



OFFICE OF INSPECTOR GENERAL

U.S. Agency for International Development

INFORMATIONAL MEMORANDUM

DATE: March 31, 2026

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Assistant Inspector General for Investigations (A) Date: 2026.03.31 13:59:47 -04'00'

SUBJECT: Continuing Oversight of U.S.-Funded Aid Programming in Gaza (Part I: United Nations)

Background

Interference by terrorists and other armed groups in U.S.-funded foreign assistance programs harms both U.S. taxpayers and the very beneficiaries whom U.S.-funded assistance supports.

On November 20, 2025, the USAID Office of Inspector General (OIG), an independent law enforcement and oversight agency with continued oversight of U.S. foreign assistance programming, initiated a proactive [investigation](#) called “Operation Stop the Carousel.” This investigation is designed to prevent the recirculation of individuals affiliated with terrorist groups across aid organizations receiving U.S. funding in Gaza, including United Nations (UN) and nongovernment organizations (NGOs).

USAID OIG has previously documented the risk that members of U.S.-designated terrorist groups may circulate across multiple aid organizations, particularly within the UN system, due to the [lack of adequate vetting mechanisms](#). Notably, USAID policies exempted UN organizations from the vetting process that the Agency required of NGOs and contractors. As a result, the U.S. government has relied on the UN to vet its own staff responsible for performing U.S. taxpayer-funded activities and programs on the ground.

Our ongoing independent investigation has already confirmed that several staff at the UN Relief and Works Agency for Palestine Refugees in the Near East (UNRWA) were Hamas members and/or participated in the October 7, 2023, terrorist attacks. An OIG investigation found evidence that Hafez Mousa Mohammed Mousa, an UNRWA-affiliated school principal, also served as an operative of the Hamas East Jabaliya Battalion and coordinated communications with other suspected Hamas members during the October 7 terrorist attacks. On February 11, 2026, based on our independent [investigation](#), the Department of State debarred Hafez Mousa Mohammed Mousa from working on U.S.-funded programs.

USAID OIG is in the process of referring numerous additional UNRWA-affiliated personnel for suspension or debarment consideration in the near future due to their affiliation with Hamas

and/or participation in the October 7 terrorist attacks in Israel. In addition, we have received and are investigating allegations of Hamas interference, diversion, and theft of humanitarian aid in Gaza, as well as allegations of smuggling contraband into Gaza through humanitarian aid shipments. USAID OIG continues to receive information not only from organizations receiving U.S. funds under their mandatory disclosure obligations, but also from whistleblowers, including aid workers and other confidential sources.

Beginning in December 2025, USAID OIG issued letters to seven UN agencies,¹ one non-UN international organization, 10 NGOs, and one contractor believed to have operated in Gaza after October 7, 2023. The letters requested:

1. Any and all documentation in which armed actors interfered with the delivery of or tampered with U.S.-funded humanitarian assistance. This includes documentation related to decisions on reporting such interference to the United States, including how your agency deemed that Hamas and other designated terrorist organizations were or were not involved in the interference;
2. A list with the date(s) and description(s) of Hamas (including any Gazan ministry) attempts to interfere with staffing or other operational decisions, directly or through intermediaries, and your agency's response to such attempts;
3. A description of your agency's interactions with Hamas (including any Gazan ministry), to include legal or operational permissions or justifications for doing so;
4. The full name, nationality, national id, contact information, and date and place of birth of employees working on or who worked on U.S.-government funded awards;
5. Copies of policies to vet employees or applicants (to include subrecipient organizations and employees) for current or past membership with Hamas and other U.S.-designated terrorists, to include a description of how known involvement with this organization would affect that individual's candidacy.

UN Agency Responses

A subsequent report will focus on NGO responses to the USAID OIG information requests. Below are the cumulative results of the UN Agency responses, both those with confirmed U.S.-government funding from USAID and those that were reasonably believed could have sought funding (also see Appendix):

¹ USAID OIG can request documents and information from UN agencies related to USAID-funded programs following USAID OIG receiving a disclosure of misconduct (see ADS 308mab M17 (e); ADS 308mab M19-Alt.). USAID OIG cannot enforce compliance against UN agencies but can escalate through Congress, USAID/State, and/or diplomatic channels if/when responses are insufficient.

- We did not receive the requested information from The World Food Programme (WFP) or United Nations Development Programme (UNDP) both of whom received U.S. government funding in Gaza.
- Four UN agencies provided partial responses: the United Nations Office for the Coordination of Humanitarian Affairs (OCHA), the United Nations Children’s Fund (UNICEF), the International Organization for Migration (IOM), and the World Health Organization (WHO).
- None of the responding UN recipients provided the requested information pertaining to their personnel.
- The responding recipients that received funding cited internal policies as well as UN systems and programs, e.g., UN Security Council Consolidated List, UN Clear Check, and the UN Global Center for Human Resources Services (OneHRCenter), as procedures for vetting staff.

As described below, each of these systems has vulnerabilities that limit the assurance that terrorist-affiliated staff have not been onboarded. The fact that U.S. awards to the UN and other public international organizations do not require prior vetting of personnel through a U.S. government system exacerbates this concern.

Constraints in Relying on the UN Security Council Consolidated List

As of March 2026, the UN Security Council Consolidated List (commonly referred to as the UN Sanctions List) includes 730 individuals and 272 entities subject to measures imposed by the Security Council. 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.

Constraints in Relying on UN Systems for Vetting of Personnel

I. ClearCheck

In response to USAID OIG’s requests, UN agencies cited “ClearCheck” as an additional means for vetting personnel. According to the UN:

ClearCheck is a highly secure online platform of a centralized database. It permits us to share information amongst UN entities, system-wide, on individuals (subjects) with a record of serious misconduct that warranted - - and, when applicable, would or could have warranted -- the end of the working relationship with a UN System organization.²

ClearCheck is limited in that it only contains records of individuals against whom allegations were substantiated or who resigned or separated from a UN entity during a pending investigation or disciplinary process.³ In its 2025 report, the UN Joint Inspection Unit (JIU) found that some organizations choose not to enter individuals who resign *during* investigations into the ClearCheck system.⁴ In addition, the JIU found that several participating organizations rely only on ClearCheck when an applicant discloses prior UN system employment, and only 14 of 43 participating organizations use ClearCheck to screen “affiliate personnel,” who have regular access to beneficiaries and other vulnerable populations.⁵ The inconsistent application of the system across UN organizations, coupled with the limited available data, can lead to less effective UN vetting processes.

2. OneHR Center

UN agencies responding to USAID OIG’s request also cited their use of the OneHR Center as an additional means of vetting. Candidates for employment with the UN generally go through the background verification mechanism of OneHR Center.⁶ The mechanism has four main components:

1. Verification of academic records;
2. Verification of former professional employment records, including records of professional misconduct;
3. Verification that the candidate is not listed on Interpol’s Red Notice (Most Wanted) list, the UN Security Council Consolidated Sanctions Database,⁷ the European Union (EU) Sanctions Regime Map, and the UN ClearCheck database for sexual misconduct; and

² In March 2025, the UN launched ClearCheck 2.0, which expanded the Sexual Exploitation and Abuse and Sexual Harassment matters contained in ClearCheck 1.0 to also include racism/racial discrimination and “other types of misconduct.”

³ [Factsheet on ClearCheck \(November 2025\)](#)

⁴ Joint Inspection Unit, “Review of policies and practices to prevent and respond to sexual exploitation and abuse in the United Nations system organizations,” [JIU/REP/2025/2](#). *Id.* at ¶67.

⁵ *Id.* at ¶¶64-67.

⁶ 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.

⁷ The UN Security Council’s sanctions database is not nearly as comprehensive as the U.S. database.

4. Qualitative suitability, including reference checks.

For the period between January 1, 2024, and December 31, 2024, the “Practice of the Secretary-General in Disciplinary Matters and Cases of Possible Criminal Behavior Report”⁸ identified the following cases among the UN’s 33,000 core secretariate personnel⁹:

- 2 cases of sexual exploitation and sexual abuse;¹⁰
- 23 cases of fraud, misrepresentation, and false certification;¹¹ and
- 3 cases of theft and misappropriation.¹²

These 28 cases represent only 0.08% of the core secretariat personnel. By comparison, the federal government rate of disciplinary actions is estimated to be 0.25%-0.9%, which is 3 to 11 times higher than the UN.¹³ This suggests misconduct in the UN may be under-reported, under-investigated, or resolved through alternative means that are not captured through this disciplinary report. Additionally, while the UN adopts EU sanctions reporting as part of its vetting process, it does not incorporate U.S. sanctions. These issues raise concerns about the comprehensiveness and transparency of UN vetting procedures, especially when executing foreign assistance programs funded by the United States.

Additional Responses from the UN Regarding Questions about Armed Actors and Hamas/Gazan Ministry Interference in Gaza

In addition to requesting information about UN staff and vetting procedures, OIG also asked about armed actors and Hamas/Gazan ministry interference in the delivery of U.S.-funded aid, as well as how UN agencies determine what to report about such interference. Since October 7, 2023, no UN agency has self-reported to USAID or USAID OIG any instance in which Hamas interfered in the delivery of aid.

Neither OCHA, UNICEF, or IOM reported that “armed actors [had] interfered with the delivery of or tampered with U.S.-funded humanitarian assistance.” UNICEF reported three instances of looting in accordance with award requirements. None of the agencies that responded reported any instances of “Hamas (including any Gazan ministry) attempts to interfere with staffing or other operational decisions, directly or through intermediaries.” IOM noted that in regard to its’ programming in Gaza, “[e]xternal actors do not participate in [the]

⁸ UN General Assembly, *Practice of the Secretary-General in disciplinary matters and cases of possible criminal behaviour, from 1 January to 31 December 2024* ([A/80/533](#)), November 13, 2025.

⁹ [U.N. Personnel by Organization](#)

¹⁰ UN General Assembly, [A/80/533](#), at ¶ 10.

¹¹ *Id.* at ¶ 11.

¹² *Id.* at ¶ 13.

¹³ Calculated based on the number of federal (non-military) employees as reported by [OPM](#) and adverse action reporting data by [MSPB](#)

decision-making processes.” In response to our request for “a description of your agency’s interactions with Hamas (including any Gazan ministry),” the agencies stated that their interactions were in accordance with UN principles and Security Council resolutions. However, OCHA stated that:

[it] engages in negotiations to secure humanitarian access across the Occupied Palestinian Territory. OCHA’s engagement with Hamas and other non-state actors in Gaza is essential to ensure the performance of functions that are explicitly required by the intergovernmental organs of the United Nations.

OCHA may have, when operationally necessary, practical working-level contacts with Hamas and other non-state actors to ensure no interference in humanitarian operations in line with its mandate, international law and humanitarian principles. These engagements occur at a strictly technical, administrative level and are limited to technical officials and operational focal points within relevant departments who exercise administrative functions on the ground.

Considerations for the Department of State, USAID, and Congress

The above information pertaining to UN vetting of staff leaves U.S. taxpayer dollars at risk of funding the salaries of individuals associated with terrorist organizations. USAID OIG’s investigation into the UNRWA staff’s affiliation with Hamas—which has already resulted in the debarment of one employee who operated a Hamas battalion on October 7, 2023—remains active and ongoing.

As outlined above, the UN’s own vetting system contains numerous shortcomings and vulnerabilities. Without clear policy or statutory requirements to expand U.S. vetting processes to UN personnel, the U.S. government will continue to lack the requisite information necessary to determine UN staff affiliation with U.S.-designated terrorist organizations.

OIG has consistently raised concerns about UN cooperation, transparency, and willingness to provide information to investigators who request UN records pertinent to U.S.-funded awards. We continue to encounter [significant delays in self-reporting from the UN](#). In addition, when we do receive an allegation, we often encounter delays from the pertinent UN agency or an outright refusal to provide OIG with the investigative information it needs to assess the claims. In a case study reviewing 10 different matters involving five different UN agencies, the response time ranged from six months to more than two years.

In another instance, the delays were so significant that they prevented OIG from taking any further action with the Department of Justice due to an expired statute of limitations. Tightening mandatory disclosure requirements for the UN and adding clear consequences for failure to comply or attempting to conceal allegations will improve accountability and deter

misconduct. To this end, it is essential that UN agencies comply with applicable reporting requirements and that the Department of State requires OIG and the Government Accountability Office to have access to UN records as a material contractual provision, as mandated by Section 7048(h) of the 2024 Consolidated Appropriations Act.

Not later than 30 days after the date of enactment of this Act, the Secretary of State, in coordination with the Administrator of the United States Agency for International Development, shall seek to enter into written agreements with each international organization that receives funding appropriated by this Act to provide timely access to the Inspectors General of the Department of State and the United States Agency for International Development and the Comptroller General of the United States to such organization's financial data and other information, including investigative records and reports of sexual misconduct, relevant to United States contributions to such organization, as determined by the Inspectors and Comptroller General.

As Congress and the administration consider practical policy changes and modifications to award clauses with the United Nations, USAID OIG will continue to use all of its sources, methods, and diplomatic channels to further investigations into the misuse of taxpayer dollars in Gaza and across the world. We will continue to encourage aid workers or other personnel operating in the region to confidentially report allegations of any misuse of U.S.-funded aid, including fraud, corruption, or diversion, to [USAID OIG's Hotline](#). Further, we will leverage our decades of global investigative experience to stay ahead of potential challenges in foreign assistance and to inform decision makers of any fraud risks we encounter.

APPENDIX

UN Response Tracking Chart

Recipient Name	Date Request Sent	Confirmed Receipt? (Y/N)	Date Response Requested	Extension Requested?	Response Received? (Y/N)
United Nations Office for the Coordination of Humanitarian Affairs (OHCA)	12/16/2025	Y	1/15/2026	Y 1/30/2026	Y 2/6/2026
United Nations Children's Fund (UNICEF)	12/16/2025	Y	1/15/2026	Y 1/31/2026	Y 1/30/2026
United Nations Population Fund (UNFPA)	12/16/2025	Y	1/15/2026		Y 1/16/2026
World Food Programme (WFP)	12/23/2025	Y	1/22/2026		N Emailed 2/10/2026; working on response
International Organization for Migration (IOM)	1/5/2026	N	2/4/2026		Y 2/12/2026
United Nations Development Programme (UNDP)	12/23/2025	N	1/22/2026		N
World Health Organization (WHO)	1/26/2026	Y	2/24/26		Y 3/16/2026
International Committee of the Red Cross (ICRC)	2/4/2026	N	3/6/2026		Y 3/4/2026 No funding