



**Statement before the
Senate Committee on Banking, Housing, and Urban Affairs**

***“Afghanistan’s Future:
Assessing the National Security,
Humanitarian and Economic
Implications of the Taliban Takeover.”***

A Testimony by:

Sue E. Eckert

Senior Associate, CSIS Humanitarian Agenda;

Lecturer, Jackson Institute for Global Affairs;

Senior Adviser, International Peace Institute

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Dirksen Senate Office Building 538

Chairman Brown, Ranking Member Toomey, and distinguished members of the Committee, thank you for the opportunity to appear before you today to discuss the critically important implications of the Taliban's takeover for US national security, and the future of Afghanistan.

My views are informed by many years seeking to refine economic tools to promote US national security and foreign policy objectives. As a staff member of the House Committee on Foreign Affairs overseeing export controls and economic sanctions, and then in the Executive branch administering US dual-use export controls, and subsequently in academia and think tanks, I've worked to realize the potential of economic and financial measures to promote international peace and security. My research and efforts to reform these instruments at both the UN and domestic levels entail a better understanding of the objectives, utility, and limitations of such measures (including unintended consequences), as well as the circumstances when sanctions are most likely to be effective. While popular discourse continues to be skeptical of sanctions, I believe economic coercion, carefully crafted and effectively implemented, remains a critical component of US national security.

Dire and Deteriorating Humanitarian Situation in Afghanistan

Even before the Taliban took control in August, Afghanistan was experiencing one of the worst humanitarian crises in the world. After decades of conflict, the country has been mired in overlapping humanitarian crises – including the COVID-19 pandemic, climatic changes and 2021 drought, persistent political insecurities, and increased violence. The Taliban's return to power—and the ensuing political instability—compounded these challenges. Responding to the severe and worsening humanitarian situation, UN Secretary-General António Guterres launched an urgent flash appeal on September 13 for \$606 million in additional funding, emphasizing the urgent need to ensure that the international community's humanitarian response “saves lives but also saves livelihoods.”¹ Donors responded by pledging \$1.2 billion for the Afghani population.

Over 18.4 million people (or half of Afghani citizens) need humanitarian assistance, with more than 30 percent of the population facing emergency or crisis levels of food insecurity; half of all children under five facing acute malnutrition.² This increase in food insecurity can be partially attributed to rising food and fuel prices, disappearing jobs, and the drought-induced destruction of 40 percent of the country's wheat crop. In the first half of 2021, there were 5,183 civilian casualties and injuries, with a sharp increase between May and June following the withdrawal of international military forces and an uptick in fighting; more than 4 in every 10 civilian casualties were women and children. Additionally, at least 570,000 individuals have fled from conflict in 2021, while a record

¹ <https://www.un.org/sg/en/node/258992>

² OCHA's *Flash Appeal: Snapshot of Immediate Humanitarian Response Needs* (Sept – Dec 2021) <https://www.humanitarianresponse.info/en/operations/afghanistan/document/flash-appeal-snapshot-immediate-humanitarian-response-needs-sept-%E2%80%93-dec-2021>

757,000 Afghans were deported or returned from neighboring countries between January and August, despite suboptimal return conditions.³

According to the United Nations Development Programme's most recent assessment, Afghanistan is heading toward universal poverty. As much as 97 percent of the population is at risk of falling below the poverty line by mid-2022—compared to the current poverty rate of 72 percent—unless the country's political and economic crises are curtailed. The ramifications of the Taliban's takeover are accelerating these crises, particularly due to frozen foreign reserves, long-standing sanctions against the Taliban, collapsing public finances, and increasing pressure on the banking system.

On October 3rd, the European Union's foreign policy chief Josep Borrell, warned that Afghanistan is facing a collapse of its economic and social systems that risks turning into a humanitarian catastrophe, which is dangerous not only for Afghans, but for the region and international security as well. Since the Taliban took power in August, food prices have jumped more than 50% as the freezing of \$9 billion of Afghanistan's assets held in foreign central bank reserves and the withdrawal of foreign income stokes inflation. The Afghan banking system is largely paralyzed, with people unable to withdraw money, while the country's health system - which was heavily dependent on foreign aid - is close to collapse.⁴

The World Food Program (WFP)'s Situation Update in late September reported that food security is deteriorating rapidly with only 5% of households consuming adequate levels of food.⁵ WFP Executive Director and Former US Congressman David Beasley pleaded, "The time is now, we cannot wait six months – we need the funds immediately so we can move the supplies, to pre-position before the winter sets in."⁶ WFP noted that the situation is also dire among the middle classes, who used to be able to feed their families every day: three out of four households now limit portion sizes; adults are eating less so their children can eat more.

Moreover, the World Health Organization (WHO) last week warned of a deteriorating health situation in Afghanistan, with decreasing access to health care for the Afghan population. There are more cases of measles and diarrhea, and less response to the pandemic, as well as a resurgence of polio. According to WHO, only 17 per cent of the over 2,300 health facilities previously supported by the World Bank are fully functional. Two thirds of these health facilities have run out of essential medicines.⁷

³ CSIS, "U.S. Sanctions Squeeze Humanitarian Assistance in Afghanistan," <https://www.csis.org/analysis/us-sanctions-squeeze-humanitarian-assistance-afghanistan>

⁴ "Afghanistan on verge of socio-economic collapse, EU's top diplomat says," Reuters. <https://www.reuters.com/world/asia-pacific/afghanistan-verge-socio-economic-collapse-eus-top-diplomat-says-2021-10-03/>

⁵ World Food Program Situation Report, 30 September 2021, [Shttps://reliefweb.int/report/afghanistan/wfp-afghanistan-situation-report-30-september-2021](https://reliefweb.int/report/afghanistan/wfp-afghanistan-situation-report-30-september-2021)

⁶ "Afghanistan: The time to act is now," <https://www.wfp.org/stories/afghanistan-time-act-now>

⁷ Alexander Matheou, Asia Pacific director of the International Federation of Red Cross and Red Crescent Societies, said at a news conference on September 30. <https://www.nytimes.com/2021/09/30/world/asia/afghanistan-aid.html>

“We are deeply concerned that Afghanistan faces imminent collapse of health services and worsening hunger if aid and money do not flow into the country within weeks... There needs to be some solution to the financial flows into Afghanistan to ensure that at least salaries can be paid, and that essential supplies — power and water being two of them — can be procured.”

Fears about a surge in deaths from basic medical ailments have ballooned, as more than 20,000 health workers are out of work, either because the facilities closed, or their salaries were frozen.

UN Emergency Relief Coordinator Martin Griffiths on September 22 released \$45 million in life-saving support from the UN Central Emergency Response Fund to help prevent Afghanistan’s health-care system from collapse, noting, “Allowing Afghanistan’s health-care delivery system to fall apart would be disastrous. People across the country would be denied access to primary health care such as emergency caesarean sections and trauma care,”⁸

Beyond official UN and EU agencies stressing the critical nature of the situation in Afghanistan, leading humanitarian organizations have also issued stark assessments. Jan Egeland, Secretary-General of the Norwegian Refugee Council, and former UN Undersecretary-General for Humanitarian Affairs, visited Afghanistan last week, reporting that,

“Afghanistan’s economy is spiraling out of control. The formal banking system could collapse any day now because of a lack of cash. I’ve spoken to families who tell me they are surviving on tea and small scraps of old bread. If the economy collapses, even the most basic services will no longer function, and humanitarian needs will soar even higher. Dealing with the liquidity crisis is critical as aid organisations seek to scale up to meet urgent humanitarian needs. UN member states must urgently broker a multilateral agreement to stabilise the economy, fund appropriate public services and address the liquidity crisis.”⁹

After visiting Afghanistan last month, Peter Maurer, head of the International Committee of the Red Cross, warned of “conditional humanitarianism.” Humanitarian action should not be conditioned on political, human rights, or other stipulations, as it weakens respect for IHL and humanitarian actors. And it erodes principles of neutral, independent, and impartial humanitarian action.¹⁰

Ensuring that assistance reaches the Afghan population is not just a moral and legal imperative, but one which also advances US security interests. The risk of massive flows of refugees destabilizing the region and creating an environment conducive to the spread of terrorism is real. Continuation of humanitarian support and programs in Afghanistan, as well as efforts to stabilize the economic and

⁸ “Afghanistan: ERC Griffiths releases \$45M from UN CERF for life-saving support,”

<https://www.unocha.org/story/afghanistan-erc-griffiths-releases-45m-un-cerf-life-saving-support>

⁹ “Afghanistan is on a countdown to economic collapse,” <https://www.nrc.no/news/2021/september/afghanistan-is-on-a-countdown-to-economic-collapse/>

¹⁰ High Level Ministerial Meeting on the Humanitarian Situation in Afghanistan,”

<https://www.icrc.org/en/document/president-maurer-meeting-humanitarian-situation>

financial system (minimizing the Taliban's benefit and maximizing the public's benefit) is the international community's best chance to avoid an economic and humanitarian catastrophe.¹¹

Complications of sanctions for humanitarian responses

Preexisting sanctions by the United States and the United Nations make an already challenging operational environment for humanitarian actors in Afghanistan even more complicated.

Following the bombings of US Embassies in East Africa in 1998, the United Nations Security Council imposed sanctions on the Taliban. Initially under UNSCR 1267 and in 2011, as part of a new sanctions regime pursuant to UNSCR 1988, all Member States must prohibit any "funds, financial assets and economic resources" from being provided to designated parties. In this regard, the UN 1988 regime targets individual members of the Taliban (but not the entity of the Taliban), currently consisting of 135 individuals plus five entities (the Haqqani network and four hawaladars). Of note, the majority (19) of the acting Taliban officials announced in September are sanctioned by the UN, with at least 4 members of the Haqqani Network currently in charge of Afghan ministries (Interior, Telecommunications, Higher Education and Refugees).¹²

In addition to 1988 sanctions, the UN also sanctions al Qaeda and ISIL (UNSCR 1267/2253) which includes 12 individuals and 20 entities affiliated with Al-Qaida operating within Afghanistan.

In the US, the Taliban as an entity is designated as a Specially Designated Global Terrorists (SDGT) under E.O. 13224; the Haqqani Network is also a SDGT, as well as being designated as a Foreign Terrorist Organization (FTO) under section 219 of the Immigration and Nationality Act. Thus, the US sanctions both leaders of the Taliban group as individuals, but also sanctions the Taliban as an entity. While these sanctions do not prohibit U.S. persons from exporting or reexporting goods or services into Afghanistan, the lack of clarity regarding precisely whom the Taliban is has created concern among NGOs. US persons (and others given US secondary sanctions) are prohibited from any dealings with the Taliban, at the risk of potential civil and criminal penalties.

First, significant uncertainty over how to treat the Taliban as a sanctioned entity now that they are the de facto government of Afghanistan exists....do sanctions apply to self-identified members of the Taliban or to the totality of the Afghan government? Given that principled humanitarian assistance requires engagement with all parties to a conflict to secure access to the civilian population, the answer to this question has serious implications for humanitarian and civil society organizations, as well as financial institutions providing banking services to NGOs. The fact that that majority of acting Taliban officials are on UN or U.S. sanctions lists adds to the confusion as to whether entire ministries led by these individuals are also subject to sanctions. Payments of partnership money to

¹¹ "William Byrd on Afghanistan's Economic Crisis" <https://www.usip.org/publications/2021/09/william-byrd-afghanistans-economic-crisis>

¹² "Afghanistan's UN Rep Slams Taliban's New Govt: '17 Of 33 Ministers Sanctioned By UN,'" <https://www.republicworld.com/world-news/rest-of-the-world-news/afghanistans-un-rep-slams-talibans-new-govt-17-of-33-ministers-sanctioned-by-un.html>

ministries for joint implementation of civil society programs benefiting the populations are on hold until questions as to how ministries led by designated individuals should be treated are clarified. Further complicating the situation, countries implement sanctions differently, with the European Union and the United Kingdom closely aligning with UN sanctions, while the United States is more expansive in its scope.

In light of outstanding questions regarding who is sanctioned, it is not surprising that financial institutions are being cautious, with many suspending transactions related to Afghanistan and even a few “de-risking” NGOs operating in Afghanistan.¹³ Concerns over reputational harm, potentially invasive audits by regulators, and the possibility of civil and criminal penalties should a transaction inadvertently involve the Taliban are pushing banks to avoid these risks instead of managing them. The chilling effect leads to disruptions of financial services and forces NGOs to scale back operations due to a lack of financial access and even altered programs (some NGOs have referred to programmatic decisions being made based on where banks will transfer funds, rather than purely on need) - with meaningful effects on civilians who rely on these services.

Finally, there is a lack of clarity over the scope and scale of authorizations provided. On 24 September, Treasury’s Office of Foreign Assets Control (OFAC) issued two new general licenses (GL 14 and 15) along with four FAQs, *authorizing humanitarian assistance or other activities that support basic human needs to Afghanistan*. These actions and guidance were welcomed and extremely helpful to many NGOs, and the Biden Administration is to be commended for taking these important steps.

However, the scope of activities covered by the new GL authorizations is narrower than in other recent OFAC actions, raising questions as to how the range of civil society programs and services benefiting ordinary Afghans which the international community has supported for the past 20 years are to be treated.¹⁴ General Licenses issued by OFAC in 2021 for Yemen, Burma, and in September Ethiopia (and previously as applied to Venezuela), have included a broad range of authorized humanitarian and civil society programs. These routinely include:

(1) Activities to support humanitarian projects to meet basic human needs, including drought and flood relief, the provision of health services, assistance for vulnerable populations including individuals with disabilities and the elderly, environmental programs, and food, nutrition, and medicine distribution.

¹³ De-risking entails denying or delaying financial access or the transfer of funds to humanitarian agencies out of concern of running afoul of regulatory requirements (i.e., sanctions, anti-money laundering, and countering the financing of terrorism). See “Financial Access for US Nonprofits.” February 2017.

[https://www.charityandsecurity.org/system/files/FinancialAccessFullReport_2.21%20\(2\).pdf](https://www.charityandsecurity.org/system/files/FinancialAccessFullReport_2.21%20(2).pdf)

¹⁴ “Treasury Issues General Licenses and Guidance to Facilitate Humanitarian Assistance in Afghanistan,” <https://home.treasury.gov/news/press-releases/jy0372>.

- (2) Activities to support democracy building, including activities to support rule of law, citizen participation, government accountability, universal human rights and fundamental freedoms, access to information, and civil society development projects;
- (3) Activities to support education, including combating illiteracy, increasing access to education, international exchanges, and assisting education reform projects;
- (4) Activities to support non-commercial development projects directly benefiting the people of the sanctioned country, including preventing infectious disease and promoting maternal/child health, sustainable agriculture, and clean water assistance; and
- (5) Activities to support environmental protection, including the preservation and protection of threatened or endangered species and the remediation of pollution or other environmental damage¹⁵.

In the case of GL 14 and 15 for Afghanistan, however, the scope of authorized activities is much narrower and limited to transactions, “that are ordinarily incident and necessary to the exportation or reexportation of agricultural commodities, medicine, medical devices, replacement parts and components for medical devices, or software updates for medical devices to Afghanistan, or to persons in third countries purchasing specifically for resale to Afghanistan.”¹⁶

While broad agreement exists that no support should be provided to the Taliban, NGOs have significant concerns as to whether and how other assistance activities will be permitted to continue. According to reports of the Special Inspector General for the Reconstruction of Afghanistan (SIGAR), the US has spent \$145 billion rebuilding Afghanistan in the past 20 years - with billions going to USAID's long term development programming. Many NGOs are looking for clarity and confirmation that that USAID's basic development sectors of agriculture, education, democracy and governance, health, and economic growth among others, would be authorized under a GL and permitted to continue. Programs beyond basic human needs to promote education, governance, human rights and protection, and peacebuilding are vital to preserve and build upon gains made by and for the Afghan population during the last two decades.

Other Challenges Faced by NGOs

Aside from ongoing uncertainty as to permitted transactions, NGOs' most significant problem in getting assistance into Afghanistan relates to the limitations in moving cash into Afghanistan. The US' freezing of foreign reserves and suspension of international assistance through the World Bank and IMF have resulted in a shortage of cash (USD and AFN) and severe liquidity crises affecting NGO operations.

Without access to its foreign reserves, the Central Bank (DAB) has set limits on a range of financial activities, including cash withdrawals for individuals and corporate payments between banks, and unavailability of corporate banking services. Without the ability to import USD notes, the scarcity of

¹⁵ Language contained in Yemen, Burma, and Ethiopia General Licenses

¹⁶ See GL 14 and FAQ 928.

cash will continue: NGOs report that the cash flow crises in Afghanistan is getting worse with every passing day: people waiting on line for hours to withdraw limited funds and banks are running out of cash, asking individuals to register and wait until they get physical cash with some staff waiting more than 3 weeks. Foreign remittances are blocked, and the banking system is barely able to operate. With such a scarcity of cash, NGOs are not able to pay suppliers, contractors, vendors, and most importantly national staff. Everybody wants to be paid either by cash or outside of country which refers to another layer of difficulties in terms legality, due diligence, compliance as well as security issues linked to physical handling of cash.

Moreover, devaluation of AFN currency and high inflation are making it more difficult to maintain financial frameworks for NGO operations; several fear that the collapse of the banking sector if the government continues to be unable to access government accounts held externally (which remains explicitly prohibited in OFAC GL14). Informal methods of moving money have also proven to be inadequate. While hawalas are an option for cash transfer, they are not generally a reliable one. Problems associated with screening hawalas, high fees, and the fact that hawalas will not have enough cash to meet NGO needs (some NGOs estimates that the sector needs as much as \$3 million USD/day) limit the utility of such methods.

Recommendations to address humanitarian challenges in Afghanistan

The Biden administration has been supportive of NGOs continuing to provide their essential assistance in Afghanistan, and the September OFAC GLs represent important steps in clarifying permissible NGO activities. Additional action is needed, however, in the near term to avert a humanitarian catastrophe. As in past cases of severe humanitarian need (such as 2010-11 famine in Somalia, or in response to the natural disasters), the US should be forward-leaning and provide broad grants of authority and legal certainty to NGOs, as well as the financial institutions providing services to support these activities. This should happen in several ways.

First, OFAC should continue to broaden and clarify the scope of authorized activities for Afghanistan. Additional GLs authorizing other NGO programs, including ongoing development programs that benefit the Afghan population, not the Taliban, should be issued as the most expeditious way to ensure civilians continue to receive vital assistance.

Important NGO programs providing services to Afghan citizens in the areas of protection and prevention (such as atrocities prevention, protection of human rights defenders, protection of religious and ethnic minorities or early warning and response systems and rights-based education initiatives), women's rights (addressing women's economic empowerment, support to women-led civil society, prevention of gender-based violence, etc.) and conflict and stabilization (such as community-level dialogue, conflict prevention, mediation, conflict resolution, and violence prevention at the local level) should be continued and authorized through general licenses.

Second, the United States should clarify to whom the sanctions apply. Is the Taliban deemed to have an interest in the Government of Afghanistan and, if so, whether the Afghanistan Government's assets are blocked and transactions with it are prohibited? Since the Taliban is the de facto government, do sanctions apply broadly to the entirety of the government, or just the designated ministers? And if a minister is sanctioned, does that mean any dealings with their ministry are prohibited? Further clarifications and legal protection are necessary for payments to be processed in support of these programs. In addition to GLs, providing NGOs and financial institutions with official assurance codifying OFAC's no enforcement policy that inadvertent violations will not be the basis of enforcement actions if due diligence is exercised, could go a long way toward mitigating risk aversion.

Third, because it is likely to be months before the Afghan financial system stabilizes with international payments in support of humanitarian and civil society NGOs being regularized, the US, together with international partners, financial institutions, and NGOs, need to develop a safe and reliable system to move humanitarian funds into Afghanistan. A viable mechanism to support these important programs in a way that does not benefit the Taliban but ensures necessary funds, goods, and services are able to be transferred into the country with appropriate protections is necessary to forestall a widespread humanitarian and economic collapse.

Fourth, the US needs to work within the Security Council to create safeguards to ensure humanitarian action can continue in Afghanistan. Clear guidance is needed, not only from national regulatory authorities, but also from the 1988 Taliban sanctions committee to clarify that sanctions are not intended to impede humanitarian action, and that Member States must refrain from any measures or restrictions on humanitarian activities carried out by impartial humanitarian actors - building on UNSCR 2462's requirement that States must implement sanctions consistent with their obligations under International Humanitarian Law.

Further, explicit measures to safeguard humanitarian activities and the provision of essential goods and services in Afghanistan should be authorized through the adoption of an exception. An exception or 'carve-out' as currently exists in the UNSCR 751 regime regarding Somalia is needed for transactions and other activities required for humanitarian activities and for the provision of essential supplies and services in Afghanistan. The Somalia regime provides a precedent upon which to build to ensure that all impartial humanitarian organizations' activities and transactions required to provide essential supplies and services in Afghanistan can continue.

Fifth, the US needs to work closely with allies to harmonize policies and regulatory practices, as well as engage with other countries that have relationships with Afghanistan. Recognizing national interests of other countries such as Russia, China and Pakistan vary, all states have common interest in ensuring that Afghanistan does not become a safe haven for al-Qaeda and other terrorist groups, ensuring regional stability, managing refugee flows, and preventing a return by the Taliban to violence and practices of the past concerning women and minorities. Other countries with more influence on the Taliban, such as Qatar also represent opportunities for cooperative engagement.

Sixth, the USG needs to engage banks and other financial and money service providers, insurance and transportation companies, and exporters to provide assurances that they will not be violating sanctions by authorizing and facilitating transactions that are permitted under licenses or a UN exception. This includes the issuance of ‘comfort letters’ and other forms of guidance and encouragement to the private sector as a means of effective risk sharing among stakeholders.

Long-term systemic reform is necessary

While the focus of today’s hearing is clearly on the immediate crises in Afghanistan and finding ways to maintain existing humanitarian and civil society programs and activities in Afghanistan that benefit the Afghan people, this crisis brings into sharp relief the complicated interplay between sanctions and humanitarian action.

Time after time when there are crises in countries subject to sanctions, the US regulatory system goes through a difficult process to clarify, define, and except humanitarian action. Just this year, we’ve been faced with the threat of withholding humanitarian assistance in Yemen (following the designation of Ansarallah in January 2021), Burma, Ethiopia, and Afghanistan. There is a need for systemic reform to create standing carve-outs for humanitarian action.

In fact, when Congress passed the International Emergency Economic Powers Act¹⁷, the foundational authority for Treasury’s financial sanctions, it included Section 203(b) a humanitarian exemption. Since 9/11, however, most terrorism-related Executive Orders issued under IEPPA automatically waive this exemption without rationale. In doing so, humanitarian aid is treated as prohibited transactions with designated terrorist organizations, affecting everything from negotiating access to civilians to coordinated rescues during earthquakes and floods.¹⁸ It’s time to restore the Congressionally mandated humanitarian exception and reform the financial sanctions framework so general licenses do not have to be created each time. Humanitarian exceptions should also be routinely included in UN Security Council sanctions as well.

Distinguished Members of the Committee,

Significant US security and foreign policy interests are at stake with the Taliban’s reconrol of Afghanistan. A serious assessment of the past two decades of US policy is certainly in order as we seek to learn from this tragic experience. As the US respond to the many challenges in Afghanistan, it’s important that sanctions do not further compound the humanitarian crisis evolving on the ground in which real people are suffering. The US and the international community maintain valuable leverage to influence the Taliban through frozen reserves and

¹⁷ PUBLIC LAW 95-223, 28 December 1977. “(2) donations, by persons subject to the jurisdiction of the United States, of articles, such as food, clothing, and medicine, intended to be used to relieve human suffering, except to the extent that the President determines that such donations (A) would seriously impair his ability to deal with any national emergency declared under section 202 of this title...”

¹⁸ Charity & Security Network, “Proposals for new Congress and Biden-Harris Administration to Support and Facilitate Humanitarian and Peacebuilding Operations through Nongovernmental Organizations, https://charityandsecurity.org/wp-content/uploads/2021/03/CSN-Transition-Memo_V4.pdf

assets, continued sanctions, and ultimately, recognition. But humanitarian assistance should not be conditional – it’s fundamental to US values and commitments to protect human rights and international humanitarian law. “Saving lives and also saving livelihoods” is the best way of achieving US objectives to prevent Afghanistan from becoming again a safe haven for terrorists, precipitating a refugee crisis, and maintaining regional stability. A humanitarian catastrophe and collapse of the economy would have devastating consequences for millions of people and risk destabilizing neighboring countries – an outcome that serves no one’s interests.

The US has invested much in Afghanistan and its’ people over the past twenty years; the US must continue critical assistance programs and support the broad range of NGOs’ activities and access in Afghanistan through urgent and coordinated action with international partners.

Sue Eckert is a recognized expert on economic sanctions and export controls, having served as Assistant Secretary of Commerce for Export Administration, and as a scholar working at the intersection of economic and security issues. During her eighteen years at Brown University’s Watson Institute for International Studies, she co-directed research programs on UN sanctions (co-authoring the Interlaken Manual on [Targeted Financial Sanctions](#), the book [Targeted Sanctions: The Impact and Effectiveness of United Nations Action](#), and series of three “[Watson Reports](#)”) and the financing of terrorism ([Countering the Financing of Terrorism](#)). In 2017, she undertook the first quantitative study, [Financial Access for US Nonprofits](#), of the challenges American NGOs face in transferring funds abroad to support humanitarian programs. Based on this research, she currently serves as a consultant to the World Bank on “de-risking”; senior adviser to the NY-based International Peace Institute on counterterrorism, sanctions, and humanitarian action; and senior associate with the Center for Strategic and International Studies’ Humanitarian Agenda to create a multi-stakeholder dialogue to address financial access problems. She is on the faculty of the Jackson Institute for Global Affairs at Yale University, and works extensively with the U.S. Government, the United Nations and other international organizations, and member states, most recently on reform of sanctions to promote humanitarian action in conflict environments.