



July 24, 2024

Deborah J. Jeffrey, Inspector General
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-2977

Dear Inspector General Jeffrey:

Attached is the system review report of the U.S. Securities and Exchange Commission, Office of Inspector General audit organization conducted in accordance with *Government Auditing Standards* and the Council of the Inspectors General on Integrity and Efficiency *Guide for Conducting Peer Reviews of Audit Organizations of Federal Offices of Inspector General*. Your response to the report is included as an exhibit with excerpts and our comments incorporated into the relevant sections of the report.

We appreciate the cooperation and courtesies extended to our staff during the review.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathon Walz".

Jonathon Walz
Deputy Inspector General

Enclosure



System Review Report

July 24, 2024

Deborah J. Jeffrey, Inspector General
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-2977

Dear Inspector General Jeffrey:

The Office of Inspector General for the Export-Import Bank of the United States has reviewed the system of quality control for the audit organization of the U.S. Securities and Exchange Commission (SEC) Office of Inspector General (OIG) in effect for the year ended March 31, 2024. A system of quality control encompasses SEC 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 system of quality control for the audit organization of SEC OIG in effect for the year ended March 31, 2024, has been suitably designed and complied with to provide SEC 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*. SEC OIG has received an External Peer Review rating of *pass*.

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 interviewed SEC OIG personnel and obtained an understanding of the nature of the SEC OIG audit organization, and the design of SEC OIG's system of quality control sufficient to assess the risks implicit in its audit function. Based on our assessments, we selected two engagements performed in accordance with generally accepted government auditing standards (GAGAS engagements) during the peer review period and reviewed administrative files to test for conformity with professional standards and compliance with SEC OIG's system of quality control. The GAGAS engagements selected represented a reasonable cross-section of SEC OIG audit organization, with an emphasis on higher-risk engagements.

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

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eximoig.oversight.gov

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

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

Responsibilities and Limitation

SEC OIG is responsible for establishing and maintaining a system of quality control designed to provide SEC 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 SEC 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 deteriorate.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathon Walz", written in a cursive style.

Jonathon Walz
Deputy Inspector General

Enclosures

Scope and Methodology

The Office of Inspector General for the Export-Import Bank of the United States tested compliance with the U.S. Securities and Exchange Commission Office of Inspector General (SEC OIG) audit organization’s system of quality control to the extent we considered appropriate. These tests included a review of two engagements conducted in accordance with generally accepted government auditing standards (GAGAS engagements) that was issued during the three-year period ending March 31, 2024. We also reviewed internal quality control reviews performed by SEC OIG.

There were no GAGAS engagements performed by Independent Public Accountants during the scope of this external peer review.

The audit team did not physically visit any SEC OIG offices.

As part of this peer review, we reviewed the below GAGAS engagements performed by SEC OIG.

| Report No. | Report Date | Report Title |
|-------------------|--------------------|---|
| <u>No. 577</u> | 2/28/2023 | Audit of Small Business Contracting |
| <u>No. 581</u> | 1/29/2024 | Audit of the Office of Equal Employment Opportunity (EEO) |

Enclosure Two



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DEBORAH J. JEFFREY
INSPECTOR GENERAL

July 10, 2024

VIA EMAIL

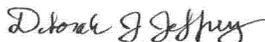
Jonathon Walz
Deputy Inspector General
Export-Import Bank of the United States
Office of Inspector General
811 Vermont Avenue, NW
Washington, DC 20571

Dear Mr. Walz:

Thank you for the opportunity to comment on the Draft System Review Report, transmitted July 3, 2024, on the U.S. Securities and Exchange Commission's Office of Inspector General's audit organization for the period ended March 31, 2024. We are pleased that your independent review of our audit operations resulted in a rating of pass and concluded that our system of quality control was suitably designed and complied with to provide reasonable assurance of performing and reporting in conformity with applicable professional standards and applicable legal and regulatory requirements in all material respects.

Please extend my thanks to your review team for their hard work and the courtesies that they extended in this important undertaking. Peer reviews may not be glamorous, but they are certainly valuable in maintaining high professional standards, so we appreciate the care that EXIM OIG dedicated to this purpose. Should you have questions, please contact me or Rebecca Sharek, Deputy Inspector General for Audits, Evaluations, and Special Projects, at (202) 551-6061.

Sincerely,


Deborah J. Jeffrey

Cc: Parisa Salehi, Inspector General, Export-Import Bank of the United States