



OFFICE OF INSPECTOR GENERAL

U.S. Agency for International Development

MEMORANDUM

DATE: May 18, 2026

SUBJECT: Priority Reforms for Strengthened United Nations Transparency and Accountability

The USAID Office of Inspector General (OIG) is pleased to share a consolidated shortlist of reform areas that we have identified as most critical to strengthening the United Nations' (UN) capacity to conduct meaningful oversight and to engage substantively with U.S. oversight bodies to ensure maximum accountability and transparency over U.S. voluntary contributions.

Over the past several years, USAID OIG has encountered persistent and unique oversight challenges in U.S. foreign assistance implemented by UN agencies and has been vocal in calling for targeted reforms. Despite these challenges, USAID OIG investigations have led to unprecedented U.S. action against UN officials implementing U.S. taxpayer-funded programs, including the suspension and debarment of UNRWA staff affiliated with Hamas and/or participation in the October 7, 2023, attacks in Israel and numerous World Health Organization doctors for sexual assault during the Ebola response in the Democratic Republic of Congo. We continue to investigate allegations against UN personnel alleged to have orchestrated the massive food diversion scheme in Ethiopia and other procurement fraud allegations across Africa.

As the United States and other member states seek opportunities to reform the UN, the following ideas draw on our decades of experience in oversight of U.S. foreign assistance.

Establish Clear Standards for Referring Credible Allegations of Misconduct Involving Member-State Funding

USAID standard award provisions for cost-type agreements with the UN required UN agencies to disclose "credible" allegations of misconduct to USAID OIG.¹ In practice, this requirement was hindered by two primary issues: an unclear definition of "credible" and prolonged UN internal review processes to assess credibility. Official guidance clarifying what threshold must be met in order for an allegation to be deemed "credible" (for example, we would define a credible allegation as one that is "believable"), as well as reasonable and enforceable limits on

¹ "When the [award] recipient becomes aware of credible allegations of prohibited conduct, the recipient will promptly inform the USAID Office of the Inspector General...upon reasonable request, the recipient agrees to provide further available relevant information, unless disclosure of such information would be inconsistent with the recipient's rules and procedures concerning disclosure of information." USAID, Automated Directives System (ADS), 308mab M.17(b); ADS 308mab M.17(e).



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the amount of time UN bodies have to make such a determination, would improve both the UN's and the U.S. government's capacity to swiftly respond to allegations and ensure that all probative evidence is preserved.

Clarify Custodianship of Investigative Records and Expand Information Sharing with Member States

We have observed, on multiple occasions, discord between the UN Office of Internal Oversight Services (OIOS) and other UN agencies regarding which entity is the “custodian” of investigative information (in other words, who has the authority to share the information). In many cases, each respective entity responds to our requests by asserting that it lacks the authority to produce investigative materials due to the interests of the other UN body. This dynamic results in a waste of time, money, and resources for both the UN and member states seeking access to often time-sensitive investigative information involving their funds.

We have also, however, observed this disconnect in the context of UN agencies that do have their own oversight body, such as the World Food Programme (WFP). Despite an existing information sharing agreement between our office and WFP's Office of Inspector General, we had an investigative request pending with WFP IG for over a year due to conflicting narratives about who, WFP or WFP IG, had the authority to share the requested information with us. This grossly impacted our ability to advance and conclude an investigation into the aforementioned food diversion scandal in Ethiopia. Given the pressing need for USAID OIG criminal investigators to have immediate access to information from the UN, our office is negotiating information sharing agreements with UN organizations, in addition to those that we have with many UN oversight entities. These arrangements will allow us to obtain information directly from the UN agency's front office, whether its internal oversight body has, will, or is permitted to open an investigation and share information unilaterally. While these agreements will work to ensure our timely receipt of information, broader reform is still necessary.

Our office strongly encourages the government's full implementation of Pub. L. No. 118–47 § 7048(h), which would require international organizations, including UN agencies, receiving funds from the U.S. under the National Security-State Department appropriations Act to provide timely access for Inspectors General and the Government Accountability Office (GAO) to “financial data and other information relevant to United States contributions to such organization.” The UN could also adopt this as its own policy and apply it consistently in all its standard agreements.



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Clarify Scope and Application of Privileges and Immunities

UN privileges and immunities is frequently cited by UN agencies as a basis for “refusing donor participation in oversight processes or access to United Nations documents and archives.”² USAID OIG disputes the assertion that the UN’s “privileges and immunities” serves as a valid rationale for not sharing information about misuse or abuse of U.S. government funding. We believe UN agencies’ invocation of “privileges and immunities” is premature in the factfinding investigative stage, as the information requested by our special agents is not connected to a current U.S.-based prosecution. Instead, we ask for information solely to determine if further investigation is warranted. According to a 2008 report from the Secretary General on information-sharing practices between the UN and national law enforcement authorities, “[o]nce the decision has been made to release the requested information or material, such information or material is generally provided to the law enforcement authorities. . . without prejudice to the privileges and immunities of the United Nations.”³ Reaffirming the 2008 report with clear, required guidelines would allow national investigators to obtain and assess information material to a potential or ongoing investigation, with the UN maintaining its ability to assert privileges and immunities in a later legal proceeding.

Standardize and Implement UN-Wide Databases for Vetting, Misconduct, and Suspension/Debarment

According to the UN, candidates for employment with the UN generally go through the Background Verification mechanism of the UN Global Center for Human Resources Services (OneHR Center).⁴ The mechanism has four main components:

1. Verification of academic records;
2. Verification of former professional employment records, including records of professional misconduct;

² Joint Inspection Unit, “Review of Donor-Led Assessments of United Nations System Organizations and Other Oversight-related Requests from Donors in the Context of Funding Agreements and the United Nations Single Audit Principle,” ¶75, [JIU/REP/2025/3](#).

³ Report of the Secretary-General, “Information-sharing practices between the United Nations and national law enforcement authorities, as well as referrals of possible criminal cases related to United Nations staff, United Nations officials and experts on mission,” ¶16, [A/63/331](#).

⁴ Department of State, Report to Congress on Transparency and Accountability from Each Organization, Department, or Agency Receiving a Contribution from Funds under the Headings “Contributions to International Organizations” and “International Organizations and Programs” Section 7048(a) of the Department of State, Foreign Operations, and Related Programs Appropriations Act, 2024 (Div. F, P.L. 118-47) (FY 2024 SFOAA) and the Full-Year Continuing Appropriations and Extensions Act, 2025 (Div. A, P.L. 119-4), Appendix H-Vetting of Staff.



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3. Verification that the candidate is not listed in Interpol's Red Notice (Most Wanted) list, the UN Security Council Consolidated Sanctions Database, the European Union (EU) Sanctions Regime Map, and the UN ClearCheck database; and
4. Qualitative suitability, including reference checks.

Many of the systems the mechanism purports to utilize are fragmented and lack comprehensive coverage, creating significant gaps and undermining the UN's and external partners ability to respond effectively.

UN Security Council Consolidated Sanctions Database

The UN Security Council's sanctions database is not nearly as comprehensive as the United States'. To include an individual or entity on the UN Sanctions List, a UN member state must submit a request to the relevant Sanctions Committee with supporting evidence of involvement in terrorism, human rights violations, or arms proliferation. However, any of the five permanent members of the UN Security Council can block a sanctions request. Combined with strict due process and targeted sanctions criteria as well as regular delisting reviews, this results in a relatively low number of listed individuals and organizations in the UN system, especially when compared to the number of individuals and organizations sanctioned under U.S. counterterrorism laws. Notably, Hamas has been designated a foreign terrorist organization under U.S. law since October 8, 1997, but is not considered a terrorist organization by the UN. Accordingly, reliance on the UN Sanctions List for lists of terrorist actors offers only limited information.

Vetting UN Personnel Through ClearCheck

ClearCheck is an online platform that allows for the sharing of information amongst UN entities on individuals with a record of serious misconduct. "ClearCheck 1.0," operational since 2018, documented only Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) matters.⁵ Beginning in March 2025, "ClearCheck 2.0" was expanded to include racism/racial discrimination and "other types of misconduct."⁶ Individuals against whom allegations of misconduct were reported, substantiated, and resulted in (or would have resulted in) separation of service, and those who resigned or separated from a UN entity while being the subject of a pending SEA or SH investigation, are reportedly included in the ClearCheck database.⁷ There are currently 43 UN entities that participate in the ClearCheck system, with

⁵ United Nations Chief Executives Board for Coordination, Fact Sheet on ClearCheck (May 2026).

⁶ *Id.*

⁷ *Id.*



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38 of those participating in ClearCheck 2.0.⁸ There is not one universal standard operating procedure for utilizing ClearCheck; instead, the “guidelines” that UN entities agree to when joining the ClearCheck community instruct entities to enter their subjects in the data base and to screen candidates they consider hiring.⁹ ClearCheck processes requests and flags potential “hits” as “exact matches” (100% identical name/data) and “high percentage” matches (80-99%). High percentage matches prompt manual verification requests.

In our view, several elements of the ClearCheck system limit its effectiveness in fully preventing the recirculation of perpetrators of misconduct. First, ClearCheck is restricted to participating organizations and does not provide full system-wide or external partner access. As a result, there is no formal mechanism to ensure individuals recorded in ClearCheck are not simply re-employed in the aid sector, including with UN implementing partners and vendors. Second, up until last year, ClearCheck only covered serious cases of SEA and SH. Non-sexual misconduct, unsubstantiated allegations, or cases closed due to insufficient information often fall outside of the scope, creating major blind spots. For example, between 2017 and 2024, 3,129 individuals were investigated as a result of SEA allegations.¹⁰ 42% of those investigations were closed due to insufficient information or other reasons;¹¹ meaning their names may not be documented in ClearCheck. Third, inconsistent definitions/policies on types of misconduct across UN entities, and the lack of a universal standard operating procedure, limit the UN’s capacity to screen candidates. For example, the UN Joint Inspection Unit (JIU) found that some organizations choose not to enter individuals who resign during investigations into the ClearCheck system.¹² In addition, the JIU found that several participating organizations only use ClearCheck when a candidate discloses prior UN system employment, and only 14 participating organizations use ClearCheck to screen “affiliate personnel,” who have regular access to beneficiaries and other vulnerable populations.¹³

When an individual has no prior experience in the UN system, there are significant gaps in the UN’s ability to vet them for misconduct. The Misconduct Disclosure Scheme ([MDS](#)), a reference checking tool connecting over 300 civil society organizations, could be utilized for

⁸ *Id.*

⁹ *Id.*

¹⁰ Joint Inspection Unit, “Review of policies and practices to prevent and respond to sexual exploitation and abuse in the United Nations system organizations,” ¶11, [JIU/REP/2025/2](#).

¹¹ *Id.*

¹² *Id.* at ¶67.

¹³ *Id.* at ¶¶64-67.



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this purpose, but only a select few UN organizations complement their vetting process by checking the MDS when a candidate does not have prior UN experience.¹⁴

Vetting Implementing Partners and Vendors

The UN Partner Portal is a platform for civil society organizations to engage with UN partnership opportunities. Organizations interested in partnering with the UN register and upload organizational details for reuse across participating UN agencies.¹⁵ The UN is then able to screen organizations against the UN Security Council sanctions list and for due diligence, programmatic risk, and compliance with UN policies.¹⁶ Notably, however, the UN's ability to assess the capacity for preventing SEA of implementing partners is weak. The JIU found that eight organizations utilize the Partner Portal for this purpose; others "rely on agency-specific tools, while, to date, 11 organizations do not conduct assessments at all."¹⁷ Separately, several UN vendor sanctions systems exist to screen vendors against internal debarment lists and external sanctions/watchlists and then restrict or block those entities from receiving contracts.¹⁸ However, these types of vendor sanctions systems are not centralized across the UN system.

Without routine disclosure of information or a centralized and publicly accessible database, it becomes difficult to truly prevent terminated UN staffers or other excluded parties from circulating throughout the aid sector.

Strengthen Independence of UN Oversight Bodies

UN oversight bodies do not enjoy the same level of legal independence held by inspectors general in the United States. Even where independence is formally mandated, those mandates are not always upheld. For example, the investigations division of OIOS does not have an independent budget but is funded by the organizations it investigates. Per Transparency International, "this can lead to conflicts of interest which threaten to undermine the investigation."¹⁹ In addition, we have documented multiple instances in which UN oversight bodies claim they cannot share information with our office unilaterally; instead, they claim they must go through their parent agency's legal office. The apparent lack of independent decision-

¹⁴ *Id.* at ¶¶69-70.

¹⁵ IOM, the UN Secretariat, UN Women, FAO, UNFPA, UNHCR, UNICEF, UNOPS, WFP, and WHO participate.

¹⁶ See generally, UN Partner Portal "[Quick Guides](#)" and "[About Us](#)."

¹⁷ Joint Inspection Unit, "Review of policies and practices to prevent and respond to sexual exploitation and abuse in the United Nations system organizations," ¶79, [JIU/REP/2025/2](#).

¹⁸ See, for example, [UNOPS Vendor Sanctions](#).

¹⁹ Parrett-Jung, S. 2025. The role of internal audit in addressing corruption risks within the United Nations system. Bergen: Transparency International-U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute (U4 Helpdesk Answer 2025: 28).



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making capacity by UN oversight bodies is concerning and negatively impacts their ability to be transparent and respond to donor requests.

Conclusion

We look forward to continuing to flag opportunities for meaningful UN reform based on observations from our active and ongoing investigations and related UN accountability work. For more on USAID OIG's past and ongoing UN accountability work, please visit <https://oig.usaid.gov/our-work/un-accountability>.