

December 13, 2021

Ms. Parisa Salehi
Inspector General Designate
Export Import Bank
811 Vermont Ave NW #911
Washington, DC 20571

Dear Ms. Salehi:

Thank you for testifying before the United States Senate Committee on Banking, Housing, and Urban Affairs on December 7, 2021, at our nomination hearing.

To complete the hearing record, we would appreciate your answers to the enclosed questions by December 14, 2021 at 12:00PM. When formatting your response, please repeat the question, then your answer, single spacing both question and answer. Please do not use all capitals.

Send your reply to Mr. Cameron Ricker, the Committee's Chief Clerk. He will transmit copies to the appropriate offices, including the Committee's publications office. Due to current procedures regarding Senate mail, it is recommended that you send replies via e-mail in a Microsoft Word or PDF attachment to Cameron_Ricker@banking.senate.gov.

If you have any questions about this letter, please contact Mr. Ricker at (202) 224-5587.

Sincerely,

Sherrod Brown
Chairman

SB/cr

Committee on Banking, Housing, and Urban Affairs
Nomination Hearing
December 7, 2021

**Questions for Ms. Parisa Salehi, of the District of Columbia, to be Inspector General,
Export Import Bank, from Chairman Sherrod Brown:**

1. Where have you excelled in past and current positions in attracting, hiring, and promoting people of color in positions in your organization/s? Where might there be room for improvement?

I am a first generation American and a woman. Diversity and inclusion are important to me, personally. I understand that commitment to having a diverse workforce starts at the top. In every position that I have held within the federal government, whether as a GS-14 hiring manager or a career Senior Executive, I have hired and promoted people of color and those who identify with other marginalized identity groups, because I believe that diversity of thought and a varied lens by which we see the world strengthens any team.

Through hirings or internal promotions I have taken advancing diversity seriously to implement what I believe in: that promoting qualified individuals from underrepresented communities, including people of color and minorities, matters.

I am an active member of CIGIE's Diversity, equity and inclusion working group. Additionally, in my current position as Chief of Staff at the Department of State OIG, I directly hired four individuals, three of whom identified themselves as people of color or belonging to a minority group. In addition, I participated in many panel interviews on behalf of others within the State OIG leadership group and actively ensured that diversity is a consideration in many of those hires. I work with State OIG's Diversity and Inclusion council as well as Human Resources to ensure that we find creative ways of engaging with Historically Black Colleges and Universities to attract talent. I worked at USAID OIG's Office of Management, and led a group of about 90 professionals, many of whom I promoted. My team was the most diverse group within the organization. At EXIM OIG, I promoted people of color to higher positions of influence. While at the Department of Agriculture, the majority of my staff, some of whom I hired, identified themselves as people of color.

2. What is your plan for creating an inclusive working environment for employees within your office?

If confirmed, I plan to create an inclusive working environment by:

- (1) Ensuring EXIM OIG's performance and strategic plans include diversity and equity goals and objectives.
- (2) Partnering with the CIGIE Diversity, Equity and Inclusion working group to remain informed of best practices to attract and recruit diverse talent.

Committee on Banking, Housing, and Urban Affairs
Nomination Hearing
December 7, 2021

- (3) Working with my team's hiring managers to promote attracting, hiring and retaining diverse talent.
- (4) Initiating open conversations within EXIM OIG regarding diversity and inclusion as a regular meeting as appropriate.
- (5) Empowering my staff to review the policies and procedures of the Bank, with an eye towards diversity and inclusion. In other words, when possible, our audits or evaluations will contain recommendations on how EXIM can improve its performance regarding issues of equity and inclusion.

Committee on Banking, Housing, and Urban Affairs
Nomination Hearing
December 7, 2021

Questions for Ms. Parisa Salehi, of the District of Columbia, to be Inspector General, Export Import Bank, from Ranking Member Patrick J. Toomey:

Congressional Oversight

1. Please provide your philosophy on how the Export-Import Bank of the United States (EXIM) will approach and respond to Congressional information requests (both for documentary information and oral testimony), if you are confirmed.

Congress created the offices of inspector general (OIGs) to assist in its oversight of the executive branch. If confirmed as the Inspector General at EXIM, I will lead EXIM's OIG to share information in a transparent and non-partisan fashion and according to the law. This will apply to both testimonies and written products such as audits, evaluations, and reviews. Timeliness in reporting is also a key element of effective oversight, and without timely EXIM OIG reports, EXIM's ability to respond to such oversight efforts and Congress's ability to conduct effective oversight of EXIM's operations are limited. Therefore, I will be focused on timely and transparent oversight, if confirmed.

Additionally, if confirmed, my role will be to make recommendations to the Bank's Chairman on how to improve EXIM's relationships with Congress, as part of any potential audits or evaluations that my office might conduct.

2. If confirmed, do you intend to respond to information requests differently depending on who is making the Congressional information request (whether it's the chair of the Congressional committee, the ranking member, or another member of Congress)? Please answer "yes" or "no." If your answer is "yes," please explain.

If confirmed as the Inspector General, I will lead EXIM's OIG to share information in a transparent and non-partisan fashion and according to the law. I plan to respond to information requests from *all* stakeholders. In the event of specific requests, I will ensure that EXIM OIG works closely with Congressional staff to provide timely and useful information, should I be confirmed.

3. Will you commit that, if confirmed, you will respond in a timely manner and fully comply with all information requests from me? Please answer "yes" or "no." If your answer is "no," please explain.

If confirmed, I commit to respond in a timely manner and fully comply with information requests by you and all stakeholders in accordance with the law and through EXIM OIG's audits and evaluations or reviews.

4. Will you commit that, if confirmed, you will make yourself and any other EXIM employee expeditiously available to provide oral testimony (including but not limited to briefings, hearings, and transcribed interviews) to the Committee on any matter within its jurisdiction,

Committee on Banking, Housing, and Urban Affairs
Nomination Hearing
December 7, 2021

upon the request of either the Chairman or Ranking Member? Please answer “yes” or “no.” If your answer is “no,” please explain why.

I commit to making myself and other EXIM OIG employees available to provide oral testimony to the Committee on any matter within its jurisdiction, upon the request of either the Chairman or Ranking Member.

5. Do you believe that EXIM or EXIM’s Office of the Inspector General (OIG) may assert any privileges or other legal justifications to withhold information (whether records or oral testimony) from Congress? Please answer “yes” or “no.”

If confirmed as the Inspector General, I will lead EXIM’s OIG to share information in a transparent and non-partisan fashion and according to the law. While disclosing information to Congress with transparency and in a non-partisan manner will be my guiding principle, if the law requires and thus prohibits EXIM OIG not to disclose the information, I must follow the law.

6. If you answered “yes” to the preceding question, please list every such privilege or other legal justification and provide the legal basis for why you believe EXIM or EXIM’s OIG may use such privilege or legal justification to withhold information from Congress.

I am not currently familiar with any EXIM specific privileges or legal justifications to withhold information. However, in my general oversight experience, in circumstances when, on balance, disclosing the information might not be permissible, I commit to seek the advice of counsel, as well as those in the Inspectors General community, such as CIGIE, who have the expertise to guide me in identifying what information I would be legally permitted to share. Some examples of the type of information that may not be disclosed, absent extraordinary justification, might be:

- (1) Personally Identifiable Information to safeguard, for example, a whistleblower’s identity during an ongoing investigation (to avoid a chilling impact on disclosing wrongdoing);
- (2) Information about an open criminal investigation (to comply with the law);
- (3) Executive Privilege (this privilege belongs to the Agency and not the OIG, therefore, OIG may not waive the privilege);
- (4) When otherwise required by the law.

7. In an effort to be open and transparent with Congress and the public, will you commit not to assert any such privilege or legal justification against Congress that you listed above? If not, why not? If so, please identify all such privileges or legal justifications that you will commit to not assert against Congress.

Committee on Banking, Housing, and Urban Affairs
Nomination Hearing
December 7, 2021

I will commit to transparent and open communication whenever legally permissible. Additionally, I commit to seek the advice of counsel, as well as those in the Inspectors General community, such as CIGIE, who have the expertise to guide me in identifying what information I would be legally permitted to share

Private Sector Financing

8. During the December 7, 2021 Banking Committee hearing for your nomination, I asked you: *“if you would commit to conduct another evaluation to determine if EXIM is in fact complying with its updated policies and procedures that are designed to prevent crowding out of private sector capital, and also will you commit to reviewing the updated policies themselves to ensure that they are actually achieving EXIM’s statutory mandate not to replace private capital?”* In your response, you did not commit to conduct an evaluation of EXIM’s updated additionality policies. However, during the hearing you were willing to commit to at least one other Senator’s request for a commitment.

- a. Will you commit to conduct an evaluation of EXIM’s updated additionality policies?

Congress created offices of inspector general in 1978 to assist in its oversight of the executive branch. As a member of the IG community, I believe my duty in assisting Congress is paramount. As the Inspector General, it is my role to review the policies and procedures of the Bank to ensure they are in accordance with the law and the Congressional intent. Therefore, should I be confirmed, I commit to working with you and your staff to fully understand your concerns relating to additionality as part of my oversight of the Bank. Though I do not currently hold a position at EXIM OIG, and therefore am not aware of EXIM OIG’s workload, staffing challenges, or priorities, I commit to working with my staff at EXIM OIG to ensure that the timing of a follow-on review produces relevant recommendations to EXIM and Congress, so that EXIM supplements and encourages private capital as opposed to competing with it.

- b. If the answer is “no,” can you please explain the reason why you will not commit to this evaluation? NA

Priorities as Inspector General

9. During the December 7, 2021 Banking Committee hearing for your nomination, Senator Bob Menendez (D-NJ) asked you: *“so how would you help EXIM improve their performance when it comes to the issues of racial equity?”*

In your response, you stated: *“...this issue of diversity and inclusion is a priority of mine. It’s a very important issue and I hope that when, and if I am confirmed, to be able to*

Committee on Banking, Housing, and Urban Affairs
Nomination Hearing
December 7, 2021

basically bring that tone of, the fact that diversity matters, at the top and ensure that my EXIM OIG staff finds areas of opportunity in, when they do their work of audits and inspections and evaluations, with an eye towards diversity, inclusion and this priority. I also would like to make sure my own staff within EXIM OIG is empowered to think through these issues of diversity and inclusion and include them wherever possible for management of the Bank to think through them.”

- a. Can you elaborate further on how you would operationalize your diversity and inclusion priority?

If confirmed, I would operationalize my commitment to diversity and inclusion concepts by:

- (1) Ensuring EXIM OIG’s performance and strategic plans include diversity and equity goals and objectives.
 - (2) Partnering with CIGIE Diversity, Equity and Inclusion working group to have best practices top of mind.
 - (3) Working with my team’s hiring managers to promote attracting, hiring and retaining diverse talent.
 - (4) Initiating open conversations within EXIM OIG regarding diversity and inclusion as a regular meeting at the frequency that suits my staff.
 - (5) Empowering my staff to review the policies and procedures of the Bank, with an eye towards diversity and inclusion. In other words, when possible, our audits or evaluations would contain recommendations on how EXIM can improve its performance regarding issues of equity and inclusion.
- b. Please list additional priorities that you have as EXIM’s Inspector General, if confirmed.

If confirmed, in consultation with my EXIM OIG staff, I would like to understand the organizational priorities that we should focus on to possibly include:

- (1) Review the new programs and policies of EXIM, as a result of the 2019 Reauthorization of the Bank, so that we can provide timely and transparent information to Congress and to the Chairman of EXIM through our audits, evaluations and reviews, to ensure taxpayer protections.

Committee on Banking, Housing, and Urban Affairs
Nomination Hearing
December 7, 2021

- (2) Thoroughly investigate all allegations of fraud and misconduct to deter waste fraud and abuse.
- (3) Perform a workforce analysis to ensure that EXIM OIG has the resources that it needs to function as an effective oversight body, which is especially important as the office has been without a PAS IG since June, 2014.

10. Have you had any discussions with the White House, EXIM, or EXIM's OIG staff about potential OIG priorities if you're confirmed? If so, please identify the priorities and explain what, if any, potential changes and modifications that may result from the priorities.

I have not had any discussion with White House, EXIM or EXIM's OIG staff about potential OIG priorities.

Fraud from COVID-19 Legislation/Measures

11. EXIM's OIG Semiannual Report to Congress that was released last month states the OIG anticipates an increase in suspicious transactions due to the COVID-19 pandemic. The report points to other investigative agencies that are overwhelmed by fraud stemming from COVID-19 related legislation such as the CARES Act and other relief measures.

- a. Given the potential large amount of fraud that is expected to arise over the coming years, what steps will you take to ensure proper oversight of EXIM's transactions?

If confirmed, I would consult with my staff on how to take the following steps:

- (1) Knowing that EXIM has created special initiatives in response to the COVID-19 pandemic, understand the impact of these measures on the Bank's mission of supporting American jobs by leveling the playing field.
- (2) Trace financial transactions, both as a routine part of any of our investigations of suspicious activities, and to oversee EXIM's efforts in being a good steward of taxpayers' monies.
- (3) Collaborate with other government oversight bodies in an effort to build on their experiences in understanding the nature of these bad acts and to recommend preventative measures and internal controls to EXIM.

Committee on Banking, Housing, and Urban Affairs
Nomination Hearing
December 7, 2021

- b. The EXIM OIG Fiscal Year 2022 Congressional Budget Justification indicates the OIG has 26 full-time equivalent employees (FTE). Do you anticipate requesting additional OIG FTEs as result of an increase in suspicious transactions stemming from the pandemic?

If confirmed, I hope to perform a workforce analysis and consult with the current staff to ensure that we have the FTEs as well as a sufficient budget to be able to function as an effective oversight body, and request for an increase in OIG FTEs if it is determined that the current staff is unable to perform any additional and necessary work.

Climate Policies on EXIM Financing

12. EXIM has long been financing energy related projects. In its 2020 Annual Report, EXIM reported that oil and gas represented 25.6 percent of its total exposure. However, given the Biden administration's favoritism for renewable and sustainable energy projects, there may be pressure within EXIM to re-evaluate these past deals and refrain from financing oil and natural gas deals in the future.

- a. Will you commit to investigating any reports or allegations of political interference occurring during EXIM's evaluation and decision making surrounding the issue of whether or not EXIM will support a fossil-fuel related loan, financing, or project?

Accountability for the exercise of government authority is key to our nation's governing ethical principles. Independent government audits, in turn, provide essential accountability and transparency over government programs and operations by providing objective analysis and information to decision-makers and the public. I will commit to overseeing the review of any allegation of wrongdoing independently and swiftly. That is the core function of any OIG.

Answering Questions for the Record

13. Please describe with particularity the process by which you answered these questions for the record, including identifying who assisted you in answering these questions along with a brief description of their assistance.

I received the questions Friday 12/10/2021 in the afternoon. I drafted my responses to these questions the same day. On Saturday 12/11/21, I read my initial answers and made a few edits. I finalized my responses on Monday 12/13/21 and submitted them to the EXIM liaison for transmittal to the Senate Banking Committee.

Committee on Banking, Housing, and Urban Affairs
Nomination Hearing
December 7, 2021

**Questions for Ms. Parisa Salehi, of the District of Columbia, to be Inspector General,
Export Import Bank, from Senator Kyrsten Sinema:**

1. In your current capacity as Acting Inspector General, how do you assess the efficiency of existing EXIM programs and the efficacy of existing taxpayer protections?

I currently serve as the Chief of Staff at the Department of State OIG. I did, however, serve as the Acting Inspector General for EXIM in 2018-2019. In that role, I assessed the efficiency and effectiveness of the programs through conducting fact-based, data driven audits, evaluations, inspections and reviews. Through these reviews, OIGs make recommendations to the agency that they oversee on how to improve their policies and operations in order to ensure that the agency is acting as a responsible steward of taxpayer's monies. If confirmed, I will consult with my staff and all stakeholders, including Congress, to ensure that my office engages in impactful oversight and to ensure EXIM is acting as a responsible steward of taxpayers' monies.

2. If confirmed, what reforms would you consider making to processes within your purview to improve oversight at EXIM and protect the public trust?

If confirmed, I will:

- (1) consult with my EXIM OIG staff who are currently working at the Bank and know the programs and the operations of the Bank well.
- (2) engage in a risk-based exercise to plan our work and decide which processes and operations of the Bank we will examine near and long term. In that planning we will ensure to consider all stakeholders' views regarding any potential reforms.
- (3) consider whether we have the necessary resources and tools for effective oversight and to perform the audits and evaluations necessary to recommend reforms to EXIM.
- (4) review EXIM OIG's strategic and performance plans with an eye towards improving our oversight.
- (5) report the findings of any reports regarding reforms to Congress, the Chairman of the Bank, and the American people transparently and independently