



*Office of Inspector General*

September 14, 2021

**MEMORANDUM**

**TO:**

[REDACTED]

Office of Humanitarian Business and Management Operations  
USAID/Bureau for Humanitarian Assistance

**CC:**

[REDACTED]

USAID/Bureau for Humanitarian Assistance

[REDACTED]

USAID/Office of Inspector General

**FROM:**

[REDACTED]

[REDACTED] for Investigations  
USAID/Office of Inspector General

**SUBJ:** Situational Alert on Future Aid to Afghanistan

USAID-OIG is alerting BHA to several recent instances in which humanitarian aid in Afghanistan has been compromised by intimidation and demands from the Taliban. In recent Top Management Challenges, USAID-OIG noted the inherent risks and challenges in providing humanitarian and stabilization assistance in nonpermissive settings, particularly areas controlled by sanctioned or armed groups. While the events below occurred prior to the Taliban's takeover of the Afghan government in August, USAID-OIG anticipates that the Taliban will be emboldened to further direct or influence the implementation of humanitarian assistance programming in Afghanistan.

**Background**

In August 2021, the Taliban seized control of Afghanistan. The Taliban<sup>1</sup> is classified as a Specially Designated Global Terrorist (SDGT) organization by the U.S. Department of the Treasury, Office of Foreign Asset Control (OFAC). On August 25, 2021, OFAC issued a license, which expires on March 1, 2022, for the U.S. government and its employees, grantees,

---

<sup>1</sup> Also referred to as the Islamic Movement of Taliban; Tahrike Islami'a Taliban; Taliban Islamic Movement; Tehreek-I-Taliban Jamaat-UI-Ahrar; and Talibano Islami Tahrik by OFAC, available here:

<https://sanctionssearch.ofac.treas.gov/Details.aspx?id=6636>.

and contractors “to engage in all transactions necessary and ordinarily incident to the provision of humanitarian assistance in Afghanistan that would otherwise be prohibited under the Global Terrorism Sanctions Regulations or Foreign Terrorism Organizations Sanctions Regulations...”<sup>2</sup>

While discussing the future of U.S. aid and considering these sanctions, U.S. Secretary of State, Anthony Blinken stated that U.S. aid “will not flow through the government, but rather through independent organizations, such as U.N. agencies and NGOs. And we expect that those efforts will not be impeded by the Taliban or anyone else.”

Notwithstanding the OFAC license, trends in Afghanistan suggest that the Taliban’s takeover will present significant challenges and interference to the resumption of humanitarian aid. Since 2008, USAID-OIG has received 23 complaints/disclosures referencing various matters involving the Taliban, with 21 of them having been received in the last two years. A vast majority of these disclosures/complaints relating to the Taliban involved threatening the lives of local sub-awardee personnel, claiming credit for aid distribution, interfering in aid distribution, taxing beneficiaries, taxing of delivery services, and stealing food commodities.

In the last nine months USAID-OIG initiated three investigations involving implementers facilitating diversion, as well as direct cash payments to the Taliban, including, but not limited to, the following examples:

- Personnel from a major international NGO engaged in negotiations with the Taliban to provide remuneration (financial support) in exchange for security and/or safe passage in the [REDACTED] and [REDACTED] provinces of Afghanistan
- Employees from a second major international NGO allegedly provided payments, supplies, and employment assurances to the Taliban to maintain access to areas under Taliban control. The alleged misconduct occurred during the implementation of USAID-funded projects in the provinces of [REDACTED] and [REDACTED]
- Employees from a third major international NGO allegedly engaged in sham procurement processes under threats to life made by the Taliban. Specifically, USAID-OIG is investigating allegations that the Taliban have influenced beneficiary lists, steered Non-Food Item distributions to Taliban-affiliated entities and directed staff to hire Taliban members. The alleged misconduct occurred during the implementation of USAID-funded projects in [REDACTED] Province, Afghanistan.

## Conclusion

USAID-OIG is providing this information for BHA’s awareness. If you have questions or require additional information, please contact [REDACTED] at [REDACTED]@usaid.gov, and [REDACTED] at [REDACTED]@usaid.gov.

---

<sup>2</sup> Disclosure(s) of allegations involving the Taliban which occurred prior to the OFAC specific license issuance may still be prohibited under previously established sanctions.