

(SBU) I wanted to share this with you in the event that you do receive information or an instruction for USAID to fund GHF. Today I pulled together a small team from OAA, GC, BHA's Middle East Office as well as our Risk Management Division. We will want to see what the Secretary has approved, but in the absence of that memo I am outlining the typical steps required to provide funding for a new partner in Gaza. There are both legal and policy requirements – many of which could potentially be waived – though it will require direct involvement of the USAID Administrator and/or Secretary of State. Thank you for giving us some lead time to think this through; and let's meet at your convenience if you do see a signed memo.

(SBU) Given USAID's drawdown, we have heard that the Department of State may be preparing to take this on directly. If we do need to move it forward, below are the basic steps USAID would normally follow to provide funding. This is not an exhaustive list and we are not delving into the actual award-making process as we don't know details on the scope of any programming. But it's an initial list of items that will need to be resolved in short order. Please let us know if you have any questions.

- **Legal Considerations:**

- *SAM registration:* In order to get USG funding, GHF would need to be registered in [SAM.gov](https://sam.gov) for funds to be transmitted to GHF.
- *Congressional Consultation/Requirements:*
 - We will need to work with LPA and State H on a Consult Note. Prior to the obligation of any funding, Congress must be consulted for any planned humanitarian assistance in Gaza, including the amount and anticipated uses of such funds. (See Section 7073(g) of the Further Consolidated Appropriations Act, 2024, as incorporated by Section 1102 of the Full-Year Continuing Appropriations and Extensions Act, 2025, P.L. 119-4).
 - The Department of State has also previously certified and reported to Congress on the oversight policies, processes, and procedures that have been established by State and USAID to prevent diversion to Hamas and other terrorist groups in Gaza, including specific actions that would be taken should such assistance be diverted, misused, or destroyed. (See Section 7073(a) & (b) of the Further Consolidated Appropriations Act, 2024, as incorporated by Section 1102 of the Full-Year Continuing Appropriations and Extensions Act, 2025, P.L. 119-4).
 - Any deviations from what has been reported to Congress may invite Congressional scrutiny.

- Vetting is required in West Bank Gaza for IDA funded programs, both as a function of law and policy, in light of the material support statutes (18 USC 2339B).

- **Programmatic and Policy Considerations for USAID Award Oversight:**

- *Pre-award survey (PAS)* This would be required since GHF has not received previous USG funding. A PAS is done to assess internal controls, particularly on accounting/finance and human resources, to make a determination that an organization has appropriate management and financial controls in place to manage USAID funds and implement programs.
- *Pre-award risk assessment (PARA):* All NGO organizations require an organizational PARA and based on the PAS findings, specific conditions could be inserted into a USAID award.
- *Counterterrorism (CT) Pre-award vetting.* As noted, CT partner vetting is statutorily required and is a risk mitigation tool to mitigate USAID funding from reaching and supporting terrorists. USAID CT vets primes, subawardees, and any vendors/suppliers who received more than \$25K in USAID funding. Mission Order 21 includes details on CT vetting in WBG. Additionally information about CT vetting in WBG can be found in classified systems.

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On Thu, Jun 12, 2025 at 7:02 AM Dianna Darsney de Salcedo <ddarsney@usaid.gov> wrote:
Good morning, Carolina,

I must have lost the thread as I wasn't tracking a decision with S and heard this would be all managed at State. There were significant legal obstacles to any GHF award (issues like registration, vetting, a pre-award survey for a new partner) so once you see any memo please do pass it along and we can look at how any move forward is possible.

Sounds like the vision for State to do this contracting action did not get any traction?

We will huddle today with a small group here and get back to you in case there are outstanding issues.