



## SHUSHAN STREET: AFTER CONGRESSIONAL BAN ON UNRWA FUNDING, BIDEN ADMINISTRATION MUST FIND A PLAN B

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Less than a week separated two significant developments pertaining to the humanitarian catastrophe in Gaza. On March 18, the authoritative international monitoring system known as the Integrated Food Security Phase Classification Initiative (IPC) issued a grim new [report](#) showing that the Gaza Strip's entire population is subject to "high levels of acute food insecurity." With the crisis fast [accelerating](#), Gaza could soon [experience](#) over 200 deaths from starvation per day and the [most intense famine](#) since World War II.

Five days after the IPC report came out, Congress passed and President Biden signed into law a major Fiscal Year 2024 (FY24) [spending package](#) that includes a one-year ban on US funding for UNRWA in the State and Foreign Operations (SFOPs) appropriations bill. UNRWA, the UN agency charged with providing essential services to Palestinian refugees, is at the center of the humanitarian aid effort in Gaza. Following Israeli claims in January that 12 UNRWA employees participated in the October 7 attack against Israel, UNRWA's leadership summarily fired the individuals to indicate how seriously it was taking the allegations, which – if proven – would constitute a serious breach of UNRWA's [humanitarian principles](#) and commitment to [neutrality](#). Subsequently, the Biden Administration [announced](#) it was suspending contributions to UNRWA and at least 16 other UNRWA donor countries [followed](#) suit – freezing [over half](#) of UNRWA's anticipated 2024 funding. Two [investigations](#) of the organization are ongoing and, appropriately, UNRWA officials have expressed willingness to reform in accordance with their findings and those of a separate [audit](#) by EU-appointed experts of UNRWA's systems to prevent involvement of its staff and assets in terrorist activity. Maintaining the integrity of UNRWA's operations in Gaza and preventing infiltration by Hamas is critical.

With a moratorium on US funding to UNRWA in place until March 25, 2025, how can the US support the life-and-death effort to surge humanitarian aid into Gaza? In other words, what is the Plan B that US officials must speedily assemble and implement?

Before diving in to answer these questions, it's important to emphasize two things.

First, even the best possible Plan B will be inferior to Plan A – which would have entailed robust funding for UNRWA in the just-passed FY24 SFOPs bill along with an off-ramp from the Biden Administration's temporary funding pause. The latter part would have included assessment of the results of the ongoing investigations of UNRWA and implementation of any necessary reforms. As other NGOs operating in Gaza have [made clear](#), "UNRWA's supply of vital shelter, food, and basic services like sanitation, as well as the use of infrastructure by other aid organizations, is irreplaceable" and its 13,000 staff members in Gaza "far outstrip[s] the collective capacity of the rest of the humanitarian sector in the territory."

Second, implementing the best possible Plan B is vitally important. Saving the lives of children and other innocent Palestinian civilians is a moral imperative. Beyond that, it is vital to the American national interest that the US not be viewed in the eyes of much of the world as complicit in the

ongoing, [man-made humanitarian catastrophe](#) in Gaza. Already, the world holds the US at least partly responsible for failing to exercise sufficient leverage in restraining Israel's military action. Now, by banning funding to UNRWA, the US government is kneecapping the humanitarian aid effort. This undercuts America's international standing and relations with the Global South, as well as our leadership among liberal democratic states.

In addition, the US national interest in regional stability is at stake. UNRWA's operations have helped to stabilize not only Gaza and the West Bank (including East Jerusalem), but Jordan, Lebanon, and Syria, where UNRWA provides food, healthcare, and education to Palestinian refugees. Even Israeli [government](#) and [military](#) officials oppose ending UNRWA's operations during the war, while former senior Israeli security brass have [warned](#) that the dire humanitarian situation in Gaza "poses a threat to [Israel's] vital national interests."

So while there is no ideal Plan B, it is imperative that the US government construct and implement the best possible alternative. Here are the key elements:

- 1. Increase contributions to other UN agencies and NGOs providing aid in Gaza:** While no group of aid organizations can approach UNRWA's capacity on the ground, the Biden Administration should allocate non-earmarked funding to other UN agencies (e.g. World Food Programme and World Health Organization) and NGOs (e.g. ANERA, Oxfam, International Committee of the Red Cross and Palestinian Red Crescent Society, Palestine Children's Relief Fund, Doctors Without Borders, CARE, and Norwegian Refugee Council) doing life-saving work in Gaza. While the SFOPs FY24 bill cut Economic Support Funds to the West Bank and Gaza by \$50 million, it includes an \$800 million increase in International Disaster Assistance. Between those funds and additional monies that will hopefully pass in a [national security supplemental](#) (pending action by the House leadership), the Biden Administration should direct substantial new funds to these aid organizations for their work in Gaza. Unlike UNRWA, which coordinates with Gaza's Hamas-controlled municipal authorities as necessary regarding infrastructure, NGOs that receive grants from USAID are subject to a strict no-contact policy with Hamas. Should the need increase for these organizations to undertake work requiring such communication – such as coordinating with civil servants regarding garbage, sewage, and water infrastructure to maintain a tent city – USAID would need to revisit certain [regulations](#) (e.g. [Mission Order 21](#)) and humanitarian organizations and employees would need protection from [anti-terror statutes](#) and [lawsuits](#) under the False Claims Act.
- 2. Encourage other countries to restore, and increase, their contributions to UNRWA:** With the US – previously the [top donor](#) to UNRWA – unable to resume funding over the next year, it will be vital for the Biden Administration to persuade other countries to not only restart their funding, but increase contributions to make up the shortfall and sustain UNRWA's [operations](#). If the US is able to increase its funding to other UN agencies and NGOs (as prescribed above), other countries could temporarily cut their contributions to those organizations and shift funding to UNRWA. A number of donors have resumed funding – in at least one case, with [US encouragement](#) to do so. To give other countries the political cover they may need domestically to restart and increase funds, the Biden Administration should make a public statement on UNRWA following review of interim reports from the UNRWA investigations. (Canada's [statement](#) in early March provides a useful template.) In addition, the Biden Administration should appeal to Gulf Arab states to contribute generously to UNRWA. While Saudi Arabia, Qatar, and UAE have made new [pledges](#),

the Gulf's share of UNRWA funding has [not recovered](#) since these countries followed the Trump Administration in cutting aid to UNRWA in 2018.

3. **Explore any remaining avenues for providing US funding to UNRWA:** While the FY24 SFOPs prohibition on funding to UNRWA was written broadly, it may not constitute a complete ban for the coming year. One analyst has [suggested](#) that UNRWA could be funded through emergency or supplemental funding to an agency not covered by the restrictions, such as the Department of Defense. The Biden Administration and Congress should explore this possibility.
4. **Use US leverage to facilitate a massive influx of aid into Gaza:** According to copious reliable [reporting](#), including from [Israeli monitoring organizations](#), Israel is preventing humanitarian aid supplies from reaching Palestinian civilians, particularly in northern Gaza. The Biden Administration must harness US leverage to push Israel to end unnecessary restrictions and facilitate a surge of trucks carrying humanitarian aid into Gaza. This is necessary to curtail the severity of the looming famine and for the sake of compliance with US law, including [National Security Memorandum 20 and Section 620I](#) of the Foreign Assistance Act. The US should also [push Egypt](#) to streamline procedures for aid agencies to procure goods locally and exempt imported aid from tariffs.
5. **Expedite additive options, such as establishing a maritime corridor:** Rounding out Plan B, the Administration can fast-track additive options like establishing a maritime aid corridor facilitated by construction of a temporary pier on Gaza's coast, as President Biden has [ordered](#). "[Last resort](#)" measures like air and sea deliveries are expensive and far from a sufficient solution, but worth pursuing alongside other options for surging humanitarian aid into Gaza. Urgently securing a negotiated ceasefire that facilitates the release of the remaining hostages held in Gaza is a crucial piece of the equation.

Looking ahead to the 2025 fiscal year – as legislative work is already getting underway – the priority should be to ensure the appropriation of funds for UNRWA. Democrats should unite behind this goal and urge the Biden Administration to adopt a more forward-leaning posture. The need for this will likely be apparent on the ground in Gaza over the coming months. The pending investigations will likely point to needed reforms and donor countries should work with UNRWA in helping to facilitate their implementation and enhanced security vetting. In particular, the US should engage directly on this; in resuming funding going forward, it is advisable for the US to allocate funds to UNRWA specifically for enhancements to security vetting.

Tragically for Palestinian civilians in Gaza, right-wing elements [in the US](#) and [Israel](#), who want to defund UNRWA because they think it will erase the issue of Palestinian refugees, have won this round through an "[unconscionable](#)" blockage of US funds to UNRWA that will lead more children and other innocent civilians to die. Fortunately, their attempts to [permanently ban](#) US funding for UNRWA did not succeed (this time). While it is desirable to eliminate the need for UNRWA, the way to do that is to settle refugee claims as part of an overall solution to the Israeli-Palestinian conflict that includes the establishment of a Palestinian state. The keys to UNRWA's operations would then be turned over to authorities in Palestine and the other countries hosting UNRWA missions.

Meanwhile, in the interest of Palestinian welfare, Israeli and regional stability, and US leadership and national security interests, the Biden Administration and allies in Congress must work together to implement the best possible Plan B – while gearing up for the fight to restore funding to UNRWA.