

Major Management Challenges

Fiscal Year 2026

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

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FISCAL YEAR 2026 MAJOR MANAGEMENT CHALLENGES

Each year, the Office of Inspector General (OIG) for the Export-Import Bank of the United States (EXIM) identifies the major management and performance challenges facing EXIM. This report provides Congress, EXIM leadership, and American taxpayers with OIG's independent assessment of the most significant challenges facing the agency in fiscal year (FY) 2026.

OIG based its identification of EXIM's management challenges on published audits, inspections, evaluations, reviews, and other oversight activities conducted during FY 2026. OIG also considered broader trends identified through prior oversight work, recommendation follow-up activities,[1] and EXIM's ongoing corrective actions. OIG's oversight work in FY 2026 indicated that EXIM continued to make progress in several areas, including risk management, information security, and recommendation closure. However, OIG's work also identified recurring issues involving internal controls, workforce capacity, execution of agency priorities, and portfolio oversight. In addition, workforce analyses and succession planning conducted by EXIM in FY 2026 continued to indicate that the agency faces challenges recruiting and retaining the personnel necessary to meet the agency's current and future mission requirements.

[1] Recommendation follow-up activities include reviewing agency corrective actions and supporting documentation and assessing EXIM's progress toward implementing the recommendation(s).

EXIM'S MAJOR MANAGEMENT CHALLENGES REMAIN UNCHANGED

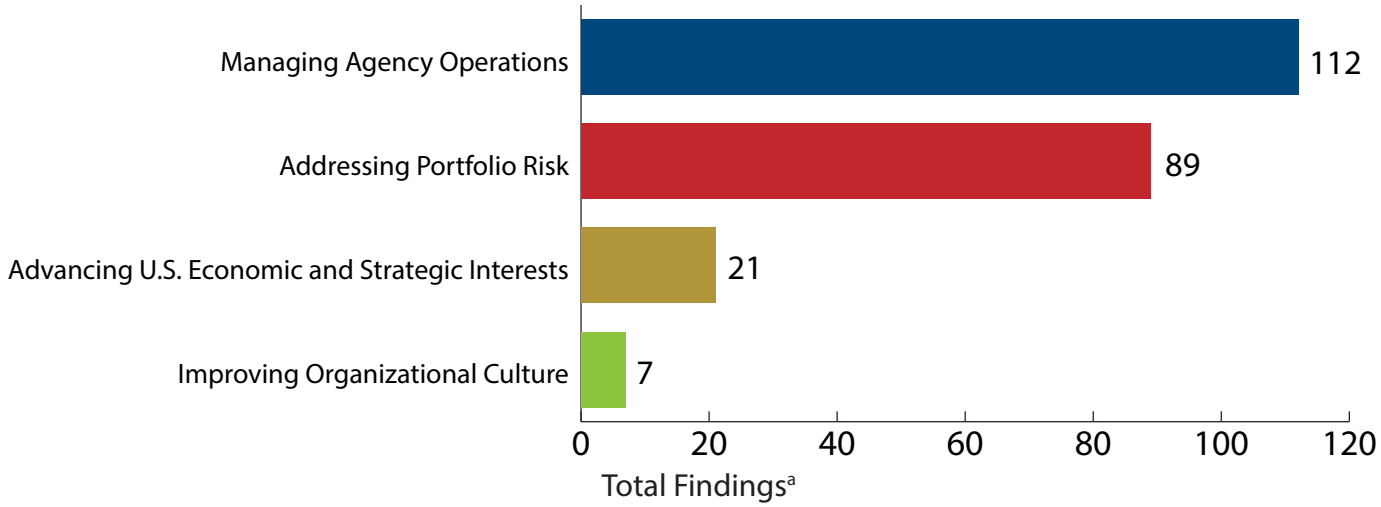
OIG determined that the four major management challenges identified in FY 2025[1] remained unchanged for FY 2026 and is reissuing them with a brief discussion of relevant developments. Accordingly, the agency's top management challenges for FY 2026 remain:

- Managing Agency Operations;
- Improving Organizational Culture;
- Advancing U.S. Economic and Strategic Interests; and
- Addressing Portfolio Risk.

These challenges have appeared consistently on OIG's list of major management challenges since FY 2023. Moreover, findings contained in OIG's FY 2026 oversight work and a recent OIG analysis of issued recommendations[2] demonstrate the continued relevance of these challenges. In particular, OIG found that challenges associated with managing agency operations impacted many aspects of EXIM's programs and operations since EXIM was last reauthorized in December 2019. OIG's analysis found that such issues represented the largest share of OIG findings and recommendations. The figure below, presents the distribution of findings across management challenges since EXIM's most recent reauthorization.

Effectively addressing the management challenges discussed below will help EXIM better achieve its mandate as set forth in its authorizing Charter as well as the goals and objectives outlined in its recently-adopted Strategic Plan.[3]

OIG Findings Associated with Each Major Management Challenges, December 2019 to September 2026



Source: OIG analysis of published oversight work related to EXIM programs and operations.

[a] One finding may be attributed to more than one major management challenge; therefore, category counts do not sum to the unique findings total.

[1] OIG, *Fiscal Year 2025 Major Management Challenges* (OIG-O-25-08; September 30, 2025).

[2] OIG, *Considerations for EXIM's Reauthorization: Insights from OIG's Oversight Work* (OIG-O-26-05; July 1, 2026).

[3] EXIM, *Strategic Plan FY 2026-2030*.

MANAGEMENT CHALLENGE | MANAGING AGENCY OPERATIONS

Managing Agency Operations			
59	**97**	**14**	**430**
Findings	Recommendations	Open Recommendations	Average Days to Close[a]

Source: OIG analysis of findings and recommendations related to Managing Agency Operations since the challenge was added to the list in FY 2024.

[a] The average closure time for recommendations issued since FY 2022 was 471 days. OIG generally encourages closure within one year (365 days), although up to two years (730 days) may still be considered timely depending on the complexity of the corrective action.

OIG first identified managing agency operations as a management challenge for EXIM in FY 2024; this challenge incorporated two previous challenges specific to human capital and internal controls. Since being added to the list of challenges, OIG has issued 59 findings and 97 recommendations related to this management challenge. Managing agency operations encompasses leadership and governance, staffing capacity, internal controls, process consistency, transparency, and documentation of key business functions.

OIG's FY 2026 oversight work continued to identify operational challenges affecting EXIM programs and support functions. For example, OIG's financial statement oversight identified continuing internal control concerns.[4] Although EXIM's FY 2025 financial statements were fairly presented and no material weaknesses were identified, auditors reported a significant deficiency in logical access controls affecting the financial reporting system. The related management letter also identified weaknesses in password configuration controls.[5]

In addition, OIG's audit of EXIM's Office of General Counsel (OGC) identified opportunities to strengthen internal controls and operational consistency.[6] Specifically, OIG found that OGC lacked written guidance for certain recurring legal and operational activities and identified staffing and succession planning concerns, including a vacancy rate of approximately 19 percent, retirement eligibility among experienced personnel, and the absence of a documented succession plan. Finally, OIG found in January 2026 that EXIM's Equal Employment Opportunity (EEO) function was no longer housed in a dedicated office.[7] OIG reported that this structure resulted from staffing constraints and further found that the structure could create actual or perceived conflicts of interest, undermining confidence in the EEO process.

During FY 2026, in response to open OIG recommendations, EXIM developed or updated their Risk Response & Mitigation Plan, Agency-Wide Workforce Analysis (FY2026–FY2029), Succession Planning Board, and Agency-Wide Succession Plan. Collectively, these assessments and plans identified risks to leadership continuity and workforce sustainability, including executive vacancies, acting assignments, retirement eligibility, limited developmental pipelines, and delays in planned hiring. For example, approximately

[4] OIG, *Independent Audit of the Export-Import Bank of the United States' Financial Statements as of and for the Fiscal Year Ended 2025* (OIG-AR-26-01; January 16, 2026).

[5] OIG, *Fiscal Year 2025 Financial Statements Audit Management Letter* (OIG-AR-26-02; February 24, 2026).

[6] OIG, *Audit of EXIM's Office of General Counsel* (OIG-AR-26-05; September 23, 2026).

[7] OIG, *Management Advisory: EXIM's Equal Employment Opportunity Function* (OIG-O-26-01; January 7, 2026).

79 percent of the General Schedule workforce occupied GS-13 through GS-15 positions, leaving relatively few employees in developmental grades to support succession needs.

Despite these concerns, OIG observed positive results in several areas. OIG determined that EXIM complied with the Payment Integrity Information Act during FY 2025.[8] In addition, the FY 2026 information security audit determined the information security program was effective overall, with all six cybersecurity functions assessed at the "Managed and Measurable" level.[9]

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[8] OIG, *Audit of EXIM's Fiscal Year 2025 Compliance with the Payment Integrity Information Act of 2019* (OIG-AR-26-03; July 30, 2026).

[9] OIG, *Independent Audit of EXIM's Information Security Program and Practices Report – FY 2026* (OIG-AR-26-04; September 4, 2026).



MANAGEMENT CHALLENGE | IMPROVING ORGANIZATIONAL CULTURE

Improving Organizational Culture			
7	**19**	**2**	**605**
Findings	Recommendations	Open Recommendations	Average Days to Close[a]

Source: OIG analysis of findings and recommendations related to Improving Organizational Culture since the challenge was added to the list in FY 2023.

[a] The average closure time for recommendations issued since FY 2022 was 471 days. OIG generally encourages closure within one year (365 days), although up to two years (730 days) may still be considered timely depending on the complexity of the corrective action.

OIG first identified improving organizational culture as a management challenge in FY 2023. OIG previously reported concerns involving employee morale, workforce capacity, leadership, and EXIM's ability to recruit and retain personnel in critical positions. Since being added to the list of challenges, OIG has issued seven findings and 19 recommendations associated with this management challenge.

OIG's FY 2026 oversight work continued to identify workforce related risks affecting EXIM's operations. For example, OIG's evaluation of EXIM's portfolio risk management procedures found that staffing limitations remained one of the most frequently cited concerns among EXIM personnel.[10] Specifically, employees identified workforce shortages, employee burnout, and increasing workload demands as significant risks affecting EXIM's ability to execute its mission and manage emerging risks. At the time of OIG's review in February 2026, approximately 28 percent of authorized positions at EXIM were vacant.

EXIM took steps in FY 2026 to close open recommendations related to its human capital function, including those related to organizational culture—closing almost 70 percent of the recommendations related to this management challenge.[11] As part of these closeout activities, EXIM completed workforce assessments and succession planning. EXIM's assessment of its workforce attrition, retention, and recruitment identified that employee engagement declined from 73 percent to 63 percent over a three-year period and identified concerns related to leadership confidence, workforce stability, retention, and succession planning. At the time of this report, EXIM was developing a staff survey to be administered and analyzed in FY 2027. EXIM planned for this survey to include the required questions identified by the Office of Personnel Management[12] as well as organizational culture-specific questions related to a past OIG recommendation.[13] Any results of that survey related to EXIM's organizational culture will be considered in the development of OIG's FY 2027 Major Management Challenges report.

[10] OIG, *Evaluation of EXIM's Portfolio Risk Management Procedures and Chief Risk Officer Responsibilities* (OIG-EV-26-01; February 26, 2026).

[11] In FY 2026, one OIG recommendation related to the creation of an advisory group to identify culture issues affecting EXIM's workforce was closed as unimplemented.

[12] The Office of Personnel Management memorandum, *Annual Employee Survey Administration Requirements – 2026 and Beyond* (July 9, 2026), requires federal agencies to admister their own employee surveys to assess engagement and organizational climate.

[13] OIG, *Evaluation of EXIM's Human Capital Function* (OIG-EV-24-03; August 14, 2024).

MANAGEMENT CHALLENGE | ADVANCING U.S. ECONOMIC AND STRATEGIC INTERESTS

Advancing U.S. Economic and Strategic Interests			
21	**34**	**0**	**580**
Findings	Recommendations	Open Recommendations	Average Days to Close[a]

Source: OIG analysis of findings and recommendations related to Advancing U.S. Economic and Strategic Interests since the challenge was added to the list in FY 2022.

[a] The average closure time for recommendations issued since FY 2022 was 471 days. OIG generally encourages closure within one year (365 days), although up to two years (730 days) may still be considered timely depending on the complexity of the corrective action.

OIG first identified EXIM's ability to advance U.S. economic and strategic interests as a management challenge in FY 2022. This challenge encompasses implementation of congressional mandates, competitiveness with foreign export credit agencies, execution of strategic programs, and measurement of program outcomes. Since being added to the list of challenges, OIG has issued 21 findings and 34 recommendations associated with this management challenge.

OIG's FY 2026 oversight work found that EXIM's strategic responsibilities continued to expand. As part of OIG's considerations for EXIM's reauthorization report,[14] OIG noted that EXIM's strategic priorities have shifted considerably since EXIM's last reauthorization in December 2019 and now have an increased focused not just on supporting U.S. jobs but also on EXIM's ability to advance national economic and security interests. This includes the creation of the China and Transformational Exports Program in December 2019; the creation of Make More in America in April 2022; and the creation of the Supply Chain Resiliency Initiative in January 2025. EXIM's recently updated Strategic Plan for FY2026-2030 also summarizes this expanded focus as a strategic economic tool, highlighting critical supply chains, domestic manufacturing, energy exports, transformational technologies, and competition with the People's Republic of China as target areas. The addition of significant new priorities, combined with EXIM's staffing constraints, creates a risk that EXIM may not be fully able to address both new and pre-existing priorities.[15]

In addition, OIG's FY 2026 white paper examining EXIM's impact on the U.S. economy and jobs further highlighted opportunities to better understand EXIM's contributions to employment and economic growth.[16] The study concluded that EXIM's current method remained valid but identified alternative methods that could provide additional insight into the manufacturing, supply chain, small business, and indirect employment effects associated with EXIM financing. As EXIM continues to assume expanded responsibilities related to national economic and security priorities, effectively implementing, coordinating, and measuring the impact of strategic programs remains a challenge.

[14] OIG, *Considerations for EXIM's Reauthorization: Insights from OIG's Oversight Work* (OIG-O-26-05; July 1, 2026).

[15] In FY 2026, two OIG recommendations related to EXIM's Sub-Saharan Africa Mandate and one OIG recommendation related to its Environmentally Beneficial Goods and Sevices Mandate were closed as unimplemented.

[16] OIG, *White Paper - Calculating EXIM's Impact on the U.S. Economy and Jobs* (OIG-O-26-06; August 28, 2026).

MANAGEMENT CHALLENGE | ADDRESSING PORTFOLIO RISK

Addressing Portfolio Risk			
66	**92**	**4**	**395**
Findings	Recommendations	Open Recommendations	Average Days to Close[a]

Source: OIG analysis of findings and recommendations related to Addressing Portfolio Risk since the challenge was added to the list in FY 2022.

[a] The average closure time for recommendations issued since FY 2022 was 471 days. OIG generally encourages closure within one year (365 days), although up to two years (730 days) may still be considered timely depending on the complexity of the corrective action.

OIG previously identified portfolio risk management as a management challenge in FY 2022 because EXIM is responsible for managing credit, concentration, default, and transaction related risks while fulfilling its mission. Since being added to the list of challenges, OIG has associated 66 findings and 92 recommendations with this management challenge.

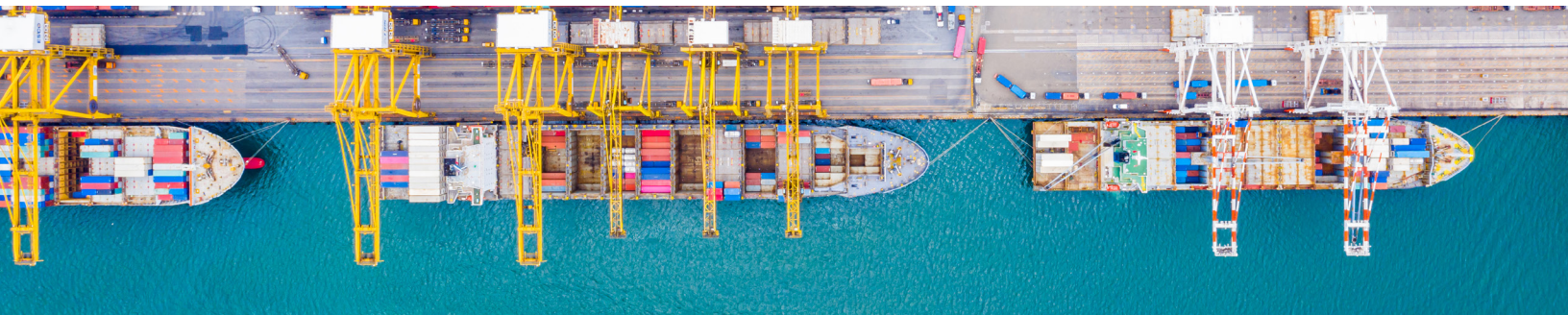
FY 2026 oversight work identified meaningful progress in EXIM's overall risk management framework. In its congressionally mandated review of portfolio risk management procedures and Chief Risk Officer responsibilities, OIG found that EXIM's implementation of the Chief Risk Officer role has matured significantly since the role's creation in 2015.[17] OIG found that EXIM established policies, procedures, training programs, governance structures, and a risk management framework that encompassed all EXIM staff. OIG also found that the agency's Enterprise Risk Management program achieved the highest maturity level and that EXIM had implemented all prior OIG recommendations related to portfolio risk management. OIG noted, though, that EXIM's expansion into new initiatives, such as support for domestic manufacturing, financing for critical supply chains, and emerging strategic sectors, may introduce new risks for which EXIM would need to develop risk frameworks and assess data as these initiative mature and data becomes available.

Morever, OIG's review of concentration risk in the aircraft industry demonstrated the importance of sustained portfolio risk oversight.[18] OIG found that EXIM's aircraft sector exposure remained highly concentrated, and generally, EXIM took steps to manage the aircraft sector concentration risk. However, OIG identified weaknesses in its collateral inspection program, which is used to protect the agency's interests and mitigate risk in the event of default. Although OIG observed substantial improvement in EXIM's risk management maturity, managing portfolio concentration and emerging risks remains a significant management challenge, particularly as EXIM expands its activities into new sectors and strategic initiatives.

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[17] OIG, *Evaluation of EXIM's Portfolio Risk Management Procedures and Chief Risk Officer Responsibilities* (OIG-EV-26-01; February 26, 2026).

[18] OIG, *Review of EXIM's Concentration Risk in Aircraft Industry Sector* (OIG-SR-26-01; March 31, 2026).



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