



**Federal Election Commission**  
Office of the Inspector General

June 29, 2021

Jennifer Fain (via email: [Jennifer.Fain@exim.gov](mailto:Jennifer.Fain@exim.gov))  
Acting Inspector General  
Export-Import Bank of the United States  
811 Vermont Ave. NW, Office 1050  
Washington, DC 20571

Dear Acting Inspector General Fain,

Attached is the *System Review Report* of the Export-Import Bank of the United States (EXIM) Office of Inspector General (OIG) audit organization conducted in accordance with the *Government Auditing Standards* and the Council of the Inspectors General on Integrity and Efficiency (CIGIE) *Guide for Conducting Peer Reviews of Audit Organizations of Federal Offices of Inspector General*. Your response to the report is included as an exhibit.

In our opinion, the EXIM OIG's audit organization has suitably designed and complied with a system of quality control for the year ended March 31, 2020. That control has provided EXIM OIG with reasonable assurance of performing and reporting in conformity with applicable professional standards and applicable legal and regulatory requirements in all material respects.

We appreciate the cooperation and courtesies extended to our staff during the review. If you have any questions regarding this report, please contact Ms. Shellie Purnell-Brown at [SPurnell-Brown@fec.gov](mailto:SPurnell-Brown@fec.gov).

Christopher Skinner  
Inspector General

Enclosure



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## SYSTEM REVIEW REPORT

We have reviewed the system of quality control for the audit organization of Export-Import Bank (EXIM) Office of Inspector General (OIG) in effect for the year ended March 31, 2020. 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 requirements. The elements of quality control are described in *Government Auditing Standards*.

In our opinion, the EXIM OIG audit organization has suitably designed and complied with a system of quality control for the year ended March 31, 2020. That control has provided EXIM OIG with reasonable assurance of performing and reporting in conformity with applicable professional standards and applicable legal and regulatory requirements in all material respects.

Audit organizations can receive a rating of *pass*, *pass with deficiencies*, or *fail*. EXIM OIG has received an External Peer Review rating of *pass*.

In addition to reviewing its system of quality control to ensure adherence with *Government Auditing Standards*, we applied certain limited procedures in accordance with guidance established by the Council of the Inspectors General on Integrity and Efficiency (CIGIE) related to EXIM OIG's monitoring of engagements conducted in accordance with generally accepted government auditing standards (GAGAS engagements) by Independent Public Accountants (IPAs) under contract where the IPA served as the auditor. It should be noted that monitoring of GAGAS engagements performed by IPAs is not an audit and, therefore, is not subject to the *Government Auditing Standards*.

The purpose of our limited procedures was to determine whether EXIM OIG had controls to ensure IPAs performed contracted work in accordance with professional standards. However, our objective was not to express an opinion; accordingly, we do not express an opinion on EXIM OIG's monitoring of work performed by IPAs.

We have issued a letter dated June 29, 2021 that sets forth one finding that was not considered to be of sufficient significance to affect our opinion expressed in this report.

## Basis of Opinion

Our review was conducted in accordance with *Government Auditing Standards* and the *CIGIE Guide for Conducting Peer Reviews of Audit Organizations of Federal Offices of Inspector General*.

During our review, we obtained an understanding of the nature of the EXIM OIG audit organization, and the design of EXIM OIG's system of quality control sufficient to assess the risks implicit in its audit function. Based on our assessments, we selected one of two GAGAS engagements during the peer review period and reviewed administrative files to test for conformity with professional standards and compliance with EXIM OIG's system of quality control.

Our review was based on selected tests and therefore, would not necessarily detect all weaknesses in the system of quality control or all instances of noncompliance with the system. In performing our review, we obtained an understanding of the system of quality control for the EXIM OIG audit organization. We tested compliance with EXIM OIG's quality control policies and procedures to the extent we considered appropriate. These tests covered the application of EXIM OIG's policies and procedures with the selected GAGAS engagement.

Prior to concluding the peer review, we reassessed the adequacy of the scope of the peer review procedures and met with EXIM OIG management to discuss the results of our review. We believe that the procedures we performed provide a reasonable basis for our opinion. Enclosure 1 to this report identifies the scope and methodology of our review.

## Responsibilities and Limitation

EXIM OIG is responsible for establishing and maintaining a system of quality control designed to provide EXIM OIG with reasonable assurance that the organization and its personnel comply in all material respects with professional standards and applicable legal and regulatory requirements. Our responsibility is to express an opinion on the design of the system of quality control and EXIM OIG's compliance based on our review.

There are inherent limitations in the effectiveness of any system of quality control; therefore, noncompliance with the system of quality control may occur and may not be detected. Projection of any evaluation of a system of quality control to future periods is subject to the risk that the system of quality control may become inadequate because of changes in conditions, or because the degree of compliance with the policies or procedures may weaken.



Christopher Skinner  
Inspector General

Enclosure



Scope and Methodology

We tested compliance with the EXIM OIG audit organization’s system of quality control to the extent we considered appropriate. These tests included a review of one of two engagement reports conducted in accordance with generally accepted government auditing standards (GAGAS engagement) issued from April 1, 2017, through March 31, 2020. Additionally, we reviewed the internal quality control reviews performed by EXIM OIG.

We reviewed EXIM OIG’s monitoring of GAGAS engagements performed by IPAs where the IPA served as the auditor from April 1, 2019, through March 31, 2020. During the review period, EXIM OIG contracted for the audit of its agency’s FY 2019 financial statements. EXIM OIG also contracted for other GAGAS engagements that were performed in accordance with *Government Auditing Standards*.

We visited the EXIM OIG headquarter location in Washington, DC on June 1, 2021.

Moreover, we reviewed the following GAGAS Engagement Performed by EXIM OIG:

Report No.	Report Date	Report Title
OIG-AR-18-06	09/26/2018	Audit of the Export-Import Bank’s Medium Term Early Problem Credits

We reviewed the following Monitoring Files of EXIM OIG for Contracted GAGAS Engagements:

Report No.	Report Date	Report Title
OIG-AR-20-02	11/13/2019	Independent Audit of EXIM’s Bank of the US Fiscal Year 2019 Financial Statements
OIG-AR-20-04	01/13/2020	Independent Audit of EXIM’s Information Security Program Effectiveness for Fiscal Year 2019

June 29, 2021

Christopher Skinner  
Inspector General  
Federal Election Commission  
1050 First Street NE  
Washington, DC 20463

Dear Inspector General Skinner:

Thank you for the opportunity to respond to the draft report and accompanying letter on the external peer review of the audit organization of the Export-Import Bank of the United States (EXIM) Office of Inspector General (OIG). We appreciate the efforts of the Federal Election Commission OIG in conducting the peer review.

We are pleased to receive an External Peer Review rating of *pass*. This rating demonstrates that the system of quality control in effect for the year ended March 31, 2020, has been suitably designed and complied with to provide EXIM OIG with reasonable assurance of performing and reporting in conformity with applicable professional standards and applicable legal and regulatory requirements in all material respects. We concur with the finding in the accompanying letter and agree with the recommendation to include an annual review of quality control policies procedures. EXIM OIG's audit manual and internal quality control policy will be updated accordingly by July 30, 2021.

We appreciate the professionalism of the FEC OIG auditors who conducted the peer review. If you have any questions, please do not hesitate to contact me or Courtney Potter, Deputy Assistant Inspector General for Audits and Evaluations, at (202) 565-3908.

Sincerely,



Digitally signed by Jennifer L Fain  
DN: cn=Jennifer L Fain, o=Export-Import Bank  
of the U.S., ou=Office of Inspector General,  
email=jennifer.fain@exim.gov, c=US  
Date: 2021.06.29 16:46:10 -04'00'

Jennifer Fain  
Acting Inspector General

Enclosure