



OFFICE OF INSPECTOR GENERAL

U.S. Agency for International Development

MEMORANDUM

DATE: May 18, 2026

SUBJECT: Strengthening Oversight of U.S. Voluntary Contributions to the United Nations

The USAID Office of Inspector General (OIG) has been at the forefront of conducting aggressive investigations and related oversight of U.S. voluntary contributions to United Nations (UN) agencies. This includes investigations into UNRWA-linked Hamas terrorists and perpetrators of the October 7 attacks in Israel, World Health Organization doctors that sexually abused women and girls in the Democratic Republic of Congo, and numerous investigations into fraud, corruption, and diversion of humanitarian assistance funded through UN agencies.

As we outlined at a recent House Foreign Affairs Subcommittee [hearing](#), USAID OIG investigators face persistent challenges in their ability to investigate and oversee U.S. funding made through voluntary contributions to UN agencies. Addressed intentionally by Congress and/or agencies responsible for administering foreign assistance programs, the following items would strengthen future award design and enhance the U.S. government's capacity to manage funds directed to UN agencies.

1. **Mandatory Reporting Requirements:** Despite clear obligations in USAID standard award provisions to report credible allegations of misconduct impacting U.S. funds directly to our office,¹ UN agencies routinely failed to do so. Delayed, and in some cases altogether absent, reporting by UN agencies has undermined our oversight efforts, resulting in an inability to pursue certain cases due to the expiration of applicable statutes of limitations, challenges in preserving material evidence, and the unavailability of former staff members available for testimony.
2. **Timely Access to UN Information:** USAID OIG has long flagged concerns about delays or outright refusals by UN agencies to share information in response to investigative inquiries. This would be remedied in part by including, as material provisions of an award or agreement, enforcement remedies for failure to provide prompt access. We have drafted proposed language to this effect for consideration and inclusion in the written agreements required to be entered into between the Department of State and international

¹ See U.S. Agency for International Development, Automated Directive Systems (ADS) 308mab M17(e); ADS 308mab M19-Alt (b).



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organizations receiving U.S. funding, as established by § 7048(h) of the 2024 Consolidated Appropriations Act.²

3. **Access to Personally Identifiable Information:** Establishing and enforcing, as an award condition, a requirement for the UN to share personally identifiable information of staff when necessary to determine credibility and investigate allegations of fraud, diversion, or sexual exploitation and abuse would improve capacity to hold bad actors accountable.
4. **UN Staff Vetting:** Uniformly requiring UN agency staff to undergo the same level of vetting as NGOs and contractors receiving U.S. funds would help ensure that taxpayer funds do not inadvertently support terrorist activity. This includes, for example, identifying potential [UN staff](#) with ties to U.S. designated terrorist organizations or other terrorist activity.
5. **Pre-Award Anti-terrorism Certifications:** USAID required applicants for assistance awards to make a pre-award certification that they had not, within the past three years, knowingly engaged in transactions or provided material support to individuals or entities subject to sanctions administered by the Office of Foreign Assets Control or sanctions established by the UN Security Council. This certification, however, applied only to grants to non-governmental organizations (NGOs), not contractors, and did not apply to public international organizations, like the UN. Establishing a similar pre-award certification at the Department of State and expanding it to UN agencies seeking U.S. voluntary contributions (and their sub awardees), would improve the Department's ability to make informed decisions about awards and provide for remedial enforcement measures for those that conceal ties to terrorist organizations.³

² The USAID OIG, Department of State OIG, and GAO have proposed use of the following new award language by the Department of State in connection with its awards to and agreements with UN and other International Organizations that would increase our access to information relevant to U.S. contributions: "As a material provision of this award, any cognizant United States Office of Inspector General and the U.S. Government Accountability Office (GAO) are, upon request, to be granted timely access to documents, data, systems, and personnel in the possession, custody, or control of [the recipient International Organization], that are related to the receipt or administration of U.S. assistance under this award [or agreement]. This includes information related to allegations of misconduct involving U.S. assistance. This access requirement also includes making available documents, data, systems, and personnel for all UN and International Organization recipient awardees and subawardees, deemed necessary for review by the requesting oversight body. Failure, within 60 days upon receipt of request, to provide any cognizant United States Office of Inspector General or GAO with access to records requested shall subject the recipient to enforcement remedies which could include cancellation, rescission, or recovery of funds, as well as notification to the United States Congress. Sharing information with the cognizant OIG and/or GAO will not prejudice the ability of UN and International Organizations to assert their equities, to include privileges and immunities, in the event of a judicial proceeding."

³ Examples of efforts to conceal such prior relationships in other nonpermissive environments include USAID OIG investigations involving two USAID-funded implementers, the American University of Beirut and Norwegian People's Aid. Both organizations reached False Claims Act settlements with the U.S. Department of Justice.



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We look forward to continuing to flag opportunities for meaningful reform of U.S. voluntary contributions to the UN, 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>.