Fiscal Year 2027 Oversight Work Plan

OIG-O-26-08 | September 28, 2026

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

A MESSAGE FROM THE SENIOR OFFICIAL PERFORMING THE DUTIES OF THE INSPECTOR GENERAL

I am pleased to present the Office of Inspector General (OIG) for the Export-Import Bank of the United States' (EXIM) *Fiscal Year 2027 Oversight Work Plan*.

OIG is responsible for oversight of EXIM's programs and operations. In FY 2025, EXIM reported that its exposure tied to outstanding loans, guarantees, and insurance totaled $34.8 billion. EXIM further reported that it authorized $8.7 billion in transactions supporting approximately $10.1 billion in U.S. export sales in FY 2025.

This work plan represents OIG's commitment to conduct rigorous oversight of EXIM through our audits, inspections, evaluations, and special reviews. In addition, OIG conducts criminal, civil, and administrative investigations. This document provides an outline of anticipated oversight activities for the upcoming fiscal year. OIG's planned work reflects the office's efforts to advance OIG's strategic goals[1] by prioritizing oversight of matters pertinent to the agency's major management challenges,[2] recent administration directives, and the prevention of waste, fraud, and abuse.

This work plan supersedes previously issued work plans. Work planning is a dynamic process and adjustments are made throughout the year to meet priorities and respond to emerging issues utilizing available resources. Accordingly, OIG will update this work plan, as necessary, to ensure our oversight remains relevant, timely, and responsive to key stakeholders, including EXIM leadership, Congress, and the American taxpayer.

We look forward to working with EXIM and our stakeholders in the coming year to deliver on OIG's important oversight mission.

Jonathon Walz
Senior Official Performing the Duties of the Inspector General

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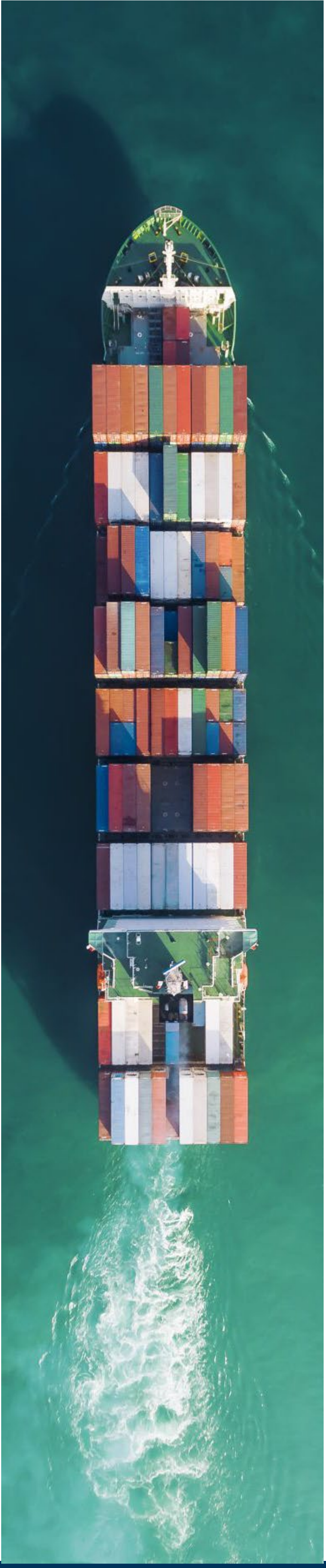
[1] OIG, *Strategic Plan for Fiscal Years 2023-2027 Revised* (September 2025).

[2] OIG, *Fiscal Year 2025 Major Management Challenges* (OIG-O-25-08, September 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 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, the Office of Investigations, and the Office of Special Reviews, with the Immediate Office of the Inspector General, the Office of General Counsel, and the Office of Management providing leadership, legal, and administrative support, respectively.

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 any problems and deficiencies—along with positive developments—relating to EXIM's administration and operations.

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

OFFICE OF AUDITS

The Office of Audits conducts and oversees independent and objective audits to assess the efficiency and effectiveness of EXIM programs, operations, and transactions. The office may also conduct research projects aimed at strengthening the oversight of EXIM's programs and operations. OIG audits are performed in accordance with the *Government Auditing Standards* issued by the Comptroller General of the United States.[1]

FY 2026 ONGOING PROJECTS

Audit of the Export-Import Bank of the United States Fiscal Year 2026 Financial Statements

Under a contract overseen by OIG, an independent public accountant (IPA) firm will audit the financial statements of EXIM as of, and for the fiscal years ended September 30, 2026, and provide a report on internal control over financial reporting, compliance, and other matters. statute requires that OIG conduct this audit on an annual basis.[2]

Major Management Challenge(s): Managing Agency Operations

Audit EXIM's Small Business Financing

According to the EXIM Charter, the agency is required to develop a program which gives fair consideration to making loans and providing guarantees for the export of goods and services by small businesses. The objectives of this audit are to determine EXIM's effectiveness in enabling small businesses to export U.S. goods and services and to determine if EXIM is adhering to applicable laws, regulations, policies, and performance standards.

Major Management Challenge(s): Advancing U.S. Economic and Strategic Interests

PLANNED AUDITS

Independent Audit on the Effectiveness of EXIM's Information Security Program and Practices – Fiscal Year 2027

Under a contract overseen by OIG, an IPA firm will perform an audit of EXIM's Information Security Program for FY 2027. The objective of the audit is to determine whether EXIM developed and implemented an effective information security program and practices as

[1] Government Accountability Office, *Government Auditing Standards* (GAO-24-106786, February 1, 2024).

[2] See 31 U.S.C. § 9105.

required by the Federal Information Security Modernization Act of 2014. The statute requires that OIG conduct this review on an annual basis.[3]

Major Management Challenge(s): Managing Agency Operations

Penetration Testing and Vulnerability Scan for FY 2027

Under a contract overseen by OIG, an IPA firm will evaluate EXIM's Information Technology systems to determine whether (a) the systems are properly configured to prevent unauthorized users from gaining access through potentially sensitive and vulnerable access points; (b) authorized users are prevented from elevating roles and permissions; (c) critical and high-risk vulnerabilities within the security infrastructure are present; and (d) EXIM's incident response and network boundary and defense capabilities are adequate.

Major Management Challenge(s): Managing Agency Operations

Audit of EXIM's FY 2026 Compliance with the Payment Integrity Information Act of 2019

The Payment Integrity Information Act of 2019 aims to improve efforts to identify and reduce government-wide improper payments. Agencies are required to identify and review all programs and activities they administer that may be susceptible to significant improper payments based on guidance provided by the Office of Management and Budget (OMB). Payment integrity information is published with the agency's annual financial statement, in accordance with payment integrity guidance contained in OMB Circular A-136. OIG will determine if EXIM complied with the requirements of the Payment Integrity Information Act of 2019 during FY 2026. The statute requires that OIG conduct this audit on an annual basis.[4]

Major Management Challenge(s): Managing Agency Operations

Audit of the Export-Import Bank of the United States Fiscal Year 2027 Financial Statements

Under a contract overseen by OIG, an IPA firm will audit the financial statements of EXIM as of, and for the fiscal years ended September 30, 2027, and provide a report on internal control over financial reporting, compliance, and other matters. A statute requires that OIG conduct this audit on an annual basis.[5]

Major Management Challenge(s): Managing Agency Operations

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[3] See 44 U.S.C. § 3555.

[4] See 31 U.S.C. § 3353.

[5] See 31 U.S.C. § 9105.

Audit of EXIM's Charge Card Programs

During FY 2024, OIG conducted a risk assessment of the EXIM charge card programs and determined that the programs are at medium risk. OIG's audit objective is to determine if: (1) EXIM's charge card programs have controls in place to ensure compliance with EXIM, OMB, and other federal guidelines; and (2) to assess whether EXIM's charge card transactions are properly and fully supported, reported, and approved.

Major Management Challenge(s): Managing Agency Operations

Audit of EXIM's Processes for Awarding and Administering Government Contracts

EXIM uses government contractors to support agency operations. EXIM's Office of Contracting Services is responsible for facilitating acquisition and procurement process at EXIM. EXIM employs contracting officers who have the authority to enter in to, administer, and/or terminate contracts, as well as make determinations and findings related to contracts. The objective of this audit is to assess the effectiveness of EXIM's internal controls over the contract award, design, and procurement processes and compliance with requirements of law, executive orders, regulations, and all other applicable procedures.

Major Management Challenge(s): Managing Agency Operations

Audit of EXIM's Compliance with the Return to Office Mandate

In January 2025, the President of the United States mandated that heads of all executive departments and agencies take all necessary steps to terminate remote work arrangements and require employees to return to work in-person at their respective duty stations on a full-time basis. The objective of this audit is to determine if EXIM is complying with this mandate.

Major Management Challenge(s): Managing Agency Operations

OFFICE OF SPECIAL REVIEWS

The Office of Special Reviews is a multi-disciplinary office that conducts inspections, evaluations, special reviews, and other oversight projects related to EXIM's programs and operations. OIG inspections and evaluations are performed in accordance with the *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency (CIGIE).[1] OIG special reviews or projects address OIG oversight work not covered by an audit, inspection, evaluation, or investigation and may focus on high-profile, sensitive, unique, or emerging matters involving EXIM. Consistent with the practices of other OIGs, these special reviews or projects comply with the CIGIE *Quality Standards for Federal Offices of Inspector General*[2] or the CIGIE *Quality Standards for Inspection and Evaluation*.

FY 2026 ONGOING PROJECTS

Evaluation of EXIM's Make More in America Initiative (MMIA)

Using an independent, third-party contractor, OIG will assess the effectiveness of EXIM's MMIA initiative in achieving its objective of supporting U.S. domestic manufacturing and infrastructure projects and strengthening U.S. manufacturers' global competitiveness. The objectives are to assess the extent to which EXIM: (1) established goals, objectives, and performance indicators for MMIA; (2) designed policies, procedures, and responsibilities for MMIA management and implementation; and (3) established procedures for collecting and applying lessons learned as the initiative evolves.

Major Management Challenge(s): Advancing U.S. Economic and Strategic Interests

Evaluation of EXIM's AI Governance Framework

OIG will determine whether EXIM maintains a governance structure and processes to manage its AI implementation in compliance with federal laws, regulations, and guidance. This evaluation will be performed by an independent, third-party contractor, and the objectives are to (1) identify and catalogue the evolution of EXIM's AI capabilities; and (2) assess EXIM's compliance with federal requirements and guidance, including OMB memorandum M-25-21 regarding governance and processes to manage its AI implementation.

Major Management Challenge(s): Managing Agency Operations

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[1] Council of the Inspectors General on Integrity and Efficiency, *Quality Standards for Inspection and Evaluation* (December 2020).

[2] Council of the Inspectors General on Integrity and Efficiency, *Quality Standards for Federal Offices of Inspector General* (August 2012).

Inspection of Select Board-Approved EXIM Transaction(s)

Using a risk-based selection methodology, OIG will inspect Board-approved EXIM transaction(s) to ensure EXIM adheres to applicable policies, procedures, and requirements for pre-authorization, authorization, and post-authorization activities to ensure taxpayer resources are properly safeguarded.

Major Management Challenge(s): Advancing U.S. Economic and Strategic Interests; Addressing Portfolio Risk

Special Review of EXIM's Travel Program

OIG is conducting a special review of EXIM's travel program. The special review will determine if EXIM's travel program complied with applicable law and regulation and assess the program's internal controls through FY 2026.

Major Management Challenge(s): Managing Agency Operations

PLANNED EVALUATIONS AND INSPECTIONS

Evaluation of EXIM's Delegated Authority Lenders Monitoring Process

OIG will evaluate EXIM's monitoring process for Delegated Authority Lenders (DALs). A DAL is a lender pre-qualified by EXIM to approve loans and receive EXIM loan guarantees without EXIM's prior consent. Because a DAL can approve loans without EXIM's prior consent, it is critical that EXIM properly monitor potential lenders to mitigate risk, such as ensuring that DALs conduct proper review and vetting of applicants against EXIM requirements as well as other regulations for financial institutions like the Banking Secrecy Act. The objective of this evaluation is to assess EXIM's monitoring process for DALs.

Major Management Challenge(s): Addressing Portfolio Risk; Managing Agency Operations

Evaluation of EXIM's Conflict of Interest Framework

EXIM relies on employees, contractors, advisors, and external partners to design programs, evaluate applications, structure transactions, and oversee a complex portfolio of financial products. Federal ethics laws and regulations require executive branch employees to avoid participating in matters affecting their financial interests and to preserve impartiality in the performance of official duties. In addition, internal control standards require agencies to identify, assess, and manage governance and integrity risks, including conflicts of interest. This evaluation will assess if EXIM has designed and implemented an effective conflict of interest framework that identifies, mitigates, documents, and monitors actual, potential, and apparent conflicts of interest for employees and other covered actors involved in EXIM programs and transactions.

Major Management Challenge(s): Managing Agency Operations

Inspection of Select Export Credit Insurance Policies and Claims

According to EXIM, export credit insurance (ECI) empowers exporters to meet, or beat, competitors by winning new customers and increasing sales to existing buyers. ECI allows exporters to report the shipment to EXIM and pay a premium for coverage. If a buyer has not paid after the agreed upon time, EXIM will pay the exporter. EXIM follows a specific methodology to calculate insurance premiums through transaction type, business size, total value of shipments, etc. This inspection will review EXIM's short term insurance portfolio to determine whether EXIM followed its policies and procedures when issuing ECI policies to potential exporters and processing claims when buyers failed to pay the exporter.

Major Management Challenge(s): Managing Agency Operations; Addressing Portfolio Risk

OFFICE OF INVESTIGATIONS

The Office of Investigations is responsible for conducting and coordinating inquiries into alleged or suspected violations of federal laws, rules, or regulations related to EXIM programs and operations. These investigations can lead to criminal, civil, and administrative sanctions. Subjects of OIG investigations may include program participants, contractors, agency employees, or individuals who target EXIM programs. OIG investigations are performed in accordance with the CIGIE *Quality Standards for Investigations*.[1]

INVESTIGATIVE FOCUS

OIG's primary areas of investigative focus include fraud or mismanagement related to:

- Export credit insurance,
- Loan guarantees,
- Working capital guarantees,
- Letters of interest, and
- Employee integrity.

OIG HOTLINE

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.

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

- EXIM OIG Hotline Form;
- Phone at 1-888-OIG-EXIM (1-888-644-3946); and
- Mail/delivery service to 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 an investigation.

[1] Council of the Inspectors General on Integrity and Efficiency, *Quality Standards for Investigations* (July 15, 2025).

APPENDIX A: PROJECTS AND MANAGEMENT CHALLENGES

The table below outlines how proposed FY 2027 oversight projects relate to OIG's assessment of the agency's top management challenges.

OVERSIGHT PROJECTS AND ASSOCIATED MANAGEMENT CHALLENGE(S)

Office	Project Title	Management Challenge(s)
Audits	Independent Audit on the Effectiveness of EXIM's Information Security Program and Practices – Fiscal Year 2027	• Managing Agency Operations
	Penetration Testing and Vulnerability Scan for FY 2027	• Managing Agency Operations
	Audit of EXIM's FY 2026 Compliance with the Payment Integrity Information Act of 2019	• Managing Agency Operations
	Audit of the Export-Import Bank of the United States Fiscal Year 2027 Financial Statements	• Managing Agency Operations
	Audit of EXIM's Charge Card Programs	• Managing Agency Operations
	Audit of EXIM's Processes for Awarding and Administering Government Contracts	• Managing Agency Operations
	Audit of EXIM's Compliance with the Return to Office Mandate	• Managing Agency Operations
Special Reviews	Evaluation of EXIM's Delegated Authority Lenders Monitoring Process	• Addressing Portfolio Risk • Managing Agency Operations
	Evaluation of EXIM's Conflict of Interest Framework	• Managing Agency Operations
	Inspection of Select Export Credit Insurance Policies and Claims	• Managing Agency Operations • Addressing Portfolio Risk

CONTACT US

REPORT FRAUD, WASTE, AND ABUSE

1- 888-OIG-EXIM

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CONTACT US

For general inquiries or additional information about our operations, contact us at:

202-565-3908

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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.

Under The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 Pub. L. No. 117-263, § 5274, if your organization has been mentioned in this report, and you would like to provide a written response for inclusion in the report, please reach out to us at OIG.Notices@exim.gov within 30 days.