



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

SEMIANNUAL

Report to Congress

October 1, 2023 to March 31, 2024



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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, 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.

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 and Communications, with the Immediate Office of 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 Chair, and Congress, fully informed about any problems and deficiencies along with positive developments relating to EXIM administration and operations.

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



I am pleased to present this Semiannual Report to Congress, covering the oversight activities of the Office of Inspector General (OIG) for the Export-Import Bank of the United States (EXIM) from October 1, 2023 to March 31, 2024. OIG is responsible for oversight of EXIM’s exposure tied to outstanding loans, guarantees, and insurance; the agency reported its total exposure as \$34.1 billion in FY 2023. EXIM further reported that it authorized \$8.77 billion in transactions supporting approximately \$10.6 billion in U.S. export sales in FY 2023.

OIG published seven reports during this semiannual period that contained 17 recommendations to safeguard taxpayer resources, strengthen internal controls, and improve EXIM’s ability to comply with its statutory mission. In addition, an OIG investigation into falsified documents provided by a Miami-based exporter resulted in the filing of criminal informations.

During the reporting period, OIG continued to work with EXIM leadership on issues central to our independence and oversight of the agency. Specifically, OIG continues to work with the agency to stress the importance of timely access to all records, or other material related to EXIM programs and operations. In addition, OIG concluded seven memoranda of understanding with the agency in the last year to formalize OIG independence in several areas, including human capital, ethics, and Freedom of Information Act requests. I appreciate the support of EXIM’s President and Chair in concluding these agreements.

OIG continues to work with EXIM on the timely closeout of OIG recommendations. During this semiannual period, EXIM extended its target implementation dates for multiple OIG recommendations from prior reporting periods. I note that the extended implementation schedule affects two recommendations that OIG considers significant, both of which have been open for over seven years.

OIG’s work would not be possible without the talent and dedication of the professionals at EXIM OIG. My thanks to them, and to the agency and Congress for their continued support of OIG’s important oversight mission.

A handwritten signature in cursive script that reads "Parisa Salehi".

Parisa Salehi
Inspector General

OFFICE OF AUDITS

The Office of Audits (OA) conducts and oversees independent and objective audits to assess the efficiency and effectiveness of EXIM programs, operations, and transactions. OIG audits are performed in accordance with the Government Auditing Standards issued by the Comptroller General of the United States.

From October 1, 2023 to March 31, 2024, OA issued four reports containing a total of 11 recommendations. At the end of the reporting period, OA had four engagements in progress. Summaries of OIG’s completed, and in-progress work are included below.

Reports Issued

External Vulnerability Scan and External Penetration Test of EXIM’s Network and System – Fiscal Year 2024 ([OIG-O-24-08](#), March 2024)

Under a contract managed by OIG, an independent public accounting (IPA) firm conducted an external vulnerability scan and external penetration test of EXIM’s network and systems. The review was aimed at evaluating the security configurations in place to protect against unauthorized access through potentially sensitive and vulnerable points of entry, identifying critical and high-risk vulnerabilities, assessing the controls over user permissions, and evaluating the efficacy of incident response and network defenses. The engagement highlighted the need for continuous improvement in certain areas in order to fortify and maintain EXIM’s defenses against evolving cyber threats. To this end, the IPA firm issued three recommendations. EXIM concurred with all the recommendations.

Management Advisory: Risk Assessment of EXIM’s Government Purchase Card and Travel Card Programs ([OIG-O-24-06](#), March 2024)

The objective of OIG’s risk assessment was to identify and analyze the risk of illegal, improper, or erroneous purchases and payments in order to determine the scope, frequency, and number of audits of agency purchase card, convenience check, and travel card programs. OIG assessed the overall risk of illegal, improper, or erroneous purchases and payments in EXIM’s purchase card, convenience check, and travel card programs as moderate. OIG identified potential risks which include: (1) cardholder training is not adequately tracked, and individuals do not meet training due dates; (2) cardholder activity status is not adequately tracked, therefore, it is not clear if cards are properly deactivated when individuals leave the agency; (3) policies are outdated and inconsistent related to the micro-purchase threshold, reporting requirement, and training requirements; (4) purchase and travel card Agency/Organization Program Coordinators (A/OPC) do not ensure consistency on the implementation of policies and procedures; (5) EXIM’s training system provides training certificates when the U.S. General Services Administration’s (GSA) training is not completed; and, (6) OMB Circular No. A-123, Appendix B, requirements were not implemented related to the use of data analytics, sustainability and environmental purchasing requirements, maintaining narrative and statistical reports for

agency's own use, and reporting statistical data to the GSA's Center for Charge Card Management. Therefore, OIG determined an audit of these programs should be performed within the next two-to-three years. OIG issued four recommendations aimed at improving EXIM's purchase and travel card programs. EXIM management concurred with all the recommendations.

Management Alert: EXIM's Process for Vetting Conference Sponsors Needs Improvement ([OIG-O-24-05](#), March 2024)

The OIG found that EXIM's process for addressing the appearance of favoritism, as it relates to the EXIM 2023 annual conference, needs improvement. Specifically, OIG identified that six of seven conference sponsors provided a total of \$76,000 in sponsorship fees despite having business before EXIM. For example, two sponsors were involved in a \$900 million transaction EXIM authorized four months prior to the conference, three sponsors had active contracts with the agency valued at approximately \$9 million, and one sponsor was an EXIM delegated authority lender (DAL). These relationships could create a perception by outside parties that EXIM is providing preferential treatment to the conference sponsors. The potential for questions about favoritism, described above, occurred because EXIM's criteria for reviewing sponsors was insufficient and needs improvement. In addition, the agency did not adequately document its decision-making process to determine sponsor eligibility. According to the EXIM Charter, the Office of Ethics, which is led by the Chief Ethics Officer, has jurisdiction over all ethics matters related to the agency and must recommend administrative actions to establish or enforce standards of official conduct. However, OIG determined that EXIM's Office of Ethics' involvement in the conference sponsorship solicitation process was not adequately documented. The inadequate documentation on the vetting of conference sponsors leads to questions about the sufficiency of the Office of Ethics' involvement in the process. OIG issued four recommendations to improve EXIM's processes for vetting potential annual conference sponsors. EXIM concurred with two recommendations and non-concurred with two recommendations.

Audit of EXIM's Financial Statements for Fiscal Year 2023 ([OIG-AR-24-01](#), November 2023)

Under a contract overseen by OIG, an IPA firm performed an audit to issue an opinion on the accuracy and completeness of EXIM's financial statements for FY 2023 and found that: (1) EXIM's financial statements were fairly presented, in all material respects, in accordance with U.S. generally accepted accounting principles; (2) there were no material weaknesses in internal control over financial reporting; and (3) there were no instances of reportable noncompliance with provisions of laws and regulations tested or other matters.

Ongoing Projects

Independent Audit on the Effectiveness of EXIM’s Information Security Program and Practices Report for Fiscal Year 2024

Under a contract overseen by OIG, an IPA firm is performing an audit of EXIM’s Information Security Program for FY 2024. The objective of the audit is to determine whether EXIM developed and implemented an effective information security program and practices as required by the Federal Information Security Modernization Act of 2014. The report will be issued in the semiannual reporting period ending September 30, 2024.

Audit of EXIM’s Financial Statements for Fiscal Year 2024

An IPA firm, working under OIG’s oversight, is conducting an audit to issue an opinion on the accuracy and completeness of EXIM’s financial statements for FY 2024. The report will be issued, along with a related management letter report, during the semiannual reporting period ending September 30, 2024.

Audit of EXIM’s Enhanced Personnel Security Program

OIG is conducting an audit to determine whether EXIM’s management and execution of the Enhanced Personnel Security Program complies with federal regulations and guidance. The report will be issued in the semiannual reporting period ending September 30, 2024.

Audit of EXIM’s Fiscal Year 2023 Compliance with the Payment Integrity Information Act (PIIA) of 2019

OIG is conducting an audit to determine whether EXIM is following the reporting requirements of PIIA in the payment integrity section of the FY 2023 Annual Management Report and accompanying materials. In addition, the audit will assess the accuracy and completeness of EXIM’s improper payment reporting and efforts to prevent and reduce improper payments. The report will be issued in the semiannual reporting period ending September 30, 2024.

OFFICE OF SPECIAL REVIEWS AND COMMUNICATIONS

The Office of Special Reviews and Communications (OSRC) is a multi-disciplinary office that conducts inspections, evaluations, special reviews, and other oversight projects related to EXIM's programs and operations. OSRC 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 or Quality Standards for Inspection and Evaluation. In addition, the office serves as OIG's liaison to congressional staff and conducts outreach to develop and maintain relationships with external stakeholders. The office also performs OIG's public affairs and media relations functions.

From October 1, 2023 to March 31, 2024, OSRC issued three reports containing a total of six recommendations. At the end of the reporting period, OSRC had five engagements in progress. Summaries of OIG's completed, and in-progress work, are included below.

Reports Issued

Management Advisory: Lack of Clarity in EXIM's Conduct, Performance, and Discipline Policy ([OIG-O-24-07](#), March 2024)

OIG conducted a review of EXIM's Conduct, Performance, and Discipline Policy to assess the clarity, equity, and applicability of section 4.1 of this policy, and the reason for the policy's exclusion of employees under temporary appointment, such as "Schedule C" and other "at-will" employees, as well as to determine whether supplemental guidance exists to address any policy gaps. OIG found that the policy did not establish the standards of conduct, as per its stated purpose. OIG issued one recommendation to clarify the policy's language. EXIM management concurred with the recommendation.

Management Advisory: OIG Access and Notification Language in EXIM's Working Capital Guarantee Program Master Guarantee Agreement ([OIG-O-24-02](#), January 2024)

OIG conducted a review of EXIM's Master Guarantee Agreement (MGA) issued under the Working Capital Guarantee Program (WCGP) to determine whether the agreement should explicitly reference OIG's authority to access the records of EXIM lenders, including DALs, and require that such lenders notify OIG of known or suspected fraud related to EXIM-guaranteed loans. The review found that EXIM's MGA for the WCGP did not explicitly reference OIG's statutory authority to access the records of EXIM lenders, to include DALs, nor did it require lenders, including DALs, to notify OIG of known or suspected fraud related to EXIM loan guarantees. The report made two recommendations to ensure OIG access to lender records and mandate that EXIM lenders report known or suspected fraud to OIG. EXIM management concurred with both recommendations.

Review of Access Control Measures at EXIM ([OIG-SR-24-01](#), November 2023)

OIG reviewed the access control measures at EXIM’s headquarters building to determine the effectiveness of those controls to: (1) prevent unauthorized access; (2) safeguard EXIM personnel and resources; and (3) ensure personnel accountability in the event of an emergency at EXIM headquarters. OIG’s review found that EXIM lacked full authority over the facility access control measures at EXIM headquarters. In addition, the turnstiles at EXIM headquarters, as configured, did not accomplish their intended purpose. The review also determined that staffing limitations in EXIM’s Office of the Chief Management Officer may have hindered the agency’s effective management of safety and security measures at EXIM headquarters. The report contained three recommendations to improve the effectiveness of the access control measures at EXIM headquarters. EXIM management concurred with all recommendations.

Ongoing Projects

Inspections of the Sasan Power Limited and Samalkot Power Limited Projects

OIG initiated inspections of two EXIM-financed power plant projects in India. These inspections will encompass follow-up work related to OIG’s 2015 inspection of the Sasan Project (OIG-INS-15-02), as well as an assessment of EXIM’s efforts to identify, evaluate, and mitigate project risks related to both transactions in accordance with EXIM policies, project finance best practices, and applicable laws. OIG will make appropriate recommendations to enhance the efficiency of EXIM’s project financing operations. The report will be issued in the semiannual reporting period ending September 30, 2024.

Evaluation of EXIM’s Human Capital Function

Under a contract overseen by OIG, an IPA firm initiated an evaluation to assess the sufficiency and effectiveness of EXIM’s human capital planning practices, to include addressing skill gaps and the agency’s human capital resources; determining the effectiveness of EXIM’s recruitment and retention activities; and assessing whether EXIM implemented effective standards and guidelines for its human resources management. The report will be issued in the semiannual reporting period ending September 30, 2024.

Evaluation of EXIM’s Sub-Saharan Africa Mandate

Under a contract overseen by OIG, an IPA firm initiated an evaluation to assess and measure EXIM’s performance and efforts to promote the expansion of its financial commitments in sub-Saharan Africa through its programs, to include identifying the potential impact of EXIM’s programs and policies that are directed at sub-Saharan Africa in increasing the export of U.S. goods and services and strengthening U.S. jobs, as well as identifying EXIM’s potential impact of job creation in sub-Saharan Africa, resulting from the agency’s programs and policies. The report will be issued in the semiannual reporting period ending September 30, 2024.

Evaluation of EXIM’s Environmentally Beneficial Goods and Services Program

Under a contract overseen by OIG, an IPA firm initiated an evaluation to assess and measure EXIM’s performance and impact on the environmental effects of exported goods and services supported through its programs, to include identifying EXIM’s efforts to promote the exporting of U.S. goods and services related to renewable energy sources, energy efficiency, and energy storage, as well as determine the agency’s performance in achieving its goal of five percent of the applicable amount being made available each fiscal year for financing renewable energy. The report will be issued in the semiannual reporting period ending September 30, 2024.

Review of EXIM’s China and Transformational Exports Program Mandate

OIG initiated a review of EXIM’s China and Transformational Exports Program mandate, to include the program’s adherence to relevant laws, regulations, and policies and assess its effectiveness in achieving its goals and objectives to support the extension of loans, guarantees, and insurance, at rates and on terms and other conditions, to the extent practicable, that are fully competitive with rates, terms, and other conditions established by the People’s Republic of China or by other covered countries as defined by EXIM’s charter. The report will be issued in the semiannual reporting period ending September 30, 2024.

OFFICE OF INVESTIGATIONS

The Office of Investigations (OI) conducts investigations in accordance with CIGIE Quality Standards for 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. Subjects of OIG investigations may be program participants, contractors, agency management or employees, or individuals who target EXIM programs and participants. OIG investigations are supported by investigative and financial analysts who conduct tactical and strategic analysis.

Investigative Activity¹

Activity	Total
Investigations Open as of March 31, 2024	17
Investigations Opened During the Reporting Period	1
Investigations Closed During the Reporting Period	2
Hotline and Complaints Processed During Period	27
Referrals to EXIM or Other Organizations During Period	5
Criminal and Judicial Actions (including joint investigations)	
Individuals Referred for Federal Prosecution	1
Individuals Referred for State Prosecution	0
Individuals Accepted for Federal Prosecution	0
Individuals Accepted for State Prosecution	0
Individuals Declined for Federal Prosecution	1
Individuals Declined for State and Local Prosecution	0
Arrests	2
Indictments and Informations	2
Convictions (by trial and plea)	0
Fines, Assessments, Restitutions, and Forfeitures	\$0
Prison Time (months)	0
Probation (months)	0
Civil Actions	0
Civil Recoveries	\$0
Administrative Employee Actions ²	1
Suspensions and Debarment referrals	3
E.O. on Advancing Effective, Accountable Policing & Criminal Justice Practices to Enhance Public Safety	
Use of force incidents involving OIG personnel	0
No-knock entries conducted by OIG personnel	0

¹ The data used in this report was obtained from 12 C.F.R. § 404.26-exempted, EIB-35 OIG law enforcement records, which are stored in EXIM OIG's Case Management Tracking System (CMTS). The CTMS database contains, *inter alia*, Hotline Reports, Complaints, Subpoenas, and Investigations.

² Administrative employee actions are responses by EXIM to terminate or discipline agency employees based on investigative findings and referrals.

Selected Administrative Referrals³

Potential Violation of the EXIM Anti-Harassment Policy by an EXIM Official

In November 2023, OIG received a complaint that an EXIM employee may have violated the EXIM Anti-Harassment Policy, which states: “The identity of the individual who provides information regarding a report, and the target of the complaint, will be kept confidential to the extent possible consistent with a thorough and impartial inquiry.” OIG referred this matter to the agency, which reported that it “did not find evidence of any purposeful disclosure of personal information.” OIG is not opining on the sufficiency of the action taken by the agency.

Complaint Alleging Hostile Work Environment

In November 2023, OIG received a complaint from an EXIM employee alleging hostile acts perpetuated by a co-worker and EXIM management’s demonstrated inaction and negligence in ensuring a safe work environment for all employees. OIG referred this matter to the agency, which verbally counseled the employee. OIG is not opining on the sufficiency of the action taken by the agency.

Investigations

During the reporting period, OIG had significant investigative activity involving EXIM programs and operations. The following are notable examples:

Falsified Documents by Miami-based Exporter Result in Criminal Informations

In September 2019, OIG received a complaint alleging that a Miami-based exporter who ran a company insured by EXIM had falsified documents EXIM relied upon in evaluating a \$725,875.00 insurance claim. After opening a criminal investigation with the United States Attorney’s Office (USAO) for the Southern District of Florida (SDFL), OIG confirmed that the exporter had used false invoices and bills of lading that EXIM understood to be true at the time it reviewed the insurance claim. During the investigation, the principle of a Miami-based freight forwarding company who assisted in the fraudulent scheme by selling the exporter the false bills of lading falsely denied involvement to government officials. In February 2024, the USAO SDFL filed a criminal information against the exporter for conspiring to commit bank fraud in violation of 18 U.S.C. § 371; and in March 2024, the USAO SDFL filed a criminal information against the freight forwarder for false statements in violation of 18 U.S.C. § 1001.

False Statements and False Documents Made by US Exporter

In July of 2009, OIG initiated an investigation into a U.S. exporter based in El Paso, Texas for making false statements and submitting false documents to EXIM Bank. The exporter, along

³ Unless otherwise specified, *Selected Administrative Referrals* are issues that did not result in an investigation, but where we referred the matter to the agency for action and requested a documented reply as to the agency responsive action, if any.

with co-conspirators in the United States, were arrested. The USAO for the Western District of Texas (WDTX) previously prosecuted the exporter and multiple co-conspirators. During the reporting period, OIG recommended three additional co-conspirators with outstanding arrest warrants for suspension and debarment (S&D) proceedings to EXIM. At the time of this report's issuance, the S&D actions were pending with the agency.

Investigations of Senior Officials⁴

During this reporting period, OIG did not complete any investigations involving a senior government employee where we substantiated an allegation of misconduct.

Trafficking Victims Prevention & Protection Reauthorization Act of 2022⁵

OIG had no suspected cases of misconduct, waste, fraud, or abuse relating to trafficking in persons during the reporting period.

OIG Collaboration with PRAC

In March 2020, the Pandemic Response Accountability Committee (PRAC) was created within CIGIE to coordinate oversight of the \$5 trillion in Federal funding related to the COVID-19 pandemic.

In November 2021 and November 2022, OIG and the PRAC entered into a memorandum of understanding that conferred on OIG the authority to investigate pandemic-related fraud. OIG agents are assigned PRAC cases while continuing to work their existing OIG caseload. This initiative allows OIG to make a broader contribution to the OIG community by assisting with investigations.

The OIG currently has two active criminal investigations associated with this effort. The potential fraud under investigation is estimated to be valued near two million dollars.

Hotline and Complaints

OIG maintains a hotline to receive complaints or reports of fraud, waste, and abuse in EXIM programs and operations. As outlined above, during the reporting period OIG processed 27 complaints. 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.

⁴ A senior government official is defined as anyone occupying a position classified at or above GS-15, or for those not on the General schedule, whose rate of basic pay is equal to or greater than 120 percent of the GS-15 minimum.

⁵ Reporting required annually by [Public Law 117-348, § 122\(e\) \(S.3949\)](#).

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
- In person or mail/delivery service to OIG Hotline, Office of Inspector General, 811 Vermont Avenue, NW, Room 1052-1, Washington DC 20571.

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.

APPENDIX A: OPEN RECOMMENDATIONS FROM PRIOR REPORTING PERIODS

The table below shows 20 open recommendations from three issued reports during the reporting period ending September 30, 2023. During the FY 2022 reporting period, EXIM has 14 open recommendations from four issued reports. During the reporting period prior to FY 2022, EXIM has two open recommendations from two reports issued in FY 2017. As outlined in Appendix C, OIG considers both to be significant recommendations that were agreed to by EXIM but have not been implemented as of March 31, 2024. OIG notes that EXIM has repeatedly requested extensions to the target implementation date for OIG recommendations, including these two significant recommendations.

Reports from prior periods are no longer listed when all recommendations are closed.

Report No./ Date	Report Title	Recommendations				Latest Target Closure Date
		Total	Open	Closed	Unresolved	
Last Period (04/01/2023 – 09/30/2023)						
Management Alerts						
OIG-O-23-04 29 Sep 2023	EXIM Has Not Fully Complied with Antideficiency Act Reporting Requirements	3	3	0	0	9/29/2024
Audits						
OIG-AR-23-07 21 Sep 2023	Audit of EXIM's Domestic and International Non-Sponsored Travel	4	4	0	0	9/21/2024
Inspections and Evaluations						
OIG-EV-23-04 29 Sep 2023	Comparative Analysis of U.S. and OECD Arrangement Export Credit Agencies	14	13	1	0	9/29/2024
Last Period (10/01/2022 – 03/31/2023)						
Audits						
OIG-AR-23-04 02 Mar 2023	Independent Audit on the Effectiveness of EXIM's Information Security Program and Practices – Fiscal Year 2022	7	1	6	0	3/3/2024
Inspections and Evaluations						
OIG-EV-23-01 14 Oct 2022	Review of EXIM's Default Rate Management Practices	3	2	1	0	3/31/2024
Last Period (04/01/2022 – 09/30/2022)						
Audits						

Report No./ Date	Report Title	Recommendations				Latest Target Closure Date
		Total	Open	Closed	Unresolved	
OIG-AR-22-07 30 Sep 2022	Audit of EXIM's Approach to Determining Additionality	3	1	2	0	9/30/2024
Last Period (10/01/2021 –03/31/2022)						
Audits						
OIG-AR-22-01 8 Nov 2021	Independent Auditors' Report on EXIM's DATA Act Submission	12	10	2	0	9/30/2024
Prior Periods (prior to 10/01/2021)						
Inspections and Evaluations						
OIG-EV-17-03 30 Mar 2017	Report on EXIM Bank's CGF Program	5	1	4	0	3/31/2024
OIG-EV-17-01 2 Dec 2016	Evaluation of Risk Management Procedures and CRO Responsibilities	8	1	7	0	3/31/2024
Total		59	36	23	0	

APPENDIX B: AUDIT, INSPECTION, EVALUATION AND/OR REVIEWS ISSUED FROM OCTOBER 1, 2023 – MARCH 31, 2024

	Report No./Date	Report Title	Management Decisions Reached on Recommendation	Total Questioned Cost	Unsupported Cost	Funds for Better Use	Disallowed Cost
1	OIG-SR-24-01 13 Nov 2023	Review of Access Control Measures at EXIM Headquarters	3/3	\$0	\$0	\$0	\$0
2	OIG-AR-24-01 13 Nov 2023	Independent Audit of the Export-Import Bank of the United States' Financial Statements as of and for the Fiscal Years Ended 2023, and 2022	0/0	\$0	\$0	\$0	\$0
3	OIG-O-24-02 25 Jan 2024	OIG Access and Notification Language in EXIM's Working Capital Guarantee Program Master Guarantee Agreement	2/2	\$0	\$0	\$0	\$0
4	OIG-O-24-05 22 March 2024	EXIM Process for Vetting Conference Sponsors Needs Improvement	2/4	\$76,000	\$0	\$0	\$0
5	OIG-O-24-07 25 March 2024	Lack of Clarity in EXIM's Conduct, Performance, and Discipline Policy	1/1	\$0	\$0	\$0	\$0
6	OIG-O-24-08 28 March 2024	External Vulnerability Scan and External Penetration Test of EXIM's Network and System – Fiscal Year 2024	3/3	\$0	\$0	\$0	\$0
7	OIG-O-24-06 28 March 2024	Risk Assessment of EXIM's Government Purchase and Travel Card Programs	4/4	\$0	\$0	\$0	\$0
Total				\$76,000	\$0	\$0	\$0

APPENDIX C:

SIGNIFICANT RECOMMENDATIONS FROM PREVIOUS SEMIANNUAL REPORTS ON WHICH CORRECTIVE ACTION HAS NOT BEEN COMPLETED

OIG identified two significant recommendations that were agreed to by EXIM but have not been implemented as of March 31, 2024. OIG is committed to working with agency management to expeditiously address the management decision and corrective 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: March 31, 2024.

Report on EXIM Bank's Credit Guarantee Facility Program ([OIG-EV-17-03](#), March 30, 2017)

Recommendation 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.

Expected implementation date: March 31, 2024.

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	Open	3/31/2024	Agree	\$0	\$0
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.*					
Report on EXIM Bank's CGF Program (OIG-EV-17-03, March 30, 2017)					
5	Open	3/31/2024	Agree	\$0	\$0
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.*					

* As outlined in Appendix C, OIG considers both to be significant recommendations that were agreed to by EXIM but have not been implemented as of March 31, 2024. During the reporting period, EXIM requested that the target closure date for both recommendations be extended to March 31, 2024.

Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
Independent Auditors' Report on EXIM's DATA Act Submission (OIG-AR-22-01, November 8, 2021)					
1	Open	9/30/2024	Agree	\$0	\$0
Determine the root cause of the errors in EXIM-provided data identified during the testing of the second quarter FY 2021 Files D1 and D2, and take 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 the error; and (c) update the policies and procedures for recording data in Comprizon, FPDS, and FABS to address the risks and include adequate verification and validation review processes performed by the data owner and a supervisor or other independent party.					
2	Open	9/30/2024	Agree	\$0	\$0
Continue to improve the design of its review of the procurement award data in FPDS and financial assistance award data submissions to FABS by identifying the root cause for the exceptions in those data elements for which EXIM is responsible, and by developing more effective review procedures for those data elements, as well as the data elements that the SAO and DATA Act Working Group identify as having a high risk of not being accurate, complete, or reported timely.					
3	Open	9/30/2024	Agree	\$0	\$0
Review EXIM's policies and procedures for submitting contract award data in FPDS, including procedures for reviewing and confirming the accuracy of the CAR, to ensure proper design and compliance with FAR guidelines for timeliness. Update the policies and procedures based on this review, as necessary, to ensure EXIM meets FAR timeliness guidelines.					

Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
4 Review EXIM’s policies and procedures that address timelines for submitting complete and accurate FABS files containing financial assistance award data, to ensure proper design and compliance with DAIMS guidance. Update the policies and procedures based on this review, as necessary, to ensure EXIM meets DAIMS timeliness guidelines.	Open	9/30/2024	Agree	\$0	\$0
5 Complete a data inventory for File D1 that defines each data element based on government-wide financial data standards, and that EXIM seeks clarification from OMB and Treasury, as necessary, in order to ensure appropriate interpretation of the DATA Act Standards.	Open	9/30/2024	Agree	\$0	\$0
6 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 that EXIM seek clarification from OMB and Treasury, if necessary, in order to ensure appropriate interpretation of the Data Act Standards.	Open	9/30/2024	Agree	\$0	\$0
7 Complete a data inventory for each of Files A through D1 to govern EXIM’s DATA Act activities and help ensure compliance with government-wide financial data standards.	Open	9/30/2024	Agree	\$0	\$0
8 Develop and document a review process of the data inventories for Files A through D2 that EXIM will perform at regular intervals and after each DAIMS update.	Open	9/30/2024	Agree	\$0	\$0

Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
9	Open	9/30/2024	Agree	\$0	\$0
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 identification of high-risk reported data, including: (1) specific data the agency 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 reported with plain English award descriptions; and (d) Actions taken to manage identified risks.					
10	Open	9/30/2024	Agree	\$0	\$0
Continue to implement its corrective action plan to ensure that object class codes are accurately and completely reported in all financial and award data submissions (Files B and C).					
Audit of EXIM's Approach for Determining Additionality (OIG-AR-22-07, September 30, 2022)					
1	Open	9/30/2024	Agree	\$0	\$0
Update the additionality guidelines and checklist to: a) explicitly state the minimum documentation requirements for establishing additionality whether that be source documentation or contemporaneous memos with the required elements of source, timing, and context.					
Review of EXIM's Default Rate Management Practices (OIG-EV-23-01, October 14, 2022)					
1	Open	3/31/2024	Agree	\$0	\$0
Identify suitable aggregate measure(s) of portfolio risk to inform organizational decision-making					
2	Open	3/31/2024	Agree	\$0	\$0
Ensure EXIM has timely, accurate, and centralized information on all nonperforming credits					

Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
Independent Audit on the Effectiveness of EXIM’s Information Security Program and Practices – Fiscal Year 2022 (OIG-AR-23-04, March 2, 2023)					
1	Open	3/3/2024	Agree	\$0	\$0
Update and implement the Enterprise Risk Management program, including applicable policies and procedures, to align with the new requirements outlined in the NIST SP 800-53, Rev. 5, Security and Privacy Controls for Information Systems and Organizations, dated September 23, 2020.					
Audit of EXIM’s Domestic and International Non-Sponsored Travel (OIG-AR-23-07, September 21, 2023)					
1	Open	9/21/2024	Agree	\$0	\$0
Develop and implement procedures to ensure that travelers have complied with all pre-travel training requirements.					
2	Open	9/21/2024	Agree	\$0	\$21,732
Develop and implement procedures to ensure that travel vouchers are submitted within five business days upon return from travel.					
3	Open	9/21/2024	Agree	\$0	\$0
Develop and implement training that ensures all staff and approving officials are aware of their roles, responsibilities, and requirements for the travel process.					
4	Open	9/21/2024	Agree	\$0	\$0
Develop and implement a process to communicate travel policy and requirement updates to staff in a periodic manner.					
Comparative Analysis of U.S. and OECD Arrangement Export Credit Agencies (OIG-EV-23-04, September 29, 2023)					
1	Open	9/29/2024	Agree	\$0	\$0
Direct staff to conduct an analysis to determine suggested policy changes to further reduce the impact of a potential future loss of a Board quorum on EXIM’s medium- and long-term lending.					
2	Open	9/29/2024	Agree	\$0	\$0
Direct staff to conduct an analysis to determine what changes should be made to further mitigate the risks to EXIM’s medium- and long-term export credit financing that were generated by the lack of Board quorum.					

Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
3 Direct staff to conduct a study exploring the potential for varying EXIM's domestic content requirement by industry or sector for all exporters—not just those that qualify under the narrow exceptions of the CTEP program—and adopt policy changes to reflect any modifications or revisions to domestic content requirements based on the results of the study.	Open	9/29/2024	Agree	\$0	\$0
4 In advance of EXIM's next reauthorization, request that EXIM's Senior Vice President for Congressional and Intergovernmental Affairs engage with interagency stakeholders to develop legislative proposals that address the challenges associated with the default rate cap.	Open	9/29/2024	Agree	\$0	\$0
6 Direct the Senior Vice President for Policy Analysis and International Relations to seek updates to EXIM's MOU with MARAD to reflect changes in EXIM's policies and priorities and consider revisiting the \$20 million threshold for U.S.-flagged shipping.	Open	9/29/2024	Agree	\$0	\$0
7 Develop a comprehensive plan, in coordination with MARAD, to provide clearer and more effective guidance on EXIM's website for U.S. exporters to assist them in complying with EXIM's domestic shipping requirements and procedures, including processes for requesting a MARAD waiver on the use of U.S. flagged vessels.	Open	9/29/2024	Agree	\$0	\$0
8 In advance of EXIM's next reauthorization, engage with interagency stakeholders to develop proposals that address the challenges associated with the impact on EXIM's competitiveness of requiring exporters to use U.S. flagged shipping vessels.	Open	9/29/2024	Agree	\$0	\$0
9 Direct staff to conduct a study exploring the potential for adopting a policy of implementing future changes to the OECD Arrangement automatically if no constraints exist in EXIM's charter or enabling legislation.	Open	9/29/2024	Agree	\$0	\$0

Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
10 In advance of EXIM’s next reauthorization, engage with interagency stakeholders to develop legislative proposals that would modify the agency’s charter to address the limitation in Sec. 2(a)(2), which prevents EXIM from matching recent updates to the OECD Arrangement.	Open	9/29/2024	Agree	\$0	\$0
11 Direct staff to conduct a study exploring the potential for revising EXIM’s domestic content policy so that lowering minimum down payments to 5 percent would not also require exporters to meet or exceed a heightened 95 percent domestic content threshold (rather than the standard 85 percent threshold) to receive full financing and down payment support.	Open	9/29/2024	Agree	\$0	\$0
12 Have the Office of General Counsel support efforts to consider recommendation of revisions to the Board’s delegated authority policy to allow for expedited reviews of larger deals, particularly when there is no Board quorum.	Open	9/29/2024	Agree	\$0	\$0
13 Have the Office of Chief Information Officer and Office of Chief Management Officer pair with the Office of General Counsel to develop a plan for decreasing the administrative burden on EXIM underwriters and third-party lenders and increasing employee expertise to facilitate faster transaction execution, to include technology options that may help in streamlining its processes and reduce cycle time, as well as centralize the administrative process and decrease the time spent by underwriters on compliance.	Open	9/29/2024	Agree	\$0	\$0
14 Support a study led by the Office of Human Capital, strategic planning, and other internal stakeholders, to identify specific factors impacting EXIM’s ability to attract and retain staff and implement recommendations to address workforce recruitment, retention, and succession planning needs in this area.	Open	9/29/2024	Agree	\$0	\$0

Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
Management Alert: EXIM Has Not Fully Complied with Antideficiency Act Reporting Requirements (OIG-O-23-04, September 29, 2023)					
1	Open	9/29/2024	Agree	\$0	\$0
Coordinate with OMB, and if necessary, obtain clearance for EXIM to immediately report the 2019 Antideficiency Act violation the agency identified, consistent with 31 U.S.C. § 1517(b) and the requirements of OMB Circular A-11.					
2	Open	9/29/2024	Agree	\$0	\$0
If applicable, and after obtaining clearance from OMB, EXIM's President and Chair should immediately report the 2019 Antideficiency Act violation the agency identified to the President, Congress, and the Comptroller General, consistent with 31 U.S.C. § 1517(b).					
3	Open	9/29/2024	Agree	\$0	\$0
Formally document EXIM's internal processes for maintaining records and reporting future Antideficiency Act violations to all required parties in a timely manner.					
Review of Access Control Measures at EXIM Headquarters (OIG-SR-24-01, November 13, 2023)					
1	Open	11/13/2024	Agree	\$0	\$0
EXIM's Chief Management Officer, in coordination with the Vice President for the Administrative Services Division, should spearhead the establishment of an interagency working group with key stakeholders to address physical access controls, including EXIM's lack of authority for physical access controls, as well as other life-safety and security issues the group may identify at EXIM headquarters.					
2	Open	11/13/2024	Agree	\$0	\$0
EXIM's Chief Management Officer, in coordination with the Vice President for Administrative Services Division, should develop an action plan, including a cost benefit analysis, to address the EXIM headquarters turnstile access issues identified in this report.					

Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
3 EXIM's Chief Management Officer, in coordination with the Vice President for Administrative Services Division, should finalize the updated EXIM Building Security Policy and ensure the final version of the revised Policy mandates EXIM employee use of the turnstiles at EXIM headquarters.	Open	11/13/2024	Agree	\$0	\$0
OIG Access and Notification Language in EXIM's Working Capital Guarantee Program Master Guarantee Agreement (OIG-O-24-02, January 25, 2024)					
1 EXIM's Office of Small Business, Business Credit Division, should amend the language in Section 4.07 of EXIM's Working Capital Guarantee Program Master Guarantee Agreement to specifically reference EXIM OIG as having authority to access EXIM lender record.	Open	1/25/2025	Agree	\$0	\$0
2 EXIM's Office of Small Business, Business Credit Division, should include mandatory reporting language in the Working Capital Guarantee Program Master Guarantee Agreement that requires EXIM lenders to notify EXIM OIG, along with EXIM, of known or suspected fraud related to EXIM loan guarantees.	Open	1/25/2025	Agree	\$0	\$0
EXIM Process for Vetting Conference Sponsors Needs Improvement (OIG-O-24-05, March 22, 2024)					
1 The Chief Ethics Officer, in coordination with other EXIM senior officials, should conduct an analysis to determine whether EXIM's practice of soliciting sponsorship fees sufficiently mitigates the appearance of favoritism towards any potential conference sponsor.	Open	3/22/2025	Disagree	\$0	\$0
2 The Chief Ethics Officer, in coordination with other EXIM senior officials, should consider developing updated criteria for reviewing sponsorship applications to mitigate potential favoritism concerns.	Open	3/22/2025	Agree	\$76,000	\$0
3 The Chief Ethics Officer, in coordination with other EXIM senior officials, should update its procedures to include steps for documenting the decision to accept or reject each potential sponsor.	Open	3/22/2025	Agree	\$0	\$0

Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
4	Open	3/22/2025	Disagree	\$0	\$0
The Chief Ethics Officer, in coordination with other EXIM senior officials, should develop and implement a process to ensure that the office's involvement in matters pertaining to conference sponsorship is consistent with its role 14 as described in the EXIM Charter.					
Lack of Clarity in EXIM's Conduct, Performance, and Discipline Policy (OIG-O-24-07, March 25, 2024)					
1	Open	3/25/2025	Agree		
EXIM's Office of Human Capital, in coordination with the Office of General Counsel, should revise the Conduct, Performance, and Discipline Policy to either define the standards of conduct or cite EXIM's Code of Business Conduct and Ethics, as well as clarify policy language, to ensure that all EXIM employees are held to the same standards of conduct, regardless of the employee's appointment status.					
Risk Assessment of EXIM's Government Purchase Card and Travel Card Programs (OIG-O-24-06, March 28, 2024)					
1	Open	3/28/2025	Agree		
The Chief Management Officer should update purchase card, convenience check, and travel card program policies and procedures to ensure training, reporting, and micro-purchase threshold requirements are consistent.					
2	Open	3/28/2025	Agree		
The Chief Management Officer should develop and implement a process for tracking purchase and travel cardholder activity status and training due dates.					
3	Open	3/28/2025	Agree		
The Chief Management Officer should develop and implement a process to ensure compliance with the requirements of OMB Circular No. A-123, Appendix B, pertaining to data analytics, sustainability, and environmental purchasing, maintaining narrative and statistical reports for agency's own use, and reporting statistical data to GSA.					
4	Open	3/28/2025	Agree		
The Chief Management Officer should develop and implement a process to ensure that travel vouchers are completed properly.					

Recommendation	Status	Expected Implementation Date	Management Agree or Disagree	Questioned Cost	Funds for Better Use
External Vulnerability Scan and External Penetration Test of EXIM’s Network and System – Fiscal Year 2024 (OIG-O-24-08, March 28, 2024)					
1 Recommendation withheld based on applicable Freedom of Information Act exemptions.	Open	3/28/2025	Agree		
2 Recommendation withheld based on applicable Freedom of Information Act exemptions.	Open	3/28/2025	Agree		
3 Recommendation withheld based on applicable Freedom of Information Act exemptions.	Open	3/28/2025	Agree		
Total				\$76,000	\$21,732

APPENDIX E: PEER REVIEW REPORTING

Pursuant to 5 U.S.C. § 405(a)(8)-(10), this section provides information on peer reviews of EXIM OIG's audit, inspection, evaluation, and investigation functions.

Office of Audits

The latest peer review of EXIM OIG's audit function was conducted by the National Labor Relations Board Federal OIG; the associated report was issued on January 22, 2024. OA received an external peer review rating of pass on the system of quality control for the audit function. A system of quality control encompasses EXIM OIG's organizational structure and the policies adopted and procedures established to provide it with reasonable assurance of conforming in all material respects with *Government Auditing Standards* and applicable legal and regulatory requirement. There are no outstanding recommendations from the peer review.

The next peer review of EXIM OIG's audit function is scheduled to be completed during the third quarter of FY 2026. CIGIE has not yet assigned an OIG to conduct EXIM OIG's audit function peer review in FY 2026. In addition, EXIM OIG is scheduled to perform a peer review of the Security Exchange Commission OIG's audit function during the third quarter of FY 2024.

Office of Special Reviews and Communications

The latest peer review of EXIM OIG's inspection and evaluation (I&E) function was conducted by the Peace Corps OIG; the associated report was issued on September 20, 2022. The review team concluded that EXIM's inspection and policy manual was consistent with the standards in CIGIE's Quality Standards for Inspection and Evaluation, December 2020.

The next peer review of EXIM OIG's inspection and evaluation function is scheduled to be completed during the third quarter of FY 2025. The peer review is scheduled to be performed by the General Services Administration OIG. In addition, EXIM OIG is scheduled to perform a peer review of the National Science Foundation OIG's inspection and evaluation function during the first quarter of FY 2025.

Office of Investigations

On February 22, 2023, the AmeriCorps OIG issued its final report on the system of quality control for OIG's investigation function. The AmeriCorps OIG issued a rating of compliant with the standards required by CIGIE and applicable Attorney General's guidelines; OIG is scheduled for its next investigations peer review in FY 2026. OIG is scheduled to perform Tennessee Valley Authority OIG's peer review in the third quarter of FY 2024.

APPENDIX F: INSPECTOR GENERAL ACT REPORTING REQUIREMENTS

The Inspector General Act of 1978, as amended, states that each Inspector General shall, not later than April 30 and October 31 of each year, prepare semiannual reports summarizing the activities of the office during the immediately preceding 6-month periods ending March 31 and September 30.¹ The IG Act specifies reporting requirements for semiannual reports.

IG Act Citation	Requirement Definition	Page
5 U.S.C. § 404(a)(2)	Review existing and proposed legislation and regulations	None
Section 5 (a)(1)	Significant problems, abuses, and deficiencies	3-4; 6-7
Section 5 (a)(2)	Recommendations made before the reporting period for which corrective action has not been completed, including potential, associated costs savings	17-24
Section 5 (a)(3)	Significant investigations closed	9-11
Section 5 (a)(4)	Total number of convictions resulting from investigations	9
Section 5 (a)(5)	Listing of each audit, inspection, or evaluation and, if applicable, questioned costs, unsupported costs, and funds be put to better use	15
Section 5 (a)(6)	Management decision made during the reporting period respecting any audit, inspection, or evaluation issued during a previous reporting period	3-4; 6-7
Section 5 (a)(7)	Information described under section 804(b) of the Federal Financial Management Improvement Act of 1996	None
Section 5 (a)(8)	Appendix containing the results of any peer review conducted by another OIG during the reporting period or, if none, date of last peer review conducted	28
Section 5 (a)(9)	List of any outstanding recommendations from any peer review conducted by another OIG that have not been fully implemented, status of implementation, and why implementation is not complete	None
Section 5 (a)(10)	List of any peer reviews conducted by the IG of another OIG and any outstanding recommendations	None
Section 5 (a)(11)	Statistical tables showing total number of investigative reports issued during the reporting period; persons referred to the Department of Justice for criminal prosecution during the reporting period; persons referred to State and local prosecuting authorities for criminal prosecution during the reporting period; and indictments and criminal information during the reporting period that resulted from any prior referral to prosecuting authorities	9
Section 5 (a)(12)	Description of the metrics used for developing the data for the statistical tables under paragraph (11)	9
Section 5 (a)(13)	Report on each investigation conducted by the Office where allegations of misconduct were substantiated involving a senior Government employee or senior official (as defined by the Office)	None
Section 5 (a)(14)	Instances of whistleblower retaliation	None
Section 5 (a)(15)	Information related to interference by the establishment	None
Section 5 (a)(16)	Descriptions of the particular circumstances of each evaluation and audit closed and not disclosed to the public; and investigations involving a senior Government employee that is closed and was not disclosed to the public	None

¹ Public Law 117263, “James M. Inhofe National Defense Authorization Act for Fiscal Year 2023,” section 5273, “Semiannual Reports.” As the National Defense Authorization Act (NDAA) amendments modifying the reporting requirements in section 5 of the IG Act of 1978, Public Law 95-452 (formerly 5 U.S.C. App. 3), are not yet codified in 5 U.S.C. § 405(b), all section 5 citations are to the requirements as amended by the NDAA. See [5 U.S.C. § 405\(b\), notes](#).

APPENDIX G: ABBREVIATIONS

CGF	Credit Guarantee Facilities
CIGIE	Council of the Inspectors General on Integrity and Efficiency
CTEP	China and Transformational Exports Program
DAL	Delegated Authority Lender
EXIM	Export-Import Bank of the United States
FISMA	Federal Information Security Modernization Act of 2014
I&E	Inspection and Evaluation
IPA	Independent Public Accounting
MGAs	Master Guarantee Agreements
MOU	Memorandum of Understanding
OA	Office of Audits
OECD	Organization for Economic Cooperation and Development
OI	Office of Investigations
OIG	Office of Inspector General
OMB	Office of Management and Budget
OSRC	Office of Special Reviews and Communications
PEFCO	Private Export Funding Corporation
PIIA	Payment Integrity Information Act of 2019
PRAC	Pandemic Response Accountability Committee
S&D	Suspension and Debarment
SDFL	Southern District of Florida
USAO	United States Attorney’s Office
WDTX	Western District of Texas

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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.