OIG anticipates that any financial fraud committed during the pandemic utilizing EXIM programs may not become detectable for at least a year after the initial transaction.

As a result of the Agency's operational slow down and its improvements in due diligence over the past several years, the number of suspected fraudulent transactions referred to OIG have also slowed. However, EXIM OIG believes that the number of suspicious transactions referred to OIG are likely to increase as EXIM rebuilds its portfolio, and the financial pressure on foreign and domestic businesses increases as a result of the COVID pandemic consistent with the substantial increase in financial fraud associated with CARES Act funding. In light of the time lag discussed above, EXIM OIG anticipates that the majority of fraud arising from the current

financial downturn will not be detected until 2021 or later, but expects a surge in fraud activity to increase OI's caseload in the coming years.

EXIM's suspension and debarment program serves as a critical tool to prevent fraud, waste and abuse, and to protect the federal government. During this reporting period, EXIM OIG referred four entities to the EXIM suspension and debarment official for consideration. In addition, two entities were indefinitely suspended from doing business with the federal government based on prior EXIM OIG referrals to the Agency.

OI shared active law enforcement intelligence with OGC on several matters concerning suspected criminal activity by participants involved in active insurance policies or transactions under review. OI made eight referrals of investigative information to OGC concerning potential fraud and funds at risk for enhanced due diligence by EXIM. Additionally, OI investigative analysts responded to nearly 500 deconfliction requests from the Department of Homeland Security and the Export Enforcement Coordination Center (E2C2).

Hotline Activity

EXIM OIG maintains a hotline to receive reports of fraud, waste, and abuse in EXIM programs and operations. Hotline reports are evaluated by our investigative team and, based on the available evidence, may result in the initiation of an investigation, audit, inspection, evaluation, referral to other law enforcement authorities, or referral to agency management for administrative action.

EXIM OIG received nine hotline reports during this semiannual reporting period. Four were resolved and closed by the hotline operator, two were opened as investigative matters, and three were referred to the Agency for action as deemed appropriate.

Hotline reports can be made by any of the following methods:

- Phone at 1-888-OIG-EXIM (1-888-644-3946);
- E-mail at IGhotline@exim.gov, or;
- In person or mail/delivery service to EXIM OIG Hotline, Office of Inspector General, 811 Vermont Avenue, NW, Room 1052-1, Washington DC 20571.

EXIM OIG will not disclose the identity of a person making a report through the hotline without their consent unless the Inspector General determines such disclosure is unavoidable during the course of an investigation.

Office of Inspector General Management Initiatives

COVID-19

The World Health Organization declared COVID-19 a global pandemic on March 11, 2020. The next day, OMB issued a [memorandum](#) to executive agency heads encouraging them to maximize telework flexibilities for federal employees, which EXIM implemented on March 16, 2020. Full-time remote work operations for EXIM and EXIM OIG persist. To proactively address the significant and evolving issues created by the pandemic, EXIM OIG continues to collaborate with internal and external COVID-19 working groups. EXIM OIG anticipates that this work will continue through the next reporting period.

Fraud Awareness Training and Outreach

As part of EXIM OIG’s mission to prevent and detect fraudulent activity, continual efforts are made to meet with and educate stakeholders and other law enforcement partners about the various risks and fraud scenarios most commonly seen in trade finance, export credit fraud, and money laundering cases. OI management met with the Agency’s OGC and the Office of the Chief Risk Officer to discuss intelligence sharing, OIG’s enhanced due diligence referrals to OGC, and other ways the OIG and the Agency can work together to prevent bad actors from defrauding EXIM. OI management also met with staff from the Office of the Chief Information Officer to discuss information sharing in the case of cyber attacks and intrusions against EXIM, as well as how the Agency can address cyber criminals targeting the participants of EXIM transactions.

Council of Inspectors General on Integrity and Efficiency

EXIM OIG participates in CIGIE activities, including the Audit Committee, the Inspection and Evaluation Committee, the Legislation Committee, the Council of Counsels to the Inspectors General, as well as the Whistleblower Protection Coordinators and legal working groups. Through CIGIE, EXIM OIG continues to coordinate and collaborate with other OIG partners to use resources more effectively, share knowledge, strengthen oversight and serve our critical mission.

President’s Management Agenda

The President’s Management Agenda and OMB memoranda [M-17-26](#) and [M-18-23](#) emphasize the need for U.S. federal agencies to refocus resources away from “unnecessary and obsolete policies, guidance, and reporting requirements” toward “mission-critical objectives and high-value work.” Accordingly, EXIM OIG continues to focus on improving its current administrative and risk assessment processes to achieve the following desired outcomes:

- Streamlined internal processes and communication through automation and use of SharePoint.
- Optimization of scarce resources through prioritizing assignments, setting performance metrics, clear allocation of responsibilities, using templates, etc.
- Greater use of data analytics by using a dashboard that provides a comprehensive historical database of EXIM transactions that will allow users to conduct queries, analysis, reporting, and data visualization.

- Incorporation of risk management within all key processes to ensure that risks can be managed effectively.

Review of Legislation and Regulations

Pursuant to section 4(a)(2) of the Inspector General Act of 1978, as amended, EXIM OIG reviews proposed and existing legislation and regulations related to EXIM’s programs and operations. During this reporting period, EXIM OIG participated in a Whistleblower Protection Coordinator working group and assisted a CIGIE working group focused on CIGIE legislative priorities.

Government Accountability Office

The IG Act states that each IG shall give particular regard to the activities of the Comptroller General of the United States with a view toward avoiding duplication and ensuring effective coordination and cooperation. During the reporting period, EXIM OIG shared information on ongoing and planned work with General Accountability Office officials. GAO issued one report during the reporting period on the end-use monitoring of dual-use exports.

Export-Import Bank: Status of End-Use Monitoring of Dual-Use Exports as of August 2020 ([GAO-19-688R](#), August 27, 2020)

GAO is required to report annually on the end uses of dual-use exports financed by EXIM during the second preceding fiscal year. This report reviewed EXIM’s monitoring of dual-use exports that it continued to finance in FY 2018. Specifically, GAO examined: (1) the status of the Agency’s monitoring of dual-use exports as of August 2020; and (2) identified any new dual-use exports financed by the Agency in FY 2019. GAO found that EXIM monitored the single dual-use export transaction that it continued to finance in FY 2018—receiving all documents for the transaction and making the annual dual-use determination on time. Further, GAO determined that the Agency did not finance any new exports under its dual-use authority in FY 2019.

APPENDIX A

Open Recommendations from Prior Reporting Periods

This table shows that 35 recommendations from nine reports issued up to March 31, 2020, remain open at the end of this reporting period. Thirty-one of the open recommendations are from reports issued in FY 2020. The remaining four open recommendations are from reports issued in FY 2017 and FY 2019. Reports from prior periods are no longer listed when all recommendations have been closed.

Report No./ Date	Report Title	Total	Recommendations			Latest Target Closure Date
			Open	Closed	Unresolved	
Last Period (10/1/19 –3/31/20)						
Audits						
OIG-AR-20-01 8 Nov 2019	Independent Auditors' Report on EXIM Bank's Data Act Submission	14	14	0	0	11/9/2020
OIG-AR-20-03 14 Nov 2019	FY 2019 Financial Statements Audit Management Letter	12	12	0	0	11/13/2020
OIG-AR-20-04 13 Jan 2020	Independent Audit of EXIM's Information Security Program Effectiveness for FY 2019	7	3	4	0	1/13/2021
Inspections and Evaluations						
OIG-EV-20-01 2 Dec 2019	Evaluation of EXIM's PRM Procedures and CRO Responsibilities	3	2	1	0	12/2/2020
Prior Periods (prior to 10/1/19)						
Audits						
OIG-AR-19-03 13 Mar 2019	Independent Audit of EXIM's Information Security Program Effectiveness for FY 2018	14	1	13	0	1/13/2021
Inspections and Evaluations						
OIG-EV-17-01 2 Dec 2016	Evaluation of Risk Management Procedures and CRO Responsibilities	8	1	7	0	12/31/2020
OIG-EV-17-03 30 Mar 2017	Report on EXIM Bank's CGF Program	5	1	4	0	3/31/2020
OIG-EV-19-03 19 Jun 2019	Evaluation of EXIM's CLF Model and Loss Reserve Process	7	1	6	0	12/31/2020
Totals		70	35	35	0	

APPENDIX B

Audit and Evaluation Reports Issued from April 1, 2020 – September 30, 2020

	Report No./Date	Report Title	Management Decisions Reached on Recommendation	Total Questioned Cost	Unsupported Cost	Funds for Better Use	Disallowed Cost
1	OIG-AR-20-05 11 May 2020	Independent Auditors' Report on Export-Import Bank's FY 2019 Payment Integrity Annual Reporting Compliance with Improper Payment Laws	0/0	0	0	0	0
2	OIG-AR-20-06 30 Sep 2020	Audit of EXIM's Suspension and Debarment Program	2/2	0	0	0	0
Totals				0	0	0	0

APPENDIX C

Significant Recommendations from Previous Semiannual Reports on Which Corrective Action Has Not Been Completed

We have identified two significant recommendations that were agreed to by EXIM but have not been implemented as of September 30, 2020. We are committed to working with Bank management to expeditiously address the management decision and correct action process, recognizing that certain initiatives will require long-term, sustained and concerted efforts.

Evaluation of Risk Management Procedures and Chief Risk Officer Responsibilities

([OIG-EV-17-01](#), December 2, 2016)

Recommendation 1: To clarify the authority and responsibility of the Chief Risk Officer with respect to the current allocation of risk management responsibilities across the agency, EXIM Bank should formally document the risk management roles, responsibilities and authority of its line of defense functions; clarify responsibilities and interaction between different senior management committees and divisions; identify the individuals and functions to be responsible for each; and address any gaps in those responsibilities.

Expected implementation date: December 31, 2020.

Report on EXIM Bank's Credit Guarantee Facility Program

([OIG-EV-17-03](#), March 30, 2017)

Recommendation 5: Review and update the reachback policy for the CGF program to be consistent with actual practice and reduce the need for waivers. In reviewing and updating the reachback policy, the Bank should analyze the case-by-case determination of a reachback relative to the average policy date (i.e., operative date); consider establishing limits on the utilization of the facility for reachback transactions; set requirements for communicating analysis of reachback issues to decision makers including the Board; and establish procedures for consideration of waivers to the policy. This would include documenting the supporting evidence in the credit file.

Expected implementation date: March 31, 2020.

APPENDIX D

Open Recommendations

	Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
Evaluation of Risk Management Procedures and Chief Risk Officer Responsibilities (OIG-EV-17-01, December 2, 2016)						
1	To clarify the authority and responsibility of the CRO with respect to the current allocation of risk management responsibilities across the agency, EXIM Bank should formally document the risk management roles, responsibilities and authority of its line of defense functions; clarify responsibilities and interaction between different senior management committees and divisions; identify the individuals and functions to be responsible for each; and address any gaps in those responsibilities.	Open	12/31/2020	Agree	0	0
Report on EXIM Bank's CGF Program (OIG-EV-17-03, March 30, 2017)						
5	Review and update the reach back policy for the CGF program to be consistent with actual practice and reduce the need for waivers. In reviewing and updating the reach back policy, the Bank should analyze the case-by-case determination of a reach back relative to the average policy date (i.e., operative date); consider establishing limits on the utilization of the facility for reach back transactions; set requirements for communicating analysis of reach back issues to decision makers including the Board; and establish procedures for consideration of waivers to the policy. This would include documenting the supporting evidence in the credit file.	Open	3/31/2020	Agree	0	0
Independent Audit of EXIM Bank's Information Security Program Effectiveness for FY 2018 FISMA (OIG-AR-19-03, March 13, 2019)						
7	Assess assets and analyze event data in real-time for compliance.	Open	1/31/2021	Agree	0	0
Evaluation of EXIM's Credit Loss Factor Model and Loss Reserve Process (OIG-EV-19-03, June 19, 2019)						
7	Expanding the current model program into a formal MRM framework, particularly with an expansion to include better risk mitigation surrounding error checking, statistical reporting, execution of model changes, and role definition. One of these roles should include documentation updates (i.e., a checklist item) to ensure that the SOP matches the current process to reduce errors.	Open	12/31/2020	Agree	0	0
Independent Auditors' Report on EXIM's DATA Act Submission (OIG-AR-20-01, November 8, 2019)						
1	Revise the internal control activities around Files A, B, and C to ensure that the Bank performs accurate and appropriately designed validations and reconciliations before the SAO submits and certifies the Bank's quarterly DATA Act submissions. Procedures should ensure that the reconciliations use all amounts shown in each file and that personnel itemize all reconciling	Open	11/9/2020	Agree	0	0

	Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
	items and identify corrective actions. Once the Bank has completed the corrective actions, it should re-perform the reconciliations until all reconciling items are resolved or no further action is required.					
2	Design, document, and implement a formalized document signoff process that includes the names of the preparer and the reviewers and the dates that the preparer and reviewers completed and approved the internal control activities (i.e., the reconciliations) so the Bank can perform proper monitoring of the control procedures in conjunction with each DATA Act submission.	Open	11/9/2020	Agree	0	0
3	Develop, document, and implement a policy requiring that all journal vouchers that adjust obligated balances include object classes and program activity codes.	Open	11/9/2020	Agree	0	0
4	Review the Bank's current policies and procedures for entering obligations in FMS-NG to ensure that they reiterate requirements for accurately and completely entering object classes and program activity codes in FMS-NG.	Open	11/9/2020	Agree	0	0
5	Develop and document a corrective action plan to assure that the Bank accurately and completely reports object classes and program activity codes in all financial and award data submissions (Files B and C). The corrective action plan should document EXIM's root-cause analysis, steps required to correct missing object classes in financial and award data submissions, and the planned timeline.	Open	11/9/2020	Agree	0	0
6	Determine the root cause of the errors identified during the testing of the first-quarter FY 2019 File D1 and take the necessary corrective action to (a) correct the errors for records shown in USASpending.gov, (b) identify the risk of reporting incorrect data for each data element containing an error, and (c) modify the policies and procedures for recording data in Comprizon and FPDS to address the risks, and to include adequate verification and validation review processes performed by the data owner and a supervisor or other independent party.	Open	11/9/2020	Agree	0	0
7	Determine the root cause of the errors identified during the testing of the first-quarter FY 2019 File D2 and take the necessary corrective action to (a) correct the errors for records shown in USASpending.gov, (b) identify the risk of reporting incorrect data for each data element containing an error, and (c) modify the policies and procedures for recording data in FABS to address the risks,	Open	11/9/2020	Agree	0	0

	Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
	and to include adequate verification and validation review processes performed by the data owner and a supervisor or other independent party.					
8	Improve the design of its review of the procurement and financial assistance award data in FPDS and FABS by reviewing additional data elements and performing more comprehensive reviews.	Open	11/9/2020	Agree	0	0
9	Design, document, and implement a process for reviewing Files D1 and D2 before the SAO submits and certifies the quarterly DATA Act submissions, and a process for notifying the DATA Broker of any errors identified in data derived by the DATA Broker. Review procedures should include steps for documenting any errors or concerns identified, including any necessary corrective actions.	Open	11/9/2020	Agree	0	0
10	Establish policies and procedures that address timelines for submitting FABS files that comply with P.L. 109-282, including internal milestones to ensure that the files can be extracted, validated, and uploaded to FABS by required due dates. The policies and procedures should also address cut-off dates for submitting correcting data that ensure sufficient time for the SAO certification of quarterly DATA Act submissions, commensurate with EXIM's risk tolerance related to data accuracy, completeness, and quality.	Open	11/9/2020	Agree	0	0
11	Establish policies and procedures to help ensure that all data reported in FABS and included in EXIM's certified File D2 are reported as intended by the DATA Act Standards and seek clarification from OMB and Treasury as necessary to ensure appropriate interpretation of the DATA Act Standards.	Open	11/9/2020	Agree	0	0
12	Complete a data inventory to govern its DATA Act activities and help ensure compliance with government-wide financial data standards.	Open	11/9/2020	Agree	0	0
13	Develop and implement a review process for the data inventory that the Bank will perform at regular intervals and after each DAIMS update.	Open	11/9/2020	Agree	0	0
14	Develop, test, and implement a DQP that covers significant milestones and major decisions pertaining to: (a) Organizational structure and key processes providing internal control activities for spending reporting; (b) Management's responsibility to supply quality data to meet the reporting objectives for the DATA Act in accordance with OMB Circular No. A-123; (c) EXIM's testing plan and	Open	11/9/2020	Agree	0	0

	Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
	identification of high-risk reported data, including (1) specific data that the Bank determines to be high-risk that are explicitly referenced by the DATA Act and (2) confirmation that these data are linked through the inclusion of the award identifier in the agency's financial system and are reported with plain English award descriptions; and (d) Actions taken to manage identified risks.					
Fiscal Year 2019 Financial Statements Audit Management Letter (OIG-AR-20-03, November 14, 2019)						
1	Improve the account provisioning controls to ensure that the process has features to prevent or detect improper provisioning.	Open	11/13/2020	Agree	0	0
2	Perform periodic reviews to ensure appropriate provisioning for access and roles.	Open	11/13/2020	Agree	0	0
3	Fully implement and configure continuous monitoring accordingly.	Open	11/13/2020	Agree	0	0
4	Configure continuous monitoring accordingly.	Open	11/13/2020	Agree	0	0
5	Perform and document evidence of a periodic review and perform research and resolution, as appropriate.	Open	11/13/2020	Agree	0	0
6	Develop and implement a correction to the data input parameters.	Open	11/13/2020	Agree	0	0
7	Develop and implement controls, at an appropriate level of precision, to support the foreign currency adjustment recorded in FMS.	Open	11/13/2020	Agree	0	0
8	Enhance EXIM's review control over the re-estimate cash flow model files used within the model to ensure all relevant data is appropriately summarized and reported.	Open	11/13/2020	Agree	0	0
9	Notify OMB of the error in File 3 historic data provided for display purposes only so that OMB can decide if a resubmission of File 3, including related inputs is necessary.	Open	11/13/2020	Agree	0	0
10	Assess the need to further modify the cash flow model to adjust the PD assumption to account for the age and performance of each specific deal, or document the determination as to how such a model change would have an insignificant effect on the model results.	Open	11/13/2020	Agree	0	0
11	Document, in sufficient detail, additional qualitative considerations used by management to calculate reestimates for financial statement reporting, that clearly bridges the gap between model historical performance and the resulting calculations. The documentation should include a quantification of the impact of these qualitative considerations on the outputs of the cash flow model.	Open	11/13/2020	Agree	0	0
12	Document, in sufficient detail, all assumptions made in preparing the cash flow model and the rationale for selecting these key assumptions. Documentation should be complete and stand on its own.	Open	11/13/2020	Agree	0	0

Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
Evaluation of EXIM's Portfolio Risk Management Procedures and CRO Responsibilities (OIG-EV-20-01, December 2, 2019)					
2 Create a Bank-wide Model Risk Management framework to ensure integrity of data products and continuity of model production.	Open	12/2/2020	Agree	0	0
3 Develop the Bank-wide Risk and Control Matrix and a Risk and Controls Self-Assessment that covers both financial and non-financial internal controls identification and mitigation of risks.	Open	12/2/2020	Agree	0	0
Independent Audit of EXIM's Information Security Program Effectiveness for Fiscal Year 2019 (OIG-AR-20-04, January 13, 2020)					
2 Fully implement and configure continuous monitoring across all of the Bank's information systems.	Open	1/13/2021	Agree	0	0
3 Appropriately configure continuous monitoring.	Open	1/13/2021	Agree	0	0
4 Perform and document evidence of a periodic review of the reported activity and perform research and resolution, as appropriate.	Open	1/13/2021	Agree	0	0
Audit of EXIM's Suspension and Debarment Program (OIG-AR-20-06, September 30, 2020)					
1 Update, finalize, and implement internal procedures to ensure that S&D referrals are processed consistently and in accordance with a designated time-frame. The internal procedures should require but are not limited to: (a) Establish preliminary and SDO review timelines for processing of referrals differentiated by case types; (b) Implement a process to alert responsible staff to send timely notification of suspension, proposed debarment, and debarment decisions to affected parties; (c) Require entry of excluded individuals into SAM within 3 business days as required and sending timely notification of decisions to the affected parties; and (d) Include controls and process validation for the various phases and steps involved (e.g., queues by case type, milestones or follow-up dates for phase and step(s) completion, monitoring reports, and periodic reconciliation of exclusion information to SAM).	Open	9/30/2021	Agree	0	0
Totals				\$0	\$0

APPENDIX E

Peer Review Reporting

Pursuant to Sections 5(a)(14), (15), and (16) of the Inspector General Act, as amended, this section provides information on peer reviews of EXIM OIG’s audit, inspection, evaluation, and investigation functions.

Office of Audits and Evaluations

The latest peer review of EXIM OIG’s audit function was conducted by the National Archives and Records Administration OIG, whose [report](#) was issued on September 8, 2017. The Office of Audits received an external peer review rating of pass on the system of quality control for the audit function. There are no outstanding recommendations from this peer review. Due in part to the uncertainty associated with COVID-19, the end date of the period covered for the peer review of the audit function scheduled for FY 2020 has been extended until March 31, 2021.

The first peer review of EXIM OIG’s inspection and evaluation function was conducted by the Farm Credit Administration and the Corporation for National and Community Services OIGs (the Review Team), whose [report](#) was issued on September 25, 2018. The Review Team concluded that EXIM OIG’s Office of Inspections and Evaluations generally met the seven CIGIE quality standards assessed and complied with internal policies and procedures. There are no outstanding recommendations.

Office of Investigations

The most recent peer review of EXIM OIG’s investigation function was conducted by the Board of Governors of the Federal Reserve System OIG, whose [report](#) was issued on September 11, 2017. OI received a rating of compliant with the standards required by CIGIE and the applicable Attorney General guidelines. There are no outstanding recommendations from this peer review. Due to the uncertainty associated with COVID-19, the peer review of the investigation function scheduled for FY 2020 has been extended pursuant to the government-wide waiver issued by the U.S. Department of Justice.

APPENDIX F

Inspector General Act Reporting Requirements

Inspector General Act Citation	Requirement Definition	Page
Section 5(a)(1)	Significant Problems, Abuses, and Deficiencies	3-4
Section 5(a)(2)	Recommendations for Corrective Actions	3-4; 12-13
Section 5(a)(3)	Prior Significant Audit Recommendations Yet to Be Implemented	25
Section 5(a)(4)	Matters Referred to Prosecutive Authorities	17
Sections 5(a)(5) and 6(c)(2)	Summary of Refusals to Provide Information	None
Section 5(a)(6)	Audit, Inspection and Evaluation Products Issued Including Total Dollar Values of Questioned Costs, Unsupported Costs, and Recommendations That Funds Be Put to Better Use	24
Section 5(a)(7)	Summary of Particularly Significant Reports	3-4
Section 5(a)(8)	Total Number of Reports and Total Dollar Value for Audits, Inspections and Evaluations with Questioned and Unsupported Costs	None
Section 5(a)(9)	Total Number of Reports and Total Dollar Value for Audits, Inspections and Evaluations with Recommendations That Funds Be Put to Better Use	None
Section 5(a)(10)(A) – (C)	Summary of Prior Audit, Inspection and Evaluation Products for Which No Management Decision Has Been Made, No Comment was Returned Within 60 Days, Recommendation Exists Regarding Aggregate Cost Savings	None
Section 5(a)(11)	Description and Explanation of Significant Revised Management Decisions	None
Section 5(a)(12)	Significant Management Decisions with Which the Inspector General Disagreed	None
Section 5(a)(13)	Reporting in Accordance with Section 804(b) of the Federal Financial Management Improvement Act of 1996 Remediation Plan	None
Section 5(a)(14)	Results of Peer Review Conducted by Another IG; or Date of Last Peer Review If No Peer Review Conducted During Reporting Period	31
Section 5(a)(15)	List of Outstanding Recommendations from Peer Review Conducted by Another IG That Have Not Been Fully Implemented	None
Section 5(a)(16)	List of Peer Reviews of Another IG During the Reporting Period Including Outstanding Recommendations from Previous Peer Review That Remain Outstanding or Have Not Been Fully Implemented	31; None

Inspector General Act Citation	Requirement Definition	Page
Section 5(a)(17)(A) – (D)	Total Investigative Report, Referred to the DOJ, Number of Persons Referred to State and Local Authorities, Total Indictments, etc. That Resulted from Prior Referral to Prosecuting Authorities	17
Section 5(a)(18)	Metrics Used for Developing Data for Statistical Tables	17
Section 5(a)(19)(A) – (B)	Senior Government Employee Substantiated Misconduct, Facts, Disposition	None
Section 5(a)(20)	Whistleblower Retaliation	None
Section 5(a)(21)(A) – (B)	Interfered with OIG Independence Through Withholding Budget or Causing Delay	None
Section 5(a)(22)(A) – (B)	Report Closed but Not Disclosed to the Public	None

HOW TO REPORT FRAUD, WASTE, AND ABUSE

The Inspector General Act of 1978, as amended, empowers the Inspector General (IG) to receive and investigate complaints or information concerning the possible existence of an activity constituting a violation of law, rules, or regulations, or mismanagement, gross waste of funds, abuse of authority or a substantial and specific danger to the public health and safety. Whether reporting allegations via telephone, mail, or in person, EXIM OIG will not disclose the identity of persons making a report without their consent unless the IG determines such disclosure is unavoidable during the course of the investigation. You may submit your complaint or information by these methods:

In person

Office of Inspector General
Export-Import Bank of the U.S.
811 Vermont Avenue, NW
Washington, D.C. 20571

Telephone

1- 888-OIG-EXIM
(1-888-644-3946)

Mail

Office of Inspector General Hotline
Export-Import Bank of the U.S.
811 Vermont Avenue, NW
Washington, D.C. 20571

E-mail

IGHotline@exim.gov

For information about EXIM OIG's Whistleblower Protection Coordinator, you may contact oig.info@exim.gov. For additional resources and information about whistleblower protections and unlawful retaliation, please visit <https://oversight.gov/Whistleblowers>.

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Export-Import Bank *of the* United States
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Washington, DC 20571**

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