

OFFICE OF INSPECTOR GENERAL

U.S. Agency for International Development

Sudan: USAID Did Not Continuously Monitor Humanitarian Assistance or Share Unresolved Fraud and Other Allegations and Key Documents with the Department of State

Report E-650-26-001-M
June 1, 2026

Evaluation



Office of Audits, Inspections, and Evaluations



OFFICE OF INSPECTOR GENERAL U.S. Agency for International Development

DATE: June 1, 2026

TO: Eric Ueland
Performing the Duties of Administrator and Chief Operating Officer
U.S. Agency for International Development

FROM: Gabriele Tonsil
Acting Assistant Inspector General for Audits, Inspections, and Evaluations

SUBJECT: Sudan: USAID Did Not Continuously Monitor Humanitarian Assistance or Share Unresolved Fraud and Other Allegations and Key Documents with the Department of State

This memorandum transmits the final report on our evaluation of humanitarian assistance to Sudan. Our objectives were to evaluate the extent to which USAID (1) monitored humanitarian assistance to Sudan and (2) managed key monitoring information during the transition of active awards to the Department of State.

USAID did not provide a response to or comments on the draft report. Should we receive written comments from the Agency on this report at a later date, we will update and reissue the report to reflect the comments and technical changes as applicable.

The report contains three recommendations and three considerations for future foreign assistance to strengthen monitoring and better safeguard taxpayer funds in Sudan and other nonpermissive environments. We consider the three recommendations open and unresolved. Please provide us with a management decision for each recommendation, including agreement or disagreement with the recommendation and a plan and target date for corrective action, copying the Audit Performance and Compliance Division.

We appreciate the assistance you and your staff provided to us during this audit.

Contents

Report in Brief.....	1
Introduction	2
Background	3
USAID Did Not Continuously Implement Planned Monitoring Activities for Its Humanitarian Assistance in Sudan	6
USAID Did Not Share Unresolved Program Irregularities or Preserve Key Documents During the Transfer of Active Humanitarian Assistance Awards to State.....	7
USAID Maintained a Tracker of Over 45 Open Program Irregularities but Did Not Share This Tracker With State.....	7
USAID Could Not Provide the Country Monitoring Plan for Its Humanitarian Response in Sudan and Did Not Share It With State	9
USAID Did Not Preserve Key Program Monitoring Documents Needed to Fully Transition Its Humanitarian Assistance Awards to State.....	10
Conclusion	11
Recommendations	11
Considerations for Future Foreign Assistance.....	11
OIG Response to Agency Comments	11
Appendix A. Scope and Methodology.....	12
Appendix B. USAID’s Review Process for Third-Party Monitoring Reports.....	14
Appendix C. Incidents Categories and Status of Program Irregularities, as of June 2025	15



Report in Brief

Why We Did This Evaluation

Sudan is facing the world's largest displacement and hunger crisis, with more than 25 million people experiencing acute food insecurity and famine conditions. In 2024, the United States was Sudan's largest humanitarian donor, providing \$880.3 million in assistance; over half of that funding supported emergency food assistance. As of June 2025, USAID was responsible for implementing and monitoring 31 active humanitarian assistance awards in Sudan. By the end of June 2025, USAID had transferred the administration and oversight of all the active awards to the Department of State (State).

The complex, unstable environment in Sudan limited USAID's ability to safely and directly oversee humanitarian assistance and increased the risk of theft and diversion. As a result, USAID relied on remote and third-party monitors to oversee its awards. Our office also received complaints of fraud, waste, and abuse, including theft and diversion of the humanitarian aid provided under USAID-funded awards in Sudan, including those implemented by public international organizations and nongovernmental organizations. Given these concerns, we conducted this evaluation to determine the extent to which USAID (1) monitored humanitarian assistance to Sudan and (2) managed key monitoring information during the transition of active awards to State.

What We Recommend

We made three recommendations to USAID to provide the program irregularities tracker and the country monitoring plan for its former humanitarian response in Sudan to cognizant officials at State and ensure that transferred award files are complete and include key monitoring information. We also suggest that cognizant State officials implement processes and procedures to monitor and preserve information on humanitarian assistance responses.

What We Found

USAID did not continuously implement planned monitoring activities for its humanitarian assistance in Sudan. The Agency did not complete all 21 planned site visits to monitor \$1.04 billion in humanitarian assistance awards in Sudan between January and June 2025. The third-party monitor conducted 11 of the 21 planned site visits in January, May, and June 2025 covering health, nutrition, food security, protection, and shelter and settlement activities. However, it did not conduct the remaining 10 site visits during the reporting period. As of the end of June 2025, four site visits had been cancelled, and six were pending completion. Furthermore, USAID did not consistently follow its internal procedures for reviewing reports for the 11 completed site visits. As a result, USAID did not have reasonable assurance that the awards were implemented as intended and may not have identified all program irregularities or taken corrective actions. In addition, USAID's ability to confirm and use monitoring results to identify and address implementation issues in a timely manner was limited.

USAID did not share unresolved program irregularities during the transfer of active humanitarian assistance awards to State or preserve key award documents. USAID maintained a tracker of reported irregularities in humanitarian programs in Sudan, including over 45 open, unresolved irregularities as of June 2025, but did not share this tracker with State. In addition, USAID had several documents describing individual monitoring activities, such as the field monitoring protocol for third-party monitoring activities, but these did not constitute a comprehensive country monitoring plan for Sudan. The Agency did not share a country monitoring plan with State. Finally, USAID did not preserve key monitoring documents needed to transition its active awards to State. As a result, State does not have the information it needs to fully monitor these awards.

Introduction

Due to ongoing conflict, Sudan is facing the world's largest displacement and hunger crisis, with more than 25 million people experiencing acute food insecurity and famine conditions reported in multiple areas. In 2024, the United States was Sudan's largest humanitarian donor, providing \$880.3 million in assistance, nearly 43 percent of the \$2.05 billion in total assistance provided to Sudan from all donors. Over half of U.S. funding supported emergency food assistance. The remainder supported water, shelter, emergency health, sanitation, protection, and nutrition. As of June 2025, USAID was responsible for implementing and monitoring 31 active humanitarian assistance awards in Sudan with a total estimated cost of nearly \$853 million. By the end of June 2025, USAID had transferred the administration and oversight of all the active awards to the Department of State (State).¹

The nonpermissive environment in Sudan limited USAID's direct oversight of humanitarian assistance and increases the risk of theft and diversion.² As a result, USAID relied on remote and third-party monitoring to provide oversight of its awards. In addition, OIG has received complaints of fraud, waste, and abuse, including theft and diversion of the humanitarian aid provided under USAID-funded awards in Sudan, including those implemented by public international organizations (PIOs), such as the United Nations' (UN) World Food Programme and the International Organization for Migration, and nongovernmental organizations (NGOs).

Given these concerns, we conducted this evaluation to determine the extent to which USAID (1) monitored humanitarian assistance to Sudan and (2) managed key monitoring information during the transition of active awards to State.

Our evaluation focused on USAID's 31 active humanitarian assistance awards in Sudan from January through June 2025. To evaluate the extent to which USAID monitored humanitarian assistance to Sudan, we reviewed relevant Federal standards and practices and Agency policies, guidance, monitoring reports, and tracking tools. We also interviewed USAID officials and third-party monitoring staff to understand the Agency's oversight practices and the monitoring challenges encountered during the review period. To evaluate the extent to which USAID managed key monitoring information during the transition of active awards to State, we judgmentally selected 5 of the 31 active humanitarian assistance awards and reviewed USAID's documentation for these awards, including financial, performance, and monitoring reports. We selected these five awards because they each received more than \$5 million in funding and generated more than five complaints through our Office of Investigations. In addition, we reviewed USAID's record of reported program irregularities on the humanitarian assistance awards in Sudan to determine the status of the irregularities and assess the extent the Agency coordinated with State on any that remained open. We also interviewed USAID officials to better understand how the Agency transferred key documents to State. We conducted our

¹ On January 24, 2025, the Secretary of State ordered a pause on all U.S. foreign assistance, including USAID-funded awards, for review. The Secretary of State issued this order consistent with the President's Executive Order, "Reevaluating and Realigning United States Foreign Aid," signed January 20, 2025.

² USAID referred to complex, fluid operating contexts as nonpermissive environments. These environments are marked by insecurity, uncertainty, instability, and limited access—conditions that significantly restrict USAID's ability to operate safely and effectively.

review from April 2025 to April 2026 in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*. Appendix A provides additional detail on our scope and methodology.

Background

Humanitarian Environment in Sudan and USAID's Response

Following years of unrest and power struggles in Sudan, fighting between rival elements of the country's security forces began in April 2023. The nonpermissive environment created by the ongoing conflict, widespread protection violations, and restricted humanitarian access severely disrupted aid operations, left millions at risk, and intensified the need for continued U.S. support. Warring parties, bureaucratic impediments, and other obstructions in Sudan further limited the ability of USAID, PIO, and NGO implementers to operate in and around the country.

In Sudan, USAID's strategic objectives were to expand humanitarian access, increase the resilience of humanitarian delivery, reform the humanitarian response structure, and expand and improve humanitarian advocacy efforts.

USAID Oversight and Monitoring of Humanitarian Assistance

USAID's responsibility for oversight of humanitarian assistance included monitoring, managing operations and risks, and assessing the effectiveness of assistance.³ Key positions included:

- Agreement officers (AOs) who had the authority to enter, administer, terminate, and close out awards. Only the AO could commit funds on behalf of the U.S. government.
- Agreement officer's representatives (AORs) who were appointed by AOs and provided oversight and administration of awards. AORs monitored award recipients' progress toward achieving the award objectives and made recommendations about award management to the AO.
- Activity managers who were often based in the field and supported the AOR by monitoring, conducting site visits, and reporting on award activities.

USAID developed monitoring guidance for staff working in nonpermissive environments.⁴ The guidance outlined best practices and remote monitoring methods, including increasing virtual meetings with implementers and using third-party monitors (TPMs) for data collection. It also recommended developing a country monitoring plan to document, schedule, and codify selected monitoring approaches, including information needs and country-specific monitoring methods.

³ USAID Automated Directives System (ADS), Chapter 251, "International Humanitarian Assistance," full revision, May 2022.

⁴ USAID BHA, BHA Internal Guidance for Monitoring in Non-Permissive Environments, August 2021.

According to USAID's internal guidance, core TPM services included verifying activities and collecting beneficiary feedback.⁵ These services were in addition to AOR oversight responsibilities and were not a replacement for the other monitoring approaches. Other USAID's guidance indicated that TPM site visits were to be followed by report reviews, discussions with implementers on findings and required actions, and continued follow-up until issues are resolved.

USAID planned a range of monitoring activities to oversee its humanitarian assistance efforts in Sudan. According to USAID documents and officials, planned monitoring activities included USAID-led site visits, remote monitoring, TPM reviews, and ongoing coordination with key humanitarian stakeholders, including Congress, interagency counterparts, donor governments, the private sector, UN agencies, and other implementers operating in Sudan and the surrounding permissible countries supporting the response. USAID and its TPM were to carry out these efforts in accordance with Agency guidance for operating in nonpermissive environments. According to USAID's contract with the TPM for Sudan, the TPM's objective was to provide timely support to field operations and monitoring activities on USAID's behalf with a full-time response capability. USAID's Bureau for Humanitarian Assistance (BHA) conducted a 10-step review of the TPM's monitoring reports, including coordinating with implementers and the TPM. Under the last four steps of the process, BHA staff met with implementers to discuss and follow up on the monitoring findings and finalize the reports. Appendix B lists USAID's 10-step process for reviewing the monitoring reports the TPM submitted for humanitarian assistance in Sudan.

Program Irregularities in USAID's Humanitarian Assistance Awards

USAID AORs' primary responsibility was, in coordination with other BHA staff, to follow a step-by-step process for documenting, reporting, and responding to program irregularities identified in humanitarian assistance awards to help provide program oversight⁶ USAID defined a program irregularity as an incident related to a USAID-funded humanitarian assistance award that fell into any of the following categories:

- Fraud and abuse.
- Waste.
- Loss, damage, safety, and quality issues.
- Transactions involving individuals or entities on the Department of the Treasury's Special Designated Nationals list.⁷

⁵ USAID BHA, BHA Internal Guidance for Monitoring in Non-Permissive Environments, August 2021.

⁶ USAID BHA, "Documenting, Reporting, and Responding to Program Irregularities in BHA-Funded Awards," February 2022.

⁷ Fraud involves intentional deception for financial or personal gain, such as falsifying information or tampering with commodities or processes. Abuse refers to improper or excessive use of resources, including misuse of authority for personal or family benefit. Loss refers to missing or unaccounted-for commodities, equipment, or assets. Damage refers to harm or destruction of U.S. government-funded items from natural or human causes.

In addition to program irregularities identified through routine monitoring, USAID required PIOs and NGOs to quickly report program irregularities in writing, working with relevant AOs, AORs, and OIG’s Office of Investigations, and provided guidance on documenting and addressing such issues. USAID’s guidance required BHA staff to maintain both country-specific and global program irregularity trackers to compare incidents across geographic areas, analyze program irregularity impacts and trends, and respond to information requests from other parts of USAID and oversight bodies. USAID’s guidance also required staff to update their trackers as they received program irregularity reports, new information emerged, and implementers completed follow-up actions. Table I summarizes this incident management process.

Table I. USAID Incident Management Process for Humanitarian Assistance

Step	Key Actions	Responsible Parties
1. Routine Monitoring	Continuously monitor programs, assess risks, review recipients’ risk mitigation measures, and follow up on prior irregularities.	BHA staff (field and headquarters)
2. Receiving and Sharing Reports	Request written reports for verbal disclosures, confirm receipt of written reports via email, and notify OIG Investigations via Hotline portal.	BHA staff and OIG Investigations
3. Tracking Incidents	Maintain and update incident trackers using BHA template as new information is received or follow-up occurs.	BHA staff
4. Responding to Incidents	Take action if incidents are unaddressed, including developing corrective action plans, initiating financial recoveries, changing award conditions, making suspension/debarment recommendations, submitting criminal referrals, or pursuing other legal remedies.	BHA staff and OIG Investigations (as applicable)

Source: OIG review of USAID program irregularity guidance.

Transition of USAID’s Humanitarian Assistance Awards to the Department of State

On January 24, 2025, the Secretary of State ordered a pause on all U.S. foreign assistance, including USAID-funded awards, for review. On January 28, the administration issued a waiver for lifesaving humanitarian assistance, but confusion over funding and award status stalled aid in Sudan. Additionally, many USAID staff were placed on administrative leave in February 2025.

On May 1, 2025, a memorandum of agreement between USAID and State established a servicing agreement outlining how State would perform certain administrative functions on USAID’s behalf. As part of this agreement, responsibility for awards management shifted from USAID AOs to State grants officers, but awards continued to be administered in accordance with USAID regulations, policies, and procedures. State staff also received access to USAID information technology systems, including the official award document management system, Agency Secure Image & Storage Tracking (ASIST), allowing the staff to access official files for USAID’s awards.

In addition, in early May 2025, BHA provided guidance for staff to transfer program knowledge and country-specific files, called “transition suitcases,” to State. The suitcases cover

management, programs, operations, and technical functions. In June 2025, USAID staff briefed State officials on the Agency's internal processes and the Sudan humanitarian assistance portfolio.

USAID Did Not Continuously Implement Planned Monitoring Activities for Its Humanitarian Assistance in Sudan

USAID did not complete all 21 planned site visits to monitor \$1.04 billion in humanitarian assistance awards in Sudan between January and June 2025. The TPM conducted 11 of the 21 planned site visits in January, May, and June 2025 covering health, nutrition, food security, protection, and shelter and settlement activities. The TPM did not conduct the remaining 10 site visits during the reporting period. As of the end of June 2025, four site visits had been cancelled, and six were pending completion.

For the 11 completed TPM site visits, USAID did not consistently follow its internal review procedures to coordinate with the TPM and all the implementers regarding reported findings and recommendations. Specifically, USAID did not complete reviews of monitoring reports for two of the five site visits the TPM conducted in June before the Agency transitioned its responsibilities for the awards to State. These monitoring reports identified several issues, including insufficient training for site workers, transportation challenges affecting beneficiary referrals, and insufficient resources to meet the needs of the increasing number of internally displaced persons. USAID did not discuss or finalize these findings with the respective implementers to ensure they established action plans to address the recommendations outlined in the TPM's monitoring reports before transitioning oversight of the awards to State.

The gaps in the TPM's site visits and USAID's implementation of its internal review procedures occurred due to the Agency's limited operating status and delays in TPM activities during that period. USAID and TPM officials attributed the cancellations and delays to the pause in foreign assistance, access constraints, and high security risks. Of the 10 site visits the TPM did not complete during this period, 5 were due to a stop-work order⁸ that paused the TPM's activities, even though 35 humanitarian awards remained active. USAID officials stated that some monitoring activities were not completed for one award because they could not meet with the implementer before the July 1, 2025, transition date. Moreover, implementers had reduced their workforces, complicating site visits. While the TPM was authorized to resume normal operations in mid-March 2025, delays in deploying field staff, securing travel clearances, planning visits with implementers, and coordinating safety requirements delayed site visits in Sudan until mid-May 2025.

The TPM was a key component of USAID's ability to monitor its programming in nonpermissive environments, representing the Agency's eyes and ears on the ground, while its

⁸ On January 20, 2025, the White House issued an Executive Order, "Reevaluating and Realigning United States Foreign Aid," pausing U.S. foreign assistance programs for 90 days to assess programmatic efficiency and alignment with U.S. foreign policy. The pause applied to assistance funded by or through State and USAID. Accordingly, USAID issued a stop-work order to the TPM instructing it to halt all work on its contract with the Agency.

procedures for reviewing monitoring reports were intended to help it identify and address problems. Without continuous third-party monitoring, USAID may not have been able to verify whether its active humanitarian assistance awards in Sudan were implemented in alignment with its intended objectives in Sudan. It may not have identified all program irregularities or taken corrective actions. During the pause in the TPM's work, the UN Office for the Coordination of Humanitarian Affairs reported high humanitarian needs in Sudan across sectors such as nutrition, health, and education.⁹

In addition, by not completing its review process, USAID's ability to confirm and use monitoring results to identify and address implementation issues affecting the awards in a timely manner was limited. Further, without a similar review process, State may not have the information needed to understand the status of these issues, implementers' plan to address them, or additional actions needed as part of its monitoring humanitarian assistance in Sudan moving forward.

USAID Did Not Share Unresolved Program Irregularities or Preserve Key Documents During the Transfer of Active Humanitarian Assistance Awards to State

USAID maintained a tracker of reported irregularities in humanitarian programs in Sudan, including over 45 open irregularities that were unresolved as of June 2025, but did not share this tracker with State. In addition, USAID officials stated that the Agency had a country monitoring plan for its humanitarian response in Sudan but could not provide us a copy of it and did not share it with State. Finally, USAID did not preserve key monitoring documents needed to transition its active awards to State.

USAID Maintained a Tracker of Over 45 Open Program Irregularities but Did Not Share This Tracker With State

USAID created and maintained a Microsoft Excel-based tracker for Sudan to reference program irregularities in humanitarian assistance awards and monitor progress throughout the reporting process.¹⁰ As required, USAID officials kept the tracker up to date as new reports arrived, information was shared, and follow-up actions were completed. However, USAID did not share the tracker with State.

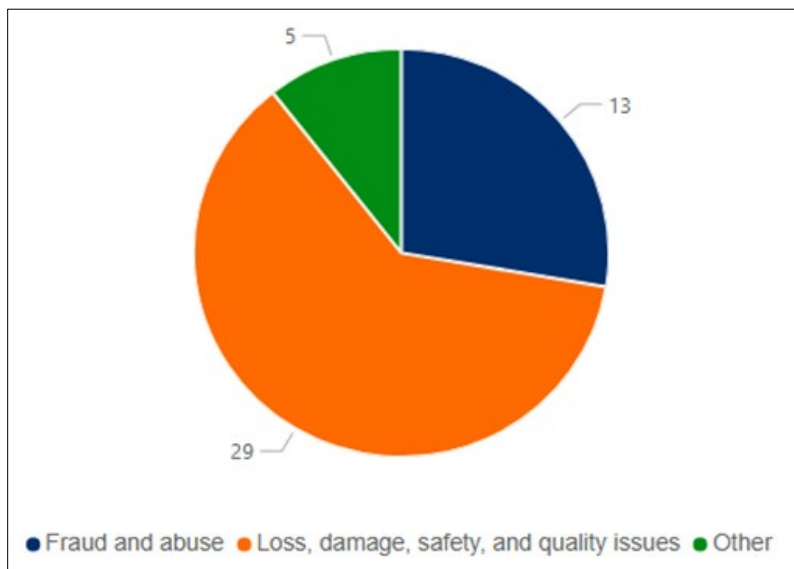
⁹ The UN Office for the Coordination of Humanitarian Affairs is the hub for information management for the humanitarian community, including UN agencies and international and local NGOs, to gather, analyze, and share data across the humanitarian response.

¹⁰ USAID used Microsoft Excel-based incident reporting trackers to capture program irregularities. The Agency used central trackers and supporting files to consolidate and compare incidents across regions, analyze impacts and trends, and respond to information requests from USAID offices and oversight bodies. The Sudan incident reporting tracker included information on program irregularity disclosures and related reporting status updates.

Our analysis of USAID’s tracker for Sudan identified 47 program irregularities across 3 categories reported between May 2023 and May 2025 on 23 awards that were open or unresolved as of June 30, 2025, including some involving significant potential losses.

- Twenty-nine incidents were related to allegations of loss, damage, safety, or quality issues. For example, three of these incidents included threat of harm to aid workers and the death and injury of beneficiaries, and six included looting of humanitarian assistance. Further, three of the looting allegations carried a total associated loss estimated at \$244,000.
- Thirteen incidents were allegations of fraud and abuse. For example, one incident alleged that Sudan’s military intelligence seized medical commodities intended for a humanitarian assistance award, resulting in a loss of \$62,438. Allegations on another award involved potential diversion, including discrepancies in records that could have resulted in the loss of up to \$250,000 worth of fuel and the seizure of \$45,000 to \$50,000 worth of fuel by armed fighters.
- The remaining five incidents consisted of two related to a robbery, two related to access and security challenges, and one with no details.

Figure I. Open Program Irregularities by Category in Humanitarian Assistance Awards to Sudan, as of June 2025



Source: OIG analysis of data in BHA’s incident tracker for Sudan.

Based on the tracking tool, these open program irregularities required notification or additional details from implementers, were under investigation, awaiting risk management guidance, or pending other actions needed for closure. Appendix C provides more detail on the awards with program irregularities.

Federal standards state that management should internally and externally communicate the necessary quality information to achieve the entity’s objectives, using established reporting

lines.¹¹ Furthermore, GAO’s guide for evidence-based policymaking emphasizes that evidence helps a Federal organization understand its operating environment, identify emerging issues, and inform decisions, which may in turn highlight the need for additional evidence.¹²

BHA officials told us they did not share the incident tracker for Sudan with State because it included program irregularities related to terminated and expired awards, and they were unsure how State would use it. A USAID official said that they did not share the tracker because there was uncertainty about which awards were active or terminated and whether State or USAID, respectively, was responsible for them.

Without access to USAID’s tracker, State does not have visibility into open program irregularities, making it difficult to address risks and make informed decisions on the Sudan humanitarian assistance portfolio and specific awards. Further, State is limited in its ability to effectively address open program irregularities and prevent funding losses in future humanitarian assistance.

USAID Could Not Provide the Country Monitoring Plan for Its Humanitarian Response in Sudan and Did Not Share It With State

USAID could not provide us a copy of the country monitoring plan for its humanitarian assistance in Sudan. USAID had several documents describing individual monitoring activities, such as the field monitoring protocol for third-party monitoring activities, but these did not constitute a comprehensive country monitoring plan for Sudan. For example, the field monitoring protocol did not include any USAID-led monitoring approaches, such as remote monitoring, virtual site visits, or in-person site visits conducted in neighboring permissible countries that support the Sudan response. In addition, USAID did not share a country monitoring plan with State when transferring program knowledge and country-specific files for Sudan to the Department.

Federal law and USAID’s records management program require the preservation of records that document agency programs, policies, procedures, functions, decisions, and key activities.¹³ According to USAID guidance for monitoring in nonpermissive environments, monitoring approaches should be documented, scheduled, and codified in a country or response-level monitoring and evaluation plan or as part of a country or response strategy and implementation plan.¹⁴ Additionally, Federal internal control standards state that management should internally and externally communicate the necessary quality information to achieve the entity’s objectives, using established reporting lines.¹⁵ Furthermore, GAO guide for evidence-based policymaking

¹¹ GAO, *Standards for Internal Control in the Federal Government* (GAO-14-704G), Principles 14 “Communicate Internally” and 15 “Communicate Externally,” September 2014.

¹² GAO, *Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts* (GAO-23-105460), July 2023.

¹³ Federal Records Act of 1950 and ADS Chapter 502, “The USAID Records Management Program,” July 2023.

¹⁴ USAID BHA, BHA Internal Guidance for Monitoring in Nonpermissive Environments, August 202.

¹⁵ GAO, *Standards for Internal Control in the Federal Government*, Principle 14, “Communicate Internally,” and Principle 15, “Communicate Externally,” September 2014.

emphasizes that evidence helps a Federal organization understand its operating environment, identify emerging issues, and inform decisions, which may in turn highlight the need for additional evidence.¹⁶

USAID officials stated that they could not access the country monitoring plan for Sudan because it was stored in specific email accounts that were deactivated during personnel reductions. Thus, during the transition time, these USAID officials no longer had access to the document.

Without access to a comprehensive monitoring plan for humanitarian assistance in Sudan, decision-makers lacked reasonable assurance that U.S. foreign assistance was used as intended. This increased the risk of awards being mismanaged, delayed responses to activity challenges, and reduced accountability. Additionally, without access to this monitoring plan, State lacked key information needed to inform its oversight of these humanitarian assistance awards, including essential information for identifying and monitoring risks of diversion.

USAID Did Not Preserve Key Program Monitoring Documents Needed to Fully Transition Its Humanitarian Assistance Awards to State

USAID did not maintain complete files with key monitoring documents for the five selected awards we reviewed. For example, three of the awards did not have financial, monitoring, or performance documents in ASIST. In June 2025, activity managers from BHA's program office were tasked with ensuring that the award files in ASIST were complete. However, our review showed that although the activity managers uploaded some documents into the system, key monitoring documents were still missing in the files, indicating that the AORs did not maintain or update the files.

ADS 502 required staff to file award documents in ASIST, including financial, monitoring, and performance documents. Further, the AORs' designation letters stated that they must maintain award files in ASIST and keep adequate records to help their successors manage the awards and understand actions previously taken. The award files must be accessible and are the AORs' primary tools in fulfilling their duties and responsibilities in managing the awards.

Award files were incomplete, in part, because the AORs who were responsible for maintaining them were placed on administrative leave from late January through June 2025. During this time, USAID relied on activity managers to upload monitoring documents into ASIST. However, the activity managers told us they had limited access to both the required documentation and ASIST because this role was outside their typical responsibilities.

Incomplete documentation of key monitoring information could impede effective management and oversight of humanitarian assistance awards in Sudan and increase the risk of disruptions during the transition of awards to State. Given that award files in ASIST are the official records

¹⁶ GAO, *Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts* (GAO-23-105460), July 2023.

of these awards, their incompleteness prevents State from having the information needed to fully monitor these awards.

Conclusion

U.S. humanitarian assistance has been a critical element in addressing acute food insecurity in vulnerable populations, such as Sudan, and requires continuous monitoring to help ensure that the assistance is delivered as intended. However, deficiencies in USAID's key monitoring activities and documentation prevented continuity of oversight during the transition of assistance awards for Sudan from USAID to State. Correcting these deficiencies would strengthen monitoring, enable timely detection and action to address program irregularities, and better safeguard taxpayer funds in Sudan and other nonpermissive environments.

Recommendations

We recommend that USAID take the following actions:

1. Provide the program irregularities tracker for Sudan to cognizant officials at the Department of State.
2. Provide the country monitoring plan for USAID's former humanitarian response in Sudan to cognizant officials at the Department of State.
3. Ensure that humanitarian assistance award files for Sudan transferred to the Department of State are complete and include key monitoring information.

Considerations for Future Foreign Assistance

As the Department of State continues to implement humanitarian assistance programs USAID formerly administered, including humanitarian assistance to Sudan, we suggest cognizant officials consider the following actions:

1. Implement continuous third-party monitoring of humanitarian assistance to Sudan.
2. Establish and implement a process for reviewing third-party monitoring reports on humanitarian assistance awards.
3. Establish and implement procedures for developing, documenting, and preserving comprehensive monitoring plans for humanitarian responses.

OIG Response to Agency Comments

We provided our draft report to USAID on April 29, 2026. As of May 29, 2026, the Agency had not provided a response to or comments on the draft report. Should the Agency provide comments at a later date, we will update and reissue this report to incorporate those comments. We consider the three recommendations open and unresolved.

Appendix A. Scope and Methodology

We conducted our work in Dakar, Senegal, and Pretoria, South Africa, from April 2025 through April 2026 in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*. Our evaluation objectives were to determine the extent to which USAID (1) monitored humanitarian assistance to Sudan and (2) managed key monitoring information during the transition of active awards to the Department of State.

The evaluation scope was USAID's 31 active humanitarian assistance awards in Sudan from January through June 2025.

To answer the objectives, we reviewed relevant Federal law, standards, and practices along with USAID policies and guidance and the reports, tracker, and award documentation for its humanitarian assistance in Sudan. We also conducted interviews with officials from USAID and the TPM contractor. Representatives from State also joined the meeting with the TPM officials.

To answer the first objective, we reviewed USAID policies on acquisition and assistance and guidance for humanitarian assistance programming and monitoring activities in nonpermissive environments such as Sudan. We examined the Agency's goals and strategies for Sudan and assessed its monitoring responsibilities, activities, and approaches by reviewing monitoring plans, reports, and trackers, including those related to third-party monitoring, field visits, risk management, and coordination with other humanitarian actors. We also interviewed USAID officials and TPM staff to understand the Agency's oversight practices and the monitoring challenges encountered during the review period.

To answer the second objective, we reviewed Federal law related to records management, GAO's *Standards for Internal Control in the Government* and guide for evidence-based policymaking, and USAID's records management program, guidance on monitoring in nonpermissive environment, and management of program irregularities. We also reviewed USAID's process for transferring program knowledge and country-specific files to State and interviewed Agency officials to understand the extent to which the Agency shared key documents.

We also reviewed USAID's incident management process by examining its standard operating procedures for managing program irregularities, selected award requirements, and AOR designation letters for the awards. We interviewed USAID officials to understand how they managed program irregularities and challenges encountered during the review period. Finally, we reviewed USAID's tracker of reported program irregularities for its humanitarian assistance awards in Sudan, which included 47 open incidents related to fraud, abuse, loss, damage, safety, and quality, to assess the extent of the Agency's coordination with State in managing these irregularities.

In addition, from the 31 active USAID humanitarian assistance awards in Sudan for the evaluation period, we judgmentally selected 5 awards with funding over \$5 million and at least 5 complaints to OIG's Office of Investigations. The five selected awards—two implemented by PIOs and three by NGOs—had a total estimated cost of \$202 million, all of which was

obligated. This amount represented nearly 24 percent of the total cost of the 31 active humanitarian assistance awards, which was about \$853 million as of June 2025. For these five awards, we reviewed financial, performance, and monitoring documentation in USAID's award management system, ASIST. Using data collection instruments, we assessed the implementation of monitoring responsibilities and approaches for these awards to determine the actions USAID staff took and the extent to which oversight continuity was maintained during the transition of awards to State.

Appendix B. USAID’s Review Process for Third-Party Monitoring Reports

In response to the nonpermissive environment in Sudan in 2023, USAID activated a regionally based Disaster Assistance Response Team (DART) in Nairobi, Kenya, and a DC-based Response Management Team (RMT) from its Bureau for Humanitarian Assistance (BHA). These teams were established to address the humanitarian assistance crisis by providing life-saving assistance to people in need as quickly as possible. They also had key roles in reviewing the TPM’s reports on humanitarian assistance awards in Sudan. This table illustrates USAID’s 10-step process for reviewing third-party monitoring reports submitted for humanitarian assistance activities in Sudan.

Step	Description	Timeline
1. Site Visit Report Received	BHA’s DART receives the site visit report, initiating the review process.	7–10 business days after visit
2. Preliminary Review & Feedback	DART conducts a preliminary review and sends a Field Monitoring Specialist Feedback Sheet to the TPM.	Within 4 business days
3. Revised Report Submission	TPM submits a revised report incorporating DART’s feedback.	Within 2 business days
4. Findings Sheet Preparation	DART prepares the Findings Sheet and shares it with BHA’s RMT point of contact along with the revised report.	Within 2 business days
5. RMT Feedback	RMT point of contact reviews the Findings Sheet and provides edits or additions.	Within 2 business days
6. Finalization of Findings Sheet	DART incorporates RMT feedback and finalizes the Findings Sheet.	Within 1 business day
7. Implementer Meeting Scheduled	DART schedules a meeting with the implementer based on the finalized report.	Within 2 weeks of receiving final report
8. Findings Shared with Implementer	Finalized Findings Sheet is shared with the implementer before the meeting.	At least 1 day before meeting
9. Implementer Meeting Held	DART conducts the meeting with the implementer.	2 weeks from initial report receipt
10. Final Report Completion	DART finalizes the report after implementer input, followed by internal review.	5 business days to review report + 2 business days for review

Source: OIG analysis of USAID’s TPM monitoring reports review process document for humanitarian assistance in Sudan.

Appendix C. Incidents Categories and Status of Program Irregularities, as of June 2025

Award Number	Fraud and Abuse	Loss, Damage, Safety, and Quality Issues	Other	Total	Date Reported to BHA	Status as of June 2025
Award 1		2		2	May-23	Open
Awards 2-3		3		3	Sep-24	Open
Award 4		1		1	Sep-24	Open
Award 5	1	1		2	May-23 to Oct-24	Open
Award 6	1	2		3	Jan-24 to Nov-24	Open
Award 7	1	3		4	Jan-24 to Nov-24	Open
Award 8		1		1	Jan-24	Open
Award 9		2		2	Jan-24 to Dec-24	Open
Award 10	1			1	Not listed	Open
Award 11	2	2		4	Jul-24 to Mar-25	Open
Award 12	1			1	Jul-24	Open
Award 13	1	4	5	10	Sep-24 to May-25	Open
Award 14		1		1	Not Listed	Open
Award 15	1	3		4	Aug-24	Open
Award 16		3		3	Oct-24 to Nov-24	Open
Awards 17-22	3	1		4	Aug-24	Open
Award 23	1			1	Apr-25	Open
Total	13	29	5	47		

Note: Twelve of the 23 awards with identified program irregularities had incidents across multiple categories. There were no open incidents reported to be waste or sanctions transactions. The “other” category reported on Award 13 includes two incidents related to a robbery, two related to access and security challenges, and one with no details of the incident.

Source: OIG analysis of data in BHA’s incident tracker for Sudan.



Visit our website at oig.usaid.gov and
follow us on social media.

X: @AidOversight

LinkedIn: USAID Office of Inspector General

Instagram: @usaid.oig



OFFICE OF INSPECTOR GENERAL
U.S. Agency for International Development

Report Waste, Fraud, and Abuse
[Online Complaint Form](#)