Collaborative Cash Delivery Platform

Feedback on ECHO Revised CTP Guidelines and Operational Solutions

The new ECI as they inter P reduce dupli and a major shift 14 humanitarian agencies and CaLP collaborating to deliver cash to people affected by crises faster, more efficiently, at higher quality and at a greater scale.

Action Against Hunger, Adeso, CARE, Catholic Relief Services, Concern, DanChurchAid, Danish Refugee Council, International Rescue Committee, Mercy Corps, Norwegian Refugee Services, Relief International, Oxfam, Save the Children, World Vision

The new ECHO CTP guidelines offer a fundamental shift as they intend to simplify the delivery of cash transfers, reduce duplication and improve accountability, through a major shift in how actors will work together to improve efficiencies. So far the discussion on the policy has focused on higher level issues. However, if the policy is to be effectively operationalised, the Collaborative Cash Delivery (CCD) Platform identifies *three main challenges* that require careful consideration, detailed ways of working and operational clarity, in order to ensure an effective and timely response of quality CTP, at scale.

The following key challenges that need to be addressed urgently are:

- Practicalities of implementation/ relationships between Partner A and B
- Cost-efficiency vs. a needs-driven approach
- Coordination and integrated humanitarian CTP programming

The CCD Platform believes we can help ECHO address some of these tactical issues, which are outlined below. This paper is split into two sections. The first section addresses the challenges that the CCD Platform foresees in the implementation of the ECHO guidelines in the current cash landscape, broken down into practical steps in relation to typical CTP processes, according to different delivery mechanisms. The second section details the solution that the CCD Platform is currently developing, in order to enhance efficient and effective collaborative cash programming, and how this could be adapted to support ECHO in addressing some of the challenges identified in the new policy.

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A: Operationalizing a Single Delivery Quality Cash Transfer Response

Challenge #1: Practicalities of implementation: Relationships between components A and B

While the new guidelines are a strong step forward and offer much more detail and nuance on how they will work, they still lack details around the practicalities of implementing the split component structure for CTP, namely components A and B, and specifically on roles and responsibilities for key activities.

The CCD Platform has broken down CTP processes into the main steps required and shows in detail how components A and B may need to work with each other in practical terms, the risk this may pose to programming if it doesn't happen effectively in the new model, and some solutions that the CCD Platform could offer.

Table: Breakdown of CTP programme processes under ECHO guidelines

(N.B Assumption that needs and market assessment has already been done and cash transfers are feasible)

CTP sub- step/activity	Lead (A/B)	Component A responsibility	Component B responsibility	Outstanding questions on responsibilities	Possible risks to programming	Mitigation measure/ Platform solution
1. Decide on cash transfer amount and beneficiary targeting criteria	A	 Calculate MEB Set beneficiary criteria Coordinate with other CTP actors in country 	Responsibility in negotiating with the FSP and them having to know: 1) what the transfer value is and the frequency of disbursements, and 2) the population affected that will be covered (which will relate to the final targeting criteria) in order to do this.	 How will targeting be linked up with partner doing registration? How will component A and B coordinate and decide on the overall response strategy (e.g. % of affected population that will be covered with CTP, frequency of cash transfers and duration, final targeting criteria) Who is actually responsible for determining these different aspects? 	 Risk of delays in implementation if insufficient coordination between component A and B and that component B can only really begin their planning and negotiations with an FSP once the design bits are clear. Risk that the relevance of the transfer value is not continuously monitored and therefore lack of adaptation of programme design accordingly Outside of the Syria crisis, payment systems and delivery mechanisms are rarely identified and negotiated ahead of the CTP planning process, confusion on roles between who leads on this between component A and B. 	 Common database for Partner A. Dialogue with B starts as part of the preparedness effort or at ASAP at the outset. Multi-party agreement* defines how the response strategy needs to be designed and the key information to be shared between A and B Process to ensure close coordination with component A and B throughout and willingness/ incentives for component B to change their implementation (e.g. change the transfer value) based on inputs/recommendations from component A. Main risk is not being able to be adaptive in our programming

2. Identify and verify Beneficiaries	A	 Create beneficiary lists and confirm Collect relevant information from beneficiaries and transfer to component B 	Receive and process beneficiary lists	 Who will actually register beneficiaries? Who will create program IDs or conduct verification if beneficiaries do not have national IDs? Who is responsible for ensuring compliance with data protection? How would the activities need to adapt to deal with longer term, multi-year programme, where beneficiaries receive monthly assistance? How would the verification process be maintained and consolidated given the need to conduct verification at various stages and on a frequent basis? Which entity is ultimately responsible for the beneficiary verification and ensuring that the right people are receiving assistance (and that these people are eligible)? 	 Lack of clarity on beneficiary lists and verification process could present risks for corruption, confusion and operational complexity. If the two components don't coordinate, the delivery system chosen by Component B may have requirements that exclude a section of the population. Risks to data being accessed by unauthorised actors or used for purposes outside of agreement Make referrals from other sectors, agencies, essential service provider difficult 	 Build in support processes to assist beneficiaries without access to required ID close coordination with component B on what ID is acceptable / required for the delivery mechanism chosen (e.g. banks or some FSPs may require photo ID or other checks – would need to be coordinated closely between A and B so that the delivery modality chosen has feasible requirements for the target population). Close coordination to ensure that verification is done at different points in the process (e.g. upon selection of beneficiaries, during monitoring activities, and regularly on an ongoing basis) Include details on data protection standards and responsibilities in contractual arrangement annex. Ensure that focal point is clear and create a Multi-party agreement outlining referral systems
3. Inform Beneficiaries	A	 Train staff Develop comms tools and messages (and disseminate) Set up feedback and complaints line 	 Receive feedback or complaints at distribution phase 	How will feedback or complaints received following distribution be linked with the main feedback line established under A?	 Issues identified after distribution are not fed back into programme design to improve implementation. Inclusion or exclusion errors are ignored. 	 Common complaints database managed by Partner A. Multi-party agreements between A and B necessary

4. Distribution for various delivery approaches		A responsible for monitoring the distribution process as part of the M&E processes	•	Who manages the feedback/complaints linked to the specific delivery mechanism (for example, if it's an issue with the ATM not giving money, or card is swallowed, need swift resolution with FSP)? If the main feedback line is held by Component A how will we make sure the time for resolution isn't delayed by Component A having to report to Component B for resolution. Equally, we would ideally like beneficiaries to have only one contact point for all feedback/ complaints.			
i) If <i>card</i> <i>method:</i> Distribute cards and train on how to use	В	 Distribute cards Activate cards 	•	Who physically distributes cards to beneficiaries? Who trains beneficiaries on the delivery mechanism chosen? Who is responsible for managing beneficiary queries in relation to distributions?	 FSP contracted may not have capacity /interest to spend time to ensure that beneficiaries are properly understanding the system Lack of beneficiary capacity to use cards. Beneficiaries turned away for lack of appropriate ID Targeting/ registration and distribution are disjointed processes, delaying implementation, creating confusion and tensions in communities Lengthy (or no) resolution for beneficiary queries on distributions 	•	If FSP expected to distribute cards, they need to be trained to set up and manage a distribution accordingly to humanitarian standards

ii) If <i>mobile</i> <i>transfer</i> : Set up mobile accounts/dist ribute phones and train beneficiaries	В	A would be responsible for process monitoring	 Set up accounts Train agents and ensure sufficient coverage Ensure cash- out capacity of agents 	 Who is responsible for managing beneficiary queries on the delivery mechanism? Who is responsible for process monitoring? Who trains beneficiaries? What is the process for finding people who don't show up and updating beneficiary lists? 	 Lack of beneficiary capacity to use mobile wallets Weak phone networks / immature agent network for cashing out 	 Role of A needs to be clear in how they can support B in this to ensure beneficiaries receive money in an appropriate way
iii) If bank counter/over the counter distribution: Set up distribution plan	В		 Complete distribution lists Inform bank staff Ensure sufficient cash on hand 	 What is the process and who is responsible for finding people who don't show up for distributions and updating beneficiary lists? Who is responsible for responding to beneficiary queries on the actual distribution? Who is responsible for monitoring the distribution process? 	 Insufficient cash in banks Beneficiaries turned away for lack of appropriate ID 	Role of A needs to be clear in how they can support B in this
5. Disbursement (Transfer value to cards/ mobile wallets)	В		Conduct Transfers	 Who is responsible for monitoring that funds actually reach the beneficiary? What processes are in place to reverse funds back to Component B in the event of no-shows? Who is responsible for covering the costs of and implementing communications to beneficiaries that a transfer has been made? 	 Delays to implementation if contracting of Component B takes too long Inflexible and un- adaptive programming once B has been contracted 	 Agree on responsibilities for monitoring (and processes) from the outset. Ensure clear communication from Comp. B to A on distribution plans (ensure information sharing that's timely and complete/accurate to enable monitoring and follow up). Ensure adequate clauses in the agreement with the FSP under component B to enable adaptations to be made (if needed) during programme implementation.

						• A could run PDMs and then the contract between A and B could stipulate a procedure for addressing problems.
6. Monitor/ Provide support for cash out process	A	Encashment monitoring			 Component A not having timely information on the distributions (e.g. detailed plan with dates and locations) from Component B to ensure adequate presence for monitoring of the process. If large scale, could also be resource intensive to have A monitoring distribution process (need to allow for resources for this in the budget of A) 	 The multi-party agreement should outline: How the issues are identified (Component A) How they are handled and communicated back to communities/ beneficiaries (Component A) accountability for fixing clearly outlined in Multi-party agreement Timely information sharing between B and A to enable process monitoring
7. Receive and address complaints from beneficiaries	A	Manage complaints mechanism	B would have responsibility in resolving some of the complaints/ issues related to distributions and the transfer itself.	 How does communication happen between A and B on transfer problems? Who is responsible for ensuring that serious complaints are referred to appropriate third parties (e.g. police, child protection agencies)? 	 User-error challenges and technical distribution problems Cash access/cash disbursement issues are not adequately considered Lack of response to protection concerns or serious issues raised by beneficiaries in relation to distribution process Confusion among beneficiaries on who to communicate issues to and how (and potentially duplicate reporting by beneficiaries if not clear) 	 The multi-party agreement should outline: How the issues are identified (Component A) How they are handled and communicated back to communities/beneficiaries (Component A) Accountability for fixing clearly outlined in Multi-party agreement

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8. Fix any problems with cash distribution	В	Could be some shared responsibility with A (e.g. in	What is the recourse if B does not fix the problem in a timely manner?	 Liquidity issues Distributions are poorly organized/ attended Technology not working as 	 Clear SOPs multi-actor contract between ECHO, A and B and FSP on how technical problems are
		terms of queries relation to verification and targeting of assistance as well)		 planned (network/ platform outages) Security issues threaten distributions Exploitation/ fraud by FSP agents 	resolved.

6-8 Feedback/Complaints Handling Suggestion:

The agreement between Components A and B needs to include steps on how the following types of issues are to be addressed and communications with beneficiaries managed in this regard, and also includes details on penalty if Component B does not respond to issues raised:

- Complaints related to targeting
- Reports of exploitation / abuse
- Cash access issues (physical)
- Cash disbursement issues (further broken down based on the payment system)

For each category, the agreement should outline:

- 1. How the issues are identified (Component A)
- 2. How they are handled (Component A)
- 3. Who is responsible to "fix" in Step 8 (Component A for targeting, Component B for cash disbursement, who for exploitation?)

4. Repercussions for not resolving issues under the partner's areas of responsibility

Ideally for large-scale cash programmes, the financial service provider should have hotlines in place to fix "simple" cash distribution issues at recipient level (PIN #s, lost cards/SMS, problems retrieving the money, etc.). That should be reflected in the agreement, not just their contract with the Component B partner.

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9. Reconciliation	B Financial reporting	ntation are partner A and B, and with the FSP on how reporting works kened

10. Conduct monitoring and especially post- distribution monitoring (PDM)	A	A conducts monitoring or manages sub- contractor, disseminates findings to Component B and makes recommendatio n for adjustments to programme design/ implementation	Implements relevant outcomes from PDM findings	 What part of monitoring and evaluation should be subcontracted (PDM or just outcome evaluations)?What monitoring is expected from Component B vs Component A? How will outcomes of various monitoring activities be shared between components and follow-up actions ensured? 	 Inadequate resources allocated to A to ensure proper monitoring and oversight at different stages of the process. Information collected and analysed is not used to adjust programme design or implementation as component B unable to make timely changes (e.g. due to nature of FSP contracting, or not coordinated in line with subsequent distribution cycles etc.) Lack of clarity on who is responsible for what types of monitoring and follow up actions that come out of monitoring 		
Risk analysis and mitigating measures for the programme overall	A & B			 Who leads? Who ensures implementation of mitigating actions? Who update the programme as a whole? 	 Lack of accountability 	•	Needs to be clearly defined in a multi- party agreement

* Multi-party agreement could include component A and B entities and donor, but also the FSP, data management system and monitoring /control entity as necessary.

The CCD Platform is willing to assist ECHO in developing the mitigation measures/CCD Platform solutions, in particular developing sample SOPs, multi-party agreement and contract templates. As one or more organisation of the CCD Platform is involve in component A or B, we could further propose to use our alliance as a learning platform to explore the issues and reality of implementing component A and B together, and feed this back to ECHO for further enhancement of the guidelines in future.

Challenge #2: Cost-efficiency vs. needs-driven approach

Should we have the financial means to proceed to conducting research, the CCD Platform will use several responses to explore the application of cost efficiency ratios and implications for component B programming. The analysis will show transfer amounts and full costs side by side.

The Lebanon Cash Consortium (LCC) has shown that calculating an overall ratio is a very difficult exercise as it fluctuates from month to month. It requires specific and strict financial tools to do be able to analyse it.

How can a collaborative approach address this?

Through the CCD Platform, the agency involved in the LCC but also in other responses will be able to use this knowledge to work towards the definition of financial tools allowing this calculation, including the costs of initial operations or costs related to organising payment mechanisms in the field, which may be overlooked in such costing exercise. As a result, ECHO will be in a better place to decide whether this ratio should be a main decision making factor for funding.

Challenge #3: Integration and coordination of cash programming into the wider humanitarian response

The CCD Platform is concerned that the guidelines make no reference to the requirements or practicalities of component A and B partners in relation to coordination structures that they sit within or integration with other programmatic services beyond CTP. The new guidelines are focused on multipurpose cash, however this focus doesn't address wider issues that should be considered when providing an effective, efficient and quality response.

Integrated programming

- CTP often sits within integrated programming and is not a standalone project. For example, CTP may be part of a protection programme alongside a large referral and protection awareness raising campaign, involving separate dedicated resources, project plan and budget. This raises challenges not only for cost efficiency calculations for CTP but also ignores inter-programmatic relationships.
- Many agencies provide sectoral cash (e.g. cash for shelter reconstruction or small businesses) as well as multipurpose cash, often within the same programme or budget. The new guidelines should explain how partners should integrate or complement other programming interventions with large-scale MPGs. The same is valid to the complementation of MPG to services or when appropriate, in-kind support. For instance, CTP often requires complementary sectoral interventions alongside the distribution of cash, such as vocational training or infant and young child feeding. In

many cases, the non-cash specialists run these programmes, as the main component is sectoral.

In many current humanitarian contexts, agencies must use a combination
of assistance modalities and/or transfer mechanisms in order to reach the
most vulnerable (e.g. Syria, Ukraine, Nigeria, Libya, etc.). This is due to
market functionality and access, which are interlinked with needs and
conflict dynamics. If the guidelines are meant to be implemented outside
of protracted refugee settings with relatively stable market systems and
conflict patterns, it is important for the guidelines to reference when/how
partners should switch modalities (for instance, what triggers to monitor,
who takes the decision and how it is implemented). This will have
implications on the roles and responsibilities between Components A and
B, as well as on the cost-efficiency calculations.

Coordination

- Multipurpose cash does not have a 'home' currently within the wider humanitarian coordination system and predictable/consistent leadership of CTP is still frequently contested and context-specific. The current coordination system is still 'silo-ed' into sectors, and inter-cluster coordination is not conducive to the effective role out of large-scale multipurpose cash. This therefore raises issues regarding the implementation of the guidelines, which are multipurpose cash focused doe to this persistent lack of clarity and strategic and technical leadership in the wider coordination architecture for MPG.
- Risks to programming:
 - Any coordination issues between Component A and B are going to be difficult to enforce or harmonise, if there is no home or place to discuss within the wider humanitarian system for the modality.
 - There are concerns that the guidelines will bring up the systematic issues that are unresolved at an operational level with no clear mandated organisation or body to monitor. Evidence is needed before we adopt one approach in a given context (and this would come primarily through different actors who have piloted different approaches in the onset of a crisis / through coordination mechanisms established for cash).

How can a collaborative approach address this?

The CCD Platform will seek to ensure through its collaborative preparedness activities (such as joint response analysis), that as many partners as possible are collaborating together for a harmonised approach from the outset of a response. It will work closely with in-country Cash Working Groups, and CALP (also a CCD Platform member) at regional and global level (where there is no present Cash Working Group in a given response) to ensure that quality standards, common tools and integrated harmonised approaches remain on the table whilst the broader coordination system remains a challenge.

B: What can the CCD Platform offer ECHO to specifically address these challenges?

Despite having a common convergence with ECHO on the call for change to operational CTP delivery and the rationale behind the new policy, the CCD Platform believes the guidelines need to be further tested operationally and reviewed based on operational evidence. The CCD Platform is keen to offer its collective knowledge, involvement in a high number of relevant operations and breadth of programming to help ECHO resolve the challenges listed above.

Identified challenge	Proposed CCD Offer
Challenge #1: Practicalities of implementation: Relationships between components A and B	 Develop sample SOPs, multi-party agreement and contract templates to avoid the potential issues listed in the Breakdown of CTP Processes Run a field pilots and learning to explore the issues and reality of implementing components A and B together, or conduct a real time review of a current cash programme
Challenge #2: Cost-efficiency vs. needs-driven approach	 Develop financial tools to enable evidence gathering on cost efficiency ratios and implications for component B programming using ongoing and further responses
Challenge #3: Integration and coordination of cash programming into the wider humanitarian response	 Support the integration exercise between MPG and other types of programming. Indeed, the CCDP will field test the basic needs assessment tool developed by the ERC MPG and will contribute to further related work, The CCDP is working on a Basic Needs Approach + to ensure better packages in emergencies and ensure a transition to better social assistance and social protection in emergencies.

In particular, the CCD Platform can offer the following:

We would be happy to have further conversations with ECHO on potential opportunities to fund such exercises if any of these offers are of interest.

ANNEX: The CCD Platform – an introduction

Fourteen humanitarian agencies¹ and CaLP have come together to create the Collaborative Cash Delivery (CCD) Platform, with the goal of delivering cash to people affected by crises faster, more efficiently, at higher quality and at a greater scale, via a collaborative approach. The vision of the CCD Platform is that within 72 hours of a crisis striking, cash transfers to meet the humanitarian needs of the most vulnerable are delivered. In particular through its preparedness work and building on existing in-country collaborative mechanisms, the Platform presents a trusted and streamlined entry point for donors to respond to a crisis with CTP through increasing the capacity of both international and local agencies to engage in collaborative programming in crisis-prone countries around the world.

The CCD Platform partners are committed to harnessing their expertise and flexibility to deliver this urgently needed facility and in doing so, move well beyond coordination to meaningful collaboration, driven by the humanitarian imperative. The Platform vision is based upon the following principles:

- Collaboration and complementarity, not competition
- Investment in preparedness
- Incentivising localisation, through capacity building of local organisations
- Evidence-based learning
- Standardised and streamlined, yet flexible
- Transparent and accountable

NGOs bring together their knowledge, resources and diversity to multiply their potential singular impact, and optimise their ability to ground their programmes in the local context through a flexible and contextually adaptable model. By applying understanding of, and experience in the local context, the NGOs will ensure the needs of the most vulnerable are met whilst communities are empowered and respected.

Central to the CCD Platform is a 'modular approach' which builds on the key understanding that a humanitarian CTP requires the application of **a range of competencies across the chain of CTP** from preparedness, response analysis and assessment, working with recipients, cash disbursal through to monitoring and learning. Enabling collaboration within the frame of different modules allows a more community-focused, contextualised and adaptive approach in collaboration to emerge, which can then be built incrementally.

¹ Action Against Hunger, Adeso, CARE, Catholic Relief Services, Concern, DanChurchAid, Danish Refugee Council, International Rescue Committee, Mercy Corps, Norwegian Refugee Services, Relief International, Oxfam, Save the Children, World Vision