CASH AND VOUCHER ASSISTANCE AND RISK IN FINANCIAL MANAGEMENT AND COMPLIANCE

BRIEFING NOTE

ACKNOWLEDGEMENTS

CaLP would like to acknowledge and thank the contributors to this report, particularly the Norwegian Refugee Council and the World Food Programme. The report was drafted by Philip McMinn Mitchell (independent consultant), Stefan Bumbacher (CaLP) and Lynn Yoshikawa (CaLP).

This study is made possible by the generous support of the American people through the United States Agency for International Development (USAID). The contents are the responsibility of the authors and do not necessarily reflect the views of USAID or the United States Government.

Cover photo: Abby Trailer-Smith/Oxfam

I INTRODUCTION

According to 'The State of the World's Cash 2018' report, the biggest barrier to the more effective and extensive use of cash and voucher assistance (CVA) is the perceived risk that cash represents, mainly due to concerns about the misappropriation or leakage of cash. The report notes an example of a double standard, in that donors may tolerate the diversion of a modest proportion of in-kind aid but may be much more sensitive when it comes to cash since it is viewed as posing a greater risk, **specifically in relation to money laundering and the financing of terrorism**.

Global Objective 2 of the Cash Learning Partnership's (CaLP's) Global Framework for Action seeks to ensure that cash is routinely considered, alongside other modality tools. While, in recent years, CVA has been considered more regularly, there remain barriers and constraints to the systematic adoption of CVA, particularly unconditional and unrestricted modalities.

Although the evidence shows that cash is no riskier than any other form of aid,[1] there is often increased scrutiny from some donors of implementing partners' risk management policies and procedures. This is exacerbated by the fact that some humanitarian organisations lack the guidance and capacity to confidently manage compliance with **anti-money laundering (AML) and counter-terrorist financing (CTF) regulations** (also referred to as AML/CTF regulations). Furthermore, there is a lack of defined standards from donors on what constitutes adequate mitigation measures, a lack of influence within government humanitarian offices to ensure that AML/CTF regulations do not negatively impact humanitarian action, and an unwillingness by donors to share risk with humanitarian organisations. Finally, financial service providers (FSPs) often have limited experience in humanitarian response and in working directly with vulnerable and marginalised populations, who may also be regarded as high risk by FSPs and by regulators.

With the aim of creating some clarity, CaLP commissioned a scoping study on CVA and risk in financial management and compliance, which considered three specific challenges facing humanitarian organisations related to AML/CTF regulations:

1. **Transferring funds to the country of operations** – challenges in identifying competent and willing banking providers and other FSPs to transfer funds to a country of operations
2. **Identifying in-country service providers** – challenges related to 'Know Your Customer' (KYC) regulations and financial sector identity checks by in-country FSPs, including mobile network operators (MNOs)
3. **Beneficiary identification and data security** – challenges relating to AML/CTF regulations and international sanctions regulations regarding CVA recipients

The approach taken by the study was to consider each challenge and to identify the relevant regulations and policy statements, the risks that these presented, how these had been managed and mitigated, and possible solutions for CaLP members for planning future responses. While the study itself was more extensive, this briefing note summarizes the key findings for each of the challenges and is targeted at CVA practitioners.

This briefing note does not aim to provide operational guidance. This is largely available in existing tools and guidance, including those found in CaLP's Programme Quality Toolbox[2] and the Consortium for Financial Access' guidance for NGOs on improving access to financial services.[3]

[1] Gordon L, 2015 "Risk and humanitarian cash transfer programming," www.odi.org/sites/odi.org.uk/files/odi-assets/publications-opinion-files/9727.pdf

[2] CaLP, 2018, "Cash Based Assistance – Programme Quality Toolbox," http://pqtoolbox.cashlearning.org/

[3] Consortium for Financial Access, 2019, "Banking Nonprofit Organisations – the Way Forward," https://charityandsecurity.org/system/files/ACAMS%20Financial%20Access%20Paper%20-%20Updated.pdf

2 METHODOLOGY

The study was conducted through an analysis of existing literature together with key informant interviews. The literature review comprised:

- published regulations from national governments
- policy and research commentary on these regulations
- donor-issued guidelines for proposals or for specific countries of operations
- case studies of CVA programmes in humanitarian responses affected by AML/CTF regulations

Key informants included CVA and/or finance and compliance focal points from UN agencies and NGOs, governmental donors and FSPs. Despite outreach efforts, there was only a handful of FSP key informants, which limited the perspectives into this report. A semi-structured questionnaire was designed to determine the difference between the perceptions and the reality that the burden of (and the risks of not) complying are greater in a response utilising CVA. The reviews and interviews also considered how these perceptions differ among the various groups of stakeholders.

3 REGULATORY ENVIRONMENT

The study reviewed regulations from the European Union (EU), the United Kingdom (UK) and the United States (US). The list of regulations does not include all those affecting humanitarian action, which have been rigorously discussed are analysed in various other studies.[4] The aim of the study was to identify the extent to which key informants were affected by specific regulations related to CVA. For example, sanctions pressure was felt more from US regulations, while AML pressure was greater from the EU's Anti-Money Laundering Directive (AMLD).

None of the legal frameworks examined specifically target humanitarian action or CVA; nevertheless, they have significant consequences. Moreover, some governmental donors, notably USAID, have developed additional guidelines for specific contexts to mitigate against diversion in areas where sanctioned groups are present.

The regulations and additional guidelines listed below are applied inconsistently, according to:

- regulations and governance at the national level
- the individual FSP and its linkages to and/or dependence on a multinational network of financial institutions
- the type of transfer mechanism used, for example, bank accounts, hawala, prepaid cards or MNOs

This complex and dynamic regulatory environment, coupled with the lack of defined standards from governmental donors on what constitutes adequate risk mitigation and limited humanitarian influence with regulators, **contributes to risk aversion among humanitarian organisations**.

3.1 ANTI-MONEY LAUNDERING FRAMEWORK OF THE EUROPEAN UNION

The Anti-Money Laundering Directive (AMLD) of the European Union is designed to prevent the use of the financial system for money laundering or to finance terrorism. The EU adopted the first Anti-Money Laundering Directive in 1990, which provides that "obliged entities shall apply customer due diligence [CDD] requirements when entering into a business relationship".[5] The fourth and fifth AMLDs, issued in 2015 and 2018 respectively, **expanded the definition of value** to include banknotes, prepaid cards, vouchers denominated in national currency and virtual currencies (for example, blockchain-based currencies such as bitcoin), as well as electronic

[4] See NRC, 2018, "Principles Under Pressure," www.nrc.no/globalassets/pdf/reports/principles-under-pressure/1nrc-principles_under_pressure-report-screen.pdf and OCHA, 2013, "Study of the Impact of Donor Counter-Terrorism Measures on Principle Humanitarian Action" www.unocha.org/sites/unocha/files/CounterTerrorism_Study_Full_Report.pdf

[5] European Commission, 2019, Anti-money laundering and counter terrorist financing, https://ec.europa.eu/info/policies/justice-and-fundamental-rights/criminal-justice/anti-money-laundering-and-counter-terrorist-financing_en

and mobile money. The fifth directive also requires EU member states to ensure that implementing organisations know the ultimate recipient of a transfer with a value of €50 or more, compared with a threshold of €250 in the previous directive. Guidelines also require national due diligence systems to be assessed as part of a risk-based approach.

The AMLD applies to all EU member states and their jurisdictions and must, therefore, be adopted by NGOs with headquarters in the EU, as well as by NGOs receiving EU or bilateral funding from a member state.[6] The 2018 EC – UN Financial and Administrative Framework Agreement were revised to hold UN agencies accountable to EC AMLD. Failure to comply with the AMLD may result in a fine and, in some cases, imprisonment.

3.2 THE UK'S MONEY LAUNDERING, TERRORIST FINANCING AND TRANSFER OF FUNDS (INFORMATION ON THE PAYER) REGULATIONS 2017 AND SUPPORTING EXPLANATORY GUIDANCE

The UK government is explicit in its expectations of the financial services sector, financial advisers and accounting service providers (for example, auditors) with regard to anti-money laundering. The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and supporting explanatory guidance[7] expect parties who transfer money to conduct thorough due diligence reviews of recipients and the intended use of the funds. It does set out where simplified due diligence is permitted but expects that to be in lower-risk jurisdictions. Auditors of Department for International Development (DFID) grants could be instructed to focus more deeply on due diligence and background checks, for example, as thoroughly as they now review safeguarding practices.

3.3 UN AND US SANCTIONS LISTS

The **UN Security Council Consolidated List** includes all individuals and entities subject to measures, ranging from arms embargoes, travel bans or asset freezes, by the Security Council. All UN members states must comply with the sanctions list, and hence, all humanitarian organisations. However, the Consolidated List does not include all individuals or entities sanctioned by individual states, resulting in some governments, such as those noted below, developing their own lists. Until the 2018 revision to the EC – UN Framework Agreement, UN agencies only had to comply with the Consolidated List. The updated framework agreement now requires the UN to report if any recipients of EU funds are subject to EU restrictions, which could lead to financial penalties.[8]

The Office of Foreign Assets Control (OFAC) is an enforcement agency of the US Treasury Department that "administers and enforces economic and trade sanctions in support of US national security and foreign policy objectives" across the US government.[9] The OFAC sanctions list[10] is an example of several such lists (such as the UN Consolidated Sanctions List, and those published by the EU and its member states – including the UK) and that aims to ensure that **sanctioned** governments, individuals **and organisations are not traded with or funded**. Notably, there is no established threshold concerning the amount of money or value, as there is with the EU AMLD. It is relevant for US-headquartered companies and organisations, as well as for recipients of US government funds, such as USAID and the Department of State's Bureau of Population, Refugees and Migration, as well as for financial services providers who are themselves based in the US, or who wish to trade with US-registered companies or banks.

6 The fact that INGOs, and UN agencies, pooling funds in a response means that the recipient of those these funds, that is, an FSP, is not only assessing just the single donor grant, but also all the other sources of funding that the INGO receives.

7 The National Archives, 2017, "The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017," www.legislation.gov.uk/uksi/2017/692/contents/made

8 The European Commission and the United Nations, 2018, "Financial and Administrative Framework Agreement between the European Union represented by the European Commission and the United Nations," https://ec.europa.eu/europeaid/sites/devco/files/fafa_working_document_signed_2018.pdf

9 Office of Foreign Assets Control, Office of Foreign Assets Control-Sanctions Programme and Information, treasury.gov accessed 25 November 2019

10 Ibid.

3.4 FINANCIAL ACTION TASK FORCE

The Financial Action Task Force is an inter-governmental body responsible for setting global AML and CTF standards. FATF is made up of 39 government entities and nine regional FATF-style entities or associates, as well as observers from the UN and multilateral banks. Over 200 jurisdictions have committed to the FATF standards (known as the FATF Recommendations) directly or via the regional associate members.[11] FATF Special Recommendation 8 notes that non-profits are "particularly vulnerable" to abuse for the financing of terrorism. A 2012 analysis found that governments in 160 countries used FATF to further limit civil society space related to development, conflict resolution and human rights.[12] Due to advocacy efforts, FATF has since revised its recommendations to mitigate negative impacts on legitimate civil society activities. Nonetheless, part of those clarifications note that non-profits who work in close proximity to active terrorist threats are most at risk, which continue to leave humanitarian organisations vulnerable to excessive regulation.[13]

4 TRANSFERRING FUNDS TO THE COUNTRY OF OPERATIONS:

CHALLENGES IN IDENTIFYING COMPETENT AND WILLING BANKING PROVIDERS AND OTHER FSPS TO TRANSFER FUNDS TO A COUNTRY OF OPERATIONS

Setting up operations in new countries and locations can be challenging, as is the task of identifying partners and vendors in-country, particularly in the post-9/11 context as AML and CTF regulations have been tightened. As a result, a report by the Charity and Security Network found that two-thirds of US-based NGOs have experienced banking-related issues, including delayed wire transfers and increased fees, as well as the closure of bank accounts and a refusal to open new accounts.[14] This situation is described as de-risking, which refers to the "trend of financial institutions terminating or restricting business relationships to avoid rather than manage risk".[15]

In order to run humanitarian operations in any given location, organisations need funds to buy and distribute humanitarian goods or to transfer to people in need, to rent vehicles and offices, and to pay their staff. These funds are often transferred from humanitarian organisations' headquarters to the country of operations.

Setting up banking arrangements or opening a bank account can take time. A UN agency reported that it can take up to six months to open an account, during which time staff working for some organisations may resort to carrying cash in hand into the country or using personal bank accounts. The time required to open an account varies, depending on whether the identified bank is national or regionally focused, or whether it is part of a global banking group.[16] A nationally focused bank or other type of FSP is bound only by national laws and KYC requirements, as set out by its banking regulators.

However, banks seeking to expand internationally or trade with EU and/or US banks and businesses are expected to rigorously comply with EU and/or US regulations respectively. Therefore, a bank's particular set-up affects its willingness to accept new customers, apply its KYC procedures and carry out due diligence on an account's activity.

---

[11] FATF, 2019, www.fatf-gafi.org/countries

[12] Transnational Institute/Statewatch, 2012, "Legalizing Surveillance, Regulating Civil Society," www.statewatch.org/analyses/no-171-fafp-report.pdf

[13] Charity and Security Network, 2015, "FATF: What Nonprofits Need to Know," https://charityandsecurity.org/issue-briefs/fatf_what_nonprofits_need_to_know/

[14] Charity and Security Network, 2017, "Financing access for US Nonprofits" www.charityandsecurity.org/system/files/FinancialAccessFullReport_2.21%20(2).pdf

[15] Ibid.

[16] A nationally focused bank or other FSP is bound only by national laws and KYC requirements as enforced by its banking regulators. A bank that seeks to expand internationally or to trade with US and/or EU banks and businesses can expect to be assessed by those international parties for compliance with US and/or EU anti-money laundering, counter-terrorist financing and KYC regulations and procedures.

The key regulations to consider when transferring funds into a country of operations are the European Union AMLD and, as an example of several such lists, the OFAC sanctions list. Together, the EU AMLD and the OFAC requirements represent a **reputational and compliance risk burden for FSPs in-country**, in addition to any specific national legislation.[17]

A bank that is currently only national, but that is seeking to develop global connections, will be protective of its reputation and may self-impose stricter KYC rules than those required by national legislation. It may also de-risk clients that could expose it to fines or that generate less business. This risk aversion could make humanitarian organisations less attractive clients, while the burden of KYC may be used as a barrier to entry for humanitarian organisations that may leave the country of operation or change banks a couple of months later.

EU and US donors expect their **non-UN grantees** to adhere to the respective donor's national legislation and include trickle-down clauses that impose those limits on sub-awardees, collaborating partners, service providers and vendors – including FSPs. In addition, the European Commission's Framework Partnership Agreement for NGOs requires grantees to ensure that ECHO-appointed auditors have access to sub-awardees, service providers and vendors funded by an ECHO grant.

Higher handling fees are one deterrent that receiving banks may impose. However, these may be significantly reduced through negotiations based on the scale or potential of the business account. This **underlines the importance of preparing banking relations in regions of potential future operations** and of collaborating with donors or in-country representatives of humanitarian (or development) organisations in order to make introductions or to share banking facilities in the early stages of a humanitarian response.

In addition, humanitarian organisations should be aware that taxpayers, politicians and the media will expect implementers to have also carried out local assessments to learn about the reputation of those they partner with.

5 IDENTIFYING IN-COUNTRY SERVICE PROVIDERS:

CHALLENGES RELATED TO KYC REGULATIONS AND FINANCIAL SECTOR IDENTITY CHECKS BY FSPS AT THE NATIONAL LEVEL

Humanitarian organisations implementing CVA often work with FSPs based in the country of operations, such as local banks, hawala networks and mobile network operators, to deliver cash and vouchers to recipients. These FSP relationships are often different to those that organisations rely on to transfer funds into the country (as outlined in the previous section). However, **AML/CTF and other regulations still apply when FSPs are contracted to deliver CVA to recipients.** One of the main challenges unique to CVA is assessing and identifying FSPs able and willing to deliver CVA in a way that is safe and accessible for recipients, and that meets national and international AML/CTF and sanctions regulations.

Further complicating the landscape is the fact that AML/CTF regulations may vary among FSPs at the national level. This is particularly the case with banks, which tend to be highly regulated compared to MNOs and hawala networks. As MNOs continue to expand globally, regulators are often still trying to catch up. For example, in Uganda, in 2017, the government ordered an MNO to cancel mobile accounts registered to refugees using UNHCR-issued documentation due to new rules requiring refugees to have a government-issued ID card. Humanitarian organisations were able to effectively advocate for a transition phase during which SIM cards remained active while the government issued new IDs for refugees.[18]

As discussed above, FSPs have been under increasing scrutiny and, as a result, some FSPs are unwilling to accept humanitarian organisations as clients. Despite the potential profits from an expanded client base and reputational gains from supporting humanitarian efforts, FSPs may be reluctant to take the compliance risk if the volume of business is relatively small.

[17] The rules that an INGO needs to consider, based on specific national legislation, vary from country to country.

[18] Interview, March 2019.

One major FSP noted that a minimum of 20,000 cash transfer recipients would be required to make this an attractive business proposition. As a result, some FSPs may simply not respond to humanitarian tenders or, if they feel obliged to apply, may resort to de-risking strategies. These may entail, for example, delaying transactions, setting high transaction fees or imposing lengthier or more complex bureaucratic processes.

The challenge of identifying and contracting FSPs is compounded by a limited understanding among humanitarian organisations of national AML/CTF regulations, as well as the lack of experience of many FSPs in working directly with affected populations, which are often perceived as a high-risk compliance burden. One solution would be to increase negotiating power with FSPs – through scale and/or joint negotiations among humanitarian actors to achieve scale – in order to make a good business case for FSPs. For example, cost-efficiency gains were achieved through the Lebanon One Unified Inter-Organisational System for E-cards (LOUISE) in Lebanon and the Common Cash Facility (CCF) in Jordan, which provided motivation for joint approaches such as the Collaborative Cash Delivery (CCD) network and the proposed UN Common Cash System.

In some contexts or with specific FSPs at the global level, humanitarian organisations have been successful in adopting a 'Know Your Business' (KYB) approach. This transfers the KYC burden on to the humanitarian organisation with the aim of reducing effort and potential liability for the FSP. With a KYB approach, a humanitarian organisation takes responsibility for the KYC/CDD process for CVA recipients and the contractual arrangement may stress the fact that the funds used for CVA are the responsibility and property of the organisation, rather than the FSP. The disadvantages of the KYB approach are that:

- It limits formal financial inclusion since the recipient is not known by or directly engaged with the FSP.
- It is unfeasible to apply a KYB approach towards MNOs since SIM cards are registered at the individual level.

A humanitarian organisation's choice of FSP to deliver CVA is also subject to compliance with sanctions, to ensure that individuals and/or entities are not traded with, funded or supported. Sanctions will inform the selection of an FSP, particularly when sanctioned individuals or entities are stakeholders in banks and MNOs. Screening software remains a frequently used tool for identifying sanctioned organisations and persons, despite the limitations noted below; however, it is just one aspect of a risk-based management approach.

6 BENEFICIARY IDENTIFICATION AND DATA SECURITY:

CHALLENGES RELATING TO AML/CTF REGULATIONS REGARDING CVA RECIPIENTS

Regulations place demands on humanitarian organisations to ensure that funds, goods and services do not benefit sanctioned persons or groups. In the realm of OFAC, and in the high-risk settings defined in the May 2019 USAID/OFDA risk mitigation guidelines for programme proposals,[19] the implication is that the implementing humanitarian organisation is **responsible for ensuring that it has risk-appropriate procedures in place** and that they are being adhered to.

The fifth revision of the EU's Anti-Money Laundering Directive (AMLD-5) has added to the burden by lowering the financial threshold at which an organisation is required to know the recipient and the likely use of the funds to €50. AMLD-5 also clarified that instruments of value (such as paper and e-vouchers) that can only be used at a few locations and cannot be exchanged for money are outside the scope of the directive – a correction from what was initially noted in Article 3 of the fourth revision, AMLD-4.[20]

While donors require specific information for both in-kind and CVA modalities, **requests for information regarding CVA are often more extensive** in order to explain the delivery mechanisms and management controls in the programme proposal narrative and design description. According to key informant interviews carried out for the study, these requests are mainly the result of a lack of detailed, context-specific knowledge of delivery mechanisms among donor focal points.

Donors also noted that their review of proposals and requests for further information can take longer to complete for CVA as they are not as familiar with the modality and variety of transfer mechanisms as they are with in-kind assistance, or with the different oversight roles of project staff. With CVA, the informants interviewed for the study noted that more staff contact time was required (before, during and in follow-up) when implementing CVA, due to the fact that it presented beneficiaries with more choices in addressing their needs.[21]

Screening individual beneficiaries against sanctions lists is rarely considered an effective risk mitigation measure on its own and is not carried out very often. This is in contrast to processes designed to target beneficiaries, which are considered effective when applying assessment or community selection methods. Several organisations interviewed considered beneficiary screening or vetting a red line and, therefore, refused to apply for funds where these requirements were applied. Where the grant agreement from the donor was explicit and directed the implementer to adopt stricter guidelines, then the screening, or at least the gathering of personal data, took place as part of a broader risk management response.

[19] High risk settings include: Afghanistan, Burkina Faso, Far North (Cameroon), Lac (Chad), Iraq, Libya, Mali, Northeast Nigeria, Somalia, Syria, Non-Government Controlled Areas of Ukraine, Venezuela Regional Crisis, Yemen

[20] European Parliament, 2018, "Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 amending Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, and amending Directives 2009/138/EC and 2013/36/EU," https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018L0843

[21] Ibid.

7 CONCLUSION AND RECOMMENDATIONS

Anti-money laundering and counter-terrorist financing regulations have had a significant impact on humanitarian action, perhaps most dramatically illustrated by the delayed humanitarian response to the 2011 famine in Somalia in which 250,000 people died. To date, CVA has not been explicitly targeted by the regulations reviewed in this study; however, there has been a trickle-down impact on the selection of FSPs to deliver CVA. While these regulations were not designed to limit a humanitarian response or CVA, and while national regulators have granted exceptions, there has been a lack of policies and guidance to ensure that humanitarian action is not further encumbered by bureaucratic processes and risk aversion.

Looking to the future, there is the potential, in a worst-case scenario, that donor governments require the screening of recipients and, specifically for CVA, increased scrutiny of the CVA chain of custody between the recipient and where funds are spent.

In order to address the gaps highlighted in this briefing note, as well as to prepare for future challenges, the following actions are recommended:

FOR THE CALP NETWORK (CALP MEMBERS AND CALP STAFF TEAM)

- Strengthen linkages and increase awareness of CVA-specific challenges among key stakeholders already working on these issues, such as:
  - The Charity and Security Network – a resource centre advocating for an enabling framework for NGOs vis-à-vis counter-terrorism-related regulations
  - The Alliance for Financial Inclusion – a network of central banks, financial regulators and other stakeholders from over 90 developing countries supporting financial inclusion, including for displaced persons
  - The Non-Profit Organization Coalition on FATF: a coalition of NGOs, including CaLP member, NRC, working to ensure that civil society perspectives are involved in AML/CTF policy making.
- Develop country-level case studies on AML/CTF regulations with CaLP members and discuss the implications for CVA, together with best practice, and share with the CVA community of practice in order to increase awareness and build capacity.
- Continue providing technical and policy support to the CVA community of practice focusing on the outcomes for recipients[22] in order to mitigate against increased scrutiny related to the CVA chain of custody between aid agencies and the recipients of the goods or services purchased.
- With CaLP's Technical Advisory Group, collate and reinforce existing good practices and consider defining CVA minimum standards for selecting an FSP and assessing its financial risks

FOR CASH WORKING GROUPS AND OTHER CVA STAKEHOLDERS

- Define and share risk registers, within national-level cash working groups (CWGs) and other relevant coordination bodies, informed by national regulations and practices so that all CVA actors can benefit from existing efforts. This will, thereby, reduce duplication of effort and facilitate opportunities for joint monitoring and mitigation measures.
- Facilitate strong relationships with central banks at the country level, particularly through the CWGs, in order to increase mutual understanding and develop practical solutions to address KYC and due diligence issues.

[22] The Grand Bargain Cash Workstream prioritised action to develop harmonized outcome indicators for multipurpose cash, which were finalized for piloting in mid-2019. See: www.usaid.gov/sites/default/files/documents/1866/10-1-19_Multipurpose_Cash_Assistance_PIRS.docx

This study is made possible by the generous support of the American people through the United States Agency for International Development (USAID). The contents are the responsibility of the authors and do not necessarily reflect the views of USAID or the United States Government.