



# **TOP MANAGEMENT CHALLENGES**

**Facing USAID in Fiscal Year 2025**

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



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# Message From the Inspector General

As required by the Reports Consolidation Act of 2000,<sup>1</sup> this annual report presents the Office of Inspector General's (OIG) independent assessment of the top management and performance challenges facing the U.S. Agency for International Development (USAID). OIG has identified three broad challenges for the Agency in fiscal year (FY) 2025, reflecting both organizational issues and ongoing global crises:

- **Challenge 1. Measuring Effectiveness, Tracking Results, and Improving Sustainability of U.S. Foreign Assistance**
- **Challenge 2. Relying on the United Nations and Other Public International Organizations to Distribute U.S.-Funded Aid in Unstable or Inaccessible Environments**
- **Challenge 3. Hiring and Retaining Skilled Staff and Adapting Programming to Address Emerging Priorities**

USAID is the primary government agency providing non-security assistance in regions experiencing evolving, complex emergencies such as Ukraine and Gaza. In addition, the Agency provides billions of dollars in humanitarian and development assistance in over 100 countries on behalf of the American people. This task becomes even more difficult when aid recipients are in regions devastated by war and conflict, facing famine or food insecurity, or struggling with droughts, wildfires, floods, and other natural disasters. Accordingly, priorities for USAID include:

- Ensuring that Agency resources are used effectively and reach the most vulnerable populations, which requires rigorous monitoring, tracking, and management.
- Obtaining quality information from partners and improving the reliability of agency systems—essential if the Agency is to protect U.S. taxpayer dollars from fraud, waste, and abuse.
- Increasing localization efforts, which can be difficult when local partners lack sufficient expertise or financial resources to implement U.S. programs or adhere to U.S. regulations.
- Addressing sexual exploitation and abuse and human trafficking in the foreign aid sector, which remains a persistent issue due to the inherent power imbalance between aid workers and beneficiaries.

In the coming years, USAID's programs and activities will continue to be shaped by an increasingly volatile global environment, as conflicts in the Middle East, Africa, and Eastern Europe impact development and humanitarian assistance efforts. International cooperation will be critical for overcoming these challenges, particularly as the world encounters new crises requiring coordinated

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<sup>1</sup> The Reports Consolidation Act of 2000 (Pub. L. No. 106-531) requires USAID to include in its performance and accountability report a statement by the Office of Inspector General summarizing the most significant management and performance challenges facing the Agency and the progress made in addressing them.

bilateral and multilateral responses. The Agency relies on the United Nations and other public international organizations to fulfill its mission but faces challenges in ensuring these organizations provide timely reporting of allegations of misconduct, such as fraud, sexual exploitation, and diversion, as well as unhindered access to information needed for effective oversight.

The three broad challenges we highlight in this report are not the only significant issues that confront USAID, nor does identification of an issue as a top challenge denote lack of attention on the Agency's part. Rather, most of these issues are long-standing, difficult challenges central to USAID's core mission and therefore likely will remain top challenges for years to come. Consequently, they require consistent, focused attention from USAID leadership and ongoing engagement with Congress and other stakeholders.

OIG is dedicated to providing independent oversight of USAID's programming and personnel. As such, in the coming year we will conduct audits, evaluations, and inspections to support the Agency as it addresses these and other challenges in an effort to improve U.S. foreign assistance. We will also continue to hold bad actors accountable by investigating allegations of corruption, misconduct, and other wrongdoing that threaten the integrity of USAID's vital programming.



**Paul K. Martin**  
**Inspector General**



## **Challenge 1. Measuring Effectiveness, Tracking Results, and Improving Sustainability of U.S. Foreign Assistance**

For USAID's humanitarian and development assistance efforts to achieve long-lasting impact, the Agency must be able to effectively track the progress of its programs and measure whether they are achieving their intended goals. Factored into this challenge is the need for program offices to comply with existing policies and procedures, obtain and use reliable data, and hold implementers (nongovernmental organizations or NGOs, contractors, and public international organizations or PIOs) accountable for results. Simultaneously, USAID must strengthen its efforts to detect and prevent corruption, fraud, and sexual exploitation and abuse, as these serious issues compromise the integrity of Agency programs, create reputational risk to USAID, and betray the very beneficiaries its programs are intended to assist.

### **Obtaining Quality Information From Partners and Improving Reliability of Agency Systems**

Obtaining current, complete, and accurate data from USAID-funded grantees and contractors (implementers) is essential for the Agency to identify shortcomings in current programs and modify projects as appropriate. This is particularly critical in places such as Ukraine where travel is highly restrictive, or Gaza where current U.S. embassy travel restrictions prevent USAID personnel from entering the region.

In 2022, USAID contributed \$1.7 billion to the World Bank’s Single Donor Trust Fund to reimburse the government of Ukraine for healthcare worker salaries. However, our February 2024 evaluation found that USAID did not verify the accuracy of the salaries in expenditure reports because it was not required to do so by its own policy.<sup>2</sup> As a result, one report initially included approximately \$42,500 in expenditures for 350 mobilized healthcare workers—a category of personnel excluded from salary reimbursement. By not verifying Ukraine salary reports, USAID risked supporting ineligible expenditures. The Agency concurred with our recommendation to implement an action plan to verify the accuracy of the Ukraine healthcare worker salary reports and remediate any deficiencies.

A similar challenge relates to the Agency’s management of indirect cost agreements, which are used to reimburse implementers for expenses such as office space, utilities, and salaries not directly tied to specific awards. A January 2024 audit found that limitations with USAID’s systems and the lack of a monitoring process limited the Agency’s ability to determine whether indirect costs are reasonable, allowable, and allocable.<sup>3</sup> We made six recommendations to help USAID negotiate and apply contractor and grantee indirect costs in compliance with government-wide and Agency requirements with the goal of preventing implementers and their subawardees from overcharging USAID for these expenses; four recommendations remain open.

We have previously alerted USAID about a vulnerability concerning the conversion of program funds from U.S. dollars into other currencies.<sup>4</sup> Without robust transparency and oversight, such actions expose USAID programing to increased risks of theft, embezzlement, diversion of funds, and fraudulent invoicing. In crisis areas, several different exchange rates exist, including unofficial or black-market exchange rates, which can vary by as much as 10 times more than the official rates. These large variances can encourage individuals to buy a currency in one market and sell it at a higher rate in another market in a process known as currency arbitrage. Allowing implementers to buy and sell currencies without any requirements to disclose their financial gains creates the risk that implementing organizations will benefit from U.S. government funding that is intended for beneficiaries.

In addition, implementers are not required to provide detailed documentation of their currency exchange transactions, which creates an opportunity for fraudulent activity by implementers, subawardees, or government entities. Agency policy directs implementers to ask USAID mission directors for the written procedures on converting U.S. dollars to local currency instead of requiring the mission director to provide the information at the onset of an award.<sup>5</sup> Our investigations have revealed that multiple USAID missions in the Middle East had no record of being contacted by any implementer regarding this requirement, had not expressly prohibited the use of black-market



<sup>2</sup> USAID OIG, [Direct Budget Support: USAID Ensured That the Government of Ukraine Adhered to Required Controls, but Did Not Verify the Accuracy of Salary Expenditures](#) (8-121-24-001-M), February 13, 2024.

<sup>3</sup> USAID OIG, [Negotiated Indirect Cost Rate Agreements: Opportunities Exist to Improve Processes and Data Management](#) (3-000-24-001-U), January 26, 2024.

<sup>4</sup> USAID OIG, [Update: Conversion of U.S. Dollars into Local Currencies in Conjunction With Complex Emergencies](#) (memorandum), September 27, 2023.

<sup>5</sup> USAID, [“Standard Provisions for U.S. Nongovernmental Organizations”](#) (mandatory reference for Automated Directives System [ADS] Chapter 303), Section M.15, December 29, 2022.

exchange rates by implementers, or were providing broad and unspecified country guidance that was more than 35 years old.<sup>6</sup>

Another critical area of focus is ensuring the reliability of Agency information technology (IT) systems, especially given USAID's increasing reliance on cloud computing services. Cloud computing provides Federal agencies with a shared pool of networks, servers, storage, applications, and services available 24/7 but also presents a risk of cybersecurity compromises, which could result in higher costs, litigation, loss of public trust, and reputational harm.

We found that USAID did not consistently follow three of five requirements for procuring and monitoring cloud computing services because Agency policy was unclear or inconsistently applied.<sup>7</sup> Without clear guidance on producing cost-benefit and alternative analyses for potential cloud service contracts, it is uncertain whether staff are conducting and using such analyses to reduce the risk of investing in services that are not cost effective or best aligned with the Agency's needs. USAID also did not consistently implement and document its monitoring of security controls or update security plans for the cloud computing systems we reviewed, an omission that may affect the security of the Agency's data.

USAID also needs to resolve long-standing weaknesses in its access controls for its IT systems. In FY 2020, our office recommended that USAID's Office of the Chief Information Officer (OCIO), with support from the Office of Human Capital Talent Management (HCTM), improve controls for verifying that accounts are disabled in a timely manner. OIG also recommended that the Chief Human Capital Officer maintain electronic records for employees leaving the Agency.<sup>8</sup> However, a recent audit found that after almost 4 years, OCIO and HCTM officials have not implemented our recommendations.<sup>9</sup> The officials explained that offboarding involves staff housed in various bureaus and offices across the Agency (including contracting officer's representatives, executive officers, Administrative Management Services officers, payroll specialists and human resources specialists). This decentralization of offboarding responsibilities reflects the diverse array of hiring mechanisms used at USAID. Despite repeated efforts, OCIO and HCTM officials have not succeeded in getting the other bureaus and offices to act on our two long-standing recommendations.

These ongoing weaknesses heighten the risk that USAID's information systems will be subject to account misuse and unauthorized access. In addition, the Agency lacks assurance that departing employees have returned IT equipment (laptops, tablets, cellphones, and other electronic devices) and diplomatic passports, paid outstanding debts, and stopped receiving transit benefits. Until USAID establishes a central mechanism to effectively manage these off-boarding processes, it remains vulnerable to unauthorized access, compromising the confidentiality, integrity, and availability of its information and systems.

<sup>6</sup> USAID OIG, [Update: Conversion of U.S. Dollars into Local Currencies in Conjunction With Complex Emergencies](#) (memorandum), September 27, 2023.

<sup>7</sup> USAID OIG, [Cloud Computing: USAID Needs to Improve Controls to Better Protect Agency Data](#) (A-000-24-004-P), September 16, 2024.

<sup>8</sup> USAID OIG, [USAID Generally Implemented an Effective Information Security Program for Fiscal Year 2020 in Support of FISMA](#) (A-000-21-004-C), January 7, 2021.

<sup>9</sup> USAID OIG, [USAID Implemented an Effective Information Security Program for Fiscal Year 2024 but Longstanding Weaknesses Persist](#) (A-000-24-005-C), September 19, 2024.





## Ensuring That USAID Program Offices Coordinate With Third-Party Monitors to Comply With Agency Requirements

USAID uses third-party monitors (TPMs) as a critical oversight tool to monitor program implementation, help the Agency and its partners make programmatic adjustments, and inform future design and decision making. The Agency has faced challenges in relying upon these entities to monitor USAID programs, particularly in nonpermissive environments (regions of the world subject to instability, inaccessibility, or insecurity).

For example, an April 2024 Government Accountability Office (GAO) report noted that USAID bureaus and missions providing assistance overseas have controls to prevent and detect fiduciary, counterterrorism- or sanctions-related, and security risks, but their ability to conduct direct oversight in conflict zones is limited.<sup>10</sup> Therefore, they rely largely on remote techniques, such as third-party monitoring for oversight. However, an absence of guidance for using third-party monitoring to detect risks has led to varying use of this method. The report also noted that USAID's Bureaus for Humanitarian Assistance and for Conflict Prevention and Stabilization have formal mechanisms to share lessons learned about risk management in conflict zones, but the entire Agency does not have such a mechanism. Without a way to systematically share lessons learned across conflict zones, missions cannot benefit from valuable practices employed in other regions and may unnecessarily make or repeat mistakes.

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<sup>10</sup> U.S. Government Accountability Office (GAO), *Foreign Assistance: USAID Should Strengthen Risk Management in Conflict Zones* (GAO-24-106192), April 30, 2024.



## Achieving Desired Humanitarian and Development Aid Outcomes

The need for sustainable foreign assistance in locations across the globe is exacerbated by extreme weather events. Heat waves, droughts, wildfires, floods, cyclones and other extreme weather events affect social and economic development and disproportionately impact the poorest and most marginalized communities. In April 2022, USAID announced a new, 8-year climate strategy with the following goals: to mitigate greenhouse gas emissions; conserve, restore, or manage natural ecosystems; and mobilize \$150 billion of public and private finance to address climate change. However, as we reported in July 2024, USAID did not have quality data to support its efforts to implement a comprehensive climate strategy.<sup>11</sup> Specifically, the data was not complete, accurate, accessible, or current due to the design of USAID's information system and related processes the Agency used to collect and report data on its climate change mitigation activities.

We also found weaknesses in USAID's processes for awarding funds, managing performance, and communicating climate change information. For example, USAID did not have a full inventory of its activity funding for climate change mitigation efforts. The Agency provided us with two different reports showing that it expended as much as \$2.6 billion on climate change mitigation from FY 2011 to FY 2021 but \$1.5 billion from FY 2013 to FY 2020. Moreover, the Agency's performance management process did not include key information on operating unit responsibilities, specific timeframes for achieving strategic targets, and measurable terms for assessing performance. The Agency also lacked efficient processes for communicating comprehensive, consolidated information on its mitigation efforts to internal and external stakeholders, which hindered its ability to transparently demonstrate its climate change mitigation work. We made five recommendations to improve USAID's ability to implement its climate strategy; all five recommendations remain open. Until it addresses these issues, USAID may not achieve the impact that is needed to tackle this global challenge.

Another key issue for USAID has been transitioning from providing short-term humanitarian assistance to long-term development assistance in response to prolonged crises. Over the past decade, USAID has focused on ensuring that development initiatives are sustainable, in part by fostering long-term commitments from local stakeholders. However, tailoring solutions to the specific needs and contexts of local populations has proved challenging.

In Burma and Bangladesh, USAID provided life-saving humanitarian aid to displaced Rohingya people and refugees. While USAID's food and nutrition assistance programming has been critical for addressing immediate needs of the Rohingya, the Agency has struggled to provide more sustainable aid in both countries. Our January 2024 audit found that USAID faced multiple challenges that impeded its ability to transition from humanitarian to long-term development assistance, including host country restrictions in Bangladesh and access and security issues in Burma.<sup>12</sup> USAID also lacked a centralized strategy for moving from humanitarian aid to development programming; instead Agency operating units worked under their individual mandates and governing strategies that shaped each unit's siloed response to the crisis. As a result, USAID did not have clearly defined end goals, specific and measurable outcomes, clear roles and responsibilities, or a roadmap for achieving those goals.

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<sup>11</sup> USAID OIG, [USAID's Climate Strategy: Limitations in Information Quality and Agency Processes Compromise Implementation](#) (5-000-24-002-P), July 17, 2024.

<sup>12</sup> USAID OIG, [Rohingya Crisis: Ongoing Challenges Limit USAID's Ability to Move From Humanitarian to Development Assistance](#) (5-000-24-001-P), January 19, 2024.

With respect to its localization efforts, USAID allocated only 1 percent of its total funding for the Rohingya crisis directly to local organizations due to limited local capacity as well as USAID’s bandwidth to monitor and support those organizations. We made six recommendations, five of which remain open, to improve USAID’s humanitarian and development assistance efforts in response to the Rohingya crisis.

## Balancing Localization Efforts With Staffing and Funding Limitations

USAID continues to prioritize locally led development—shifting funding and decision-making authority to local organizations to “foster sustainable results across its development and humanitarian assistance work.”<sup>13</sup> However, diversifying its partner base remains a significant challenge for the Agency.

In 2019, the Agency launched the New Partnerships Initiative (NPI), which creates avenues for new and underutilized partners—defined as organizations that have received less than \$25 million in awards from USAID over the past 5 years—to work with the Agency through an updated approach to partnering and procurement. As our audit found, USAID missions identified longstanding challenges to working with these partners, including their inexperience and USAID’s limited monitoring bandwidth.<sup>14</sup> Consequently, future localization efforts will need to take these challenges into account. The Agency concurred with our three recommendations for improving and streamlining USAID’s processes for measuring and reporting NPI performance results.

USAID has also faced challenges when working with local partners in Latin America and the Caribbean (LAC), where the U.S. government has significant economic, political, security, and humanitarian interests but also faces a range of external challenges, such as corruption and criminal activity. For example, our audit of three USAID missions found that they implemented certain required procedures before making awards to local organizations in the LAC region; however, they missed opportunities to enhance risk management for the program.<sup>15</sup> Two of the three missions did not request or document required reviews to identify whether proposed local implementers had any known involvement with drug trafficking. By not applying robust risk management practices into the pre-award process for local entities or ensuring full compliance with Federal requirements, USAID may subject itself to significant reputational harm that undermines U.S. credibility and interests.

Still, USAID is finding ways to hold implementers accountable for results. For example, with the emphasis on expanding locally led development, USAID has increased its use of fixed-amount awards (FAAs). Unlike traditional assistance awards, FAAs do not require the Agency to review implementers’ actual costs, reducing the administrative burden. As we reported, this approach holds implementers accountable for results throughout the life of a project, as the Agency only makes award disbursements once specific milestones are achieved.<sup>16</sup>

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<sup>13</sup> USAID, [What Is Locally Led Development? Fact Sheet](#), n.d., accessed September 3, 2024.

<sup>14</sup> USAID OIG, [New Partnerships Initiative: USAID Provided Technical Assistance to Support Implementation but Faced Challenges with Data Reliability, Partner Inexperience, and Mission Staff Capacity](#) (9-000-24-003-P), March 25, 2024.

<sup>15</sup> USAID OIG, [Pre-Award Risk Management: USAID and IAF Missed Opportunities to Enhance Risk Management of Local Entities in Latin America and the Caribbean](#) (9-000-24-004-P), May 30, 2024.

<sup>16</sup> USAID OIG, [USAID Conducted Risk Assessments and Monitoring for Sampled Fixed Amount Awards](#) (900024002-P), March 22, 2024.

## Preventing Aid Diversion and Fraud

Safeguarding the Agency’s programming from fraud, corruption, diversion, and other misconduct remains an ongoing challenge for USAID. Theft and diversion of cash assistance, food, medicine, and other commodities frustrates the intent of the United States, which contributed the aid, and deprives the people who are most in need of humanitarian assistance. Moreover, there is a high risk that aid and money could be diverted to foreign terrorist organizations (FTOs) or scammers seeking to defraud prospective job, grant, and visa applicants.

In November 2023, we highlighted the responsibility of organizations receiving USAID humanitarian assistance funding in Gaza to identify and report diversion to Hamas and other U.S.-designated terrorist organizations.<sup>17</sup> We followed up on that alert with an advisory in July 2024 that focused on the various oversight mechanisms available to USAID: self-reporting by Agency-funded implementing organizations, partner vetting, antiterrorism certification in contracts, and third-party monitoring.<sup>18</sup> Our past investigations have identified deliberate interference and efforts to divert humanitarian assistance in regions where FTO activity is prevalent. This includes: systemic coercion of aid workers by FTOs; imposition of taxes, duties, and fees on USAID awardees and beneficiaries; and FTO influence over beneficiary selection and the management of camps for internally displaced persons. Rigorous oversight and accountability measures by USAID in nonpermissive environments can help ensure that U.S. government-funded assistance is protected from diversion or fraud. For example, when bread provided under a USAID award was diverted from the intended beneficiaries at the al-Hol refugee camp in Syria,<sup>19</sup> the Agency disallowed \$17,940 in costs from the awardee, which was responsible for administering the USAID-funded assistance. USAID also informed all of its operational awardees across Syria that allegations related to diversion, fraud, waste, and abuse of U.S. resources must be reported to OIG. In another example, an implementing organization in South Africa agreed to pay \$671,914 to resolve allegations that it had knowingly submitted false payment claims to USAID for employees who had not performed any work.<sup>20</sup>



<sup>17</sup> USAID OIG, [Responsibility to Identify and Report Potential Diversion of U.S. Humanitarian Aid to Hamas and Other Foreign Terrorist Organizations](#) (advisory), November 3, 2024.

<sup>18</sup> USAID OIG, [Assessment of USAID’s Oversight Policies to Prevent the Diversion of Assistance to Hamas and Other Terrorist Organizations](#) (advisory), July 25, 2024.

<sup>19</sup> USAID OIG, [OIG Investigated and Found Food Diversion in the al-Hol Displaced Persons Camp in Northeast Syria](#) (investigative summary), August 30, 2024.

<sup>20</sup> Department of Justice, “South African Company Agrees to Pay \$617,914 to Resolve False Claims Act Allegations,” September 5, 2024.

One of our recent investigations found that a company in Zahle, Lebanon, which received \$89,798 from a USAID-funded grant to support ecotourism and agrotourism in Lebanon, employed children in various positions.<sup>21</sup> The company also transported the children to its location from what witnesses described as local Syrian refugee camps. OIG investigators interviewed the owner and manager who admitted to employing multiple minors. USAID terminated the grant and issued 2-year debarments for the owner and his company.

We have also notified the Agency about ongoing fraud schemes that misuse USAID's name, Agency symbols, and letterhead to defraud prospective job applicants, USAID grant applicants, and visa program applicants.<sup>22</sup> In these schemes, individuals and entities claim to represent USAID or a USAID-funded organization. The scammers require victims to pay fees associated with job, grant, and visa applications through wire transfers or mobile money applications. Hundreds of applicants defrauded by these schemes have lost hundreds of thousands of dollars.

## Stopping Sexual Exploitation and Abuse and Human Trafficking in the Foreign Aid Sector

As we have noted in previous Top Management Challenges reports, addressing sexual exploitation and abuse (SEA) and human trafficking in the foreign aid sector remains a persistent issue for USAID due to the inherent power imbalance between aid workers and beneficiaries. Our previous work identified gaps in USAID's approaches for preventing SEA in Agency award and monitoring processes and responding to SEA allegations.<sup>23</sup> USAID concurred or partially concurred with our nine recommendations to bolster the Agency's controls for preventing and responding to SEA of beneficiaries. However, two recommendations requiring the Agency to update its pre-award risk assessment process and acquisition and assistance award requirements to better prevent and detect instances of SEA remain open.

Still, preventing SEA remains a paramount challenge for USAID, necessitating urgent and sustained attention. According to the UN, in the first year of Russia's full-scale invasion of Ukraine, one-third of Ukraine's population of 41.4 million people was uprooted and forced to flee to safer areas within the country, in neighboring countries in Europe, or further abroad. Ninety percent of the people displaced by the war were women and children. Given the high displacement rates, women experienced an elevated risk of SEA and trafficking.<sup>24</sup>

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<sup>21</sup> USAID OIG, [Investigative Summary: OIG Investigation into Child Labor Allegations at Lebanese Company Results in Sub-Grant Termination and Debarment](#), July 11, 2024.

<sup>22</sup> USAID OIG, [Fraud Alert—USAID Name and Logo Used to Defraud Job, Grant, and Visa Applicants](#) (advisory), June 14, 2024.

<sup>23</sup> USAID OIG, [USAID Should Implement Additional Controls To Prevent and Respond To Sexual Exploitation and Abuse of Beneficiaries](#) (9-000-21-006-P), May 12, 2021.

<sup>24</sup> USA for UNHCR (the UN Refugee Agency), [5 Things You Should Know About the War in Ukraine](#), February 23, 2024.



A serious crime and a grave violation of human rights, trafficking in persons is a global challenge. In 2023, OIG issued an audit to assess USAID’s implementation of counter-trafficking in persons (C-TIP) programming in Asia. OIG found that USAID adhered to some C-TIP programming objectives but did not consistently integrate C-TIP across development sectors, engage with trafficking survivors, designate C-TIP coordinators, or track implementer compliance with trafficking in persons prevention and detection requirements. Though several actions have since been taken to address these findings, the Agency has yet to fully address OIG’s recommendations to align and update policies, procedures, and other key guidance to mitigate C-TIP risks across its missions in Asia.<sup>25</sup>

Similarly, a recent GAO report found that USAID had not taken the initial steps outlined in a 2019 memorandum from the Office of Management and Budget to identify risks of working with contractors who engage in human trafficking.<sup>26</sup> While the Agency communicated Federal anti-trafficking requirements to contracting officials through training and guidance, compliance with requirements was inconsistent. In addition, USAID had not yet taken a systematic approach to managing risks in contracting to better support the U.S. zero-tolerance policy for human trafficking.

<sup>25</sup> USAID OIG, *Counter-Trafficking in Persons: Improved Guidance and Training Can Strengthen USAID’s C-TIP Efforts in Asia* (5-000-23-001-P), September 11, 2023.

<sup>26</sup> GAO, *Human Trafficking: Agencies Need to Adopt a Systematic Approach to Manage Risks in Contracts* (GAO-24-106973), July 30, 2024.



## **Challenge 2. Relying on the United Nations and Other Organizations to Distribute U.S.-Funded Aid, Particularly in Unstable or Inaccessible Environments**

USAID depends on UN agencies and other public international organizations (PIOs) as well as NGOs and contractors to implement its programs. Due to access and security issues in some countries and regions, direct oversight and monitoring by USAID of these organizations continues to present a very real challenge.

### **Oversight of Public International Organizations in Nonpermissive Environments**

Cutting across a significant amount of oversight of U.S. foreign assistance is the extent to which USAID and OIG successfully obtain information from USAID-funded UN agencies about alleged misuse of aid funds.<sup>27</sup> USAID funds billions of dollars in humanitarian assistance and developmental programming through UN agencies across the globe, often in nonpermissive environments such as Gaza, Ukraine, Ethiopia, and Haiti. To conduct effective oversight, USAID and OIG must have access to the same level of information from PIOs that they receive from nongovernmental organizations or contractors.

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<sup>27</sup> USAID OIG, [\*Independent Oversight of USAID Funding to United Nations Agencies\*](#), September 11, 2024.



Our work has led to fundamental changes to USAID awards to UN agencies, including new requirements to promptly disclose to OIG credible allegations of fraud, corruption, and sexual exploitation and abuse. In August, we issued an evaluation of USAID’s due diligence of funding to PIOs, including UN agencies.<sup>28</sup> The evaluation focused on 67 PIOs that received approximately \$46 billion in USAID funding between FY 2019 and FY 2022 and found that USAID did not consistently use due diligence mechanisms for its pre-award processes and some of its post-award processes to ensure effective oversight of PIOs. We noted that when USAID does not use established mechanisms to ensure that a PIO is capable of safeguarding USAID funding, the Agency lacks information on potential vulnerabilities that may lead to waste or misuse within critical programming.

USAID’s disbursements to PIOs increased from \$5.3 billion in FY 2019 to \$24.2 billion in FY 2023. However, PIOs are not subject to the same rigorous oversight regulations as contractors, grantees, and other nongovernmental organizations. Still, USAID’s policies on PIO agreements include a variety of due diligence mechanisms to help ensure proper oversight of U.S. funds. Pre-award, USAID must perform organizational capacity reviews to ensure that a PIO is capable of safeguarding Agency resources. While USAID reports that it conducts these reviews every 5 years, our evaluation found that, for more than 70 percent of PIOs, USAID did not conduct the reviews in line with Agency guidelines.<sup>29</sup> Similarly, after making an award, USAID can rely on a variety of due diligence mechanisms,

<sup>28</sup> USAID OIG, [Public International Organizations: USAID Did Not Consistently Perform Expected Due Diligence](#) (E000-24-002-M), August 22, 2024.

<sup>29</sup> USAID OIG, [Public International Organizations: USAID Did Not Consistently Perform Expected Due Diligence](#) (E000-24-002-M), August 22, 2024.

including spot checks, that vary by agreement type. For the type of awards we reviewed, however, USAID generally did not perform spot checks and had limited guidance on how to conduct such reviews. Without more rigorous pre- and post-award mechanisms, Agency officials will lack access to information about vulnerabilities in a PIO's policy or organizational framework, project operations, and management that might lead to waste or misuse of U.S. aid funds.

## Oversight of Implementers in Nonpermissive Environments

Nonpermissive environments constrain USAID's ability to safely and effectively execute its programs. For example, attacks on implementing organizations in Ukraine have impacted their ability to reach nonpermissive environments and provide humanitarian assistance safely.<sup>30</sup> In Iraq, already challenging conditions have been compounded by the lack of effective coordination among NGOs, which has hindered their ability to engage collectively with local authorities and increase access to humanitarian programs.<sup>31</sup>

Both USAID and OIG encounter significant challenges in overseeing U.S.-provided assistance in Ukraine and Gaza due to the severity of the ongoing conflicts. U.S. government personnel face restrictions when traveling outside of a limited "Green Zone" around Kyiv and from entering any part of Gaza. Despite these limitations, we strive to alert the Agency about vulnerabilities in its aid programs and to ensure that USAID-funded organizations operating in nonpermissive environments report allegations of wrongdoing so that our criminal investigators can hold accountable those who corrupt or defraud taxpayer-funded programs. Given the challenges posed by Gaza's inaccessibility to OIG staff, we are working to secure both on-the-ground and geospatial monitoring contracts to gather information that will inform our oversight work and assess the effectiveness of USAID's ongoing programming. These initiatives, coupled with our audits and evaluations, will allow us to inform USAID and external stakeholders about the key risks and challenges to the Agency's programming.

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<sup>30</sup> USAID OIG, State OIG, DoD OIG, [\*Operation Atlantic Resolve Lead Inspector General Quarterly Report to Congress, April 1, 2024–June 30, 2024\*](#), August 15, 2024, p. 71.

<sup>31</sup> USAID OIG, Department of State OIG, Department of Defense (DoD) OIG, [\*Operation Inherent Resolve Lead Inspector General Quarterly Report to Congress, April 1, 2024–June 30, 2024\*](#), July 31, 2024, p. 58.





## Challenge 3. Hiring and Retaining Skilled Staff and Adapting Programming to Address Emerging Priorities

Hiring and retaining skilled and experienced staff has been a longstanding challenge for USAID. This includes ensuring adequate staffing to facilitate implementation of rapid-response programming—a critical need, given that USAID responds on average to 75 crises in 70 countries every year, providing humanitarian aid to tens of millions of people. In addition, budgetary planning remains difficult as the Agency only has full control of a portion of its allocated funding with the rest subject to congressional earmarks that may not reflect Agency priorities. Still, USAID may be able to adapt its programming to emerging crises by leveraging flexibilities in its policies and procedures.

### Managing the Composition and Allocation of Agency Staffing

Staffing challenges can lead to consequential outcomes affecting USAID's rapid-response programming in countries in crisis or where USAID-affiliated personnel are in danger. For example, during the United States' withdrawal from Afghanistan in August 2021, USAID did not have defined evacuation-related roles and responsibilities or a mechanism to accurately track implementing organization staff.<sup>32</sup> Further, staff and volunteers detailed to the effort did not consistently have the necessary

<sup>32</sup> USAID OIG, *Withdrawal From Afghanistan: USAID Faced Challenges Assisting in the Evacuation and Relocation of Implementer Staff* (E-306-24-001-M), March 18, 2024.

institutional knowledge or skills to perform evacuation-related tasks efficiently. One Agency official noted that because USAID is generally short staffed, it must rely on the same people to respond whenever emergencies arise, which exacts a physical and mental toll on those routinely involved in these crises. As a result, staff working for USAID-funded implementers said they felt that they did not receive enough support from USAID because the Afghanistan mission was understaffed before the evacuation. In addition, implementer staff said they had trouble accessing information from the mission during the evacuation.

Our evaluation also found that adaptable risk management strategies would help USAID respond to rapidly changing environments and unanticipated global crises. Specifically, USAID's Bureau for Asia, which provides technical and programmatic support to the USAID Mission in Afghanistan, did not conduct a comprehensive review of the risks that the mission in Kabul identified before the evacuation—likely due to the staff's limited knowledge and experience in this area. The lack of a full review may have weakened the Agency's response to the withdrawal. As USAID continues to be involved in complex crises globally, it should identify the organizational risks facing both its bureaus and their subordinate missions. USAID agreed with six of our seven recommendations to improve the Agency's preparation to support implementing organizations during a withdrawal; two recommendations remain open. In addition, USAID updated its Emergency Planning Overseas policy in September 2024.<sup>33</sup>

In an April 2024 report, GAO recommended that USAID strengthen its risk management in conflict zones, noting that the Agency

did not comprehensively assess or document ... the relevant fraud risks affecting its assistance in the three conflict-affected countries GAO selected for its review—Nigeria, Somalia, and Ukraine. As a result, USAID cannot ensure it has identified and is mitigating all relevant fraud risks in these countries. [For example], while the Nigeria and Ukraine missions conduct financial reviews to detect fiduciary risks, the Somalia mission has not. Additional oversight in conflict zones would strengthen USAID's ability to detect risks of misuse or diversion.<sup>34</sup>

During a review of the operations at USAID's Bureau for Global Health, GAO found that the bureau's staffing is not aligned with its mission and priorities.<sup>35</sup> GAO made six recommendations, including that USAID ensure the bureau develops a workforce plan, improves performance assessments and reporting, documents lessons learned from the COVID-19 pandemic, and institutionalizes efforts to address negative behaviors affecting the bureau's culture. USAID concurred with all of GAO's recommendations but they remained open as of September 2024.

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<sup>33</sup> USAID, Automated Directives System, Chapter 530, "Emergency Planning Overseas," September 12, 2024.

<sup>34</sup> GAO, *Foreign Assistance: USAID Should Strengthen Risk Management in Conflict Zones* (GAO-24-106192), April 30, 2024.

<sup>35</sup> GAO, *USAID: Management Improvements Needed to Better Meet Global Health Mission* (GAO-23-105178), June 9, 2023.

## Designating Resources While Controlling Only a Portion of the Agency’s Allocated Funding

Budgetary planning remains a challenge for USAID as it works to fulfill its humanitarian and development mandate. In part, this is because the Agency’s funding is subject to congressional earmarks as well as administration and State Department priorities. While some program earmarks align with USAID’s priorities, in general earmarks reduce the Agency’s ability to act flexibly and support the administration’s current goals. To ensure that such funds are spent in accordance with the intent of Congress, USAID is required to align its budget execution with earmarked purposes even if they do not fully align with broader Agency priorities. Further, it is difficult for USAID to allocate earmarked funds to other activities, such as economic growth, energy security, conflict mitigation. Our previous audit work has suggested that earmarks may create a mismatch between a country’s development and cooperation strategy and its budget allocation.<sup>36</sup>

In FY 2022, for example, congressional earmarks constituted 85.9 percent of the \$8.7 billion in funding for the Agency’s Economic Support Fund, development assistance program, and funding for Europe, Eurasia, and Central Asia. Similarly, earmarks comprised 84.9 percent of a base of \$9.2 billion in FY 2023 and 91 percent of an \$8.6 billion base in FY 2024. According to Agency officials, such a lack of flexibility hinders USAID’s ability to achieve its humanitarian mission without compromising overall effectiveness.

## Leveraging Flexibilities in Policies and Procedures to Adapt Programming to Emerging Issues

An ongoing challenge facing the Agency is the increasing need to respond quickly and efficiently to emerging global crises and humanitarian disasters. One approach is to adapt existing policies and procedures to reflect region-specific challenges. For example, USAID’s actions in Ukraine following Russia’s full-scale invasion can serve as a model for the Agency’s response to new complex emergencies in the future. When escalating hostilities in Ukraine increased the USAID Mission in Ukraine’s (USAID/Ukraine) need for flexible programming, the Administrator gave the mission approval to modify its awards to address wartime conditions and align with Ukraine’s recovery efforts.<sup>37</sup> USAID also developed a framework for the Agency’s response to Russia’s invasion that aligned with USAID/Ukraine’s development objectives and the government of Ukraine’s priorities for recovery.

In another example, the Agency authorized the use of a new procurement procedure—the Expedited Procedures Package for Responding to Outbreaks of Contagious Infectious Diseases (Outbreak EPP)—to accelerate awards for COVID-19 programming. The Outbreak EPP deviated from the Agency’s standard competitive procurement procedures by allowing USAID to issue new and

<sup>36</sup> USAID OIG, [Audit of USAID/Haiti’s Feed the Future North Project](#) (1-521-16-001-P), October 21, 2015. USAID OIG, [USAID Updated Guidance To Address Inconsistent Use of Journey to Self-Reliance Metrics and Misalignment of Missions’ Budgets](#) (9-000-21-002-P), December 23, 2020.

<sup>37</sup> USAID OIG, [Ukraine Response: USAID/Ukraine Adjusted Its Internal Processes and Strategies to Support Recovery Goals for Ukraine](#) (8-121-24-001-P), October 16, 2023.



modified contracts for COVID-19-related activities without resorting to full and open competition. In that undertaking, however, our audit found that USAID did not have complete and accurate information about how the Agency used the Outbreak EPP for COVID-19 programming.<sup>38</sup> In addition, USAID lacked an established process for periodically reviewing the continued need of the Outbreak EPP for other diseases. Complete information and periodic evaluation will enable the Agency to better manage its use of the Outbreak EPP approach when addressing future pandemics. USAID agreed with three of our four recommendations to address weaknesses in how the Agency tracks and reports Outbreak EPP information and assesses continued need; all recommendations are now closed.

USAID also has an opportunity to apply lessons learned and strengthen knowledge sharing so that missions can learn from their regional counterparts facing some of the same challenges. For example, during our audit of the efforts of selected missions in the LAC region to promote and strengthen democracy, staff identified a need for regional mission-to-mission knowledge sharing.<sup>39</sup> Without support from USAID headquarters to formally organize such learning, missions are not fully aware of lessons learned and program ideas that could enhance their influence and ability to respond to democratic backsliding and other global challenges. USAID concurred with both of our recommendations to improve the Agency's ability to respond to democratic backsliding in the LAC region; both remain open.

Similarly, our evaluation of USAID's planning, execution, and oversight of the distribution of humanitarian assistance to Gaza via the Joint Logistics Over-the-Shore (JLOTS) maritime corridor noted that USAID should examine its experience with JLOTS for lessons related to deconfliction, stakeholder coordination, and contingency planning.<sup>40</sup>



<sup>38</sup> USAID OIG, [\*COVID-19: Enhanced Controls Could Strengthen USAID's Management of Expedited Procurement Procedures\*](#) (4-000-24-001-P), October 18, 2023.

<sup>39</sup> USAID OIG, [\*Democratic Backsliding in Latin America and the Caribbean: Practical Guidance and Internal Coordination May Enhance USAID's Response\*](#) (9-000-24-001-P), January 23, 2024.

<sup>40</sup> USAID OIG, [\*USAID's Gaza Response: External Factors Impaired Distribution of Humanitarian Assistance Through the JLOTS Maritime Corridor\*](#) (E-000-24-004-M), August 27, 2024.



## USAID’s Progress on Addressing the Top Management Challenges for FY 2024

USAID has reported progress on addressing the challenge areas identified in last year’s [Top Management Challenges](#) report with the examples detailed below. However, OIG has not verified the completion of these actions or confirmed the extent of the Agency’s progress. For information related to USAID’s actions to address OIG recommendations, refer to our [Semiannual Reports to Congress](#).

### **Challenge 1. Curbing Corruption, Abuse, and Fraud That Degrade U.S. Foreign Assistance**

USAID reported the launch of a new action plan to assess and mitigate diversion risks across all humanitarian programs, including a review of Agency and third-party monitor (TPM) staffing levels and training. In addition, USAID plans to adapt its mandatory annual fraud awareness briefing for staff—developed in coordination with OIG—for its humanitarian assistance partners. USAID also reported engaging directly with UN agencies, including the World Food Programme, on reforms to better address diversion moving forward.

To target business email compromise schemes and mitigate the risks posed by currency exchange arbitrage, USAID highlighted its efforts to:

- Provide cybersecurity notices and annual cybersecurity awareness training to staff;
- Establish multifactor authentication with phishing- and disabling-resistant capabilities;
- Train contracting officer representatives how to detect business email compromise triggers, such as an urgency to act; and
- Coordinate with donors and UN agencies to work with governments or other authorities to limit abuse and arbitrage of foreign currency.

USAID reported that it is continuing to strengthen its controls to prevent and respond to SEA and other safeguarding violations by incorporating a new mandatory standard provision in its cooperative agreements and grants. This provision:

- Prohibits exploitation, sexual abuse, child abuse, and child neglect across USAID programs as well as inaction in response to these violations;
- Requires NGOs to report incidents immediately to OIG; the USAID agreement officer; and the Bureau for Management Responsibility, Safeguarding, and Compliance; and
- Requires partners with larger awards to develop a context-specific plan to assess risks and establish mitigation measures. USAID states that it has formally initiated rulemaking for similar requirements for contractors.

USAID also released comprehensive guidance—on SEA; human trafficking; and child exploitation, neglect, and abuse—for its staff and partners and established a centralized incident and case management system for documenting violations. According to the Agency, as of July 2024, it had trained more than 2,500 staff and partners on safeguarding and compliance topics, including on the new safeguarding mandatory standard provision for NGOs.

USAID established [disclosures@usaid.gov](mailto:disclosures@usaid.gov) as a reporting mechanism for safeguarding violations as well as other forms of social, economic, and environmental harm occurring in connection with USAID-funded programming.

## **Challenge 2. Mitigating Programming Risks, Increasing Accountability, Improving Stakeholder Awareness, and Strengthening Agency Documentation**

Acknowledging that the increased pace of obligations to awardees has made USAID’s oversight role more difficult, the Agency reported that it is addressing this challenge in the following ways:

- USAID’s Bureau for Planning, Learning and Resource Management (PLR) conducts Organizational Capacity Reviews every 5 years and reviews them annually to ensure they are current and accurate. PLR requires public international organizations to report all program irregularities, waste fraud, and abuse, and allegations of diversion, immediately or as soon as possible, to USAID and OIG.
- As of February 2024, all applicants for Bureau of Humanitarian Assistance funding must submit a Risk Assessment Management Plan (RAMP) to the bureau regardless of whether the operating context is deemed “high risk.” RAMP requirements now look beyond sanctions and terrorism risks to include the risk of fraud, waste, and abuse (including diversion) of Federal funds.
- To mitigate risks facing humanitarian assistance programs in Ukraine, USAID is working with OIG to encourage implementers to prevent and report fraud, corruption, and other crimes. The Agency is also using a TPM contractor to provide independent monitoring of USAID-funded humanitarian activities in Ukraine. According to the Agency, to date, TPM monitors have completed 100 site visits to 27 partners to verify and validate that USAID programs are reaching the intended populations.

- USAID also expanded its procurement staff from 6 to 14, including the addition of 4 contracting officers. According to the Agency, this will allow USAID to assign a dedicated team to each development sector for procurement management purposes. USAID is also working to increase employees' awareness of their roles, expectations, and responsibilities.
- In response to OIG's counter-trafficking in persons (C-TIP) audit,<sup>41</sup> the Bureau for Democracy, Human Rights and Governance (DRG) developed and implemented an action plan to improve CTIP-related guidance and training for missions. DRG is also working with the Department of State to streamline C-TIP standard indicators based on feedback from the missions.
- To ensure that documentation of results is sufficient to measure performance, evaluate partners, and fully understand risks, USAID reported issuing guidance reminders and conducting training on performance indicators and target results.

### Challenge 3. Optimizing the Workforce to Deliver on USAID's Mission

According to USAID, it plans to conduct the following actions to enhance the effectiveness and diversity of its workforce:

- Schedule an ongoing, annual workforce planning cycle at both the Agency- wide and the operating unit levels to begin in late summer FY 2025.
- Gather and use workforce data reporting and analysis tools to support decision making and engage senior leadership in this approach, clarifying their role in setting strategic direction.
- Develop a workforce planning governance structure, policy, procedures, and guidance. The Agency's forthcoming policy, Automated Directives System Chapter 417, "Workforce Planning," is in draft form.
- Establish an advisory Strategic Workforce Planning Council to set strategic direction on filling vacant positions, planning and budgeting allocation levels, expanding the Pathways Intern Program, developing recruitment and hiring dashboards to communicate the status of position openings, and implementing hiring reform initiatives for Civil Service and Foreign Service employees. Civil Service reform will focus on five pillars: career mobility, talent management (hiring) recruitment strategies, professional development, leadership development, and employee experience.

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<sup>41</sup> USAID OIG, [Counter-Trafficking in Persons: Improved Guidance and Training Can Strengthen USAID's C-TIP Efforts in Asia](#) (5-000-23-001-P), September 11, 2023.

The Agency also described its efforts to rebuild the USAID Mission team in Kyiv—hiring 54 new cooperating country national personal services contractors (CCNPSCs), filling 19 new direct hire positions, and increasing the number of offshore-hire U.S. personal services contractors. According to USAID, in May 2023, only 20 out of 73 CCNPSCs were living and working in Kyiv; by June 2024, this number had increased to 110.

USAID reported that it used small increases in operating expense funds from FY 2022 and FY 2023 to add nearly 300 new career positions and also created nearly 600 noncareer Federal employee positions using program accounts authorized by Congress for that purpose. About 400 of the 900 positions were previously designated as contractors.

In support of the global workforce, the Agency reports that it is working to expand and strengthen leadership, learning, and professional development opportunities; build on services that promote well-being, work-life balance, and organizational resilience; and strengthen human resources operations and systems. Underpinning these efforts is a focus on diversity, equity, inclusion, and accessibility.

## **Challenge 4. Implementing Financial and Information Technology Controls to Safeguard Taxpayer Resources**

To strengthen the Agency's financial management controls and close security gaps in its IT practices, USAID reported that it has implemented:

- An automated accruals methodology to minimize human error;
- A process to verify that employees' accounts are disabled in a timely manner in accordance with USAID policy; and
- A revised policy for maintaining the Agency's hardware inventory to include requiring the specific physical location of hardware assets to the degree possible.



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*Page 6:* Rohingya refugee camp, Cox's Bazar, Bangladesh.

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*Page 9:* Bags of USAID-funded food reach beneficiaries in East Africa.

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*Page 11:* Metro cars in Kyiv, Ukraine, decorated with USAID signs highlighting the signs of human trafficking.

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*Page 12:* Truck delivering aid to Gaza via the Joint Logistics Over-the-Shore (JLOTS) maritime pier, summer 2024.

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*Page 13:* Ukrainian flag flying between two buildings destroyed during Russia's invasion of Ukraine.

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*Page 15:* USAID-funded humanitarian aid distributed to families affected by the rains and floods in the Lambayeque region of Peru.

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*Page 17:* 3-D rendering highlighting areas of Ukraine impacted by Russia's invasion.

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*Page 18:* Aerial view of JLOTs maritime pier on the Gaza coast.

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*Page 19:* Rendering of an organizational review process.

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