James E. Risch
Chairman
Senate Foreign Relations Committee

Brian J. Mast
Chairman
House Foreign Affairs Committee

Cc:

Jeanne Shaheen, Ranking Member, Senate Foreign Relations Committee
Gregory W. Meeks, Ranking Member, House Foreign Affairs Committee
Mario Diaz-Balart, Chairman, House Appropriations Sub-Committee on National Security, Department of State and Related Programs
Lois Frankel, Ranking Member, House Appropriations Sub-Committee on National Security, Department of State and Related Programs
Lindsey Graham, Chairman, Senate Appropriations Sub-Committee on State, Foreign Operations and Related Programs
Brian Schatz, Ranking Member, Senate Appropriations Sub-Committee on State, Foreign Operations and Related Programs

July 28, 2026

Dear Chairman Risch and Chairman Mast,

We are writing regarding the US Development Finance Corporation's failure to adequately respond to an independent investigation confirming its contribution to child sexual abuse harms at a DFC/OPIC-financed school, Bridge International Academies. We are gravely concerned that DFC's dismissal of these independent findings stem from an attempt to conceal its complicity in a child sexual abuse scandal. We are calling on you to urgently engage with the DFC Board and Management, ensuring that DFC responds to all recommendations issued in the investigation report, including exploring remedial actions that meet the needs of former pupils who are survivors of sexual abuse.

In July 2024, four young Kenyan women appealed to the U.S. International Development Finance Corporation's Independent Accountability Mechanism (IAM) seeking accountability for sexual abuse they suffered as children while attending Bridge International Academies (BIA, now also referred to as NewGlobe Schools or Bridge Kenya). The survivors sought compensation, counselling support, educational assistance, support in accessing justice, acknowledgement of harm, and stronger protections to prevent future abuse.[i]

The IAM's Compliance Investigation Report, finalized in March 2025, substantiates the allegations made by the four Requestors.[ii] It confirms that OPIC was made aware of the presence of child abuse risks at BIA and failed to take any action to address or mitigate the risks, thereby contributing to harms.[iii]

DFC Management was required to develop an action plan responding to the investigation recommendations, in consultation with the Requestors, within 50 business days.[iv] Instead, the process was held in limbo for more than a year, and the Requestors were never consulted. The resulting Management Action Plan therefore exhibits a conspicuous disregard of survivor inputs and contains no measures to address harms to survivors.[v]

The DFC's due diligence failures have had real and long-lasting implications for children who were abused at Bridge schools,[vi] including the four young women who came to the IAM in pursuit of justice. The mishandling of this case by DFC Management, and the dismissive Management Action Plan, has only compounded those initial impacts borne by BIA pupils.

<u>Failure to Respond to IAM Recommendations on Remedy</u>

The IAM Compliance Investigation Report includes two sets of recommendations: those focused on the Requestors, and those focused on institutional improvements. Lamentably, the DFC Management Action Plan refuses to acknowledge the former, referring only to institutional improvement measures. While preparing the MAP, DFC effectively denied requests for dialogue with the Requestors, made through their representatives.

As noted in the IAM Compliance Investigation Report, the International Finance Corporation (IFC) is in the early stages of implementing a program aimed at strengthening community response and support services to survivors of sexual abuse in counties where Bridge schools operate(d).[vii] The IFC has also committed to providing "immediate support" to the four Requestors through a case manager. This may include measures related to vocational training, further education, and economic empowerment.

The DFC IAM Compliance Investigation Report calls on DFC to consider, in close consultation with the Requestors, how DFC can "leverage its unique role, capacity and advantages," to either contribute to these ongoing initiatives or develop complementary actions. DFC has evidently refused to consider either of these approaches.

The DFC's decision to ignore and dismiss the survivor-centered recommendations risks sending a message to the Requestors, and all survivors of harm linked to DFC-funded projects, that their experiences are inconsequential to DFC.

<u>Disregard of the IAM Mandate and Terms of Reference</u>

DFC Management has demonstrated a complete disregard for the Board-approved Terms of Reference (TOR) intended to guide the handling of IAM cases.[viii] The implications of this extend far beyond this case, setting a dangerous precedent in which DFC Management refuses to respect the mandate and purpose of the IAM, as established in the BUILD Act of 2018 and elaborated in the TOR.[ix] This is particularly concerning as DFC has recently tripled its financing budget and is taking on bigger and riskier projects.[x]

Extensive Delays

The compliance investigation was completed and shared with DFC management for factual review in January 2025, and finalized in March 2025.[xi] It was then held in limbo for over one year, and approved by the Board of Directors on April 17, 2026.[xii] This is a clear breach of the TOR, which requires Management to submit its response and action plan to the Board within 50 business days of receiving a compliance report.[xiii] Throughout this period of delay, and despite requests for information, the Requestors were never provided with any updates.

Failure to Consult Requestors

Beyond the failure to update the Requestors on delayed timelines, Management never consulted the Requestors in the preparation of its MAP at all—despite a clear requirement contained in the IAM TOR to do so.[xiv] Our attempts at proactive engagement with Management were left unanswered.[xv] Our attempts to engage with Board Liaisons were similarly declined.[xvi]

Failure to Respond to IAM Recommendations

Lastly, DFC Management neglected to address the IAM's recommendations focused on the Requestors. This is a clear violation of the requirements of the TOR, which call upon Management to prepare timebound remedial actions in response to IAM findings of non-compliance and related harm,[xvii] and a "reasoned response" to any IAM findings or recommendations "that DFC is unable to address in the MAP."[xviii]

Requests

DFC's dismissal of IAM findings and recommendations sets an alarming precedent for future cases, which risks rendering the IAM process a meaningless one for requestors. It also has profound implications for the four survivors we represent, who have waited for over two years to receive a response to the concerns they brought to the IAM.

Considering this, we urge you to do the following:

- Raise concerns with the DFC Board over its approval of the inadequate Management Action Plan despite the exclusion of the Requestors, the failure to address all IAM recommendations, and the numerous inconsistencies with the procedures of the IAM Terms of Reference.
- Engage urgently with the DFC Board and Management to ensure that DFC responds to all of the IAM findings and recommendations, including exploring remedial actions that meet the needs of the Bridge survivors, including the Requestors.
- Call upon DFC Management to engage meaningfully with the Requestors and their representatives before any revised or additional action plan is finalized.
- Engage with DFC Management and Board over the failure to abide by the IAM TOR, and emphasize the expectation that future IAM cases are handled in strict accordance with the policy.
- Hire a Director for DFC's Independent Accountability Mechanism (IAM) and at least two full-time staff members to manage the IAM according to its Terms of Reference.
- Condition future appropriations to DFC on these commitments.

We welcome further dialogue with you, including an online meeting, at your convenience. Thank you for your time and attention to this matter.

Regards,

David Pred
Executive Director
Inclusive Development International

Wangu Kanja
Executive Director
Wangu Kanja Foundation

Kate Donald
Director
Oxfam International

Margaux Day
Executive Director
Accountability Counsel

Endnotes

[i] DFC IAM Compliance Appraisal Report.
https://www.dfc.gov/sites/default/files/media/documents/DFC%20IAM%20Appraisal%20Report%20BIA%20Case%20Kenya%2020241010.pdf

[ii] DFC IAM Compliance Investigation Report. See Section 4, Findings & Causes, Finding 1.
https://www.dfc.gov/sites/default/files/media/documents/DFC%20IAM%20Compliance%20Investigation%20Report%20BIA%20Kenya.pdf.

[iii] OPIC was informed of the presence of child abuse risks during the active due diligence period, during which OPIC had maximum leverage to act. In clear breach of its ESPS, OPIC failed to take any action to address or mitigate such risks. This gross oversight stemmed from the bank's weak knowledge management systems, lack of sufficient thematic expertise to manage GBV/CSA risks, and insufficient monitoring systems. See Section 4, Findings & Causes, Underlying Causes. See also Section 5, Contribution to Harm.

[iv] IAM Terms of Reference, see Paragraphs 130 and 134.
https://www.dfc.gov/sites/default/files/media/documents/IAM%20ToR%20Final%20Clean%20Dec%204%202024.pdf

[v] US DFC Bridge Management Action Plan.
https://www.dfc.gov/sites/default/files/media/documents/BDR%2826%2909%20Bridge%20Management%20Action%20Plan_0.pdf

[vi] The Compliance Advisor Ombudsman (CAO) Bridge 04 Compliance Investigation Report details 23 child sexual abuse incidents between 2013 and 2019. https://www.cao-ombudsman.org/sites/default/files/downloads/CAO%20Investigation%20of%20IFC%20Investment%20in%20Bridge%20International%20Academies_Bridge-04_October%203_2023.pdf

[vii] DFC IAM Compliance Investigation Report. See Section 6.2, IFC's Approach to the BIA Case.

[viii] Terms of Reference for the Independent Accountability Mechanism of the U.S. International Development Finance Corporation, December 2024.
https://www.dfc.gov/sites/default/files/media/documents/IAM%20ToR%20Final%20Clean%20Dec%204%202024.pdf

[ix] The BUILD Act of 2018 clearly defines the function of the DFC IAM as including, "provid[ing] a forum for resolving concerns regarding the impacts of specific Corporation-supported projects with respect to [environmental, social and human rights] standards." See Section 1415. https://www.dfc.gov/sites/default/files/2019-08/BILLS-115hr302_BUILDAct2018.pdf

[x] Devex Newswire: DFC goes bigger, riskier in new development finance push, April 2026.
https://www.devex.com/news/devex-newswire-dfc-goes-bigger-riskier-in-new-development-finance-push-112314

[xi] DFC IAM Compliance Investigation Report, Section 7, Next Steps.

[xii] US DFC Bridge Management Action Plan.
https://www.dfc.gov/sites/default/files/media/documents/BDR%2826%2909%20Bridge%20Management%20Action%20Plan_0.pdf

[xiii] Terms of Reference for the Independent Accountability Mechanism of the U.S. International Development Finance Corporation, December 2024. See paragraph 130.
https://www.dfc.gov/sites/default/files/media/documents/IAM%20ToR%20Final%20Clean%20Dec%204%202024.pdf

[xiv] Ibid., see paragraph 134: During the preparation of the MAP, Management will be required to consult the Requester and the Client.

[xv] Inclusive Development International, Accountability Counsel, Oxfam International, and Wangu Kanja Foundation (the CSO representatives of the four requestors) sent an email in July 2025 to DFC Management requesting a meeting to discuss survivor inputs during the development of the Management Action Plan. We received no response.

[xvi] The CSO representatives also sent an email to DFC Board Liaison team and received a response in August 2025, confirming that discussions regarding the MAP were ongoing, but declined our invitation for a meeting to discuss survivor inputs to inform the MAP's development.

[xvii] Terms of Reference for the Independent Accountability Mechanism of the U.S. International Development Finance Corporation, December 2024. See paragraph 131.
https://www.dfc.gov/sites/default/files/media/documents/IAM%20ToR%20Final%20Clean%20Dec%204%202024.pdf

[xviii] Ibid. See paragraph 132.