

**REPORT ON THE QUALITATIVE ASSESSMENT REVIEW
OF THE INVESTIGATIVE OPERATIONS OF THE
OFFICE OF INSPECTOR GENERAL FOR EXPORT-IMPORT
BANK OF THE UNITED STATES**

**Conducted in Washington, DC
by
AmeriCorps Office of Inspector General**

Team Leaders:

**(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)**

February 2023

TABLE OF CONTENTS

	Page
Section 1 – Report on the Qualitative Assessment Review	3
Attachment A – Listing of Visited Field Offices	5
Attachment B – Listing of Sampled Closed Investigative Files	6
Section 2 – Letter of Observations	7



Deborah J. Jeffrey
Inspector General

February 22, 2023

Honorable Parisa Salehi
Inspector General
Export-Import Bank of the United States
Office of Inspector General
811 Vermont Ave., NW, Ste. 1070
Washington, DC 20571

Subject: Report on the Qualitative Assessment Review of the Investigative Operations of the Office of Inspector General for the Export-Import Bank of the United States

Dear Inspector General Salehi:

We concluded our review of the Office of Inspector General for the Export-Import Bank of the United States (EXIM-OIG's) system of internal safeguards and management procedures for the investigative operations in effect for the period of 2017 through January 2023. We conducted our review in conformity with the Quality Standards for Investigations and the Qualitative Assessment Review Guidelines established by the Council of the Inspectors General on Integrity and Efficiency (CIGIE).

We reviewed EXIM-OIG's compliance with its system of internal policies and procedures to the extent we considered appropriate. We conducted our review at EXIM-OIG's headquarters office in Washington, DC. Additionally, we sampled 12 case files for investigations closed during calendar year 2021.

In performing our review, we considered the Attorney General's Guidelines for the Office of Inspectors General with Statutory Law Enforcement Authority and Section 6(e) of the Inspector General Act of 1978, as amended (IG Act). Those documents authorize law enforcement powers for eligible personnel of each of the various Offices of Inspectors General. Law enforcement powers may be exercised only for activities authorized by the IG Act, other statutes, or as expressly authorized by the Attorney General.

In our opinion, EXIM-OIG's system of internal safeguards and management procedures for the investigative function in effect for the period ending January 2023 is in compliance with the quality standards established by the CIGIE and the other applicable guidelines and statutes cited above. These safeguards and procedures provide reasonable assurance of conforming with professional standards in the planning, execution and reporting of its investigations and in the use of law enforcement powers.

Sincerely,

A handwritten signature in black ink, reading "Deborah J. Jeffrey". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Deborah J. Jeffrey
Inspector General

Attachment A: Locations Visited

<u>Location</u>	<u>No. of Personnel Interviewed</u>
Headquarters, Vermont Avenue NW, Washington DC	3

Attachment B: List of Closed Investigative Files Reviewed

<u>Case File Number</u>	<u>Case Closing Date</u>
21-0003-PRO	9/29/21
21-0008-C	6/24/21
21-0004-C	12/8/21
21-0001-PRO	9/28/21
19-0011-C	6/30/21
19-0005-C	9/9/21
21-0005-PRO	9/30/21
18-0008-C	3/31/21
17-0009-C	1/27/21
21-0007-C	9/20/21
17-0006-C	11/23/21
21-0002-PRO	9/30/21
21-0004-PRO	9/30/21



Deborah J. Jeffrey
Inspector General

February 22, 2023

Subject: Letter of Observations following the *Report on the Qualitative Assessment Review of the Investigative Operations of the Office of Inspector General for the Export-Import Bank of the United States*

Dear Inspector General Salehi:

This is a supplement to our *Report on the Qualitative Assessment Review of the Investigative Operations of the Office of Inspector General for the Export-Import Bank of the United States (EXIM-OIG)*, dated February 2023.

In addition to reporting a rating of compliant, the peer review team identified two “Best Practices” or similar notable positive attributes of your investigative operations. Specifically, the review team identified the following:

Your office’s timeliness in FBI notifications is to be commended. Additionally, for cases that do not require FBI notification, the documentation in the case files supported the basis as to why an FBI letter was not necessary.

Additionally, your practice of referring an allegation to the Export-Import Bank of the United States for enhanced due diligence when it does not rise to the level of an investigation or is outside the purview of EXIM-OIG is noteworthy.

If you have any questions or require further assistance, please do not hesitate to contact me at 202-606-9366.

Sincerely,

A handwritten signature in black ink that reads "Deborah J. Jeffrey". The signature is written in a cursive style with a long, sweeping underline.

Deborah J. Jeffrey
Inspector General