AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES

AFGE LOCAL 2211 • EXIM BANK UNIT

MEMORANDUM

TO: Chief of Staff, Export-Import Bank of the United States

FROM: Vice President, AFGE Local 2211, EXIM Bank Unit

DATE: March 12, 2026

RE: Opposition to the Proposed Closure of the New York Regional Office and Reassignment of Regional Directors

On behalf of the bargaining unit employees of AFGE Local 2120 at the Export-Import Bank of the United States (EXIM Bank), and specifically in representation of the two Regional Directors (RDs) whose positions are directly impacted by the proposed closure of the New York Regional Office, I write to formally and respectfully oppose this action and to request that the agency reconsider before taking further steps.

I. Stated Rationale and the Actual Record of Regional Performance

We have been advised during meetings with management that the primary basis for closing the New York Regional Office is insufficient production and overall cost. This characterization is, with respect, inconsistent with the documented record of the territories served by these RDs. According to EXIM Bank's own internal data, the Northeast and Mid-Atlantic territories - comprising Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, Vermont, Delaware, New Jersey, and Pennsylvania - collectively generated approximately $984.6 million in average annual supported financing activity between FY2022 and FY2025. In FY2024 alone, the combined figure exceeded $1.17 billion. The cumulative total for the region across the period from FY2022 through FY2026 (to date) exceeds $4.3 billion.

Specifically, the data reflects the following state-by-state totals (FY2022–2026):

Northeast Territory:

New York: $756,295,580 • Connecticut: $426,898,727 • Vermont: $197,978,975

Massachusetts: $126,484,510 • New Hampshire: $17,345,974 • Maine: $12,660,392 • Rhode Island: $12,061,427

Northeast Subtotal: $1,549,725,585

Mid-Atlantic Territory:

Pennsylvania: $1,204,556,068 • New Jersey: $787,933,407 • Delaware: $765,438,260

Mid-Atlantic Subtotal: $2,757,927,735

Combined Regional Total (FY2022–2026): $4,307,653,320 | Average Annual: ~$984.6 Million

The assertion that this region lacks production is, on its face, not supported by the evidence. The combined territories represent nearly $1 billion in average annual activity, which is a substantial and meaningful contribution to the agency's mission.

II. The Immeasurable Value of Regional Outreach and Business Development

What the above figures do not-and cannot-fully capture is the broader economic impact of the Regional Directors' day-to-day outreach work. The RDs in the Northeast and Mid-Atlantic territories are actively engaged with exporters, lenders, financial partners, trade associations, state and local economic development agencies, and other community stakeholders. This work is inherently educational and relationship-based. They introduce EXIM Bank programs to parties who may not otherwise be aware of the agency's offerings.

A critical reality of this type of outreach is that once an exporter or lender is made aware of an EXIM program, they do not always return to the specific Regional Director who first educated them. They may apply directly, work through a lender, or return at a future date through a different channel. There is no mechanism within EXIM's systems to attribute that downstream business activity to the outreach effort that initiated it. Therefore, any performance analysis based solely on directly attributed transactions will systematically undercount the true contribution of regional business development activity.

To be clear, there are instances in which the RDs do become more directly and intimately involved in specific transactions, and those are captured in Salesforce. However, the cases where the RD's educational engagement leads to business that flows through other channels - and which does not carry the RD's attribution - are not captured and should not be discounted when evaluating regional performance. Judging the value of regional representation based exclusively on Salesforce-attributed transactions produces an incomplete and misleading picture.

III. The Long-Term Nature of Regional Presence and Relationships

Effective regional business development is not built overnight. The credibility, trust, and professional network that the current RDs have cultivated in the Northeast and Mid-Atlantic regions represent years of sustained engagement and community investment. Regional presence is integral to ongoing business development effectiveness. These are not positions that can simply be relocated or consolidated without significant and lasting damage to the relationships that drive results.

Reassigning the Regional Directors to Washington, D.C. would effectively remove them from the territories they serve. In-region exporters, lenders, and partners rely on proximity and accessibility. Requiring these RDs to conduct regional engagement from a distant headquarters location would impose significant costs - in time, travel expense, and relationship continuity - that would inevitably reduce the frequency and quality of outreach. This is not a theoretical risk; it is a predictable and measurable loss to the communities and exporters in these regions.

IV. Internal Staffing Deficiencies Are Impeding Business Development

It is important to acknowledge that internal staffing and operational challenges at the agency level have had a material negative impact on business development outcomes across the bank, including in the Northeast and Mid-Atlantic territories. In particular, the processing of larger transactions - specifically Supply Chain Risk Initiative (SCRI) and Make More In America (MMIA) products - have been severely hampered by an extensive and well-documented backlog.

Deals that have been in the pipeline are being lost because potential users are identifying alternative funding sources rather than waiting for EXIM processing capacity to catch up. If the agency’s broader reorganization review is examining performance metrics, it must account for the fact that pipeline deals have been constrained not by lack of regional outreach or demand, but by internal processing limitations. Attributing diminished production to regional representation, rather than to systemic operational capacity issues, misidentifies both the problem and the solution.

V. If the Region Is Underperforming, the Answer Is More Resources, Not Fewer

We respectfully submit that even if leadership concludes that regional performance has room for improvement, the appropriate response is not to eliminate regional representation. The Northeast and Mid-Atlantic are among the most dynamic exporting regions in the United States, with dense concentrations of manufacturing, technology, life sciences, agriculture, and financial services exporters. These regions have the capacity to generate significantly greater EXIM Bank business with the right level of support and resources.

Removing two experienced Regional Directors from this territory would eliminate the very resource base required to grow the pipeline. If the goal is to increase business development activity - and it should be - then additional resources, not fewer, should be allocated to regions with the greatest opportunity for growth. Reducing the regional footprint of the agency in one of the country’s largest export corridors is counterproductive to that mission.

VI. Emerging Opportunities in Defense-Related Export Finance

A particularly significant and timely consideration in this analysis is the evolving policy landscape with respect to defense-related exports. There are indications that changes may be forthcoming that would expand EXIM Bank’s ability to support defense industry exporters in ways that were previously unavailable to the agency. The Northeast and Mid-Atlantic corridors are home to major defense contractors, aerospace manufacturers, technology firms, and related supply chain companies that stand to benefit directly from any such expanded authority.

The RDs in this territory are positioned - through their existing networks and regional knowledge - to immediately engage these stakeholders and bring EXIM Bank's expanded offerings to market. Removing experienced regional representation at precisely the moment when these growth opportunities are materializing would be not only premature but damaging to the agency's ability to capitalize on what may be a historic expansion of its mission. This is an opportunity that requires institutional readiness and trusted regional relationships, both of which would be lost if the RD positions are eliminated or moved.

VII. Options to Retain Staff in the Region Even If the Office Closes

The Union recognizes that the agency may have legitimate administrative or budgetary reasons for closing the physical New York Regional Office. However, closing a physical office space and eliminating the Regional Director positions are entirely separate decisions. Even if EXIM Bank proceeds with the office closure, there are workable options available - including remote work arrangements, telework agreements, or alternative office designations - that would allow both RDs to remain resident and active within their assigned territories. Proposals for which have been shared and discussed with management.

We strongly urge the agency to consider these alternatives. The infrastructure of a physical office and the human capital embedded in the relationships, expertise, and community presence of the Regional Directors are not the same asset. One can be reduced; the other should be preserved. Removing these two seasoned professionals from their respective territories is unnecessary, particularly when alternatives exist that could achieve any stated efficiency goals without sacrificing the on-the-ground business development capacity these employees represent.

VIII. Conclusion and Requested Action

For the reasons set forth above, AFGE Local 2211 formally requests that the agency:

1. Suspend any decision to eliminate or reassign the Regional Director positions in the Northeast and Mid-Atlantic territories pending a comprehensive review;
2. Conduct a proper accounting of regional business development activity that captures the full scope of outreach impact, not solely Salesforce-attributed transactions;
3. Address the internal processing backlogs that are demonstrably constraining deal flow before attributing pipeline shortfalls to regional performance;
4. If the physical office is to close, explore and implement remote work or alternative arrangements that retain the Regional Directors within their territories; and
5. Consider allocating additional resources to the Northeast and Mid-Atlantic regions in anticipation of the emerging opportunities in defense-related export finance and other growth sectors.

EXIM Bank's mission is to support American jobs through exports. The Northeast and Mid-Atlantic territories - with nearly $1 billion in average annual financing support and a $4.3 billion cumulative record since FY2022 - are not liabilities to that mission. They are among its strongest contributors. We respectfully urge that this decision be reconsidered with the full weight of this evidence, and we welcome the opportunity to meet and discuss these concerns at your earliest convenience.

Respectfully submitted,

Richard Foy - Vice President, AFGE Local 2120
EXIM Bank Bargaining Unit
March 12, 2026