
Mapping a Route-Based Approach to CVA: Feasibility in select contexts in the Americas

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LIST OF ACRONYMS

CVA – Cash and voucher assistance

CWG – Cash Working Group

FAST – Finance Against Slavery and Trafficking

FATF – Financial Action Task Force

FSP – Financial service provider

FGD – Focus Group Discussion

IFRC – International Federation of Red Cross and Red Crescent Societies

KII – Key informant interview

KII FSP – Key informant interview, financial service provider

KII HO – Key informant interview, humanitarian organization

KYB – Know your business

KYC – Know your customer

NGO – Non-governmental organization

UN – United Nations

UNHCR – United Nations High Commissioner for Refugees

USDC – United States dollar coin

1. EXECUTIVE SUMMARY

The Americas has experienced the greatest increase in human mobility in the world.¹ This is a critical time for humanitarian actors to look at more effective and efficient ways to assist people on the move throughout the region and for donors to invest in efforts to do so. Actors using cash and voucher assistance (CVA) in human mobility contexts in the Americas treat the program environment as static when in reality it is highly dynamic. Human mobility patterns are complex and ever-changing. They are influenced by a variety of factors. To be effective, programs need to consider the full spectrum of human mobility, including the diversity of people who are on the move, the reasons why they are moving, and the routes they take. Programs need to be designed in a way that is responsive to these drivers and that considers the specific needs of the people who are on the move. They also need to be flexible enough to adapt to the changing nature of human mobility. By taking a more holistic approach to human mobility, programs can be more effective in addressing the needs of people on the move and in promoting their wellbeing.

This research explores the feasibility of adopting a route-based approach to CVA. It also provides information and analysis for interested and innovative international and national humanitarian actors to become early adopters. This approach was first suggested as a recommendation from a previous and related research on CVA in the human mobility context, *People on the Move: Can the World of CVA Keep Up?*² The research highlighted critical areas of friction and misalignment between the relatively static CVA design and delivery models used by the humanitarian sector, and the lived experiences of people on the move as well as the dynamic context of human mobility.

¹ Migration Policy Institute (2023). [In a Dramatic Shift, the Americas Have Become a Leading Migration Destination](#) (feature)

² CALP Network. G. Baizan, P. (2022). [People are on the Move: Can the World of CVA Keep Up?](#)

This research analyzes in depth how a route-based approach may offer the opportunity to mitigate some of the existing frictions evident in delivering CVA to people on the move especially if implemented in a way that effectively supports regularization and settlement, and that provides resources to encourage safer transportation routes.

The methodology used in this research was a blend of human-centered design methods and feasibility assessment and analysis. The Desirability, Feasibility, Viability model by IDEO has been used as a framework to respond to the feasibility question in a way that considers key stakeholders and systems. It proposes design options and opportunities for future implementation. Data collection consisted of key informant interviews (KIIs) and focus group discussions (FGDs) with stakeholders from humanitarian and development organizations, financial service providers, researchers, and people on the move. This research focuses on migration-dense areas in Central America—Mexico, Guatemala, Honduras and Colombia and its neighboring transit and destination countries.

A route-based approach is yet to be implemented. Therefore, defining a route-based approach is complex and challenging, and likely defies a single definition. The feasibility of the approach would depend on different situations, stakeholders, and systems. However, the idea is to shift the unit of action of CVA from a country to the whole route. This paradigm shift means that instead of focusing on individual countries, the CVA would follow an entire migration route including actors in each of the countries involved working together to deliver humanitarian support in a cohesive and predictable way for people on the move. The purpose of this research and proposition is to consolidate available information with the intention of pointing stakeholders in the right direction, towards a more practical implementation phase that is optimized for success and hopefully expansion. The analysis deliberately stops short of prescribing specific criteria, approaches, and scenarios mainly because they are untested, and some or all can be combined in different ways to design a route-based approach.

People on the move in the Americas face many challenges. However, there are also many successful strategies that reach them with assistance. By ensuring coordination amongst humanitarian stakeholders, the journey for people on the move is safer and more successful. There are several ongoing efforts to achieve multi-agency collaboration along common routes. These include joint response plans, consortium-based programs, coordination systems, route mapping efforts harmonization of monitoring indicators and data sharing agreements. Nonetheless, feedback from key informants has indicated that there remains a combination of intra- and inter-institutional barriers and practices that inhibit the flexibility of organizations to adapt to the nature of the human mobility context in the region. Concerns about dwindling funding are prevalent and are perceived as factors constraining the capacity of organizations to face a rapidly evolving human migration context. This context has led to the use of default delivery strategies and a disconnect between CVA, financial inclusion, and the mitigation of risks to safety and survival for people on the move.

Considering the financial ecosystem and service provision is vital for humanitarian agencies as it relates to CVA, leveraging mobile payment channels and partnerships with financial service providers can enhance the delivery of CVA interventions. However, regulatory barriers and a lack of strategic dialogue between the humanitarian community, regulators, and innovators in the financial sector have thus far limited the options considered for CVA delivery. Instead of treating cash delivery as a country-specific service, a route-based approach necessitates a cross-border perspective to aid delivery. This perspective requires a closer and more out-of-the-box collaboration between the humanitarian and financial sectors that account for the diverse and evolving financial ecosystem in the Americas. Coordination groups such as Cash Working Groups (CWGs) can play a key role in initiating and fostering dialogue between humanitarian actors and financial service providers to explore new cross-border approaches to delivery that leverage the presence of the humanitarian community and a combination of conventional and innovative financial instruments.

Figure 1: Main Themes: Key Informant Interviews



The development of a route-based approach will require collective agreements to ensure that people on the move participate in the design process and voice concerns with key stakeholders. Collaborators across countries and sectors must gain a mutual understanding of each other's needs, motivations, and perspectives. Ultimately, the question of whether a route-based approach is feasible will depend on the desire of the donors and the ability of humanitarian agencies to find a common ground to engage in thoughtful and iterative processes to journey away from the status quo towards this new paradigm.

If successful, the pioneering of a route-based approach promises to be valuable and relevant within the Americas and beyond. The approach could be used where there are increasing trends in human mobility alongside increasing challenges for humanitarian partners using conventional CVA approaches to address the needs of people on the move.

2. INTRODUCTION

CALP's recent publication *People are on the move: Can the world of CVA keep up?* explored in detail the inadequacies of the cash and voucher assistance (CVA) design and delivery approaches used by agencies supporting populations on the move. The approaches were found to be maladapted to the nature of human mobility^{3 4} globally. This criticism is especially relevant within the context of the Americas, considering it has been a hub for some of the largest and ongoing human migrations in recent history. It is widely recognized that designing for context is essential.⁵ Shifting from a one-dimensional focus that treats the program environment as static, to a perspective that acknowledges and adjusts the spectrum of human mobility.⁶ The dynamism of movement across different locations is not an innovation, it is a necessity.

With the intricacies of human mobility comes the need to revisit and interrogate whether current models of CVA delivery that are country-specific are 'fit for purpose' and context. Are the assistance modalities and program designs being utilized flexible enough to accommodate the dynamic nature of multi-country movement? Are the methods currently used for targeting program participants agile enough to truly serve the needs of such a multicultural and pluralistic group of people on the move? Inter-agency competition, jurisdictional barriers, limited investments in innovative approaches, and a lack of meaningful engagement and collaboration between humanitarian and private

³ The United Nations Network for Migration. (2021). [*Human mobility: A local, regional and global call for collective action and evidence-based public discourse.*](#)

⁴ Montenari, A. (2005). *Human Mobility, global change, and local development. In this view, mobility focuses on the movement patterns of people from one location to another, across any mode of transportation.*

⁵ CALP Programme Quality Toolbox: <https://www.calpnetwork.org/resources/programme-quality-toolbox/>

⁶ CALP (2023). Ibid. Systemic Framework on Human Mobility and Vulnerability (Figure 1).

sector actors have culminated in an ensemble of barriers to providing appropriate, and adaptive CVA to people on the move.

This research commissioned by the CALP Network seeks to examine the feasibility of delivering CVA through a 'route-based approach'. It explores the necessary stakeholders, systems, and changes required to implement this approach and bring about shifts in humanitarian CVA. It acknowledges that there is no definitive answer or precise measure of feasibility for this approach, as it has not been implemented by humanitarian actors in the Americas. However, the aim is to provide insights and possibilities for those who are prepared to initiate the first steps in this direction.

2.1 NAVIGATING THIS REPORT

This report presents a comprehensive analysis of the feasibility of implementing a route-based approach to CVA in the context of migration within the Americas. It begins by outlining the research objectives and methodology, providing insights into the purpose, scope, and limitations of the study. The structure of the following sections is designed to explore feasibility through three key dimensions with the overall theme of a navigational journey in mind.

The section titled *Surveying the Landscape: Current State* examines the status quo of CVA in the region along with the opportunities and challenges involved in adopting a route-based approach. This first section of the report is designed to present the topic through three perspectives: human, institutional, and functional. It begins with exploring some of the perspectives and experiences of people on the move (see: *People on the Move: Desirability, Perceptions and Personalities*), before moving on to assess institutional progress and obstacles to implementing CVA approaches (see: *Institutional Approaches: Progress, Opportunities and Challenges*). The subsequent section investigates the availability of suitable financial solutions for route-based service delivery (see: *Function: Financial Ecosystems & Service Provision*). Overall, each of these sections emphasizes the need for collaboration and collective action among humanitarian, financial, and regulatory stakeholders to ensure a unified and consistent approach to delivering assistance along major migratory routes.

The second part of the report draws on design thinking principles to present a more visionary approach (see *Paving the Way: Key Elements of a Route-Based Approach*). This is followed by a section on the modeling of a route-based approach, where visual scenarios are presented to stimulate ideas and discussions among stakeholders for integrating this approach into their CVA initiatives (see *On the Move: Route-Based Approach Scenarios*).

The *Conclusion* section begins with a design lens, highlighting the importance of an incremental approach (Vision), donor engagement (Investment), flexibility through innovation, and adaptation (Innovation) whilst providing guiding visuals such as potential models for piloting and creating a design roadmap. Forward-looking suggestions from people on the move for the humanitarian community, gathered over the course of the study are provided to ensure that future approaches are demand-driven and tethered to reality (see Listen: Recommendations from People on the Move). The report then concludes with Directions and Reflections to summarize the findings, supporting the feasibility of a route-based approach to CVA in the Americas. It emphasizes key elements that actors can incorporate into the design and implementation of such an approach.

2.2 CONTEXT

The human mobility patterns across the Americas are highly complex as larger, well-established routes overlap, connect and intersect with a multitude of smaller, and sometimes riskier routes. The routes chosen by individuals on the move are typically influenced by a variety of factors such as their origin, motivations, personal circumstances, and the means available to either facilitate or restrict their mobility.⁷ With a diversity of groups and individuals originating from multiple countries⁸ and a diverse set of socio-economic backgrounds, it can only be expected that the experiences, needs and vulnerabilities of those traveling these pathways are as numerous and complex as the routes themselves, if not more.

Despite the diversity of individuals arriving at these routes, there are still shared drivers that contribute to human mobility in the region. These drivers include conflict and violence-related forced displacement, the increasing impact of climate change, a lack of economic opportunities, and growing inequality. Amongst and between people who are on the move, these factors can not only unify communities, but they can also create division and discrimination. Protection-related risks are almost universal, exposing people of all ages and nationalities to gender-based violence, theft, extortion, and trafficking.⁹

From a CVA delivery perspective, organizational focus on operational needs, processes, and sector-specific mandates restricts flexibility in programming, particularly when addressing the needs of such a heterogeneous population. This issue is further compounded by the limited diversity in donors and their influence on fund allocation

⁷ CALP Network. G. Baizan, P. (2022). [People are on the Move: Can the World of CVA Keep Up?](#)

⁸ MMC. (2023a). [Quarterly Mixed Migration Update: Q1 2023](#) Geneva, 26 April.

⁹ Fletcher School of Law and Diplomacy. (2022). [The Journeys Project: Financial Biographies of Migrants in Colombia.](#)

within the Americas. Donor cycles and specific requirements outlined in calls for proposals play a significant role in shaping program design decisions. Unlike regions with more prevalent regional funding schemes, such as the Ukraine response or the migration response in West Africa, the Americas has fewer opportunities for cross-border project funding. Most calls for proposals in the region are tied to specific country contexts, creating challenges for exploring and implementing cross-border assistance models.¹⁰ This funding landscape, coupled with the sector's tendency to adhere to conventional systems and maintained relationships with preferred service providers, arguably discourages the exploration of local and regional financial ecosystems that could serve to develop new adaptations of CVA. Strict financial regulations – or a narrow interpretation thereof – further constrain program design choices.

These approaches lead to the use of default delivery strategies, such as the selection of simple payment instruments with limited sustainability and flexibility to serve middle and long-term economic integration needs, where access to a broader variety of financial services is required.¹¹ These same approaches also fail to explore critical linkages between CVA and financial inclusion. For instance, the planning and integration of financial inclusion measures within a CVA intervention could serve to support the transition to recovery, long-term economic stability, and reduction in household vulnerability over time via access to basic financial instruments, such as savings accounts. The relationships established with financial service providers, especially in large-scale CVA interventions can and should be leveraged to negotiate these outcomes in a manner that is mutually beneficial.

In shaping programs better adapted to human mobility, actors need to approach the identification and assessment of needs differently. They should consider non-typical expenditure patterns, risks, and income access behavior that are specific to the reality

¹⁰ Key informant interview, H07.

¹¹ Key informant interview, H06.

of men, women, and children as they move. The need for cash is universal in such situations, highlighting the importance of exploring the feasibility of interoperable, cross-border financial services.

2.3 OBJECTIVES

This study seeks to achieve the following objectives:

- Provide a working definition of what a route-based approach consists of
- Identify key enablers and blockers to the adoption of a route-based approach by humanitarian actors
- Propose feasible route-based approach models that are adapted to the needs, preferences, and capacities of people on the move, the humanitarian actors serving them, and the financial sector stakeholders providing the necessary services to deliver CVA.

This research qualifies to be an exploratory feasibility analysis particularly because the term route-based approach itself is yet to be defined. This layered context consists of the geography and human experiences characterizing mobility in the Americas, the organizational and programmatic context of humanitarian CVA, the economic context of financial ecosystems, services and systems, and lastly, the political-legal contexts in the region (e.g., policy, regulation, and geopolitics). With this level of complexity, it is admittedly not possible to cover each of these variables in depth, but rather to examine which interactions therein might yield the most feasible outcomes relevant to a route-based approach. In other words, the objective of this study is not to provide definitive assertions of what is feasible or not. Instead, it aims to present potential models and directions that are highly likely to be feasible. These findings can serve as avenues for further engagements and exploration by interested stakeholders and willing donors.

Given the exploratory nature of this report and the complexity of the subject, variations on conventional feasibility analysis and assessment methods have been adopted. These variations ensure that the findings are based on human-centered design approaches, accounting for the diversity of groups in the framework, whilst being considerate to the capacities and priorities of key stakeholders.¹² Additionally, this approach embeds a realistic consideration of current innovations and how these might be relevant to existing systems and infrastructure used to deliver financial services.

To further narrow the scope, the areas of focus for this study were selected using a purposive approach. These are the two 'hubs' where multiple migratory corridors converge and where CVA delivery by humanitarian actors is most concentrated. These geographic 'hubs' are illustrated in the map below as Priority area 1 (green) and Priority area 2 (red).¹³

¹² KII, H06.

¹³ Note: The numbering on each of the geographical locations does not indicate significance but is only for differentiating each geographic 'hub'.

Map 1: Geographical Scope of Research



This research also aspires to provoke the thinking of donors supporting programs in migration contexts to demonstrate what is possible if there is an intention to adopt a route-based approach as a better, more appropriate, and innovative method to serve the needs of people on the move. For international and national humanitarian actors, this research seeks to inspire those who are ready, as a significant minority, to step forward as early adopters and lead others in the implementation of a route-based approach. The right combination of donor interest and stakeholder willingness to move away from the status quo is a prerequisite to action. This research can only provide orientation and direction. After all, all journeys, along any route, always begin with a first step.

2.4 METHODOLOGY

The research conceptual framework blends human-centered design methods with feasibility assessments and analyses. The core areas of focus are on the potential interactions between diverse groups of people on the move with the financial systems and services around them, and the organizations mandated to serve people in the context of a 'route-based approach'.

The human-centered design is widely used to understand how existing systems meet human needs and to identify opportunities for innovative integration or restructuring to better serve users in a way that is dignified and responsive to their needs.¹⁴ It also informs the development of user-centered products and services, including those related to finance and technology often termed as 'user-centered design'.

The question of the role of government is limited to an examination of secondary literature, mention by stakeholders (key informant interviews, focus group discussions), and the extent to which government policies, laws, and political influence impact jurisdictional considerations, particularly know your customer requirements. Where relevant, government policies aiding people on the move have also been considered.

Admittedly, it is not possible to fully assess the viability of a completely novel approach that relies on stakeholder actions that have not yet occurred and the establishment of client service relationships that are yet to be developed. Except for a few examples of cross-border CVA delivery,¹⁵ and a few examples of a route-based approach strategy, the latter lacks evidence of implementation, while the former lacks the intentionality of

¹⁴ Mieke van der Bijl-Brouwer, 'Designing for Social Infrastructures in Complex Service Systems: A Human-Centered and Social Systems Perspective on Service Design. *She Ji: The Journal of Design, Economics, and Innovation*, (3, 2017) <https://doi.org/10.1016/j.sheji.2017.11.002>

¹⁵ KII, H06 (anecdotal).

design as a route-based approach, particularly with regards to migration dynamics. The scope of this research is limited to proposing potentially feasible options for the implementation of a route-based approach, without extending to the prototyping or piloting actions that are typically used to test existing assumptions related to feasibility of implementation.¹⁶

This begs the question: How can one determine the feasibility of an approach that has never been implemented?

There is evidence within the finance sector of systems and products capable of servicing a multi-country route as well as humanitarian actors (International Federation of the Red Cross and Red Crescent Societies (IFRC¹⁷) and International Organization for Migration (IOM¹⁸), who have succeeded in defining an organizational route-based approach. We know of emerging technologies enabling rapid, cross-border transactions. There have also been programs implemented across borders as well as abundant literature on the successes and failures of CVA delivery within the migratory contexts of the Americas. The ‘desirability and feasibility’ described in Section II (A) of this report offers a suitable framework to pull together these resources to respond to the feasibility question in a way that accounts for the roles of key stakeholders and systems: financial, humanitarian, and people on the move. Rather than answer the question of if a route-based approach is definitively feasible, this research proposes a partial and purposive definition of feasibility. The goal is to provide stakeholders with guidance and direction based on the information and feedback that is currently available, while acknowledging that a comprehensive assessment of implementation feasibility is beyond the scope of this research.

¹⁶ Interaction Design Foundation. (2022). [From Prototype to Product: Ensure That Your Solution is Feasible and Viable](#). Blog.

¹⁷ International Federation of Red Cross and Red Crescent Societies (IFRC). (2022b). [Global Route-Based Migration Programme: Americas](#).

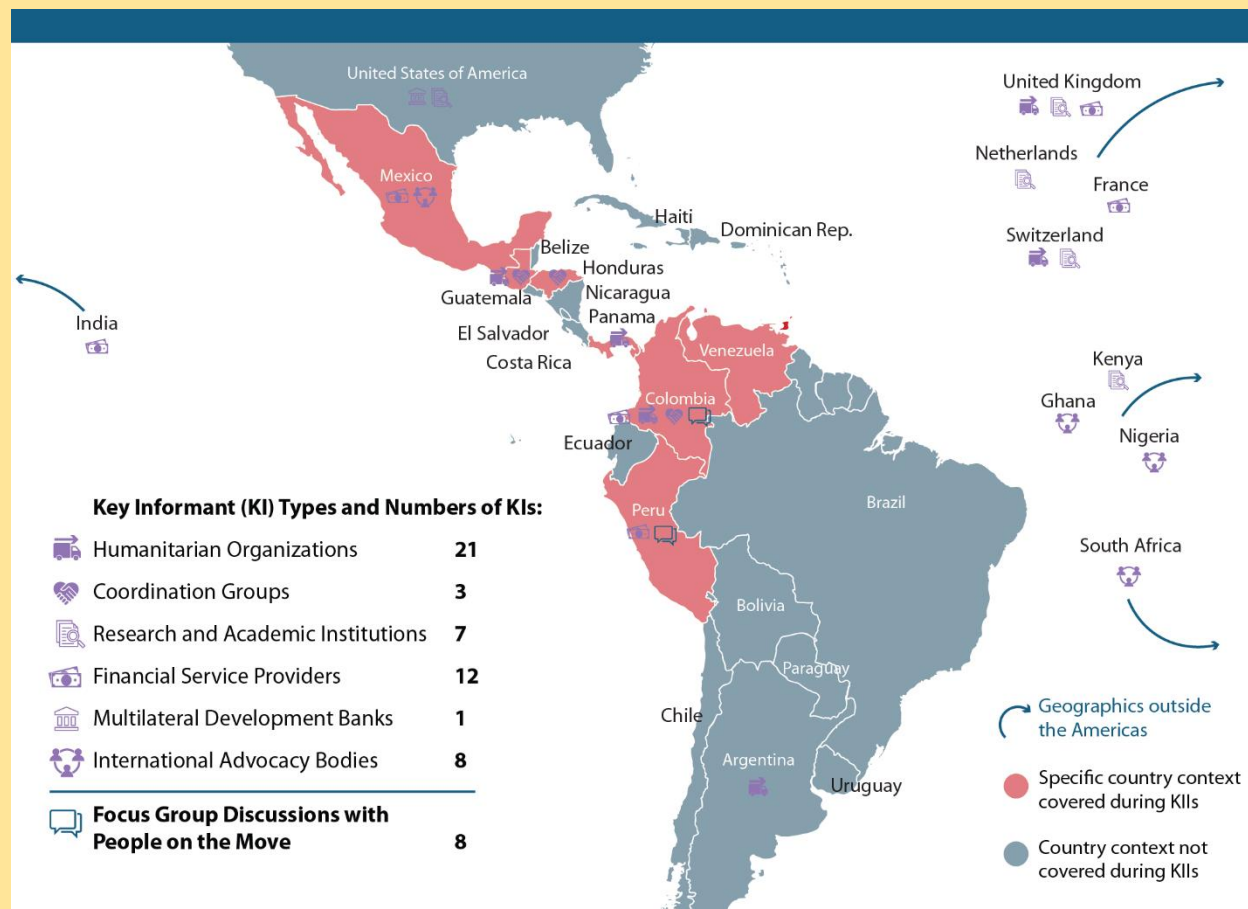
¹⁸ International Organization for Migration (IOM). (2020). [Ventanillas informativas sobre migración: Mesoamérica y el Caribe](#).

2.5 DATA COLLECTION & ANALYSIS

METHODS

This research is qualitative in nature. It is primarily based on literature review for the collection of secondary data. Primary data was collected through KIIs and FGDs with stakeholders across four categories: humanitarian and development organizations, financial service providers, researchers, and people on the move (see Map 1). In addition, several KIIs were conducted with independent researchers who have explored the topics of human mobility and financial inclusion in depth. A total of 38 KIIs were conducted with 52 individuals across 36 different organizations, using a series of questionnaires tailored to each stakeholder type. These tools are available in the annex. The geographical coverage and types of KIIs are illustrated in Map 2.

Map 2: Geographical Coverage and Number of Key Informant Interviews



To gather additional insights and perspectives from people on the move, FGDs were conducted in collaboration with partner organizations. The FGDs took place in four transit locations across Colombia (Bogota, Cali and Villa de Rosario) and Peru (Lima), facilitated by field teams from the Colombian Red Cross, Save the Children Colombia and Peru, and CALP. Eight FGDs were conducted with a total of 34 participants involving Venezuelans with diverse profiles including unaccompanied minors, single mothers, and family groups who were either on the move or had recently reached their destinations.

The FGDs were guided by a tool comprising open-ended questions designed to stimulate open and inclusive discussions. While most questions were addressed collectively in a group setting, there were instances where participants provided individual responses. This approach aimed to capture both group dynamics and

individual perspectives. This allowed for a more comprehensive understanding of the experiences, challenges, and aspirations of people on the move in the context of this study.

A systematic approach was employed to analyze the qualitative data gathered from the KIIs and FGDs. The transcripts of the interviews were carefully reviewed and coded using a thematic analysis technique identifying patterns within the responses. The research team developed a comprehensive codebook that served as a guide for labeling and categorizing the data. The coding process involved assigning descriptive labels to segments of the interview transcripts that represented key concepts, ideas, or experiences related to the research questions defined in the terms of reference for this study. The codes were applied to capture a wide range of perspectives, including regulatory considerations, operational challenges, stakeholder roles, and the needs and preferences of people on the move. The coding process facilitated the organization and structuring of the data, allowing for easy retrieval and analysis.

Once the coding was complete, the research team conducted a thematic analysis to identify major themes and patterns across the coded data. This involved examining the relationships between different codes, clustering similar codes together, and uncovering overarching themes that emerged from the data set. Through this process, the research team gained a deeper understanding of the issues shared by the key informants. The literature review served as a valuable complement to the KIIs providing a broader contextual and theoretical frame of reference. It allowed the research team to compare the perspectives shared by the key informants with existing knowledge and theories in the field. This triangulation approach helped to validate the findings of the research and provide a more comprehensive understanding of the research issues.

2.6 LIMITATIONS

Besides the inherent limitations associated with the novelty of the topic, there are additional constraints that affect the scope and accuracy of this research. These constraints include limited in-person feedback and geographical focus, which may impact the comprehensiveness and precision of the findings. Additionally, without a field work component, the research team was unable to visit the locations in question to gather in-person feedback from individuals on the move in the region. This is despite the recommendations in the preceding research: *People on the Move* to prioritize assistance based on diverse perspectives and preferences expressed by the people on the move.

Nonetheless, support was provided by the CALP Network members¹⁹ to capture these views via a limited number of focus groups, albeit only in ‘Priority 2’ areas. This left a critical feedback gap for ‘Priority 1’ areas, where there are often more operational constraints and protection concerns inherent to CVA interventions.

Several organizations demonstrated the value of honest and open discussion with people on the move.²⁰ In case this area of study continues, gathering these views and filling this gap should be given priority. Without this consultation, a comprehensive exploration of the feasibility for a route-based approach remains incomplete. It is crucial to acknowledge that individuals who have forged migration pathways and faced their associated risks possess invaluable knowledge on these matters. Ideally, investing in a field level ethnographic analysis of feasibility becomes essential to place people at the center of program design and innovation.

¹⁹ Focus group discussions were conducted by CALP Network staff, the Colombian Red Cross, and Save the Children.

²⁰ Multiple sources: IFRC. (2022). The Fletcher School of Law & Diplomacy. (2020).

This research effort is a single action within the long-term process of building evidence and practice to assist actors in leveraging the flexibility and dignity of CVA, and new trends (such as digitization) to face the steep growth of crises related to the movement of people within the Americas and globally. The timeframe (four months) for this research was very limited compared to the size of the geographical area studied and the complexity of a multidimensional, protracted migration phenomenon with numerous drivers (conflict, economic, climate and political). As a result, findings remain high-level and limited to regional ‘hubs’, rather than being granular and country-specific.

Another limitation includes unsuccessful efforts to contact country-level regulators. Fortunately, the team was able to gather sufficient information from secondary sources²¹ and multilateral organizations that work closely with regulators and regulatory bodies.²² It may also be worth mentioning that high levels of turnover particular in the humanitarian sector may have affected the depth of insights from stakeholders, as institutional memory may prove to be intermittent or incomplete. Lastly, it is important to acknowledge the dynamic nature of the context, both in terms of political and regulatory landscapes and migration dynamics. What may be considered a viable solution for a route-based CVA intervention today, could rapidly become outdated due to the emergence of new financial regulations, changes in political and economic circumstances, and other factors.

²¹ UNCHR Innovation Service. (2020). [*Displaced and Disconnected: Americas Part I & II.*](#)

²² Alliance for Financial Inclusion, Inter-American Development Bank (IDB).

Table 1: RECAP: Research Methodology and Limitations

THEORETIC FRAMEWORK		HUMAN-CENTERED DESIGN (HCD) & FEASIBILITY ASSESSMENT METHODS			
PRIMARY DATA		SECONDAR Y DATA	LIMITATIONS		
<p>Key Informant Interviews</p> <p>With stakeholders across different categories: humanitarian and development organizations, financial service providers, and resereachers.</p> <p>38 Interviews in total, some individual, others in small groups with a total of 56 interviewees.</p>	<p>Focus Group Discussions</p> <p>With Venezuelans on the move</p> <p>A total of eight FGDs were conducted in small groups of 3-6 participants (a total of 34 FGD participants</p> <p>FGDs took place in four transit locations across Colombia (Boogota, Cali, Villa de Rosario) and Peru (Lima)</p>	<p>Literature Review</p> <p>In addition to documents shared by the Steering Committee, various databases and repositories were consulted to identify relevant studies, reports, and publications.</p> <p>This involved conducting a comprehensive search of academic and grey literature sources relevant to the topic of CVA in the context of migration.</p>	<p>Limited in-person feedback</p> <p>There was no field work component to this research. As a result the consultation of people on the move in the region was limited to 8 FGDs.</p>	<p>Complex geographic context</p> <p>I.e. the size of geographic are covered, and the dynamic nature of the context, both in terms of political and regulatory landscapes and migration dynamics. Thus what may be considered a visible solution for route-based CVA today could rapidly become outdated</p>	<p>Others</p> <p>Unsuccessful efforts to contact country level regulators.</p> <p>High levels of turnover particular to the humanitarian sector, which may affect the depth of insights from stakeholders.</p>

3. WHAT IS A ‘ROUTE-BASED APPROACH’?

3.1 DIRECTION, NOT DEFINITIONS: NAVIGATING SITUATIONAL COMPLEXITY & FEASIBILITY

There is currently no single, common, accepted definition of a route-based approach. Views on the definition of a route-based approach vary according to identity, location, organizational context, capacities, and motivations of the different stakeholders. With the dynamic complexity of human mobility in the Americas, and the diversity of people and places it concerns, seeking a clear ‘definition’ is not the right answer. In fact, the novelty of the concept resists definition.

The purpose of this research is to explore the necessary systems, actions, and tools that could eventually enable humanitarian stakeholders to achieve a future point where the implementation of a route-based approach becomes feasible. In other words, the focus here is on the journey, rather than the destination. This research is thus qualified as exploratory. This clarification also illustrates a critical focus needed in a route-based approach, which is seeing the ‘route’ through the lens and perspective of the individuals as they move hence designing interventions accordingly.

There are indications and evidence to support how a route-based approach could be designed as a model for CVA delivery. A central conclusion of the preceding study strongly advocates for ‘shifting the country’ to “the route” as a design unit for CVA interventions to offer better services to those who are moving along that route. In a

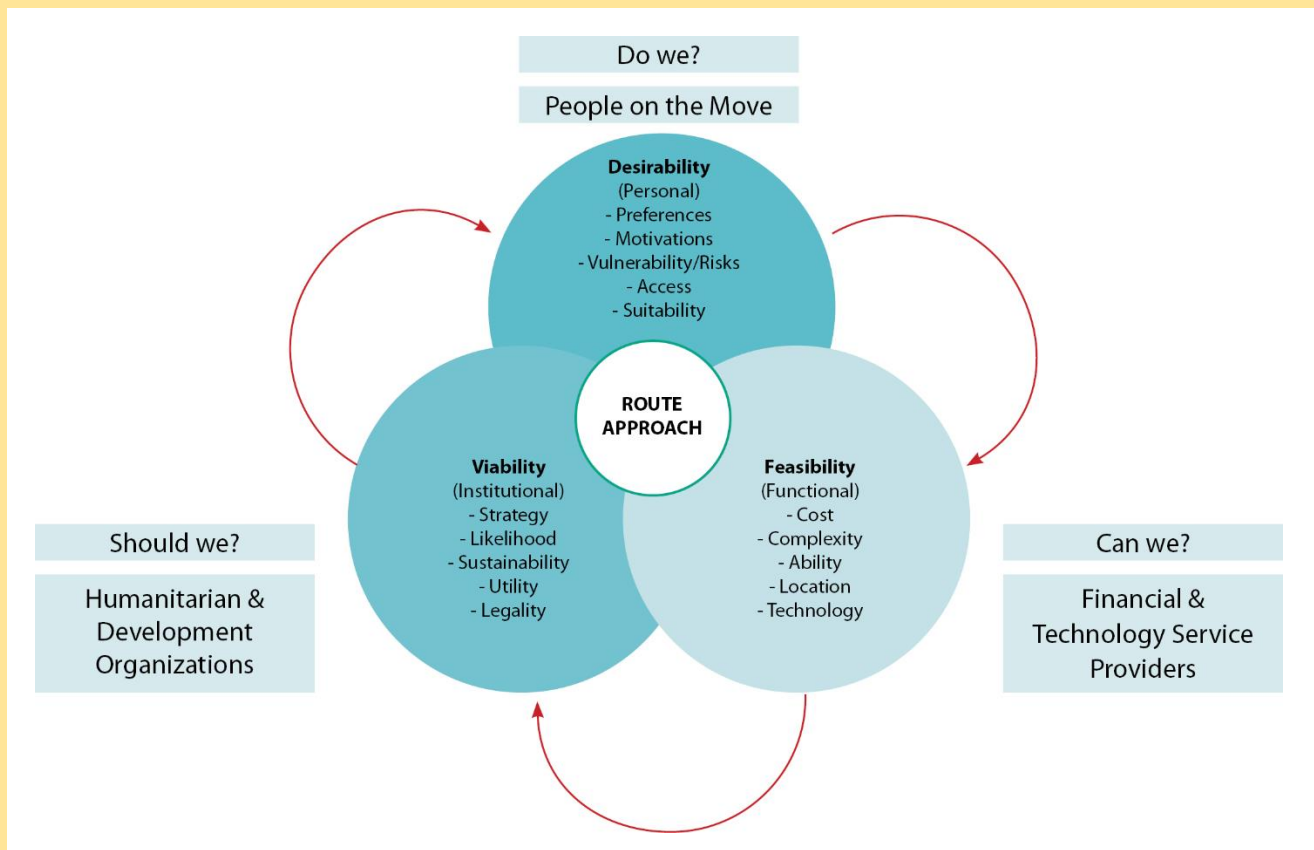
context where people on the move represent a highly heterogeneous group, a route-based approach needs to account for a multitude of variables. Mobility represents a unifying element, both as a need and as a motivation. In all cases, mobility implies direction. The concept of motility, by extension, articulates this dynamic, separating the 'actual' movement specific to mobility and referring specifically to the 'potential' for movement and the ability to do so.²³ Motility draws out interdependent issues specific to an individual's identity, vulnerability, and capacity to migrate to a new destination.

²³ Houtkamp, C. (2014). ['Integrating language in theories on long-distance movement: migration vs mobility & the concept of motility'](#). University of Amsterdam.

3.2 DESIRABILITY, VIABILITY & FEASIBILITY

Complexity and novelty combined can be daunting, especially in a sector that has long struggled with innovation.²⁴ IDEO's 'three lenses of innovation' framework offers a foundation for breaking down the concept of a route-based approach into three perspectives – people on the move, humanitarian organizations, and financial services, including government regulations governing them. Each perspective represents a design lens that must be considered for the feasibility of a route-based approach [Figure 2].

Figure 2: Desirability, Feasibility & Viability Framework – Adapted for this study



²⁴ Monich, A., Holm-Nielsen, P.V. & Raju, E. (2023). [The stagnation of innovation in humanitarian cash assistance.](#)

Figure 2 helps to illustrate the intersectional pieces that must fit together to ensure that it is designed for feasibility, while also addressing the perspectives of each stakeholder group. The route-based approach sits at the juncture of these elements, and represents the locational nature of the context, which is relevant to all the three perspectives.

Through these three 'lenses', this research gains direction and structure to explore two questions at once: What is needed to implement a route-based approach? and, How feasible is it to use CVA with a route-based approach in the context of human migration in the Americas? With a clearer starting point and a more structured outlook, the design of a route-based approach explores each lens to arrive at a basic diagnostic of what the key ingredients of a route-based approach might be.

4. SURVEYING THE LANDSCAPE: CURRENT STATE

4.1 PEOPLE ON THE MOVE: DESIRABILITY, PERCEPTIONS AND PERSONALITIES

The voices of people on the move, gathered through documentation and a series of focus groups, speak directly to the ‘desirability’ angle in a route-based approach. The abundant lessons learned and recommendations from CVA delivery in the region further substantiates this stance. The ‘user journey’ methodology has been highlighted as a best practice ‘for a view of the crisis from the reality of those affected and to adapt the response to the pace of their changing needs’.²⁵ The IFRC has gone ahead to map a variety of CVA interventions that have been provided to people on the move globally at each critical point of their journey: departure, transit, temporary settlement, and return.²⁶ Tuning in to understand and adapt to the needs, motivations, observations, and preferences expressed by people on the move must be a prevailing factor in how a route-based approach is designed. This is more so especially if it is agreed that the objective is to better adapt CVA models to the contextual reality that is human mobility.

²⁵ CALP Network. (2020). [La Provisión de Programas de Transferencias Monetarias en la Respuesta a la Crisis de Refugiados y Migrantes de Venezuela, Hallazgos y Lecciones Aprendidas](#), p. 30.

²⁶ International Federation of Red Cross and Red Crescent Societies (IFRC). (2022a). [Dignifying, Diverse and Desired: Cash and Vouchers as Humanitarian Assistance for Migrants](#). User Journey, p. 46.

There is a need to reconcile the way that humanitarian agencies present and represent themselves at the point of delivery in a manner that is responsive to feedback, unified, sensitive, and better aligned to the personal perspectives of people on the move. To better serve people on the move, humanitarian agencies should ensure their presentation and representation at the point of delivery align to the feedback from people on the move and work to promote sensitivity.

Perceptions of people on the move regarding humanitarian assistance and CVA consistently demonstrate a preference for both conditional and unconditional CVA in the Americas context, as well as in other contexts to different degrees.²⁷ However, the compartmentalized nature of CVA delivery across organizations in the Americas proves to be a sector-specific issue that spills over into the experiences of people on the move. Understanding current perceptions of the humanitarian community and the ways in which humanitarian assistance is delivered from the perspective of the person moving, is a critical starting point. Adopting this lens reveals where existing approaches interact with the needs, desires, and personalities of people on the move. In so doing, it is easy to know where these models align or misalign with these aspects of human mobility.

Within organizations, frustrations at agency bureaucracy as a barrier to multi-country integration of migration crisis responses was a recurrent theme in 6 out of 36 interviews. This issue has led to various associated problems including limited data sharing, inconsistent monitoring practices, and variations in program design and quality. Most importantly, this phenomenon creates the largest burden for those who can least afford to bear it – the individuals receiving CVA, and other forms of assistance provided in contexts of human mobility. For individuals crossing multiple borders, the requirement to repeatedly register and provide the same information to various organizations at each assistance point in different countries can not only be frustrating and undignified but also engender suspicion and distrust, particularly for those without valid documentation.

²⁷ Ibid.

Recognizing this challenge, initiatives like the Collaborative Cash Delivery (CCD) network have embarked on projects aiming to tackle this issue by developing data portability principles.

As articulated in the Colombia-based consultation exercise *Cash in Migration: Voices of Migrants*:

'There was a total rejection of having to register at each point of care every time a humanitarian service is needed. The people consulted considered that their rights to privacy were being violated and they felt revictimized. They criticized the information and registration systems as bureaucratic and unfriendly.'²⁸

From the standpoint of highly vulnerable individuals on the move who are in dire need, the priority is to receive assistance, regardless of the provider. The perception often reflects a collective understanding of humanitarian actors as a unified community, or a homogeneous concept referred to as 'assistance'. This narrative and perception spans both literature and in-person feedback, and contrasts starkly with the language used by humanitarian actors to refer to themselves as a community. The reality is that multiple boundaries and distinctions exist between humanitarian organizations. Implementing a route-based approach should make deliberate effort to reconcile this divide with participating humanitarian organizations presenting a united front (at least externally). This shift would require design and implementation in a consistent and coherent manner with predictable and accessible locations where assistance is available, strong communication and dissemination of information including route directions, type of assistance and services offered and eligibility criteria, etc.

Another aspect in adjusting assistance to experience is to consider how exactly people are moving from one country to another, what influences the decisions to take some routes other than others, and what expenditures are prioritized along the way. Those

²⁸ IFRC. (2022). [CVA in Migration Context – Voices of Migrants in Colombia](#), p. 20.

traveling on foot are often doing so due to a lack of resources to pay for vehicular transport. They are deeply affected physically and psychologically by these journeys. For these *caminantes*,²⁹ exposure to risks of violence, injury, and theft of their few resources is common, especially at border areas where gangs and guerilla groups operate. Those who go missing or die along the journey are also most often those traveling on foot.³⁰ It is likely that those traveling on foot take irregular and clandestine routes that avoid major border crossing checkpoints (most of which are on roadways). A significant example is the treacherous journey through the jungles of the Darien Gap.³¹ These trends exist across all known areas in the Americas. As one organization reported from a focus group conducted recently in Peru:

‘Very important, as well: they all say that for migrants who walk i.e., that do not have enough money to take buses or trucks, the border crossings are by far the most dangerous locations because they are vulnerable without a means of transport.’³²

In a nutshell, people on the move traveling on foot are those who are most likely socioeconomically vulnerable at the outset and become even more vulnerable over the duration of their journey. Paradoxically, these groups are also the least likely to access assistance offered by humanitarian organizations for several significant reasons, which have bearing on a route-based approach design. This was confirmed in FGDs where many participants did not receive or were not aware of large humanitarian assistance programs. Instead, they relied on support from churches, host communities, and fellow

²⁹ *Caminantes*: refugees and migrants that, due to a lack of resources to access individual or public transportation, travel partially or completely by walking to their destination. The term *población caminante* refers to a population traveling on foot without a defined destination (moving continuously, in transit via a third country, or back and forth between countries). (Colombia Cash Working Group)

³⁰ International Organization for Migration (IOM). (2023). [Missing Migrants Project](#).

³¹ Ibid.

³² Save the Children. FGD Peru, May 2023.

travelers.³³ Furthermore, even when they reached towns or larger centers where more humanitarian actors operate, a second access barrier emerged: the transitory nature of this population complicates their ability to receive humanitarian assistance effectively.

In other cases, caminantes are simply ineligible to access assistance, either due to a lack of identification or because the programs they apply for prioritize recipients who are settling in that location.³⁴ Furthermore, some governments prohibit this kind of assistance for people on the move. From the perspectives of vulnerability and coverage, these are major gaps in the current landscape of humanitarian assistance (with or without CVA). Therefore, a route-based approach must integrate strategies to reach out to these groups or meet them where they are to offer safe locations to rest and offer the much-needed aid and services to mitigate the impacts of the journey during the transit phase.

The VenEsperanza program's 'Caminantes Pilot Project' presents a highly feasible, low cost and highly effective strategy to expand outreach to these groups for inclusion in CVA interventions. This has been done via a variety of social media tools and the creation of a process for self-enrollment and preregistration while in transit. The program also incorporates reporting on the intended destination and confirmation of arrival on-site and facilitating targeted referrals to agencies operating in those locations. The approach streamlines processes and improves access to assistance for people on the move. It is equally useful for monitoring purposes. The process used in the program should be replicated to conceptualize a route-based approach as one or multiple corridors where assistance can be accessed easily, predictably, and safely. It could also be expanded to improve efficiency, coordination, and reach. For example, self-registration counts can be used to anticipate arrivals and plan on-site capacity accordingly. Leveraging social media for more direct and frequent communication

³³ Ibid. and CALP Network. FGD Colombia, May 2023.

³⁴ Mercy Corps. (2022). [Caminantes Pilot Strategy: Case Study from the Ven Esperanza Consortium.](#)

channels can help to manage expectations around the assistance being offered and better direct where it can be accessed. For instance, the program could provide Global Positioning System (GPS) coordinates and, go a step further to share photos of assistance locations and the logos of agencies that they might be referred to.

Many people on the move receive their information from others within their travel groups or those they meet along the way. This type of digital registration points can be leveraged to enable those who receive messages to relay to others to refer and preregister other eligible people traveling with them, expanding and targeting a degree further in a manner that is more participatory. Notably, the same initiative demonstrated significant use of digital platforms via the prevalence of access to social media platforms such as Facebook. Such platforms are already used as primary sources of information on potential routes and directions to people on the move.

Provision, use of and access to smartphones are other indicators that show how digital devices serve both as lighthouses and lifelines, especially when integrated into program approaches. If it can be reasonably assumed that a route-based approach for CVA is coordinated with the provision of other services, and effectively offers an assistance corridor to vulnerable people on the move, could it also serve another purpose? Specifically, providing smartphones could increase access to digital communication and achieve a larger goal: communicating regularly and helping predictably enough to encourage movement through safer locations, adding a 'safe passage' dimension to the design. For people moving on foot, this dimension could be significant in mitigating the risks associated with accelerating vulnerabilities over the course of travel. Although these outcomes would need to be proven in practice, they align with indications of a corresponding behavior: that the selection of routes by people on the move is partly determined by the assistance available along the way as a testimonial from Colombia suggested (see *Voices on the Road, Journey # 3*, next section). As an additional consideration, this information is often sought and obtained via Facebook and other social media channels. However, there are protection risks associated with provisions of smartphones.

A geographically informed route-based approach enables better alignment with the varying requirements of people on the move. By strategically mapping a route-based approach, humanitarian organizations can effectively cater to the diverse uses and needs of CVA by including distinct departure, transit, and settlement points in both rural (transit) and urban (departure/settlement) areas. This approach to mapping aligns to another dimension of the ‘desirability’ perspective along the evolution of one’s journey – How does the use of cash (when available) differ according to where an individual is during the journey? and Can the planning and use of one or more CVA modalities in these locations address these differing needs more effectively?

For those in transit, digital payment or closed-loop vouchers might onboard several bus companies to address transportation needs and lower the risks of travel on foot. The provision of health services at a route point might make the difference between whether an injured traveler can make it to their destination or not. For high-risk departure points, CVA transfer values might be topped up to permit purchase of goods and shelter to enhance preparedness for the journey and provided in USD to adapt to the market circumstances and dollarization of the location.³⁵ Major hubs that are also commonly arrival and settlement points may wish to consider providing a choice of access points based on need – transit or settlement – where someone on the move can enroll in a program that is more directly aligned to their intentions and journey progress. These opportunities for a route-based program and activity design also point to the need for a relatively flexible delivery mechanism (or combination) that has features permitting targeted spending (vouchers) and access to multipurpose cash – potentially, a safe place to keep recurring transfers should the individual wish to save funds for settlement purposes or to invest in livelihood activities. Ensuring monitoring at each potential point

³⁵ Refugees International. (2022). [*Filling the Gap: Humanitarian Support and Alternative Pathways for Migrants on Colombia's Edge.*](#)

along a CVA 'route' is equally important to understand purchase preferences specific to that location. However, some of those presented here are already relatively well-documented, such as the need for money to pay for transportation.

Based on the evidence gathered in this research, the most notable and significant shared priority is the strong influence of security risks on the selection of migration routes. In addition to security risks, there are other factors that individuals consider when making decisions before and during their journey, such as how much might be paid for travel, or how to adapt when money is lost along the way and when and whether one stops at a specific location. Other considerations include what situation an individual might be in while there (e.g. resorting to begging in cities due to lack of funds) and how information is gathered in order to inform these decisions and anticipate risk during the journey. Along with gathering relevant information, individuals make decisions about route selection and strive to anticipate and manage risks throughout their journey. This observation is in very close alignment to the prevalence of protection concerns, in reports, surveys, and conversations with humanitarian actors, with one source indicating that 91% of CVA focal points consider protection risk identification, analysis, and mitigation a priority.³⁶ Understanding and mapping out how the location, accessibility, utility, and flexibility of the different CVA delivery mechanisms can either mitigate or instigate these risks will be a necessary preliminary step in designing and estimating the cost and capacity requirements of a route-based approach.

³⁶ R4V and Regional Cash Working Group. (2021). [Technical Consultation for Strategic Planning: Open Survey to Partners](#).

Table 2: Focus Group Thematic Findings

FOCUS GROUP DISCUSSIONS: SUMMARY FINDINGS			
PROTECTION	FINANCIAL SERVICES	HUMANITARIAN ASSISTANCE	Other
Border crossings are the most dangerous, especially if traversing on foot	Most do not use/do not have access to financial services	Some, not all were able to access assistance, mostly from other individuals, friends and randomly encountering organizations	Many are earning money (in cash) from informal work, selling small goods, or sometimes begging
Carrying cash increases fear/risk of robbery, physical assault, and other risks to personal security		Most participants did not receive CVA or monetary assistance	General fear of being deceived by false services/scams
	Lack of or difficulty getting information about available financial services	Concerns around CVA include fear of deception, robbery, exploitation, exposure to scams and revealing to others that you have money	Access to information (services, assistance, etc.) is a priority issue
	Lack of documentation (ID) & moving around are the main barriers to accessing financial services	Some preferred in-kind assistance over cash	
	Desire for digital financial services and/or online bank accounts due to convenience	Transportation assistance and clothes are priority needs, not just food	
	Cards are suggested as safest to receive, hold and spend money		

4.2 VOICES ON THE ROAD: THREE JOURNEYS

The following section contains three stories from different people on the move, as a means of grounding these considerations in a more experiential context.

LOOKING FOR HOPE

This adult man's testimony was adapted from an individual interview held in Bogotá, Colombia.



Fictional picture.

'Based on my experience, I think humanitarian aid organizations should inform migrants more about their presence on the route, as well as help migrants who are settling. I don't want aid for a long time; I just need help when I settle. Once I settle, I will be good.'

Carlos, Venezuelan caminante

During my journey on foot from Venezuela to Colombia, I received shelter in Pamplona, where I arrived without any resources and without knowing where I would stay or how I would even start my life in this new country. But there I was.

My final destination was Bogotá because I heard from other people on the journey that I could find more opportunities to work and survive there. I went through the Santander route because a few contacts said that it was the best route. However, I didn't have any information about the risks on the route, so I tried to walk during the day and reach a shelter at night.

My strong desire is to find a job so I can find a place to stay and send back money to my wife and child, who are still in Venezuela, but it has not been easy. Thus, I have asked for help and thankfully I received it through a SOA card (cash assistance). This card allowed me to pay for a

ticket to Caramanga. I also used the money to eat, take a shower, and gifted some lunches to kids and families because I felt I had to share this blessing with other people in need.

I had been walking 30 km every day, so I felt very weak. One day, I found an ICRC outpost in a city and managed to get some cures for my feet. I think health aid is the most important thing; there should be “health outposts” through the routes.

I saw many people getting robbed. Thus, the best aid disbursement is through a prepaid card since it's the safest way. When I worked briefly in Cucuta, on the border with Venezuela, I hid my money and tried to spend it wisely. I am thinking about opening a bank account where I can withdraw cash, but also save for important things. I would love to have a digital wallet because it would make everything quite easy. I still don't have a smartphone, though.

Based on my experience, I think humanitarian aid organizations should inform migrants more about their presence on the route, as well as help migrants who are settling. I don't want aid for a long time; I just need help when I settle. Once I settle, I will be good.

RUNNING FROM MY PAST

This is an adapted story of an unaccompanied minor from an FGD held in Bogotá



Fictional picture.

“Because I was an unaccompanied minor, I had to pay USD\$250 to bribe the authorities to cross the border and enter Colombia.”
Venezuelan caminante.

I had a terrible childhood. At 9 years of age, I was raped by one of my uncles, and by 14 I was kicked out of the house by my parents. Now, I am 17 years old and have been living alone for the past three years. I saw the need to migrate from my hometown, Santa Cruz de Mora, in Venezuela, to Colombia to get away from my family situation and because I could not complete my studies due to my sexual orientation. My hometown is very Catholic and conservative.

Because I was an unaccompanied minor, I had to pay USD\$250 to bribe the authorities to cross the border and enter Colombia. From there, I moved to Cucuta and worked in a bakery. Then a friend received me in Cucaramanga, there the migration offices were closed, so I could not request for Colombian documents. After working hard in Cucaramanga, I saved some money to travel to Bogotá to continue my studies and request national papers. On my route to Bogotá, I traveled to Pamplona and during my journey, I was alone, assaulted, and robbed of my phone and money.

In Bogotá, I received shelter from IOM and ICRC. Because I have a valid Venezuelan ID and am under 18, I know I will get the temporary authorization to stay in Colombia automatically. Even though I requested information from several NGOs about a travel

authorization, I didn't get a lot of details. I just know that not having one gives me several benefits.

I have never received a prepaid card and have always been paid with cash. Nevertheless, I opened an Efecty account so my Colombian friends could send me money. I struggled to open an Efecty account because at the beginning they were not accepting my ID, but then they did.

I also have a public transport card and the account with Efecty, so I am the most integrated among the group I travel with. I received some learning materials from the German Embassy to help me study.

I would love to find a place to stay here in Bogotá. I have a cousin here in the city but since my phone was robbed, I cannot communicate with her.

COLLECTIVE RESISTANCE

This is an adapted story of a family group traveling together from an FGD held in Cali.



Fictional picture.

‘The main challenge we face in accessing financial services is our constant movement, which has limited our transactions to cash only.’

Carmen (fictional name) explains their group journey from Venezuela to Peru.

We have been on the road for two weeks since leaving Venezuela and are currently in Colombia, but Peru is our final destination. Traveling as a group has helped lower the risk of robbery, and fortunately, since we have been together, no cases of robbery have occurred. However, one person did experience a robbery before joining the group.

For self-defence, we carry knives, and all the group's money is managed by me (the mother). As we move from one place to another, we engage in small informal jobs to earn money, and if necessary, we resort to begging. The main challenges we face in accessing financial services is our constant movement, which has limited our transactions to cash only.

So far, we have not been able to access any kind of financial services. Throughout our journey, we made several stops and travelled at a slower pace

due to my leg injury that happened while crossing the river; plus, my age [is an issue], I am 68 years old.

One of our major frustrations is with the bureaucratic process required to obtain a valid ID in Colombia and the difficulties in entering the job market. In Bogotá, we received money from individuals on the street rather than from humanitarian organizations. People helped pay for our bus tickets from Bogotá to Cali. Currently, we are attempting to obtain bus tickets to Peru through humanitarian organizations.

We have made efforts to apply for humanitarian assistance during our journey but there are long wait-times. Also, priority was given to women and individuals with identification, but women managed to access humanitarian assistance more easily. However, the primary source of assistance for all of us has been individuals on the street rather than NGOs.

We think the best form of humanitarian aid is providing travel tickets to help us reach our final destination and food for the journey. Most of our money is spent on these two essential needs, although we do not allocate as much for food and often rely on begging to fulfil that requirement.

One group member's prior experience traveling to Peru influenced our chosen route. We followed the same route, considering it the easiest, fastest, and with more organizations offering assistance. As we progress on the journey, we gather more information about the route and strive to reach places where NGOs provide humanitarian assistance.

We have noticed that NGOs are typically present in larger cities, while smaller towns along the route have limited services.

We think banks could help us by offering credit cards through aid organizations. For instance, one single organization or bank could be dedicated to solely assisting migrants along the route, regardless of our nationality. Also, that organization could provide crucial information about the availability of accommodations in small towns, or the risks associated with specific routes. We are very concerned about the dangers of certain routes, as people often go missing during the journey.

Because I have a valid ID, I have received cash transfers, and I am very grateful to the United Nations because they have provided us with food and support. But, when we no longer have enough funds to continue our journey, we just have to beg and wait for the kindness of people who would help us.

Table 3: RECAP: Desirability, Perceptions & Personalities

RECAP: DESIRABILITY, PERCEPTIONS & PERSONALITIES	
Desirability	People on the move express a preference for both conditional and unconditional CVA interventions in the Americas context and other contexts, with positive outcomes observed.
Perceptions	People on the move view the humanitarian sector as a community, rather than distinguishing between different organizations, emphasizing the importance of presenting a united front and consistent approach in a route-based approach design.
Personalities	People traveling on foot are highly socio-economically vulnerable and face increased risks of violence, injury, and theft, particularly in border areas. They are also less likely to access assistance due to irregular routes, lack of awareness of programs, and eligibility restrictions.

4.3 INSTITUTIONAL APPROACHES: PROGRESS, OPPORTUNITIES & CHALLENGES

Institutional progress is underway, and a growing number of agencies are beginning to consider the need for a consolidated and continuous approach to the delivery of assistance across major migratory routes. Buy-in and discussions amongst humanitarian stakeholders suggest that it is not a matter of if a route-based approach is adopted, it is more a question of when and by whom. However, there are several institution-specific and sector-wide challenges that might prevent progress and adoption of a route-based approach. Paradoxically, or perhaps fortunately, some of these pain points could also be alleviated in the design and implementation of a route-based approach, depending on the stakeholders who are driving the action.

In all cases, a critical precursor to institutional implementation and adoption of a route-based approach, whether by a single agency or a consortium, is impossible without funding resources. The steady decline in visibility and humanitarian funding in the Americas, especially with human mobility, is a critical area of concern that links directly to feasibility and viability. With dwindling resources, agencies are now operating in a constrained environment that provides limited capacity to innovate resulting in a tendency to revert to short-term programming and a predictable status quo rather than innovate and explore new approaches. There is a very clear responsibility for donors to recognize that the potential improvements and gains of an eventual route-based approach cannot be achieved without investment.

4.4 ‘FIRST MOVERS’: INTRA-INSTITUTIONAL CHALLENGES & APPROACHES

A few actors have started exploring the development of a route-based approach for CVA delivery. These initiatives offer additional details on the approach and provide insights into the demand for its implementation. In 2022, the IFRC released a decisive program strategy document entitled *Case for Support: Humanitarian Assistance and Protection for People on the Move – a route-based approach spanning the Americas region*.³⁷ The detailed 4-year plan identifies the core elements constituting a route-based approach for the IFRC. It provides a very location-focused model that leverages the use of humanitarian service points that have been operational in the region for some time.

This model effectively positions the humanitarian service points as way stations for access to humanitarian assistance that includes but is not exclusive to CVA. In fact, the strategy makes a compelling argument for CVA as a preferred assistance modality³⁸ that must be accompanied by the provision of adjacent support services at each service point. Such an approach provides people on the move with predictable and immediate access to healthcare, psychosocial protection, information, and other essential services. The locational focus of this approach has the added benefit of addressing the acute loss of assets and capital in transit due to violence and exploitation. By addressing these vulnerabilities caused by the activities of smugglers, traffickers, and other predatory

³⁷ IFRC. (2022b). [Global Route-Based Migration Programme: Americas](#).

³⁸ Ibid., p.12.

groups, the route-based approach can help prevent the loss of movement capital³⁹ and harmful survival strategies.⁴⁰

The packaging and delivery of an ensemble of interventions at predictable, safe spaces such as humanitarian service points also potentially mitigates the risks associated with receiving CVA while in active transit.⁴¹ Although some evidence including from the FGDs conducted as part of this study indicates a preference for people on the move to receive CVA at the point of settlement,⁴² feedback points directly to safety and security risks specific to being on the road.

'All participants agreed that for migrants who walk (meaning that do not have enough money to take buses/trucks), the border crossings are by far the most dangerous locations. This is because the migrants are more vulnerable without a means of transport.'

FGD, Peru.

This observation might suggest that a safe space for spending may still be of significant benefit, and of course does not preclude the provision of assistance at a settlement point.

³⁹ CALP Network. G. Baizan, P. (2023). [People are on the Move: Can the World of CVA Keep Up?](#), p. 17, 19.

⁴⁰ IFRC. (2022a). [Dignifying, Diverse and Desired: Cash and Vouchers as Humanitarian Assistance for Migrants.](#)

⁴¹ Ibid., p.16.

⁴² Ibid.

If the delivery mechanism is a closed-loop payment system,⁴³ there is also the added potential to tie on-site CVA to surrounding local markets to provide economic support for host communities where the humanitarian service points are located. Ideally, multimodality solutions might provide people on the move with a safe way to spend locally at the service point, and cash out when and if there is a desire to meet needs for a continuing journey.⁴⁴ To mitigate the risks associated with restrictive closed-loop systems, this approach should prioritize market development, such that the merchants included in this closed-loop network are as diverse as possible to meet the needs of different individuals (men, women, youth, infants and elderly persons) easily and accessibly. Significant flexibility must be built in to allow regular and easy enrollment of additional merchants, such as small businesses, transport and accommodation providers who are able to join the network.

This type of network will need to evolve in a manner that is responsive to local economic needs and the preferences of people moving through the area. This is a significant deviation from current closed-loop approaches in the region and may require unconventional partnerships (compared to existing practice), such as working with local chambers of commerce and other similar trade or business networks. This can open space for humanitarian actors to leverage market support measures to mitigate the risks (real or perceived) that migration is a drain on local economies. In addition, any agencies considering this approach should equally consider the need to integrate an easily accessible 'cash out' component, where recipients can withdraw part or all the

⁴³ Closed-loop payment systems: A system in which the institution that issues the payment method also provides the acquiring infrastructure. Closed-loop payment methods (e.g. payment cards and mobile wallets) can only be used on the acquiring infrastructure of that same institution i.e., they can only be used with a specific retailer or platform/system. E-vouchers are commonly provided via closed-loop systems. [Glossary of Terms](#), CALP Network.

⁴⁴ Ibid., p.12.

balance with the agency at the humanitarian service point or with a merchant in case further flexibility in spending is needed.

However, the use of a closed-loop system is not ideal mainly because it limits a recipient's use of the transfer. Closed-loop vouchers do ensure full inclusion of people on the move with or without documentation, thereby eliminating the KYC barriers flagged by stakeholders across the board. Also worth noting is that novel approaches to closed-loop systems that go beyond voucher-based models can be explored; one was highlighted in a KII with MojaLoop,⁴⁵ an open-source platform designed to create a closed-loop payment ecosystem encompassing a flexible pool of digital and conventional financial service providers, microfinance institutions, mobile wallet providers, governments, and others (such as humanitarian actors)⁴⁶. The selection of network participants can be adapted and customized based on ecosystem requirements and program needs. In other words, where a humanitarian voucher model might be designed to create a closed-loop network connecting merchants, MojaLoop has been designed to connect financial services.

The example set by the IFRC, although yet to reach implementation, provides a solid starting point and model for exploring institutional route-based approaches as an option. Approaches such as the service/information window model used by IOM also reflect an attempt to craft approaches that ensure consistent and safe access to assistance along migration routes.⁴⁷ However, it is an example that might primarily favor improvements in consistency and efficiency for humanitarian agencies themselves – with the provision of more standard and predictable assistance for people on the move as a secondary but

⁴⁵ KII FS8, 16 May 2023.

⁴⁶ Mojaloop Foundation (website): <https://mojaloop.io/how-it-works/technical-overview/>

⁴⁷ International Organization for Migration (IOM). (2020). [*Ventanillas informativas sobre migración: Mesoamérica y el Caribe.*](#)

significant benefit. This remark embodies a critical point that carries with it an unfortunate legacy of humanitarian actors engaging in actions based on ease and benefit to the institution, rather than the individual or community requiring assistance.⁴⁸ This arguably goes against the purposes of a people-centered, route-based approach. It is highly probable that a conventional country-by-country office structure is ineffective in a scenario where a single crisis spans a chain of three or more countries where the same organization is present. Furthermore, this situation is confusing and illogical for people on the move⁴⁹ as they pass from one country to the next, as the names of the non-governmental organizations (NGOs) or the United Nations (UN) agencies for all visible intents and purposes are single brands. To find out that the assistance offered by the same organization is subject to differing registration eligibility requirements is understandably frustrating for individuals who have likely suffered significant hardship prior to arrival.

The relative absence of intra-institutional coordination across borders is alarming, given the concentration of humanitarian agencies with presence in multiple countries with the highest migration flows in the Americas. Evidently, ‘legacy’ organizational structures in the humanitarian sector have failed to adapt to dynamic changes in the humanitarian landscape, whether in the Americas or elsewhere. In fact, some organizations have operations in 11 or more countries across the region.⁵⁰ Yet each operation is largely implemented individually, often with separate finance and data management systems and little program-level coordination. Although there have been few analyses of the potential costs of these redundancies, it is highly likely that the repetitive nature of organizational expenditure and overheads associated with program set-up,

⁴⁸ I. Tshilombo. (2021). [Being on the Receiving End: Why vouchers lack dignity and are bad value](#). CALP Network blog.

⁴⁹ KII, H015.

⁵⁰ KII, H06.

management, staffing, and reporting in multiple locations in parallel, arguably generates significantly higher costs than an integrated and unified program approach serviced by a variety of country offices.

‘Because everything is set up country-by-country, you can literally cross the border and fail to be known by the other organization with an office in a different country. This creates problems when people cross the border [...] This is how our humanitarian organizations are set up, country-by-country. That’s the problem. Number one big barrier’.

KII H015.

The repetition in feedback and frustration evidenced voiced by key informants reflecting on internal organizational issues and bureaucracy, suggests that the question of ‘desirability’ in the feasibility and design of a route-based approach needs to be prioritized – assuming that there is institutional intent to prioritize responding to community feedback. Even if employed by a single organization with presence across multiple locations, this model could unburden staff, provide significant competitive advantage, save costs, and offer a more dignified experience for the participants that the organization in question might be targeting across various contexts.

Upstream benefits for donors possibly include more consistent reporting from grantees, better value for money, and simplified grant management. It is important to note that the route-based approach itself represents a significant innovation. In this regard, a single organization may have an advantage as a ‘first mover’ and serve as a model for adoption, particularly if it has a higher risk appetite than others. However, this observation assumes that the work of multiple country teams is guided by a regional strategy or common objectives, which may not always be the case.⁵¹

⁵¹ KII, H010.

In the short-term, the use of a single platform for registration, data management and tracking of CVA delivery across multiple locations might be quicker and simpler (although not necessarily better) for a single organization to achieve as opposed to a shared, multi-agency system. From a procurement and process perspective, it is more likely that standard procedures are in place or can be put in place to arrange contracting as a single entity particularly if the organization can coordinate this process (e.g. a regional office or headquarters). From a staff capacity and training perspective, it is likely easier to gather staff involved in CVA in a single location to embed the skills required at the country level to

design common standard operating procedures to ensure that frontline staff can easily use the platform in question. The use of a single service provider would also be more likely to provide consistent user troubleshooting and support to the agency as a corporate client. A single, shared database with common data management and protection protocols, standard registration and verification forms and processes might facilitate multi-country monitoring of a standard set of shared indicators, as opposed to cobbling together reports from different programs to inform decision-making. From a motivational perspective, generating buy-in is likely to be easier through internal channels, where mechanisms and tools for the dissemination of information at the corporate level already exist.

'I do believe it's a very unexplored and misunderstood field and it's difficult for people thinking and programming to think outside what they know ... definitely, we have to begin thinking outside of what we have been thinking and how we have been operating. And it's a lot on the regional coordination. But I believe we have to begin providing guidelines to other partners on what we expect on regional coordination, regional operations or regional programming ... How do we define it?'

KII H016.

4.5 ENABLERS OR BLOCKERS? MULTI-AGENCY COLLABORATION AND PROSPECTS FOR COLLECTIVE ACTION

If single agencies cannot implement a route-based approach internally, how is it even possible for multiple agencies to deliver together on a common ‘route’? Thankfully, consortium-based⁵² responses present a strong and positive precedent and are potentially the most likely springboard for the use of a route-based approach, in the southern areas covered in this research study. Here, the working of a route-based approach as a unified delivery model appears to be emergent. Already there is existence of regional platforms⁵³ and response plans;⁵⁴ coordination systems to map the routes and provide route-based statistics on the population of concern also exist;⁵⁵ gradual efforts to harmonize monitoring indicators;⁵⁶ multi-country data sharing agreements;⁵⁷ the common use of encrypted unique identifiers;⁵⁸ shared eligibility criteria and the use of multipurpose cash as an agreed, multi-sectoral intervention. Even so, this approach is limited to the response of the crisis in Venezuela. Coordinating work

⁵² VenEsperanza. (2019–2023). <https://www.venesperanza.co/en/>

⁵³ Regional Group on Risk, Emergencies and Disasters (RED the Americas). (2022). *Cash Coordination in Latin America and the Caribbean (WIP)*

⁵⁴ R4V. [Regional Refugee and Migrant Response Plan 2023-2024](#).

⁵⁵ MMC. (2023a). [Quarterly Mixed Migration Update: Q1 2023](#).

⁵⁶ Provision of Cash and Voucher Assistance in the Response to the Venezuela Refugee and Migrant Crisis, p. 26–27.

⁵⁷ Ibid. p. 35.

⁵⁸ Ibid. p. 41.

outside this scope exists but is far less cohesive and has significantly fewer coordination resources in comparison.

Although these are not all specific to a single initiative, the fact that these approaches are present, and have been implemented successfully in adjacent areas is proof of two things:

1. that the experience and tools are available for joint implementation; and
2. that there is a track record and willingness to do so.

As much as feedback from key informants expressed the need for improvement in multi-agency coordination and approaches, coordination success stories and very strong support for unified delivery models were apparent across all stakeholder groups.

‘In the ideal world it would be like, let’s focus on the route, let’s focus on the people. And if Caritas is the best place along this route with [a] caseload of 250 families a day, let’s strengthen Caritas ... if 80% travel with kids, and there are a lot of unaccompanied children, let’s bring in Save the Children, UNICEF and I don’t know, ACF. So, the idea would be to have a good coordination body that really cares about operations. It would be kind of really demand-driven based on partners and on the needs, right?’
KII H012.

In brief, it is not a stretch to assume that if a feasible model for a route-based approach is available and well resourced, the resolve and capacity to move is certainly present.

Perhaps more importantly, it is possible that a route-based approach cannot be implemented without a joint approach by multiple agencies, for very practical reasons. Having multiple actors also means broader coverage, ensuring that there are no gaps in geographical coverage and service delivery along migratory routes where the approach might be used, and might also open opportunities for smaller (e.g. local and community-based) organizations operating in more remote areas to step in to ensure continuity and support localized needs.

Operationally, interagency coordination, for example, across Cash Working Groups leads would be necessary to ensure a standardization of approaches across service points, such as creating an agreed minimum expenditure basket and agreeing on the number and frequency of transfers to people on the move. In the same way, the diversity of mandates and expertise of different organizations can be leveraged as an asset to ensure more holistic delivery of assistance and cross-organizational capacity building, allowing each organization to work according to its strengths. Additionally, the use of strategic selection and collaboration with implementing partners, which is already common can be leveraged in a route-based approach. The approach allows for the selection of partners that complement and expand the program's scope and geographical presence, further enhancing the effectiveness of the assistance.

Finding a unifying message and purpose is also foundational for collective action. Current practice indicates that while everyone is focused on supporting a response in contexts of human mobility, sectoral and CWG coordination efforts are characterized by friction between the focus areas amongst agencies. This friction arguably contributes to the inordinate focus on indicator development and questioning around how to report multipurpose cash interventions⁵⁹ ostensibly so that each organization can tick its respective boxes. There is clearly a universality of concern and focus on the protection risks faced by people on the move before, during, and after benefiting from CVA. Protection risks have significant implications for CVA programming and delivery in various aspects. They can result in the exclusion of vulnerable groups due to KYC requirements, influence the selection of delivery points to mitigate exposure to violence, smugglers and trafficking, and necessitate accurate calculation of transfer values as protection risks fluctuate. These risks also contribute to the fluctuating vulnerabilities and resource gaps experienced by specific groups depending on their chosen routes,

⁵⁹ Ibid. p. 25–27.

frequency of movement, and circumstances while stranded or at settlement points. Paradoxically, the frequency of concerns expressed around sector-specific ‘silos’ and mandates is noticeably overshadowed by a persistent focus on protection across all types of organizations, target groups, jurisdictions, respondents, and documentation.

Eight (8) out of fourteen (14) humanitarian organizations interviewed for this study voiced concerns about protection risks faced by people on the move receiving CVA. A regional CWG survey indicated that 91% of focal points considered protection risks in modality selection, but only 59% of agencies linked CVA with protection programs.⁶⁰ This finding means that a protection-based CVA approach in these areas can provide a cross-cutting impetus for action, a common point of departure, and a rallying cry that has the potential to transcend sectoral friction, in terms of collective responsibility. This is not to say that a route-based approach necessitates the design of protection-specific CVA delivery (as there is varying expertise and capacity across agencies); such an approach could be used to help standardize the ways of working. Designing a route-based approach as a multi-agency effort with a common focus on protection could present an opportunity to course-correct en masse in a manner that is people-centered and perception-sensitive, while also addressing very clear pain points and redundancies related to dignity and ease of access.⁶¹

While recognizing the need to acknowledge and accommodate the demographic diversity of people on the move, there is an obvious association between protection risks, mobility and the types of routes taken by people on the move. As indicated in the spectrum of migration profiles presented in CALP’s human mobility and vulnerability

⁶⁰ Technical Consultation for Strategic Planning. (2021). [Open survey to partners](#). Regional Cash Working Group (R4V).

⁶¹ Mercy Corps. (2022). [Caminantes Pilot Strategy: Case Study from the Ven Esperanza Consortium](#).

framework, the most vulnerable groups – such as stranded people on the move and victims of forced or prolonged displacement – are also those that have the fewest resources and mobility options. This precarious situation then leads to the use of high-risk routes that only magnify risk exposure and inhibit access to humanitarian assistance. This situation is especially well illustrated in the experiences of caminantes in Colombia and the subsequent 2021 pilot by the VenEsperanza Consortium to expand program access through the mapping and establishment of preregistration points along strategic locations that are along popular walking routes. Using the routes frequented by caminantes allowed partners to plan in unison and leverage their respective presence and expertise to identify and communicate with these at-risk groups en-route and deliver timely cash assistance at safe arrival points using a shared database (see Scenario 1: The Waystation).

Table 4: RECAP: Institutional Perspectives on a Route-Based Approach

RECAP: INSTITUTIONAL PERSPECTIVES ON A ROUTE-BASED APPROACH	
First Movers: Intra-institutional challenges & approaches	Institutional progress is underway, with agencies considering the need for a consolidated, consistent, and continuous approach to delivering assistance across migratory routes.
	Funding resources are a critical precursor to implementing a route-based approach, but there is a decline in visibility and humanitarian funding for migration responses in the Americas.
	Intra-institutional coordination across borders is lacking, and there is a need for greater collaboration and coordination among agencies operating in multiple countries.
Enabler or Blocker? Multi-agency collaboration and prospects for collective action	Consortium-based responses present a positive precedent for a route-based approach, with existing regional platforms, coordination systems, and shared indicators that can facilitate joint implementation.
	Joint approaches by multiple agencies may be necessary to enhance capacity via broader coverage, holistic assistance delivery, leveraging diverse mandates and expertise and ensuring participation by local organizations.
	A unifying message and purpose around protection risks can serve as an inspiring cry for collective action and help address sectoral friction.

5. FUNCTION: FINANCIAL ECOSYSTEMS & SERVICE PROVISION

‘We are not able to leverage, in many cases, on what exists more so in terms of financial products that the migrants could have and the knowledge that they might bring with them. As you know, we as humanitarian actors, are still trying to build the customer choice approach ... What works for a migrant with a vocation to stay is very different in terms of financial products and approach ... So this requires a very strong alliance with the financial sector. And the financial sector was not ready to even respond to those that have the vocation to stay’.
KII H04.

The steady growth in CVA programming within the context of human mobility in the Americas has been characterized by increases in agency and staff technical capacities⁶² for implementation, as well as growing adoption of multipurpose cash, particularly by NGO consortia.⁶³

For many humanitarian actors operating in South America, what began as a multi-country response focused on the Venezuela refugee and migrant crisis has now expanded to include other people on the move from other countries, such as Ecuador, Haiti, and nationalities from

⁶² KII, H06.

⁶³ CALP Network. (2020). [La Provisión de Programas de Transferencias Monetarias en la Respuesta a la Crisis de Refugiados y Migrantes de Venezuela, Hallazgos y Lecciones Aprendidas](#), p. 30.

Africa and Asia.⁶⁴ For those operating in Central America, the same trends apply, especially with the additional knock-on effects of migration flows in the South. Because of this increasing diversity of people on the move, multipurpose cash presents a flexible tool to expand CVA and address basic needs across the migration spectrum.

The utility and impact of multipurpose cash hinges on the fungibility of it, where a single payment can address a variety of needs and purchases with flexibility and choice for the individual. This approach multiplies the number of financial services and payment instruments that can be used to deliver multipurpose cash. As the use of CVA has evolved in the region, so has the variety of organizations positioned to deliver multipurpose cash. Key informant interviews highlighted a range of financial services used in CVA, including prepaid debit cards, cardless ATM withdrawals, mobile money, remittance agencies, and tailored bank solutions.

The spectrum of delivery mechanisms used by actors points to relatively well-developed financial ecosystems, products, and infrastructure in the regions covered by this study.

‘I really believe that in Latin America, we have all the systems, at least in each country, to distribute money in many different ways. But there is always the problem of accessibility by the beneficiaries, which is going to always be a problem. And especially when we look at the route approach, we have the challenge of people traveling without documentation ... Also from the side of the financial service provider, they need to comply ... and this compliance always comes with a lot of restrictions on behalf of the beneficiary. I think that those are the challenges in Latin America that our missions are facing’.
KII H02.

⁶⁴ MMC. (2023a). [Quarterly Mixed Migration Update: Q1 2023](#).

Ongoing work by the Inter-American Development Bank shows a veritable explosion in Fintech ecosystems in the Americas. They document a 112% increase in Fintech firms between 2018 and 2022. Out of these, 46% are focused on providing digital banking platforms and payment services, and within that group, nearly half serve under and unbanked consumers as a target market.⁶⁵ FintechLAC, an initiative launched by the Inter-American Development Bank, is a public-private partnership consisting of regulators and supervisors and Fintech associations from 15 countries across the region. The initiative includes in-depth market insights and a regional mapping of regulatory frameworks governing Fintech services across the Americas.⁶⁶

Ironically, most humanitarian agencies interviewed felt that their FSPs options were limited, despite most being in countries with relatively healthy and diverse financial sectors. However, this is an observation that may vary across the lesser explored country contexts in this study. In reviewing feedback and evidence, it appears that the differing perceptions between FSPs and humanitarian actors occur for two reasons: one being regulatory barriers and the second being the absence of a cohesive approach and strategic dialogue, as the humanitarian community, with the financial sector (FSPs and regulators alike). Underpinning both issues for humanitarian actors is a broader lack of exposure to financial ecosystems in the region of operation. This issue, combined with rigid procurement processes can limit the extent to which actors, even if interested, can explore additional or unconventional providers, such as Fintechs or local microfinance institutions.

⁶⁵ Finnovista, InterAmerican Development Bank (IADB) and BID Invest. (2022). *Fintech en América Latina y el Caribe: un ecosistema consolidado para la recuperación*. April 2022.

⁶⁶ FintechLAC, Inter-American Development Bank. <https://www.iadb.org/en/sector/initiatives/digital-finance-innovation/fintech>

This area merits further exploration to understand the motivators and inhibitors of the business case for different categories of FSPs to engage with humanitarian actors. For example, larger and more established banking institutions may see mobility and a lack of a fixed address as a red flag and be unwilling or uninterested to serve such a clientele that is also likely to be low-income. By contrast, a small or growing microfinance institution or Fintech seeking customer acquisition may see collaboration with the humanitarian sector as an opportunity. It is important to prioritize the understanding of the specific qualifications that constitute a viable 'business case' for financial and technology service businesses, rather than generalizing all FSPs. This level of understanding is important and should be considered a key objective in cross-sectoral collaboration efforts. During this research, no evidence was found documenting any in-depth market gap or research analysis of the financial services sector conducted by humanitarian actors to explore this issue. However, it is possible that such information is unavailable publicly.

'To have a contract signed takes a lot of time. So, this is part of the internal challenges. It took basically three years to have these four providers in place. I mean, the process is very lengthy, internally.'

KII H04.

While humanitarian actors feel limited, financial players express the sentiment that they have much more to offer the humanitarian community on all fronts: payment instruments, navigation of regulations, innovations and in some cases, coordination of FSPs for the purposes of cross-border or multi-country service coverage. Why the contradictions? Answering this question is a necessary precursor to exploring which financial services may best serve a route-based approach.

5.1 UNDERSTANDING REGULATORY BARRIERS

An important consideration is whether staff within the humanitarian agencies positioned to adopt a route-based approach can analyze and assess the financial ecosystems and regulatory frameworks. It may be more logical to collaborate with finance, compliance, and legal specialists who are based in the region, and in the country of operation. Many international humanitarian organizations have these functions on their teams at headquarters levels.

Regulations, in simple terms, are the rules that govern entities and transactions in the finance sector. In order to understand how to navigate and negotiate how and where these rules apply requires knowledge of the ‘rulebook’. Throughout this research, it is quite clear that regulatory frameworks – KYC and customer due diligence in particular, are viewed by the humanitarian community as the number one blocker that prevents the delivery of assistance to the most vulnerable, based on thematic analysis of KIIs. It may be helpful to shift this narrative away from ‘blocks’ and ‘barriers’ to emphasize navigation, negotiation, and understanding of these regulations.

The prevalence of frustration around regulatory challenges is evident in the analysis of over 200 hours of interviews. In these interviews, the use of terms such as ‘compliance’ was minimal, mentioned only five times by two interviewees while the term ‘due diligence’ was mentioned only once. These findings indicate a potential gap in understanding and engaging with the language and processes used by regulators and the finance sector. The question is not about intent or intelligence but more about two different sectors with vastly different areas of technical expertise that operate in entirely different languages. ‘Translators’ – people who understand the regulatory environment are needed. Specialists working for and in the interests of humanitarian agencies rather

than banks can help to fulfill this role and purpose, as well as help actors within the sector to understand the perspective of the regulator.

Take a step back; from the perspective of a regulator, would an organization seeking to deliver payments to thousands of individuals be authorized to operate without a compliance team or would this raise red flags? If the same company was to request relaxed regulatory requirements, would that be permitted?

A number of KIIs and reports on migration in the Americas have suggested that one of the most straightforward ways to address the needs of people on the move is using direct cash (i.e. cash in hand). However, none of these discussions considered the compliance risks of doing so to the FSPs. Large cash withdrawals from a single account and/or small, frequent debits from a single account will always immediately trigger anti-money laundering red flags linked to transaction reporting requirements.^{67, 68} This then requires the FSPs to justify the purpose and origin of funds for these transactions to the regulatory authority or financial intelligence authority in the country.

Not understanding and failing to anticipate regulatory implications can create friction between FSPs and humanitarian actors, making it more difficult to negotiate and strengthen relationships. The humanitarian agencies at the country level rarely include roles that are designed to understand or anticipate country-specific regulatory issues, such as financial compliance specialists familiar with a country's regulations and legislation linked to local financial services delivery and access. Conducting a country-level regulation analysis exercise focused on enabling CVA delivery would be beneficial to multiple agencies, especially if anchored to or disseminated by a cash working group or similar inter-agency mechanism.

⁶⁷ Financial Action Task Force. (2021). [Guidance on Risk-based Supervision](#).

⁶⁸ UN Office on Drugs and Crime. [Organized Crime Module Four: Money Laundering](#).

The roles of individuals tasked with FSP selection for CVA delivery, especially in large-scale and complex responses, likely do not have the time for in-depth exploration of the financial ecosystem in their country or region. They perhaps have less time to read through financial regulations and legislations in detail.⁶⁹ A focus on the urgency of program delivery is justifiable, but this focus often results in selecting the simplest and immediate path to reach this goal. This justification also becomes less tenable in a prolonged crisis such as the human mobility context in the Americas.

In this fraught and high-pressure scenario, there is little if any, detailed and strategic analysis of regulatory frameworks, sustained dialogue with regulators or extensive research and consultation with FSPs. Instead, agencies often resort to standard and often rigid Request for Proposal processes that are implemented under tight timelines, only to find out that the services and products offered cannot reach or address the needs of all targeted groups. In some cases, the Request for Proposal process is the only point of contact with the finance industry, further narrowing opportunities for negotiation.⁷⁰ Due to short implementation timeframes, program-side pressures, including funding limitations and the need for immediate action, there is often limited time and opportunity to engage with regulators and finance sector players to address regulatory challenges ahead of time. Likewise, understanding market trends and priorities within the financial services sector is equally important to craft a demand-driven Request for Proposal process, as opposed to using a generic approach.

⁶⁹ CALP Network. (2019). *Cash and Voucher Assistance and Risk in Financial Management and Compliance*. <https://www.calpnetwork.org/wp-content/uploads/2020/03/1575312843.CaLP-CVA-Financial-Management-Compliance-FINAL.pdf>

⁷⁰ KII, FS02.

‘So, how do we get to a point where we can build something because that's essentially what you're looking for, right? You want to come to your one, stop shop, but if I'm trying to build that one, stop shop, each time I blink, there's a 50 page RFP that I have to respond to ... then I don't get to the point where I can have a conversation to give you that plug-in solution. ... Whereas, if we were having that more intentional interaction, we would be sitting together and saying, let's build a solution for this market. Right?’

KII FS02.

However, when approached differently, it can yield excellent results and foster a better understanding of needs on both sides. Coordination groups, such as CWGs, can play a key role in initiating this dialogue. These serve as valuable coordination mechanisms that are less affected by implementation pressure, making them well suited to facilitate discussions on regulatory matters. An exceptional example emerged from the Guatemala CWG:

‘We did a consultation with the Central Bank through ... the Superintendency of Banks. Regarding giving cash transfers, we [humanitarian actors] must have an identification, an ID, but a lot of people in transit, people in human mobility, often lack this ID. How to give them a cash transfer? ... The answer that the Central Bank gave us through the Superintendency of Banks is that they regulate the economic part of the country, but they do not set the conditions to give them the cash transfer. The Ministry of Foreign Affairs, through (the) Immigration (Bureau), gave the status to the person who was in the country. And with that status, each bank, according to its conditions, according to its policies, could or could not accept a [certain identification] document. After several talks we approached a bank and asked them, “What do you think about paying a cash transfer to people migrating?” The answer they gave us, because it was a specific organization the bank said, “No, we can't pay anyone who doesn't have an ID.” Okay,

go back to the Cash Working Group. So, the idea came up to say, well, if the agency⁷¹ was alone and they said no, then now we're going as a Cash Working Group. So, we're going as 30 organizations. So, I came and made [sic] the link with the bank and I told them, "Look, I want to have a meeting with you for a proposal that we have. Of these 30 organizations, many work with people on the move, in human mobility, whether they are immigrants, refugees, asylum seekers, people in transit or returnees. We work with them, and we want to give them a cash transfer. You can create a product so that all these organizations work with you or look for other options." They said, "Well, let us think about it and we are going to create something, then we will answer you later." Weeks later, they answered us, "We have created a product and we can pay cash transfer to migrants, refugees, and [people who have] request status [for regularization, asylum, etc]."

– Guatemala CWG Coordinator⁷²

Clearly, negotiation can work when approached intentionally. In this case having a CWG identify the right entry point at the regulatory level and leverage a demand-driven approach brought enough actors to the table to make a clear business case. Building a trusting relationship with a regulator and being able to offer consistent and predictable market opportunities to FSPs cannot be realistically done in short timeframes as this process takes time and requires persistence. There is a critical implication here for donors and advocacy with donors by agencies. Recognizing the shortcomings of the current practices and resolving them requires capacity and time for integration of consultation exercises in activity design, and to allocate budget for much needed specialists (or resourceful coordinators) to better understand regulatory frameworks and build a trusting relationship with the regulator, both pre- and post-crisis.

⁷¹ Agency name removed for confidentiality purposes.

⁷² KII, H03. 21 April 2023.

Organizations can also explore successful strategies to discuss with FSPs to prevent and overcome regulatory challenges such as KYC. They are to request a know your business (KYB) arrangement, in which the humanitarian organization effectively vouches for all transactions by assuming the KYC risk on behalf of program participants. A 2019 guidance note from CALP notes: 'With a KYB approach, a humanitarian organization takes responsibility for the KYC/ customer due diligence process for CVA recipients. The contractual arrangement may stress the fact that the funds used for CVA are the responsibility and property of the organization, as opposed to the FSP.' This is the same arrangement that has permitted some agencies to issue ATM cards linked to sub accounts under the name of the organization rather than the recipient.

Establishing a better in-house understanding of risks can reveal other ways to compromise regulatory constraints. For example, a humanitarian organization can offer to share the burden of conducting enhanced due diligence for CVA interventions and share this information on a recurring basis (e.g. monthly) with the FSP and regulatory body (if required). Incidentally, nearly all the risk-based enhanced due diligence measures in global recommendations of Financial Action Task Force (FATF)⁷³ are well-aligned to program quality practices in CVA monitoring⁷⁴ and reporting and are likely already being done by the organization. This practice includes proving the origin of funds (grant agreements); recipient verification; purpose of and justification for the transaction (indicator monitoring); and ongoing transaction monitoring (output reporting) of the same.

⁷³ FATF Recommendation D, p. 14. [FATF Recommendations 2012](#)

⁷⁴ CALP Network, [Programme Quality Toolbox](#).

5.2 JOINT ADVOCACY AS COLLECTIVE BARGAINING

There are valuable lessons in how relaxed KYC or exceptions to procedure have been negotiated if one looks at contexts where finance sector associations face similar issues around KYC requirements and the needs of undocumented and vulnerable people on the move. The Alliance of Digital Finance Associations (ADFA), for example, with members operating across South and West Africa, has positioned itself to support and inform the evolution of regulation and policymaking. The group engages with regulators to demonstrate the benefits of digital systems in reducing fraud and error in account enrollment and validation of deposits and payments, and by presenting position papers on behalf of the Fintech ecosystem to educate regulators on the needs of underserved communities as a target market for Fintech.⁷⁵

There are powerful human rights and protection arguments that might support joint advocacy around some of the challenges and barriers created by KYC requirements, especially if multiple partners can aggregate their negotiating power and collectively discuss with policymakers and regulators. From the regulatory perspective, it makes sense to highlight that there are significant overlaps between high-risk migration routes and transactions that violate anti-money laundering and counterterrorism regulations. KYC barriers for people who lack valid identification, and move along these migration corridors result in increased use of extra-regulatory and illicit financial behavior such as purchasing falsified identification documents, using predatory money lenders,⁷⁶ money exchangers, and other informal pass-through entities. Financial inclusion for these

⁷⁵ KII, I03.

⁷⁶ The Fletcher School of Law and Diplomacy. (2022). [Financial Biographies of Migrants in Colombia](#).

groups, therefore, potentially brings these transactions into a more regulated space in addition to providing benefits associated with account ownership, such as saving funds to travel more safely or settle down.

The lack of documentation of people on the move that necessitates the use of high-risk routes translates into the same KYC-related obstacles within the traditional financial system that often prevent and complicate the delivery of payments by humanitarian organizations to these same at-risk people on the move. A focus on the short-term regulatory risks inherent to this context is done at the expense of mitigating the long-term risks of illicit activities that increase in proportion to the scale of human migration. The exclusion of individuals from the financial system, coupled with a lack of access to additional resources and support, creates a detrimental snowball effect, pushing people towards resorting to illicit services and adopting harmful survival strategies. One possible solution is the use of low-limit financial instruments to receive, hold and transfer money, as it provides a compromise on KYC requirements. This solution serves the dual purpose of facilitating CVA delivery and de-risking, by driving down the use of illicit finance and services with high money laundering exposure.

Humanitarian organizations should seek out partnerships that offer the expertise, influence, and resources to power these negotiations as one of the mechanisms to pave way for a route-based approach. Organizations such as the Finance Against Slavery and Trafficking (FAST)⁷⁷ at the UN Centre for Policy Research⁷⁸ has done extensive research on the link between rigid regulations, financial exclusion, and human rights violations. They have documented strategies and successes in raising awareness with regulators to relax and adapt KYC regulations as a result. Even more useful, FAST offers a suite of tools and examples for stakeholders to ‘use leverage creatively’, among

⁷⁷ Website: <https://www.fastinitiative.org/>

⁷⁸ REF. KII, RH04.

other guidance.⁷⁹ The IDB also works extensively on the development of financial ecosystems in the Americas and has been arguing that the acceleration of Fintech ecosystems and digital payments in the Americas serves as a lever to accelerate revisions to regulatory practices. A 2022 White Paper presented at the World Economic Forum notes that the inflexibility of these systems in the region is often linked to the prevalence of in-person and manual customer due diligence processes and that high regulatory burdens have a negative impact on market growth and innovation in the finance sector.⁸⁰

Global organizations, such as the Alliance for Financial Inclusion, have historically worked on the need for relaxed regulatory approaches. They have adapted regulatory approaches to meet the financial inclusion needs of forcibly displaced persons and groups, who face similar KYC barriers. The Alliance for Financial Inclusion is also well-positioned to play a strategic role as a regional convener for negotiations between the humanitarian community and the members of the Alliance for Financial Inclusion all of whom are regulators in the Americas.⁸¹ The Alliance for Financial Inclusion's upcoming annual meeting that will be hosted by the Office for Latin America and the Caribbean will introduce the topic on financial access and inclusion for people on the move for discussion. Furthermore, research is currently under way for the release of a special report on barriers to financial access and inclusion for people on the move, to better advise and support the efforts of regulators in the region to address these issues.⁸²

⁷⁹ Finance Against Slavery & Trafficking. (2019). [A Blueprint for Mobilizing Finance Against Slavery and Trafficking](#).

⁸⁰ IDB Lab. [Accelerating Digital Payments in Latin America and the Caribbean](#). White Paper, World Economic Forum 2022.

⁸¹ Alliance for Financial Inclusion. (2023, ongoing). [Financial Inclusion Initiative for Latin America and the Caribbean](#).

⁸² KII. FS01. Alliance for Financial Inclusion.

Interestingly, one of the reasons for this special focus is due to demand and requests for support from country regulators in the Americas such as: Peru, Ecuador, and Dominican Republic due to the drastic increase in migration in their jurisdictions.⁸³

Although there are fundamental differences in financial inclusion and humanitarian CVA interventions, there is also an inevitable intersection between the two within contexts of human mobility, especially when people on the move choose to settle in a specific destination. While financial inclusion may be more difficult to integrate into responses supporting people in transit, it becomes a critical pathway to accommodate people on the move who spend longer periods of time in one location. As a rule of thumb, one can assume that collaboration between humanitarian and financial inclusion actors should increase as programs start to evolve to support economic inclusion, integration, and sustainable livelihoods. Both types of interventions and the organizations implementing them face similar challenges and therefore carry the same need to raise awareness at the regulatory level around two issues. Firstly, the need to prioritize rights-based approaches and financial access for at-risk groups (whether to receive a payment or open an account), and secondly the need for relaxed customer due diligence practices for specific minority groups. There is even precise guidance on the strategies and actions serving this shared agenda.⁸⁴ Together, both sectors are a sizable group with aligned interests, complementary skill sets and resources to bring to the table and advocate with influence.

⁸³ International Federation of Red Cross and Red Crescent Societies (IFRC). (2022a). [*Dignifying, Diverse and Desired: Cash and Vouchers as Humanitarian Assistance for Migrants*](#). User Journey, p. 46.

⁸⁴ European Centre for Development Policy. (2022). [*Supporting the Financial Inclusion of Migrants \(visual summary\)*](#).

5.3 PROGRAM – PRODUCT FIT:

AVAILABLE FINANCE & TECH SOLUTIONS

There are a vast number of types, and costs associated with financial services and payment solutions in CVA interventions with people on the move. As previously mentioned, this variety has increased with the growing use of multipurpose cash in CVA interventions and expanded the types of payment instruments that can be used to deliver. It also validates the presence of a healthy and growing financial ecosystem in the region. On the other hand, current arrangements reflect a poorly organized patchwork of different financial services selected on a country-by-country and case-by-case basis, with little cohesion between agencies, and even less evidence of geographical alignment with migratory routes.

A CVA design shift to a route-based approach may have the benefits of creating more harmonization between service delivery models. Ideally, the selection of delivery mechanisms to support a route-based approach should recognize human mobility as a phenomenon comprised of different groups of people moving through countries along a specific corridor. These design assumptions point to three critical areas relevant to selection of delivery mechanisms that enable a route-based approach to be feasible:

1. the diversity of user ‘personas’, including varying needs, challenges and forms of identification that are suitable for cross-border use;
2. continuous movement within and between countries across a variable period (i.e., months, years); and
3. movement corridors (e.g. routes) that cross multiple borders.

All the three points above have created unique challenges for CVA programming in their own regard, depending on the context and location in question. For example, in Colombia the continuous movement of Venezuelans internally and externally to and from Venezuela (*pendulares*⁸⁵) created difficulties in monitoring and maintaining contact with program participants. Similarly, drastic increases in vulnerability resulting from the dangerous journey across the Darien

‘Vulnerabilities change drastically from one country to the other, depending on the setting. Let's say, for example, the vulnerabilities that would have been identified in South America before they cross the ... will change drastically after crossing the ... They will also change drastically for the same people once they reach Mexico, let's say. So you have to constantly be adapting’.

KII I02.

Gap has created a unique but major issue that is rapidly worsening. Lastly, the consistent multiplication of nationalities and motivations for migration seen in the ‘northern triangle’ also presents another pain point. Ultimately, across all the areas studied, recipient attrition is problematic.⁸⁶

To date, no single CVA intervention or delivery mechanism has managed to address all these issues with a single modality. It is unlikely that it is realistically possible. It is much more likely that a route-based approach will require a ‘stack’ of services and solutions delivered in a standard and coordinated way. As a reference point, KIIs revealed useful examples of financial services and clever program designs to successfully meet these challenges individually. These examples provide indications on what might be possible

⁸⁵ KII. H04. WFP.

⁸⁶ P. J. Meyer. (2022). [Central American Migration: Root Causes and U.S. Policy.](#)

in selecting a suitable blend of partnerships and financial services to facilitate a route-based approach (Table 5).⁸⁷

Table 5: Route-Based Approach Challenges and Corresponding Service Providers Currently used by Humanitarian Actors

'ROUTE' CHALLENGE	SOLUTION/SERVICE DESCRIPTION	AGENCY
Movement across multiple borders	<p>Prepaid debit cards. Can be used in multiple countries at ATMs and for purchases (dual or single access depending on the country).</p> <p>Card top-up contingent on check-in. At specific locations, card limits and use have restrictions.</p>	<p>IFRC/UNHCR (Multi-country card)</p> <p>Single country cards: World Vision, VenEsperanza, Colombian Red Cross, NRC Colombia, STC, IRC Mexico, Tarjetas Peruanas Prepagos and partners in Peru</p>
Varying forms of identification	Use of closed-loop payment instruments, redeemable at local vendor outlets.	World Food Programme (WFP), International Organization for Migration (IOM), ZOA.
	Issuance of agency 'ID cards', a unique identifier or other documents accepted by FSPs.	UNHCR, IOM, Mercy Corps.

⁸⁷ To avoid bias and/or limiting the scope of options to the financial service providers covered in this study, only the type of payment instrument and/or financial service has been specified, rather than the brand or name of service provider.

Continuous movement within and between countries	Facebook, Web App and WhatsApp Chatbot used for remote & route-based preregistration for CVA to caminantes. CVA is provided upon self-reported arrival at destination.	VenEsperanza Consortium ⁸⁸ IFRC/Ecuador Red Cross, Catholic Relief Services.
	Creation of a 'functional identity' linked to a digital wallet, for continuous access to (only) assistance, including across multiple countries. Check-in via Unstructured Supplementary Service Data (USSD) PIN code or QR code scan to receive top up at agency location.	DIGID Project (Gravity, IFRC, Kenya Red Cross, International Rescue Committee).
Movement across multiple borders	Use of the digital wallet application to disburse USD stablecoin ⁸⁹ remotely and cash out at remittance outlets in any country (where present).	Stellar Development Foundation United Nations High Commissioner for Refugees (UNHCR).

⁸⁸ VenEsperanza is a multipurpose emergency humanitarian assistance program designed to meet the most urgent humanitarian needs of people in situations of greatest vulnerability, such as Venezuelan migrants, Colombian returnees, and host communities. For more, see <https://www.venesperanza.co/>

⁸⁹ Stablecoins are cryptocurrencies whose value is pegged, or tied, to that of another currency, commodity, or financial instrument. [Investopedia](https://www.investopedia.com/terms/s/stablecoin/). Accessed July 2023.

5.4 LEVERAGING THE FINTECH ECOSYSTEM

Digital solutions mentioned previously point to the increased flexibility that digital finance products are offering beyond traditional banking. The growing Fintech ecosystems⁹⁰ in the Americas – Mexico and Colombia in particular – hold promise in terms of having a route-based approach serviced by one or more Fintechs. From a regulatory perspective, partnering with Fintechs can offer flexibility because these companies offer a narrow range of financial transactions. In many jurisdictions, they are considered technology providers rather than full financial service providers, such as banks that offer credit and deposit services. Fintechs facilitate specific types of value-based transactions, such as payments with a value limit per day or per user. However, it is important to note that all financial transactions still fall within the purview of financial regulators. For example, the FintechLAC initiative led by IDB

‘Fintechs have fewer restrictions and tend to work more with remittances and people on the move in general. So it would be ideal to have some sort of macroregional Fintechs operating in the continent for us to work more with them, since they are more prepared to deal with money moving from one country to the other. Also, they enjoy less regulations with banks so, less bureaucracy. Banks have more barriers to move money (e.g. impossible to move money from a country to another even in the same bank since there is no regional integration)’. KII H08.

⁹⁰ Fintech ecosystems are complex networks of interacting Fintech start-ups and scale-ups, financial institutions, regulators, governments, investors, and talent institutions who share an interest in advancing the financial services industry through technological innovation. For more, see <https://www.sbs.ox.ac.uk/sites/default/files/2020-09/OXEPR%202019%20%28Building%20FinTech%20Ecosystems%29.pdf>

is a collaboration between Fintechs and regulators for the purpose of developing regulatory measures designed to enhance, rather than inhibit the Fintech ecosystem growth. A mapping of Fintech regulations across the Americas is available on their website.⁹¹

As the Fintech ecosystem continues to grow economically and evolve rapidly with new classes and types of financial products, there is frequent and ongoing collaboration, discussion, negotiation, and engagement between Fintechs and country regulators. Fintech companies also often have access or can apply for access to regulatory sandboxes to explore unconventional digital finance solutions. Here, there might be room to discuss the shared objective of finding regulatory flexibility.

Most financial products offered by Fintechs consist of low-value transactions only, without offering services such as deposit accounts (i.e. checking and savings) or loans.⁹² The digitization of these transaction-based services works in favor of regulatory compliance because traceability and reporting of transactions is improved and can be made readily available to regulators that require compliance-based monitoring. In addition, the regulatory status afforded to Fintechs often limits the value of transactions, mitigating the risk of 'red flag' indicators, such as unusually large transactions or highly variable and high value transaction patterns. The combination of partnering with Fintechs and leveraging their digitization capabilities enhances compliance monitoring and verification of senders and recipients. This approach provides a predictable, quick, and simple method for transaction reporting, as required by regulators. The reporting is more accurate compared to manual processes or older systems.

⁹¹ FintechLAC, FintechRegMap and Inter-American Development Bank (IDB). Available at: <https://www.iadb.org/en/sector/initiatives/digital-finance-innovation/fintechregmap>

⁹² KII, H08.

It is easier to negotiate arrangements that leverage the fixed service structure of a Fintech to accommodate low-rate payments from a single funding source to a restricted group of individuals for a predetermined period, accessed at a pre-identified series of locations along a 'route'. This level of predictability in transaction reporting potentially de-risks the process for the regulator and provides consistency in transaction frequency and volume to the Fintech provider. Likewise, ecosystem growth trends indicate that there may be more market appetite amongst Fintechs for collaboration, given the novelty of these products, compared to conventional banking services with an established clientele. Discussions with various Fintechs during the KIIIs revealed willingness to explore partnerships with the humanitarian sector. They provided examples of and expressed openness to developing products specifically tailored to the needs of the sector. Depending on the Fintech product, partners should be aware that the inclusion of people on the move as Fintech account holders or clients unfortunately does not always translate into financial literacy and/or inclusion due to limitations in the scope of the services provided.

Many humanitarian actors point to a key caveat of solutions in the Fintech space to date the need for an internet connection and smartphone (or access to a tablet/computer). In addition, tech-based solutions may pose a steeper learning curve for some compared to others, such as older persons and populations with lower educational capital. Interestingly, populations the world over have demonstrated that this learning curve is achievable, hence the growing pace of smartphone adoption. However, it is worth asking – if vulnerable people on the move that might be targeted by CVA interventions do not have phones, does providing phones leading to an improvement in the efficiency and scale of 'route-based' delivery justify the cost? Does this provide an additional benefit or an additional risk? Here, it makes sense to examine this approach within the context of the 'market' for Fintechs in the Americas, alongside the demographics of people on the move throughout the region. For example, the average age of people on the move and refugees from Venezuela across the region falls within the global

demographics for social media and smartphone usage⁹³ between 18 and 35 years of age.⁹⁴ Similar patterns are seen in migration trends in Colombia, Ecuador,⁹⁵ and at border entry points in Costa Rica and Mexico.⁹⁶

The same Fintech products that could be used for more agile CVA delivery will also continue to be useful to the individual beyond the program itself – to plug into Facebook and WhatsApp, as critical communication and information tools⁹⁷ (see section 6) and for access to income and work on digital platforms.⁹⁸ The Rappi platform, for example, is purportedly used by over 30 million users in multiple countries from Ecuador to Mexico and is a primary source of income for many people on the move seeking casual work. Several key informants highlighted Efecty,⁹⁹ a remittance company known for its money transfer and payment services, as a potential avenue for financial inclusion. It is widely accessible and has been successfully utilized as a platform for delivering CVA remittances.^{100, 101} As a potential avenue to address issues around loss or lack of identification, there is also a growing number of digital ID applications available to

⁹³ Statista. [Distribution of Social Media Users in Latin America as of December 2019, by age group.](#)

⁹⁴ ILO, R4V. (2021). [Migration from Venezuela: opportunities for Latin America and the Caribbean.](#)

⁹⁵ IOM. (2023). [Migration Trends in the Americas.](#)

⁹⁶ Ibid.

⁹⁷ National Public Radio. (2021). [How Social Media Has Changed Migration to the United States \(broadcast\).](#)

⁹⁸ For more, see <https://www.rappi.com.co/>

⁹⁹ Efecty is a digital financial services provider that allows people to send and receive money to other accounts digitally, as well as to pay bills online. The company also features an ad-hoc section for business services. For more, see <https://www.efecty.com.co/web/>

¹⁰⁰ KII, H07.

¹⁰¹ KII, FS09.

smartphone users, including some designed for safe digital storage and verification of existing credentials such as passports.¹⁰²

The potential benefits and justifications in providing basic smartphones more consistently as a ‘cash plus’¹⁰³ intervention deserves to be explored, at least for the successful implementation of a fully inclusive route-based approach. The high prevalence of smartphone users across groups of people on the move limits the need for this measure to those who are most vulnerable. The fact that a single device can be used to access multiple services offers a major opportunity to multiply long-term impact in a single distribution. Evidently, there is no one-size-fits-all solution for a route-based approach or delivery mechanism that can address all the inherent challenges; but a smartphone arguably offers a close alternative by providing access to multiple applications to service a broad variety of needs and preferences for CVA in a single device. This option is further corroborated by interviews, research, and focus groups with people on the move that consistently indicate a recurring preference for digital identification and payment options.^{104, 105}

The point is not the smartphone itself, but rather the expansion of options it provides to humanitarian actors. There are more options to deliver CVA digitally, communicate consistently with people on the move and host communities, and to resolve challenges

¹⁰² ID, Now Identity Wallet. <https://www.idnow.io/products/identity-wallet/>

¹⁰³ CALP Network, Glossary of Terms: Cash plus is generally defined as the combination of cash transfers with complementary interventions. While it shares features with complementary programming, it differs in that it implies that cash is presupposed as the core component, rather than determining all modalities via response analysis. It also implies that providing cash assistance without complementary interventions is commonplace.

¹⁰⁴ Noted in: IFRC/CRC. (2022). *Voices of Migrants in Colombia*. Mercy Corps. (2022). *Caminantes Pilot Strategy*. Focus Group Discussions.

¹⁰⁵ See also: UNESCO. (2023). [Mobile Phones: An indispensable tool for migrants](#). (blog).

in identification. For the individual, it provides better access to these services, improved access to information on migratory routes via social media, and improved communication. As the printing of ID cards for people without identification is not uncommon, the use of a digital ID for people on the move could potentially be leveraged by humanitarian actors to negotiate better access to digital financial service providers. Secondary impacts, such as addressing the 'digital divide' and gender gaps in digital access might also be achieved according to current research on ultra-low cost smartphone availability,¹⁰⁶ although this is difficult to measure at the program level. Low-grade, off-brand android smartphones can be purchased in bulk from global wholesalers for as low as US\$35 per device. In terms of value for money, this might be a worthwhile tradeoff and should not be out of the question for humanitarian organizations working with people on the move to better serve them. At the bare minimum, this deserves informed consultation with the civil society and community groups that include or represent people on the move.

5.5 CLOSED-LOOP PAYMENT NETWORKS

More conventional approaches, such as the use of closed-loop networks for CVA delivery are potentially compatible with a route-based approach. However, some out-of-the-box thinking and investments in cost and capacity might be required to use these options at the scale needed to enable multi-country transfers. This approach is a more conservative option but may also be more acceptable to some stakeholders, given the frequency of use of e-voucher solutions in CVA interventions in the region.¹⁰⁷ It might

¹⁰⁶ Trustoni. C. (2022). [*Cost of Living in Latin America: Providing affordable access to smart devices.*](#) (blog).

¹⁰⁷ See Tables 3, 4. Also: <https://reliefweb.int/report/ecuador/providing-food-vouchers-venezuelans-ecuador>

also be acceptable due to the longtime precedent of resorting to voucher-based solutions as a workaround to guarantee delivery to a large and diverse population group that includes undocumented persons. From a regulatory perspective, digital vouchers, or e-vouchers operating within a closed-loop system are not required to meet the same KYC requirements as a cash payment for users, and therefore are potentially more feasible from a regulatory perspective. This is possible provided they are redeemable at a sufficient variety of surrounding vendors. It is also often the case that these types of systems can be more expensive to implement, and therefore need to be thoroughly assessed in terms of value for money (for both the organizations' and the system's participants). Program design and other factors such as cost-effectiveness in driving outcomes vary according to circumstances and implementation context.¹⁰⁸

Technically, there is nothing preventing closed-loop systems from becoming scalable on a cross-border basis, provided there is an available payment mechanism to push funds to participating vendors on a timely basis. Expanding out a closed-loop network to cover a specific migratory route is potentially feasible, as confirmed by this research and the e-voucher providers interviewed for this study.¹⁰⁹ In addition, it is also technically feasible to develop a closed-loop digital payment corridor, rather than resorting to the use of digital vouchers. As mentioned earlier, MojaLoop¹¹⁰ is an example of a digital payment loop – it is an open-source platform designed to create a closed-loop payment ecosystem encompassing a pool of digital and conventional financial service providers, microfinance institutions, mobile wallet providers, governments, and others such as humanitarian actors)¹¹¹. In this scenario, a closed-loop network of FSPs enables the

¹⁰⁸ Hidrobo, M. et. al. (2014). [*Cash, food, or vouchers? Evidence from a randomized experiment in northern Ecuador.*](#)

¹⁰⁹ KIIs, FS03, FS04.

¹¹⁰ KII, FS08, 16 May 2023.

¹¹¹ Mojalooop Foundation ([website](#)):

processing and settlement of payments among network participants based on agreed conditions, such as verification by a humanitarian agency, having an account at a participating bank, or setting transaction value limits. Realistically, humanitarian organizations are more likely to accept and adopt the use of a familiar fungible digital voucher rather than invest in the development of a new digital payment ecosystem, even though both options fall under the category of 'closed-loop' systems.

The workload and planning required in terms of database coordination, financial and vendor network management, and governance inherent to a closed-loop system are potentially significant. Transparent and participatory governance arrangements will also be required to mitigate the risks of having a single agency dominate design and decision-making. It is also more likely that designing a route-based approach in this fashion would require a single organization to host the platform and manage vendor payment disbursements. They would then delegate responsibilities and data management agreements with other humanitarian partners for recipient and vendor enrollment. More flexible definitions of 'vendors' that could be linked to the system should also be considered and made responsive to the needs of people on the move including transportation and accommodation providers. Also, important to note is the fluidity of movement across migratory corridors and locations servicing a route-based approach. In all cases where a digital voucher system might be used, both the humanitarian organization and the system used must allow for real time, on-site enrollment (i.e. registration) and voucher issuance. This is an aspect that ensures this type of delivery mechanism is genuinely adapted to the mobility of the population being serviced and that mobility of the individual is not inhibited due to time lag between registration, verification, and issuance.

On the one hand, the creation of a single, integrated digital voucher corridor may open possibilities for addressing needs adjacent to a migratory route. For instance, having small- and medium-sized businesses in host communities and transport providers servicing the route in question. On the other hand, using e-vouchers inherently limits the

flexibility and choice of recipients and certainly contradicts feedback indicating a preference for cash. At minimum, with rules for enrollment of new or differing business types and sizes, vendors should also be integrated quickly and easily into this approach. This can ensure that the vouchers provided are as fungible as possible and that the surrounding markets are available and responsive to the needs of groups moving through these areas.

If the product selected provides enough visibility to track vendor transactions, there may also be additional avenues to explore in using transaction volumes and patterns to understand market effects. Doing so might also enable organizations to better tackle reports of service provider discrimination against specific groups of people on the move. For instance, incidences of vendors charging higher prices for nationalities and ethnicities originating from outside the vicinity in question, a common occurrence affecting Haitian people moving through Central and South America in particular.¹¹² Conversely, this feature might also inflate existing concerns around surveillance amongst people on the move and potentially, the businesses serving these groups. For governments, planning for and understanding how this type of infrastructure can be complementary to existing systems such as social protection schemes should also be considered with the purposes of avoiding duplication, confusion around benefits, and not creating unnecessary parallel infrastructure.

The more flexible the vendor network is, the more crucial it will be to choose a low-cost, low bandwidth e-voucher solution that uses lightweight hardware. It is increasingly common for e-voucher providers to offer a vendor a point-of-sale app that can operate on a majority of android smartphones that can serve this purpose. For participants, most e-voucher solutions will require the issuance of a QR code or ‘tap and pay’ near-field

¹¹² [The Situation of Human Rights of Haitian People in Human Mobility in the Region](#). Thematic Hearing before the Inter-American Commission on Human Rights. 183rd session. March 2022.

communication (NFC) cards. However, there are also some early-stage companies servicing the humanitarian community that offer smartphone-based systems that tie voucher issuance to a biometric identity credential, namely fingerprints, allowing for completely hands-free transactions for recipients at vendor locations with a smartphone acting as both the biometric scanner and the point-of-sale in one.¹¹³

5.6 DIGITAL CURRENCIES

At the same time, there is a very real risk that the volume and frequency of payments and management of contracts with multiple FSPs across such a large network exceeds the capacity of any single humanitarian actor. This concern is especially pertinent if the organization in question is not present across the entire route and therefore, limited in its capacity to contract third parties in multiple jurisdictions. In KII conversations, shared sentiments of frustrations with contracting processes and bureaucratic inefficiencies reinforce this concern.

There are two options to mitigate these risks, both of which hinge on the use of digital currencies. The first option is to select a digital voucher solution that is integrated with a stable and widely used digital currency, such as a USD stablecoin with ‘off-ramp’, or cash-out options, facilitating real time settlement of funds. The blockchain-based attributes of using a United States Dollar Coin (USDC), the most compliant and commonly used digital dollar stablecoin, and other USD or Euro stablecoins have been proven to accelerate payments and ensure transaction settlement and tracking in real time. They also simplify forex management (currency exchange) by running transactions in a common single currency with a stable rate of exchange. Additional

¹¹³ F4ID. <https://www.f4id.org/>

benefits include the ‘safeguarding’ of value for project participants and vendors by transacting and holding funds denominated in USD, rather than a local currency that may be more volatile. The second option is to simply treat the distribution of stablecoins as cash on an open network – with humanitarian actors’ enrollment program participants, and with merchants joining the network to accept transactions and offer cash-out services in a single ecosystem, such as the AirTM network.

While there is debate around the use of blockchain-based solutions in the humanitarian sector, there are several precedent cases in the Americas where USD stablecoins have been used. For instance, the UNHCR-Stellar Aid Assist collaboration noted in Table 4. Other collaborations include the use of USDC to assist medical workers in Venezuela during COVID-19 (2020). The initiative was funded by the US government in partnership with the political opposition in Venezuela and is thus admittedly political. As a result, it is worth debating to what extent this situation differs from other issues around the politicization of assistance in the region.

The initiative was successful and was implemented by two decentralized finance providers: Circle Financial (USDC issuer) and AirTM, a Fintech company servicing the Americas.¹¹⁴ AirTM, interviewed for this study,¹¹⁵ remains widely used and available throughout the Americas, with two million registered users¹¹⁶ in 2022. AirTM and an increasing number of Fintechs in the Americas are integrating systems with the USDC stablecoin, offering options well beyond closed-loop voucher systems, namely digital wallets, and peer-to-peer payments. Hesitancy in the humanitarian sector

¹¹⁴ Circle Financial. (2020). [Circle partners with Bolivarian Republic of Venezuela and AirTM to deliver Aid to Venezuelans using USDC.](#)

¹¹⁵ KII, FS5.

¹¹⁶ G20. [AirTM: a solution for digital entrepreneurs in Latin America.](#) Database: Digital and Innovative Financial Products and Services for MSMSs beyond credit.

notwithstanding, this trend is more the rule than the exception. According to a 2023 IMF study,¹¹⁷ the Americas is also home to some of the highest rates and growth of stablecoin use and adoption by individuals, businesses, and governments.

5.7 WHOLESALE BANKS, PAYMENT AGGREGATORS & PAYMENT RAILS

Partnerships with wholesale banks, sometimes known as merchant banks, and payment aggregators offer a second option to mitigate the capacity-related risks for an organization operating a multi-country, closed-loop payment system. Both types of financial services share the attribute of being built to access multiple payment corridors through a variety of relationships with service providers operating in each payment corridor, such as local banks, Fintechs, and remittance providers. These actors also possess specific expertise in the coordination and processing of cross-border payments to multiple locations, often simultaneously. Crown Agents Bank, which is a wholesale bank and was interviewed for this study,¹¹⁸ has a track record of partnerships with humanitarian agencies. It specializes in hard-to-reach locations, with payment corridors and currency coverage across 100+ countries. Clients can execute single or batch transactions through a single digital gateway/platform to send payments to these locations using a variety of channels including SWIFT and mobile wallets.¹¹⁹ Nonetheless, these services certainly come with an associated cost in addition to transaction and operational costs.

¹¹⁷ International Monetary Fund. (2023). [*Crypto Assets and CBDCs in Latin America and the Caribbean: Opportunities and Risks.*](#)

¹¹⁸ KII, FS02.

¹¹⁹ Crown Agents Bank. <https://www.crownagentsbank.com/solutions/payments/>

Operating in a way that is highly like the structure described for a voucher-based route-based approach, the use of global card payment rails also presents a potentially feasible opportunity to deliver CVA in collaboration with humanitarian partners. For the purposes of a CVA program, there are two critical differences compared to a voucher-based approach. Firstly, by virtue of the payment instruments used at the point-of-sale where the terminal used to accept payment may pose a limitation due to differences in device, cost, and availability. Secondly, there is a benefit in the coverage provided by the provider's underlying infrastructure, which in most cases is well established and global in reach. This is as compared to a voucher or P2P-based network that must be built from the ground upwards. These two options have been used in CVA programming throughout the Americas.

'Payment rails' refer to actors such as Mastercard and Visa, or other regional equivalents, such as Mercado Pago and Paypal, who themselves are not banks but are payment infrastructure providers that connect payers and payees. One key informant framed this option impeccably.

'[...] ultimately an organization like ourselves [sic] is a partnership business. We don't actually issue any cards; we don't provide credit lines. We are a network. We're like the organization that runs the train tracks that allow the train companies [such as banks] to run their trains on. So we run the tracks ... and we secure the tracks, and we operate the tracks and there are rules around the tracks to make sure these tracks are integrated, interoperable as [sic] secure and safe'.¹

Recent discussions between a group of INGOs and Visa included a joint 'user journey' exercise to map the needs of people on the move, from the point of departure to the point of settlement. This exercise is an outstanding model of joint problem-solving

between humanitarian partners and a global FSP,¹²⁰ which in this case allows Visa to understand the needs and experiences of a migrating ‘end- user’ while also gaining an understanding of CVA interventions and the related requirements of organizations delivering these interventions.

On the other side of the discussion, humanitarian organizations participating in this exercise gained information on how global payment rails like Visa can function to ‘push’ payments to a variety of financial products that are suited to different personas or to different phases in the mobility journey (i.e. departure, transit settlement). This approach might include a ‘stack’ of solutions offered by Visa as a single provider including debit-only prepaid cards for those without identification, full-feature Visa cards for individuals with photo IDs and digital wallets or bank transfers for those meeting higher-tier KYC requirements and wishing to settle or begin an entrepreneurial activity. Since payment rails like Visa and Mastercard are almost universally accepted, these service providers also have a multitude of relationships with, and access to FSPs for card issuance whilst boosting efforts to negotiate terms and costs. More importantly, the global reach of these service providers is potentially instrumental in helping humanitarian actors to identify and build networks of suitable country-level financial providers across an agreed international migration corridor as targeted by a route-based approach.

Ultimately, the diversity of ‘personas’ represented in groups of people on the move throughout the region does not necessarily mean that each person may benefit from each option. The enduring issue of the ‘digital divide’ is closely linked to age, gender, and income. The choice of payment instruments and participating partners and service providers will or will not address the needs of people according to the route selected.

¹²⁰ NB: Report forthcoming and was not yet available at the time of writing.

The flexibility of the delivery mechanism will affect the extent to which transfer values can or cannot be adapted to differing vulnerabilities. From a higher-level perspective, the preferences and choices of both humanitarian organizations and people on the move are largely based on experience, creating limitations in knowledge or biases simply because a new approach or tool has never been tried or tested by the stakeholders. However, this research overwhelmingly indicates that it is both technologically and financially possible to implement a route-based approach from the perspective of payment delivery.

Table 6: RECAP: Functional Financial Services for a Route-Based Approach

RECAP: FUNCTIONAL FINANCIAL SERVICES FOR A ROUTE-BASED APPROACH	
Leveraging the Fintech Ecosystem	Basic smartphones can enhance route-based delivery by offering access to multiple applications and addressing the digital divide.
Closed-Loop Payment Networks	Closed-loop payment networks, like digital vouchers, are compatible with the route-based approach, enabling scalability and real time enrollment.
	Integration with stable digital currencies, such as USD stablecoins, accelerates payments and simplifies forex management.
Wholesale banks, Payment aggregators and Payment rails	Partnerships with wholesale banks and payment aggregators provide an option to mitigate capacity-related risks in operating a multi-country, closed-loop payment system.
	Global payment rails, (Mastercard, Visa), offer an established and global infrastructure for CVA in collaboration with humanitarian partners, allowing for diverse payment instruments and access to FSPs along migration routes.

6. PAVING THE WAY: KEY ELEMENTS OF A ROUTE-BASED APPROACH

This research provides a high-level understanding of the needs, motivations, and capacities of stakeholders across the three groups identified: people on the move, finance sector players, and humanitarian and development organizations. The methodology used for this analysis has attempted to triangulate available information and associate each of these groups with the three lenses of human-centered design, and hopefully increase the chances of success in exploring a route-based approach for CVA.

From here, a set of basic and essential ‘key elements’ required for a route-based approach have been identified. Referring to these as ‘elements’ deliberately stops short of considering these to be criteria, mainly because they are untested, and some or all of these can be combined in different ways to design a route-based approach. Not all these elements need to apply to a CVA design to successfully implement a route-based approach. Each one of them corresponds to a specific design lens.

Thus, if all elements can be incorporated in the same design, then it is likely that needs across all stakeholder groups can be met. However, if only a few are applied, then it is likely that the needs of some stakeholders will be addressed more than others. Note that in neither case are all the needs of all stakeholders met, as this ambition is unrealistic and therefore not a feasible scenario or goal. To frame this in an analogy, each element is like an ingredient. The recipe for a route-based approach can be

created depending on which ingredients are used and how they are combined. Like most recipes, this will result in a meal that appeals to some, but not everyone. To be feasible, a route-based approach will require CVA design and delivery that includes a maximum combination of the elements as shown in Table 7.

Table 7: Key Elements of a Route-Based Approach

Design Lens (IDEO Framework)	Desirability	Viability	Feasibility
Stakeholders	People on the Move	Humanitarian & Development Organizations	Financial & Technology Service Providers
Route-based approach 'elements'	<ul style="list-style-type: none"> Accommodates the diversity of personas and vulnerabilities of people on the move 	<ul style="list-style-type: none"> Allows for multi-agency usage and enrollment 	<ul style="list-style-type: none"> Multi-country coverage for receiving, paying and cash-out
	<ul style="list-style-type: none"> Considers the intentions and motivations for migration 	<ul style="list-style-type: none"> Uses a secure and shared database to unify data across locations and stakeholders 	<ul style="list-style-type: none"> Includes cross-border payment capability

	<ul style="list-style-type: none"> Allows flexibility and autonomy in how money is received and used now and in the future 	<ul style="list-style-type: none"> Has one or more universally shared program objectives 	<ul style="list-style-type: none"> Addresses and mitigates regulatory barriers in a compliant way to minimize exclusion
	<ul style="list-style-type: none"> As safe as possible from theft & other risks 	<ul style="list-style-type: none"> Provides continuous delivery to persons of concern across multiple locations on an agreed 'route' irrespective of which agency delivers it 	<ul style="list-style-type: none"> Flexible enough to accommodate multiple CVA amounts, modalities and payment delivery mechanisms
			<ul style="list-style-type: none"> Can scale up/down as necessary

The scenarios presented in the next section provide examples of how these elements might be combined differently to favor the interests and capacities of some stakeholders over others.

Simply having the identification and breakdown of which elements might be combined to constitute a route-based approach is a preliminary step. As explained in the earlier sections of this report, the aim of this research and proposition is to consolidate available information with the purpose of pointing stakeholders in the right direction, towards a more practical implementation phase that is optimized for success and hopefully expansion.

7. ON THE MOVE: ROUTE-BASED APPROACH SCENARIOS

The following route-based approach ‘scenarios’ are a visual representation of some of the options explored in this research that are available to stakeholders wishing to integrate this approach into CVA interventions in the Americas. These models are by no means prescriptive, rather, they are intended to generate ideas and discussions amongst stakeholders based on the information presented in this research. Each scenario represents a different design lens, and therefore, might benefit and reflect the needs of one stakeholder group over others. Depending on the creativity, risk appetite and resources of the organizations that might use these scenarios to craft a route-based approach, one or more elements from each scenario could also be combined to best fit the objectives of the CVA interventions in question, and the locations chosen to represent the route itself.

Figure 3: Scenario 1: The Waystation

Design Lens: Institutional (Viability)

Most adapted to humanitarian organizations. Uses a combination of existing CVA delivery mechanisms (e-voucher) and assistance delivery models (HSP, vendor marketplace)

Pros:

- Familiar to humanitarian orgs
- No KYC required (ex. vendors)
- Supports host communities
- Convenient and safe

Cons:

- High coordination burden
- High cost & high maintenance
- Less flexibility & choice for person on the move
- Less adaptable to changing routes
- Security concerns – may attract bad actors

**SCENARIO 1:
The Waystation**



Buy what i need now & for the road
Interact & discuss with host community

Local Marketplace
(Host community)

- Additional Assistance**
- Health services
 - Information
 - Temp. shelter
 - Psychosocial
 - Child-friendly spaces

Access other support safely & as needed

Departure



"Anchor"Org.

If i'm new: register
If i'm not: Check-in

Humanitarian Service Point

If i'm new: receive digital voucher
If i'm not: Receive top-up \$

Destination

- Digital voucher/e-voucher provider (ideally, flexible system with app, card, biometric options + dashboard)
- Local vendors – must have a smartphone or POS + bank account
- Payment aggregator or bulk payment processor w/intl. coverage

How it Works:

- Single closed-loop system used by multiple orgs (e-voucher card / digital certificate)
- Anchor organization
- Has an established presence in location
- Establishes service point
- Registers newcomers & logs "check in" for ppl already in system (ex. enrolled at a prior service point)
- Anchor and/or partner organizations in location
- Select and enroll local vendors from host community
- Provide additional assistance and services
- Provide general information and maps of waystations

Figure 4: Scenario 2: The Wallet

Design Lens: Personal (Desirability)

Fits best with preferences of people on the move. A decentralized blockchain wallet has minimal KYC requirements and provides full autonomy during and after the program. Deposits are made in a USD-pegged stablecoin.

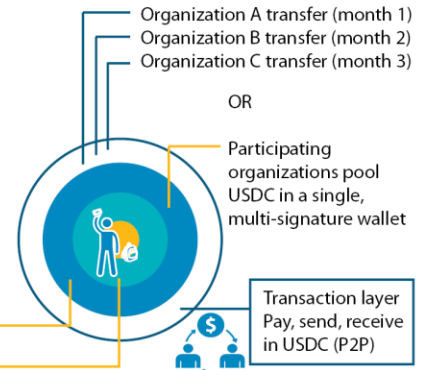
Pros:

- Flexible, very low cost
- Multi-sig wallet security (optional)
- Minimal KYC, tiered KYC available
- Secure and anonymous
- Traceability of transactions in real time
- Multi-use beyond CVA (remittances, informal work)

Cons:

- Humanitarian orgs must open/ manage a digital currency wallet
- Less visibility / control of beneficiary data
- Requires smartphone
- May require extra work to build cash out points

**SCENARIO 2:
The Wallet**



Wallet Layer
Receive & hold USDC



IDENTITY LAYER
Unique Digital I.D.(wallet address)



Transaction layer
Pay, send, receive in USDC (P2P)

How it Works:

- People on the move download wallet for free (set up time 5–10mins) via remote self-registration process (ex. VenEsperanza Caminantes pilot).
- Any organization with a digital wallet can provide direct assistance, OR
- A shared wallet can be used to pool funds for distribution. A single agency can host or multi-sign function allows multiple orgs to auth transactions.
- Network of assistance locations doesn't have to be linear (i.e. more than one 'route')
- Requires a service provider/wallet with multiple/accessible cash out points.
- Can integrate with digital vouchers & prepaid cards in some cases.

Service Providers: FinTechs

- Wallet provider (ex. AirTM)
- Bulk disbursement platform (if not incl. w/ wallet)
- Cash out partner (if required; ex. AirTM has 'cashier' agent network)
- Blockchain enterprise wallet (ex. Circle, Coinbase)

Figure 5: Scenario 3: The Boxcar

Design Lens: Functional (Feasibility)

Best aligned with existing (familiar) financial services and compliance standards. Combines payment rails, card network and one or more issuing banks.

Pros:

- Familiar to FSPs & others
- Leverages card network coverage + links to FSPs
- KYC + card adapted to different personas

Cons:

- Complex setup
- Card issuance speed & scale issues
- Limited to merchants with card POS devices

Service Providers: FinTechs

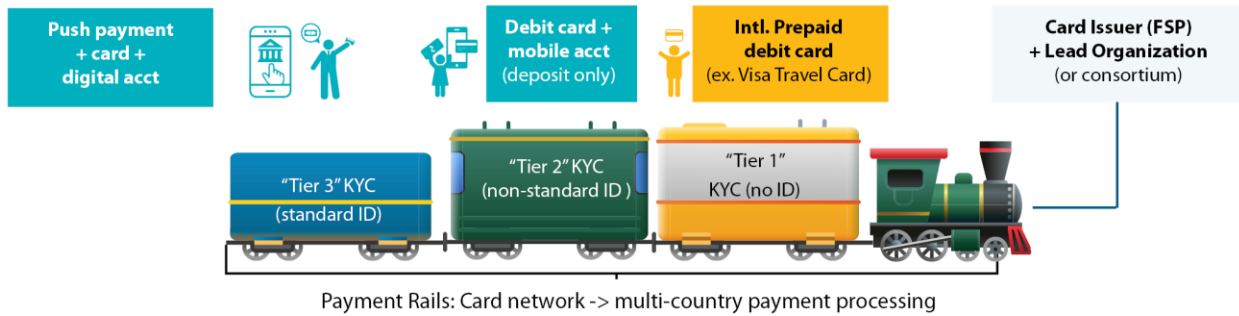
- Card network & payment rails (VISA, Mastercard)
- Issuing bank (ideally in country w/tiered KYC, ex. MX, BR)
- OR bespoke payment service provider (ex. Onbe)

**SCENARIO 3:
The Boxcar**



How it Works:

- Card network/payment rail assigns unique identifier and facilitates payment in multiple countries on 'route'
- Card issuer (one or more FSPs) provides card type based on KYC tier
- Organizations register people according to KYC tier and issue corresponding card type
- People with full ID have option of card + digital account or direct deposit



8. CONCLUSION: **THE ROAD AHEAD**

8.1 VISION: ADOPT AN INCREMENTAL APPROACH

The true feasibility and definition of a route-based approach can only be determined through practical implementation. To follow through on the design thinking methods used in this research unavoidably requires key preparatory activities, such as design consultation workshops between the key stakeholder groups and clear geographical identification of the agreed 'route' itself. This research has highlighted some of the distances in perspective and position of key actors (stakeholder groups). It follows that a critical starting point in the route-based approach planning process requires a 'meeting of the minds' in order to ensure that all key players are provided with an opportunity to participate in the design process, to voice and address concerns, and most importantly, to gain a mutual understanding of each other's needs, motivations and perspectives.

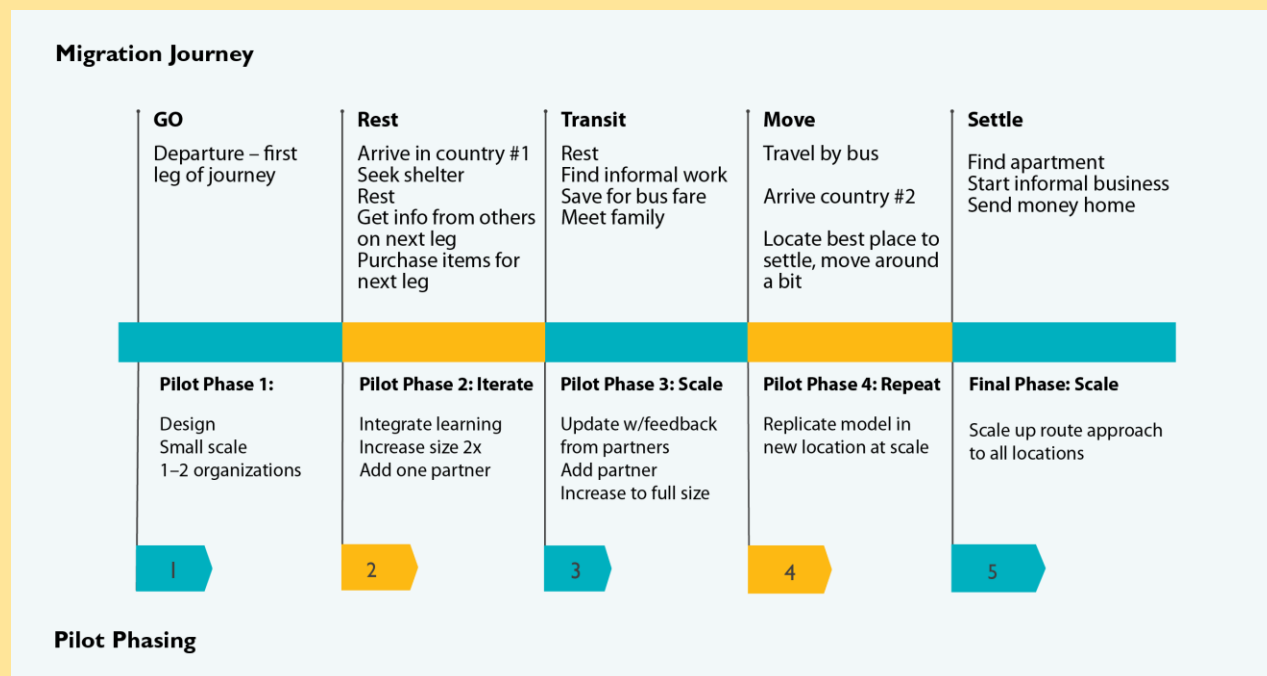
This exercise will require leadership and approval at the senior level from participating agencies, as well as intentional investments of time and resources such as technical experts and support staff. It is prudent to delegate the responsibility of facilitating the initial design process to a neutral third-party, such as a design firm for coordinating and facilitating the consultative process to minimize the perception or possibility of bias (for example, if a single agency leads the initiative). A qualified design team will also bring to the table the necessary expertise in design thinking processes that are hands on, and

user-centered, such as the mapping of user journeys, ideation and prototyping exercises, design sprints, and eventually pilot design and testing frameworks.

There is ample current and past data on markets, needs and vulnerability assessments, and the geography of major routes characterizing human mobility in the Americas. Nonetheless, making sure that the route-based approach being designed corresponds to context and to the use of CVA as a delivery modality is key. It will require assessment of suitable geographies for implementation (including local markets), capacities of participating organizations, and host community acceptability.

Staying true to the concept of a route-based approach, one idea for piloting incrementally and iteratively is to plan and model the pilot and its activities based on the evolution of a journey. This might involve piloting each 'leg' of an agreed route, refining and learning from implementation, and subsequently applying the tested and improved model to a subsequent leg until the full 'route' is covered. Strategically and thematically, this approach to piloting serves the purpose of starting small and expanding. However, it also leverages the geography of a 'route' to align with pilot phasing, from inception to completion, such that the final phase of piloting also results in completion of the last leg of the journey. Practically, this also permits testing of CVA delivery in different locations (urban and rural) specific to each stage of migration (departure, transit and settlement). Although there are clearly some larger and more static migration corridors than others, this type of approach would need to remain generic enough to remain flexible given the changeable nature of smaller routes.

Figure 6: Pilot Journey Diagram



8.2 INVESTMENT: THE ROLE OF DONORS

If there is a singular risk that might jeopardize the feasibility or even the possibility of a route-based approach, it is almost certainly linked to a lack of funding resources. As expansive as this research has been, the only available data on donor trends specific to CVA and migration in the Americas paints a worrying picture. Concerns about dwindling funding were voiced by humanitarian stakeholders in key informant interviews and were also pointed out as a factor constraining the capacity of organizations to adapt and innovate in order to face a rapidly evolving human migration context.¹²¹ It is likely that the resourcing levels of many agencies are just enough to enable business as usual, rather than driving innovation due to scarcity or exploring innovation through extra

¹²¹ Humanitarian appeals for the Americas is only funded at 18% <https://response.reliefweb.int/latin-america-and-caribbean> Accessed 2 August 2023.

funding. The result is stagnation where there is neither pressure nor incentive to innovate. Donor pressures, preferences, grant conditions and policies were highlighted as key drivers to enhance coordination mechanisms and capacities, to harmonize delivery amounts and approaches, and to operate where possible in consortia. If this push for consortia and harmonization is an accurate reflection of donor preference, then a route-based approach needs to be pitched and presented as an avenue to better fulfill those priorities and ensure there are adequate resources available to innovate away from the status quo.

Donor funding for a route-based approach should be considered as an investment in a more targeted and smart way to adapt to the shifting dynamics of migration in the region, and to ultimately achieve better coordination and value for money in the way that CVA is implemented. Approaching funding as an investment should underline the need for a longer funding timeframe to accommodate the time needed for responsible design and consultation, incremental expansion through strategic pilot implementation and eventual adoption at scale by participating organizations. However, it is up to the humanitarian community to present a convincing and united front to increase donor confidence in the capacity to change the status quo, seek new implementation models, and see them through. These aspects would need to be balanced with more political concerns around the perceived ‘pull factor’ of humanitarian interventions, a phenomenon that remains debatable with little supporting evidence.¹²²

On the donor side, amending grant conditions may be required to remove country-specific or population-specific conditions that would otherwise act as barriers to a multi-country approach. As mentioned earlier in this study, consultation with donors was limited. Therefore, the extent to which these barriers prevent actions because of funding

¹²² National Immigration Forum. (2019). [*Push or Pull Factors: What Drives Central American Migration to the U.S.?*](#)

is not clear. Considerations around how funds might be structured are also relevant – perhaps a pooled or shared fund for the implementation of a route-based approach, and/or the conditional release of funds based on the completion of each design phase to ensure that there are built-in incentives to follow through.

No single region in the world has experienced a greater relative increase in international human mobility than the Americas.¹²³ This is a critical time for humanitarian actors to look at more effective and efficient ways to assist people on the move throughout the region, and for donors to invest in efforts to do so. A route-based approach may also offer the opportunity to mitigate some of the political tensions around funding CVA to people on the move, especially if implemented in a way that effectively supports regularization and settlement, and that provides resources to encourage safer transportation routes. The 2022 Los Angeles Declaration, to which most major donors are signatories, also supports this shift in programming, calling for increased coordination on migration management and emergency response and protection systems.¹²⁴

8.3 INNOVATION: CAPACITY TO ADAPT

There is a final and important question to ask as part of the topics explored in this research: Are humanitarian organizations truly ready and equipped to think and act innovatively enough to make a route-based approach feasible? The other two groups of stakeholders who are needed to create this new model for CVA implementation namely:

¹²³ Migration Policy Institute. (2023). [*In a Dramatic Shift, the Americas Have Become a Leading Migration Destination.*](#)

¹²⁴ Migration Policy Institute. (2023). [*In a Dramatic Shift, the Americas Have Become a Leading Migration Destination.*](#)

FSPs and people on the move have already demonstrated capacity to rapidly innovate, adapt, and adopt. To echo the question in the research preceding this study: Can the world of CVA keep up? ¹²⁵

Many people on the move otherwise excluded by the global financial system have begun to embrace the use of cryptocurrency to send and receive money. For example, Venezuela has one of the highest rates of peer-to-peer use of cryptocurrencies.^{126, 127} People on the move in Colombia are finding work in digital labor marketplaces, using applications such as Rappi.¹²⁸ Fintech growth and investments in novel financial tools and technology such as digital banking and decentralized finance is growing at a rapid pace and has the backing of regulators and regional institutions in the Americas. Even more conventional FSPs, such as Visa and Mastercard, have recognized and embraced the potential of new technologies. Debit cards from both Visa and Mastercard are also increasingly available to users of major cryptocurrency exchanges. New interoperable transaction layers based on digital stablecoins are being developed.¹²⁹ It is important to note that engaging with these technologies requires extra due diligence and controls and is often subject to regulatory scrutiny. However, the fact that traditional, well-established, and connected financial players are actively interacting with these technologies is an indication that regulatory frameworks and guidelines will gradually fall into place to address the evolving landscape of digital financial services.

¹²⁵ CALP Network. G. Baizan, P. (2022). [People are on the Move: Can the World of CVA Keep Up?](#)

¹²⁶ Americas Quarterly. (2022). [Is Crypto the Path to Financial Inclusion in Latin America?](#)

¹²⁷ Center for International and Strategic Studies. (2021). [How Open and Public Currencies Can help Venezuelans.](#)

¹²⁸ More on Rappi can be seen on their website [Rappi](#).

¹²⁹ Damodaran, R. [Putting Trust at the Center of the Next Digital Assets Innovation Cycle](#). Mastercard Newsroom. 28 June 2023.

Meanwhile, the humanitarian community is characterized by reluctance, slow acceptance of technological innovations, and in some cases, total stagnation due to a persistent refusal to explore innovative approaches.¹³⁰ CVA, especially in hyperinflationary contexts like Argentina, Venezuela, and increasingly Haiti, has offered significant advantages in time, cost efficiencies, and risk mitigation as demonstrated by numerous humanitarian agencies. However, many of these projects rarely move beyond the pilot stage, revealing time and again that there is either a lack of capacity or a lack of willingness to scale.¹³¹ Yet, for an assistance modality that relies almost exclusively on the use of financial instruments, the acceleration of tech innovations in the finance sector, seen in the growth of Fintech, has not taken hold. In the Americas, the two largest contexts of human mobility are surrounded by the region's second and third largest (and growing) Fintechs (Mexico and Colombia, respectively).

Innovation is not the goal of a route-based approach, but a route-based approach will absolutely require the capacity, agency, and motivation to innovate. Humanitarian actors implementing CVA in the Americas are fortunate enough to be surrounded by a rapid acceleration in the availability and adoption of digital technologies, particularly in finance. While agencies in other regions might be challenged by a lack of context-appropriate digital innovations, this is not the case here. The availability of local Fintechs to work jointly to create a route-based approach is significant – this is one of the few regions where the impetus for locally-led responses can be leveraged to drive the adoption of innovative solutions in the sector. Beyond private sector partnerships and products, this environment also implies the availability of local tech talent, a potential resource for humanitarian agencies to fill in what is arguably a knowledge and

¹³⁰ Monich, A. et. al. (2023). [The Stagnation of Innovation in Humanitarian Cash Assistance](#). Journal of Humanitarian Action, V8(4).

¹³¹ UNHCR Innovation Service. (2020). [Disruption and digital revolution for whom? Considerations on the use of blockchain and digital ledger technology in displacement contexts](#).

capacity gap. There are few excuses to ignore or refuse to seize these opportunities for the benefit of a novel CVA approach. Perhaps it is worth taking our own advice on CVA: 'If not, why not?'¹³²

If a few leading agencies will embrace the opportunities available in the region to explore digital solutions as a means of implementing a route-based approach, it is worth pointing out the opportunities that exist beyond basic Fintech partnerships and established product adoption. Depending on the desire to rethink and open up CVA models, there are a variety of additional options and strategies that could be explored to multiply the impact of digitization in the route-based approach. An outstanding example of this is the potential to leverage the use of social networks and mutual support behavior.

This research highlights a consistent finding that most of the people on the move primarily rely on mutual assistance. They form groups and provide support for one another, even beyond their family connections. Moreover, individuals who receive aid from charities and humanitarian organizations are often quick to share it with others in their vicinity. Nearly everyone obtains information from Facebook or WhatsApp or from someone else with access to these resources. Here are some suggestions on how taking this extra step in the innovations process might serve to maximize the impact of a route-based approach to CVA.

- **Use Chatbots and digital applications for participatory preregistration and referral processes** to expand the reach of interventions to those without digital access and/or who are in smaller or less frequented locations;

¹³² CALP Network. (2022). [*Increasing the Use of Humanitarian Cash and Voucher Assistance: opportunities, barriers and dilemmas.*](#)

- **Provide access to and explore the use of shared digital wallets for group cash transfers** for people in transit traveling in groups, and for those wishing to settle who might benefit from the ability to pool funds with others in a single digital wallet (e.g. for rent);
- **Ensure that digital applications used to deliver/receive CVA have peer-to-peer payment functionality** and are available to the public as are most Fintech apps. This will allow recipients of CVA to send funds back to their families or to other family members who have fallen behind or plan to move. A public app might also be adopted by critical service providers, such as buses or trucks; and
- **Consider the possibilities of digitizing the concept of a ‘humanitarian service point’ on a social media platform as a core tool to roll out a route-based approach.** This digital point can serve the purpose of communicating, sharing information, reporting incidents, and receiving updates and feedback from people on the move who could have already received assistance.

For innovation, leaders in the humanitarian community with risk appetite and ambition should adopt a digitization strategy to implement a route-based approach in the humanitarian community. Other opportunities include the opening and use of corporate/agency digital wallets to fund and disburse CVA across a multi-country network or even the possibility of doing the same to digitize a common funding pool for agencies implementing a route-based approach in different locations. The list can go on, and the local tech community in the region could likely propose more novel solutions, if humanitarian organizations are able to think and engage openly in that space.

8.4 LISTEN: RECOMMENDATIONS FROM PEOPLE ON THE MOVE

RECOMMENDATIONS FROM PEOPLE ON THE MOVE: HOW TO IMPROVE AID DELIVERY

During the focus group discussions, several suggestions were voiced by people on the move, offering valuable insights into their needs and preferences. It is important to acknowledge that these suggestions hold more anecdotal value and may not necessarily reflect the perspectives of the broader population of people on the move. However, they provide meaningful indications of the types of assistance that could be highly valued by this group. These responses also speak more broadly than just CVA.

Access to financial services:

1. improve access to financial services and support for migrants during their journeys;
2. offer credit cards through organizations providing aid;
3. create a personalized platform for migrants to access financial services and information easily; and
4. allow opening online accounts with different types of IDs for cash transfers (e.g., digital).

Aid delivery:

1. offer more transportation assistance to other cities;
2. provide more kits with clothing, not just food; and
3. ensure better treatment in shelters and more respect for migrants.

Information and communication:

1. provide clearer information about available assistance and criteria for receiving aid; and
2. increase the presence of humanitarian organizations along migration routes and improve communication about their services.

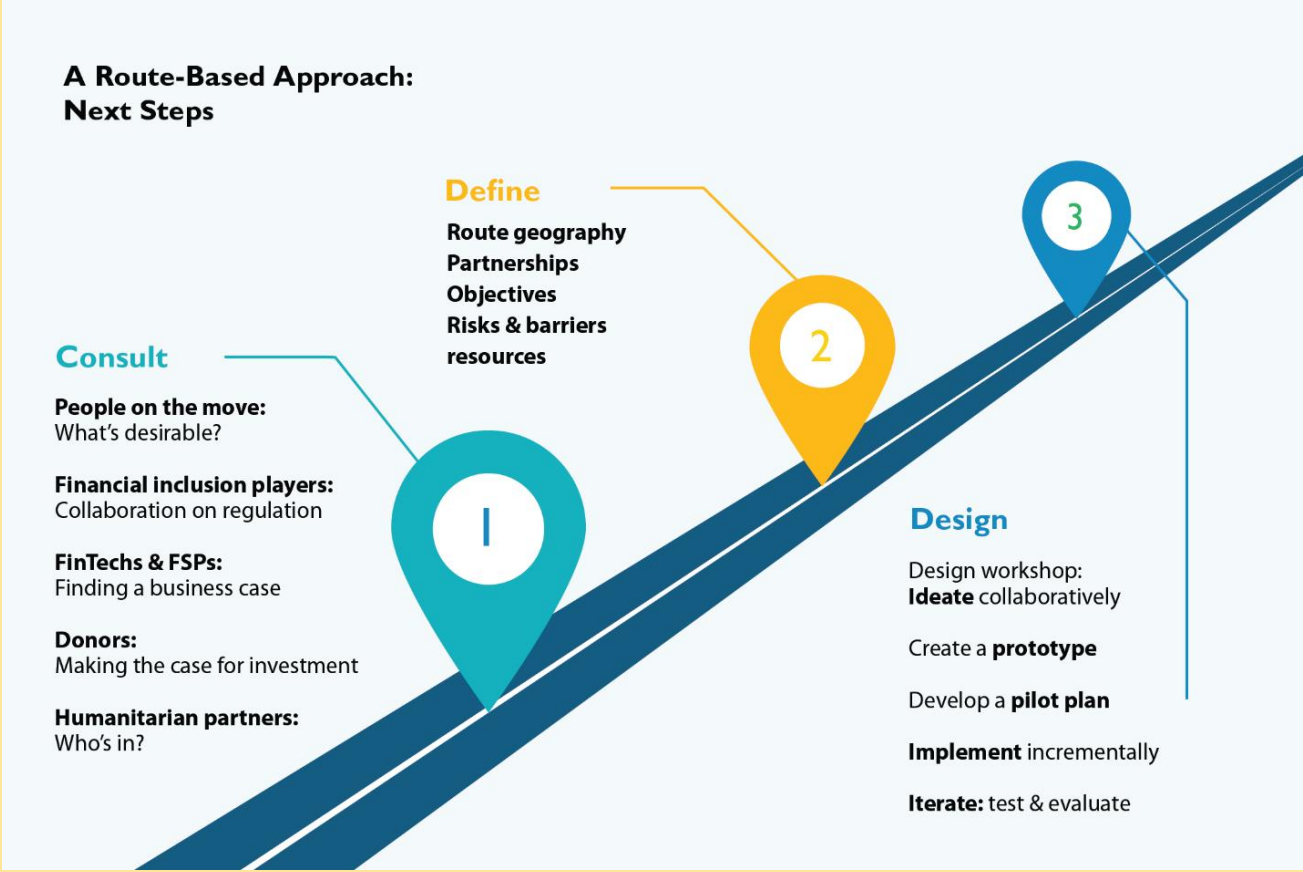
Legal support and integration:

1. work as intermediaries to help migrants access services in the host country and find jobs; and
2. provide legal support and help migrants in their regularization processes.

8.5 DIRECTIONS

This research aspires to prepare and point humanitarian partners in the right direction when developing a route-based approach. This is an early step in the pathway to implementation. Immediate steps that might be taken should aim to fill in some of the information gaps highlighted in this report; bridging the existing divide between the three groups of stakeholders that are critical to success. These actions are a prerequisite to defining a route-based approach that is holistically reflective of existing capacities and preferences, and that is the result of a multilateral vision, rather than unilateral action. Once defined, only then can partners move together to mobilize the resources needed to move into the design phase. An example of what this preliminary roadmap might look like is shown below.

Figure 7: Next Steps: Sample Roadmap



8.6 REFLECTIONS

If successful, the pioneering of a route-based approach promises to be valuable and relevant within the Americas and beyond. This research provides strong evidence to support and inform the feasibility of a route-based approach to CVA. The findings highlight key elements for actors to utilize and integrate into the design and implementation of a route-based approach. The researchers acknowledge that a change in approaches to CVA will be subject to the leadership, capacities, and resources available to do so. To guide forward-thinking, scenarios associated with the route-based approach have been proposed, such as the waystation model, wallet model, and payment rails model, which promise benefits for individuals, humanitarian organizations, and FSPs in the provision of humanitarian assistance.

Significantly, the research reveals the presence of a diverse range of stakeholders and expertise within the Americas. These actors demonstrate the capacity and readiness for collaboration in implementing a route-based approach. By leveraging the strengths of humanitarian organizations, regulatory bodies, the finance sector, and advocacy groups, the region has the potential to drive innovation and reshape the delivery of CVA. The human-centered design principles proposed in this study emphasize the opportunity to consult openly and inclusively with people and communities on the move to make sure that their voices are heard throughout the design and implementation phases. Ultimately, the question of whether a route-based approach will be truly feasible will depend on the appetite of donors and ability of humanitarian agencies to find common ground, rally together, and engage in a thoughtful and iterative process to journey away from the status quo towards this new paradigm.

Recognizing the limitations of existing models, this research underscores the need for innovative approaches to address the complex challenges of human mobility effectively. By embracing technology, fostering collaboration, and adopting adaptive strategies,

stakeholders can ensure the delivery of efficient, inclusive, and impactful assistance to people on the move. The findings call for proactive leadership and commitment from stakeholders to explore and implement a route-based approach, setting a new standard for humanitarian assistance in the Americas, and beyond, in response to the dynamics of migration.

ANNEXES

ANNEX I: FSPS INCLUDED IN RESEARCH SCOPE

NAME	TYPE	COUNTRY CONTEXTS MENTIONED DURING KIIS	COMMENTS
AirTM	Global Fintech	Across the Americas	A digital wallet platform that operates globally.
ITAU	International bank	Across the Americas	
Mastercard	International payment processing (payment rails)	Across the Americas	
Visa	International payment processing (payment rails)	Across the Americas	
BBVA	International bank	Argentina, Colombia, Mexico, Peru, Uruguay	Previous payment provider of several humanitarian organizations.
<i>Banco Caja Social</i>	National bank	Colombia	
<i>Banco de Bogotá</i>	National bank	Colombia	

<i>Banco de Occidente</i>	National bank	Colombia	Third most used FSP amongst CWG members.
<i>Bancolombia</i>	National bank	Colombia	
<i>Efecty</i>	Money transfers, remittances	Colombia	Second most used FSP amongst CWG members.
People Pass	Payment provider	Colombia	
<i>Supergiros</i>	Money transfers, remittances	Colombia	Top FSP collaborating with CWG members (as of May 2023).
Sodexo	Payment provider	Colombia	Specialized in voucher issuance.
Davivienda	International bank	Colombia, Panama, Costa Rica, Honduras, El Salvador	
Global 66	FinTech	Colombia, Brazil, Mexico, Chile, Argentina, Peru, Ecuador	E-wallet provider.
Mibanco	International bank	Colombia, Peru	
<i>Banco Pichincha</i>	National bank	Ecuador	Collaborates with Western Union to serve people on the move, cardless ATM services also

			provided in some contexts.
Western Union	International money transfers, remittances	Ecuador, Colombia	Widely available throughout the Americas.
<i>Ban Rural</i>	National bank	Guatemala	
<i>Banco de los Trabajadores</i>	National bank	Guatemala	
<i>Banco GTE Continental</i>	National bank	Guatemala	
Tigo134	Mobile financial services	Guatemala	
<i>UpSiVale</i>	Fintech specialized in prepaid cards	Mexico, Guatemala, El Salvador, Honduras	Active collaborations in Mexico and Guatemala with both UN and NGOs. Prepaid solutions compatible with both Master and Visa cards.
<i>Tarjetas Peruanas Prepago (Prepaid Peruvian Cards)</i>	Fintech specialized in prepaid cards	Peru	Actively involved in humanitarian aid projects for over four years, developing solutions specific to the requirements of

			the humanitarian sector.
TEPCA	Fintech specialized in electronic money issuing	Peru	Authorized by the <i>Superintendencia de Banca, Seguros y AFP</i> (Superintendency of Banking, Insurance, and Private Pension Fund Administrators) to operate as an electronic money issuing company.
Jet Peru	International money transfers, remittances	Peru, Chile, Argentina	FSP with capabilities in currency exchange and electronic wallet services.
MoneyGram	International money transfers, remittances	Various countries across the Americas	Integrated with RedRose platform for cash distribution.

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