



Office of Inspector General

To: C.J. Hall
Acting President and Chairman

From: Michael McCarthy
Acting Inspector General


Digitally signed by MICHAEL MCCARTHY
DN: c=US, o=U.S. Government,
ou=Export-Import Bank, cn=MICHAEL
MCCARTHY,
cB.2042.10200305.100.1.1-8300100188
ABE1
Date: 2017.09.14 15:50:37 -0400

Subject: External Peer Review of the Office of Investigations

Date: September 14, 2017

I am pleased to provide you with a copy of the recently completed external peer review report on the investigations function of the Export-Import Bank (EXIM Bank) Office of Inspector General (OIG).

The Board of Governors of the Federal Reserve System OIG conducted the investigations peer review in conformity with the Quality Standards for Investigations established by CIGIE and the Attorney General's Guidelines for Office of Inspectors General with Statutory Law Enforcement Authority, as applicable. The Fed OIG determined that the system of internal safeguards and management procedures for EXIM OIG's investigative function is in compliance with the standards, and the safeguards and procedures provide reasonable assurance of conforming to professional standards in the planning, execution, and reporting of investigations.

If you have any questions, please do not hesitate to contact me.

Attachment

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

**Conducted in Washington, DC,
by the
Office of Inspector General for the
Board of Governors of the Federal Reserve System and the
Consumer Financial Protection Bureau**

Cory Nootnagel, Assistant Special Agent in Charge

August 2017

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OFFICE OF INSPECTOR GENERAL

BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
CONSUMER FINANCIAL PROTECTION BUREAU
WASHINGTON, DC 20551

September 11, 2017

Michael McCarthy
Deputy Inspector General
Export-Import Bank of the United States
811 Vermont Avenue NW
Washington, DC 20571

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

Dear Mr. Mike McCarthy:

We have reviewed the system of internal safeguards and management procedures for the investigative operations of the Office of Inspector General for the Export-Import Bank of the United States in effect for the period ending June 30, 2017. Our review was conducted in conformity with the *Quality Standards for Investigations* and the *Quality Assessment Review Guidelines* established by the Council of the Inspectors General on Integrity and Efficiency (CIGIE) and the Attorney General's *Guidelines for Office of Inspectors General with Statutory Law Enforcement Authority*, as applicable.

We conducted our review at your headquarters office in Washington, DC. We reviewed compliance with your office's system of internal policies and procedures to the extent we considered appropriate. Additionally, we sampled 21 case files for investigations closed during the previous 18-month period.

In performing our review, we considered the prerequisites of section 6(e) of the Inspector General Act of 1978, as amended (IG Act), and section 812 of the Homeland Security Act of 2002 (Pub. L. 107-296). Those documents authorize law enforcement powers for eligible personnel of each of the various offices of presidentially appointed Inspectors General. Those powers may be exercised only for activities authorized by the IG Act, other statutes, or as expressly authorized by the Attorney General.

In our opinion, the system of internal safeguards and management procedures for the investigative function of the Office of Inspector General for the Export-Import Bank of the United States in effect for the period ending June 30, 2017, is in compliance with the quality

standards established by CIGIE and the applicable Attorney General guidelines. These safeguards and procedures provide reasonable assurance of conforming to professional standards in the planning, execution, and reporting of your investigations.

If you have any questions or require any further assistance, please do not hesitate to contact me at 202-973-5000.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Bialek". The signature is fluid and cursive, with the first name "Mark" and last name "Bialek" clearly distinguishable.

Mark Bialek
Inspector General

Attachment A: Locations Visited

<u>Location</u>	<u>No. of Personnel Interviewed</u>
Headquarters, Vermont Avenue NW, Washington, DC	2

Attachment B: List of Closed Investigative Files Reviewed

Case File Number	Case Closing Date
10-0001-AMD-PI-C	05/10/2017
10-0020-HOT-PI-C	06/22/2017
12-0010-OGC-C	06/22/2017
12-0012-AMD-C	05/04/2016
12-0015-AMD-C	06/20/2016
13-0018-AMD-PI-C	02/23/2016
14-0015-GRG-C	03/10/2016
14-0020-AGT	01/12/2016
14-0022-AGT-PI-C	12/16/2016
14-0023-LEO-C	06/22/2017
14-0024-GRG-C	10/18/2016
15-0008-AGT-PI-C	03/28/2016
15-0012-AMD-PI-C	02/23/2017
15-0014-AGT-C	12/30/2016
16-0003-AMD-C	03/11/2016
16-0012-OGC-C	03/21/2016
16-0023-AMD-C	06/19/2017
16-0024-OSS-C	09/30/2016
17-0002-AGT-C	02/15/2017
17-0008-GOV-C	04/11/2017



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BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
CONSUMER FINANCIAL PROTECTION BUREAU
WASHINGTON, DC 20551

September 11, 2017

Michael McCarthy
Deputy Inspector General
Export-Import Bank of the United States
811 Vermont Avenue NW
Washington, DC 20571

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

Dear Mr. McCarthy:

This is a supplement to our *Report on the Quality Assessment Review of the Investigative Operations of the Office of Inspector General for the Export-Import Bank of the United States*, dated August 2017.

In addition to reporting a rating of *compliant*, the peer review team identified a best practice that we found to be a notable positive attribute of your investigative operations. Specifically, your Special Agents have issued 968 administrative subpoenas since 2009, which is, on average, more than 120 subpoenas per year. During our assessment review, we learned that your office completes and approves most administrative subpoenas in 1–2 days. Your streamlined and expeditious process is to be commended and should serve as an example to other Offices of Inspector General as a means to get needed information in an efficient and timely manner.

If you have any questions or require any further assistance, please do not hesitate to contact me at 202-973-5000.

Sincerely,

Mark Bialek
Inspector General