



OFFICE OF INSPECTOR GENERAL

U.S. Agency for International Development

MEMORANDUM

DATE: January 23, 2025

TO: USAID/West Bank and Gaza Mission Director, Amy Tohill-Stull

FROM: Middle East and Eastern Europe Regional Office, Audit Director, Louis Duncan, Jr. /s/

SUBJECT: Examination of CrossBoundary LLC 's Compliance with the Terms and Conditions of Subcontract SUB-1284, Building Regional Economic Bridges Program in West Bank and Gaza, November 17, 2022, to December 31, 2023 (8-294-25-001-O)

This memorandum transmits the final examination report of CrossBoundary LLC 's compliance with the terms and conditions of subcontract SUB-1284 under prime Chemonics International Inc. contract 72029422C00003, Building Regional Economic Bridges program in West Bank and Gaza, from November 17, 2022, to December 31, 2023. USAID/West Bank and Gaza contracted with the independent audit firm Mazars to conduct the examination. The audit firm stated it performed the examination in accordance with attestation standards established by the American Institute of Certified Public Accountants and Government Auditing Standards issued by the Comptroller General of the United States. However, it did not have an external quality control review program because professional organizations in West Bank and Gaza do not offer such a review program. The audit firm is responsible for the enclosed report and the conclusions expressed in it. We do not express an opinion on CrossBoundary LLC's internal control effectiveness or its compliance with the award, laws, and regulations.¹

The examination objectives were mainly to (1) determine whether the awardee complied with the terms and conditions of the subcontract including compliance with Executive Order 13224 "Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism", and (2) provide reasonable assurance of detecting fraud, illegal acts, or violations of provisions of the grant. To answer the engagement objectives, the audit firm performed the subject examination that covered the period November 17, 2022, to December 31, 2023.

The auditors did not identify any material instances of noncompliance with the award terms,

¹ We reviewed the audit firm's report for conformity with professional reporting standards. Our desk reviews are typically performed to identify any items needing clarification or issues requiring management attention. Desk reviews are limited to review of the examination engagement report itself and excludes review of the auditor's supporting working papers; they are not designed to enable us to directly evaluate the quality of the examination engagement performed.

conditions and applicable laws, regulations, USAID Assistance and Acquisition Procurement Directives, and notices including compliance with Executive Order 13224. The auditors did not identify any material weakness in internal controls. Further, the audit firm issued a management letter.

The report does not include any recommendations for your action.

OIG does not routinely distribute independent public accounting reports beyond the immediate addressees because a high percentage of these reports contain information restricted from release under the Trade Secrets Act, 18 U.S.C. 1905 and Freedom of Information Act Exemption Four, 5 U.S.C. 552(b)(4) (“commercial or financial information obtained from a person that is privileged or confidential”). In addition, USAID OIG has determined that this transmittal memo and the enclosed report are not subject to notification and reporting requirements under Section 5274 of the National Defense Authorization Act.²

² The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 Pub. L. No. 117-263, § 5274. Please direct related inquiries to oignotice_ndaa5274@usaid.gov.