Center for Strategic and International Studies

TRANSCRIPT

Event

DATE
Monday, November 14, 2022 at 9:30 a.m. ET

FEATURING
Sasha Bennett-Roomipoor
Chief of the Audit, Risk, and Performance Management Division, USAID Bureau for Humanitarian Assistance

Alexander Parets
Counselor to the Under Secretary, U.S. Department of the Treasury Office of Terrorism and Financial Intelligence

Kate Phillips-Barrasso
Vice President of Global Policy and Advocacy, Mercy Corps

Ali Rathod-Papier
Director of Investigations, Sanctions & EDD, Brex

CSIS EXPERTS
Sue Eckert
Senior Associate (Non-resident), Humanitarian Agenda, CSIS

Jacob Kurtzer
Director and Senior Fellow, Humanitarian Agenda, CSIS

Transcript By
Superior Transcriptions LLC
www.superiortranscriptions.com
Hello and welcome to the Center for Strategic and International Studies. My name is Jacob Kurtzer, with the Humanitarian Agenda. I want to thank you all for joining us today for this event where we’re launching our most recent report on Mitigating Financial Access Challenges. I want to thank the U.S. Agency for International Development’s Bureau for Humanitarian Assistance for their longstanding partnership with our program and for their support for today’s discussion.

We have an esteemed and excellent panel joining us to discuss this issue of financial access for nonprofit organizations working in high-risk jurisdictions, but before we go to our panelists I want to take a few minutes to talk about the background of CSIS’s interest in this issue. In 2019, the Humanitarian Agenda launched a task force on humanitarian access, co-chaired by Senators Young from Indiana and Booker from New Jersey. In the process of that task force work, the members of the task force identified as a major challenge for humanitarian access around the world, in addition to the logistical hurdles, the security risks, and all those other bureaucratic obstacles that humanitarian organizations face in their operating environments, the task force found that regulatory obstacles on the part of donor governments constituted a major portion of the challenges that they were dealing with.

And one of the issues that specifically came up in that context was the issue of de-risking. I’ll let my panelists – I’ll let our panelists speak to some of the details and the particulars of that challenge later in the discussion, but in the context of our work we came across the work that was happening previously in the United states, but also in Europe and elsewhere, where nonprofit organizations, financial institutions, and members of government agencies where meeting collectively to try to tackle those issues. So last June, the CSIS Humanitarian Agenda put together a multistakeholder working group to take on this challenge, but to speak privately, and openly, and honestly, and frankly in the context of a closed space to talk through some of these issues. And the report that we’re launching today, Mitigating Financial Access Challenges, is a product of those meetings.

And so what I’d like to do is turn it over to Sue Eckert, who is a former senior fellow with the Humanitarian Agenda at CSIS, and is currently part the 10-person U.N. Monitoring Team for the al-Qaida and Taliban Sanctions, to speak to the multistakeholder working group process and to the report. I should caveat that Sue is speaking in her capacity as the author of this report, and not representative of the U.N. or any other stakeholders.

So with that, I’d like to turn it over to you, Sue. If you could leave us through a little bit about the stakeholder working group process and the highlights of the report, we’d be very grateful. Over to you.
Great. Thank you very much, Jake. And welcome, all. I would just like to take this moment to thank the more than hundred people who, on top of their full-time jobs working in financial institutions, the U.S. government, and with NGO/NPOs, that took the time to come together over the course of the year for the many meetings to discuss these important issues. The range of proposals that we’ll talk about now is really – grew out of these discussions. And so I think that hopefully most people will see something reflected of the discussions that they contributed to. But I just want to emphasize how much it mean to this process. We would not have this report if it weren’t for the dedication of all of you who have participated in it. So thank you very much.

So the first thing I’ll just say is, you know, diagnosing the problem, if you will, OK? There’s growing evidence about the – in recent years about de-risking, and challenges to financial access. I’m not going to address that because Kate, I’m sure, representing Mercy Corps, will have more than enough, you know, information to share, which is the kind of problems that NGOs have faced. But needless to say, I think we’re starting from – after examining all the evidence – from the presumption that de-risking is real, that it is a systemic challenge for NPOs delivering vital humanitarian assistance abroad.

So my focus is very quickly I’m going to go through just the highlights of some of the policy recommendations. Now, it’s not in particular order. It is a compilation, if you will, of a wide variety of options that emerged to address financial access challenges. And let me just say, be very clear: No one response is going to solve the range of the complex challenges. And what we have to do, I think, is to develop a multifaceted approach that incorporates many of these elements in order to really make a difference to addressing financial access problems.

Two other points I just wanted to make before I do the overview is, first, this – the recommendations are addressed to all the three stakeholder groups – financial institutions, NGOs, and the U.S. government. In days past, we’d have a situation where there would be a lot of finger-pointing. The NGOs would talk about the problems with banks. Banks would say they didn’t have enough information from government. And you had a lot of shifting of it’s not me, it’s them. For the first time, I think all the stakeholders came together and shared the problem, shared responsibility, and the outcome or recommendations that need to be, you know, carried forward by all three of the stakeholder groups.

And then the final thing I would just say is that we – the World Bank and ACAMS had undertaken a process to – a stakeholder dialogue a number of years ago. And what’s made the difference this time is that the Biden
administration has taken a very serious and deliberative approach to address the problem. And so for that, and the amount of time that our government colleagues have spent reading, hearing from NGOs, et cetera, let me just say a special word of thanks.

Now, as we go forward, let me just – I’m going to talk about the issues from, you know, the three stakeholder perspectives. The first is the U.S. government. And here, we had a number of recommendations. One was to elevate attention to financial access issues and institutionalize multistakeholder processes. The second is to modernize licensing and implement exceptions to safeguard humanitarian and peacebuilding activities. And the third is to provide regulatory clarity and guidance. Fourth is to promote safe payment channels for humanitarian transactions. Fifth, promote risk-sharing among donors and recipients. Sixth, facilitate technological solutions to facilitate NPO transfers. And the last is to create incentives for financial institutions to bank NPOs.

So I’m going to just focus on a couple specific recommendations. For the U.S. government, in terms of modernizing licensing and implementing exceptions, I think the modernization of the administrative procedures and increased utilization of authorities to facilitate and safeguard NPO activities is critical. There are a number of recommendations, such as creating a global general license, to address gaps in existing humanitarian carveouts. And further, to actually develop recommendation, or at least exceptions, which the U.S. government has done at the U.N. level. It’s currently being negotiated in New York is to create an exception for humanitarian activities from sanctions regimes.

The second area for the U.S. government I’d highlight is providing regulatory clarity and guidance. And here, the kind of guidance that we’re looking for is those agencies, or those NPOs, rather, who receive funding from the U.S. government have already been screened and have had to meet due diligence requirements, by virtue of the fact the U.S. government is funding them. And if that’s the case, then the idea is why do banks have to do a double screening? Have they not already met due diligence requirements?

So, secondly then, under this category, OFAC should issue guidelines that actually state that if an NPO receives money from the U.S. government, it will not bring enforcement action against the financial institution making those payments. And then additional guidance by regulatory agencies to bank examiners to correct misperceptions of risks associated with NPOs. And this is part of the Anti-Money Laundering Act of 2020, but it’s very important that NPOs be partners.

The promoting safe payment channels for humanitarian transactions. There are places where financial institutions are not going to go because it’s either
too risky, too expensive, they don’t feel comfortable. For that, you need to have safe payment channels to develop means for those humanitarian transfers to go through. So the recommendation is to create pilots for humanitarian transfers, operated by or sanctioned through the U.S. government institutions, into higher-risk jurisdictions. It replicates something that the Federal Reserve has already done with the DPRK, but it’s something that’s very important to establish.

And then the other on safe payment channels is development of alternative measures to encourage payments into countries that commercial financial institutions won’t go. This could be utilizing international organizations to transfer and disperse donor funds among other potential payment channels. For promoting risk sharing among donor and recipients, the U.S. government should consider a lessons-learned exercise with stakeholder input to determine why previous models – and here we’re talking about the Swiss humanitarian trade arrangement, did not perform as it as desired, and whether or not these models play any kind of example for new modes of risk sharing.

For creating incentives, here something fundamentally is lacking at this particular point. And what we see is in de-risking or financial access challenges is really market failure. So in order to create the kind of incentive for financial institutions to bank NPOs, we’re talking about the formalization of OFAC’s nonenforcement policy. That applies to financial institutions banking NPOs. Here is another – the pilot safe harbor program for financial institutions, with rigorous compliance programs, whereby any inadvertent violations related to humanitarian transfers would be exempt from penalties, and establishment of things like no action letters processes to facilitate humanitarian transfers.

There’s a range of recommendations in the report. I won’t focus more than that for the U.S. government. But for now, what I wanted to do is to focus a little bit on financial institutions. Here, we come across three objectives. One is to enhance understanding and information flows with NPO customers. The second is to promote greater understanding within financial institutions of the NPO sector and develop internal procedures appropriate to the sector. And third is to develop new data and responses to NPO-related financial access problems.

So in the first, for enhancing understanding and information flows with NPO customers, we’re asking or recommending that banks develop guidance as to specific information and documentation that FIs, financial institutions, need from NPOs. This is something that they require generally of all customers.

It’s not unique to NPOs, though there may be some additional questions. But to make sure that financial institutions have explained what information
they need and how the information will be used. Sharing risk requirements up front with clients also helps to explain in clear terms what FIs need to feel comfortable from a risk standpoint. And then there are other recommendations, such as creating an online information resource or portal for NPO questions and needs.

Secondly, for financial institutions, is to promote greater understanding of the NPO sector and develop internal procedures which would help. Here, decisionmakers need to understand – decisionmakers within financial institutions – need to understand the criticality of providing services to humanitarian groups. And senior financial officials could meet on a regular basis with leaders of humanitarian groups to engage in discussions on financial access challenges. Financial institutions should also streamline internal processes, so the same unit, team, department, et cetera, within the bank engages with NPO issues when questions arise.

And thirdly, on financial institutions, develop new data and responses to NPO-related financial access problems. Because problems with transfers to higher risk jurisdictions frequently occur downstream with correspondent banks, financial institutions need to include all information in the cross-border wire transfer for their correspondence. When de-risking does occur, further due diligence needs to be carried out. And to minimize the adverse effects on NPOs, effective and timely remedy and redress should be made available.

So for the third category, nonprofit organizations, again, three main recommendations. NPOs should invest in relation building with financial institutions and provide all relevant information as early as possible. They should enhance information sharing, data collection, and collaboration with other stakeholders. And that collaborative initiatives should be undertaken in particular between financial institutions and NPOs.

On the first, I think it’s very important to invest in relation building. There is – we discovered at the outset of this process there was a great deal of misunderstanding of all stakeholders about each other, but in particular assumptions about NGOs, NPOs, and how they work. And what the nonprofit organizations need to do is to help educate what their role is, how they work, and to establish the kind of assurance through clear, effective policies and procedures, for managing risk and explain them to their financial institutions. Also, transparency and conveyance of all relevant information at the outset can actually help in building trust and avoiding delays.

The second, enhance information sharing, data collection, and collaboration, is that right now there’s not a lot of data on the impact. We have – the Yale team has done an analysis of an update of a charity and security network report from several years ago. But we need more information. And the
information needs to be conveyed to the U.S. government to help inform policymaking. Larger NPOs with established due diligence and compliance systems should support and mentor smaller NPOs. And NPOs should develop and exchange good practices that could become sectoral standards.

And finally, in terms of recommendations for nonprofit organizations, we think that the financial institutions and NPOs should jointly develop a best practices guide, create a checklist of information and documents that financial institutions require to bank nonprofits, and to develop a repository of comprehensive information on U.S. NPOs that could be extended to multilateral NPOs, and to explore new payment platforms and technology solutions to address financial access challenges.

So, Jake, that is, very quickly, a summary. And with that, I look forward to hearing from the rest of the panel. Thank you.

Mr. Kurtzer:

Thank you so much, Sue, and for your efforts on this process. And actually, over the last, you know, 10 or 20 years of your career, you’ve really been at the forefront and a leader on these issues. So we’re very grateful for your efforts at CSIS.

I want to turn to our panel now. We have four great representatives joining us.

Kate Phillips-Barrasso is the vice president of global policy and advocacy at Mercy Corps.

Sasha Bennett-Roomipoor is a division chief of the Audit, Risk and Performance Management Division at USAID’s Bureau of Humanitarian Assistance.

Alex Parets is counselor to the under secretary at the U.S. Department of Treasury’s Office of Terrorism and Financial Intelligence.

And Ali Rathod-Papier is the director of investigations, sanctions and enhanced due diligence at Brex.

I won’t read everyone’s bios out, but I can assure you they’re all very accomplished individuals. And we’re grateful for your time today.

I want to start with you, Kate, you know, as a representative of a sector that feels the most impact from this. One thing that Sue mentioned at the end is the question of information. And she talked about the – that this is systematic and real. So can you tell us a little bit, from your perspective at Mercy Corps, what is the impact of de-risking and financial access challenges? Why is this issue so important for the humanitarian NGO sector?
Great. Well, thanks so much, Jake and Sue, for the invitation to speak today. And before I answer that question, I really do want to thank CSIS for standing up the multistakeholder working group. I think by definition there’s no one owner of this issue, and it involves a complex set of actors and their individual perspectives and considerations. So as a result, there’s no clear lead in resolving these challenges and oftentimes no clear convener trying to bring them together. So the working group has really been a big step forward in filling that gap, and we’re really grateful for the opportunity CSIS has provided.

So in short, the impact of financial access challenges in the NGO sector is a growing and significant barrier to providing principled, effective, and efficient humanitarian assistance to populations in need. When we think of access challenges in the humanitarian space, one’s mind often goes to physical access to populations in need, which is often interfered with by government or nonstate armed access. But lack of access to financial services, which are the lifeblood of humanitarian action, is also extremely challenging, and it can hobble humanitarian responses.

So in this particular case, given humanitarian crises continue to largely be complex ones or manmade ones driven by conflicts, and those have been occurring most frequently in places where listed actors or entities are present, this is being really deeply felt in the humanitarian community. So if you just consider the places where the largest humanitarian responses have gone during the last decade – Syria, Yemen, Afghanistan, Somalia – this is obviously a real big challenge for NGOs, and also where the future of humanitarianism lies. When you think about some of the breaking situations that we see in places like northern Mozambique and the Sahel, this is certainly a problem that’s only deepening.

So just to really quickly run over how financial access challenge manifest themselves for humanitarian NGOs – this is covered in the report, but I’m just going to run over really quickly. There are things like lengthier transfer times to get resources to get our country teams that are often rife with repeated requests for additional documentation. We face rejected wire transfers, sometimes after weeks and even months later of answering these questions and efforts expended, you know, to sort of ping-pong back and forth, only to have a transfer rejected that you’ve been working on for some time. In certain instances, account closures have occurred and difficulty opening accounts, particularly for smaller NGOs, is a real, major challenge.

And then finally, I really want to hit on a point that Sue mentioned when she was going over the report findings, which is that it’s getting increasingly difficult – whether you’re a large NGO or a small NGO, to find any financial
service provider who’s willing to work in some of these environments where we’re trying to respond – again, ones that track with that country list that I just gave.

So before I move onto what the impact is, I would be remiss if I didn’t mention the fact that these challenges are often experienced most acutely by smaller organizations. I work for a large organization, and we have problems. I can only imagine what that’s like for smaller, less-established ones, that have less opportunity to sort of mitigate some of these challenges. So the pain of these impact is not always felt equally among the NGO community, and that we should really keep in mind what this means for smaller organizations with less resources and less staff to help troubleshoot some of these challenges.

So I talked about, you know, how lack of financial access manifests, but really I want to talk about the impact and how this impacts humanitarian action by NGOs. First and foremost are operational slowdowns, and in rare cases shutdowns. Beyond obviously having a cost in terms of getting lifesaving assistance to those who desperately need it in a timely fashion, this can actually have knock-on effects in terms of our ability to access populations and, ultimately, on NGO worker safety. And by that, I mean program continuity and transparency with communities in complex humanitarian environments is a huge part of community acceptance, and something key to an operational organization like Mercy Corps’ ability to work in dangerous environments. So in this sense, financial access and program disruptions can directly impact physical access to communities.

Making choices – another way that this impacts us is making choices to operate in parts of the country where NGOs have greater ability to access financial services. For example, parts of Syria, which is not necessarily guided by greatest need, which is a core tenet of humanitarian action. Obviously, all of the time invested in troubleshooting and chasing things down creates increased administrative costs, and spending time documenting, troubleshooting, et cetera – having conversations with financial institutions.

And then one that I think is very, very important is actually increasing risks. So when you’re having trouble getting cash into a country, organizations like mine will often result to cash carrying – actually physically carrying cash into a country, or using informal money transfer networks called hawala. So put simply, dealing in cash is just more dangerous, particularly in environments where there’s desperate situations and actors may already be targeted for crime. NGOs also pay a premium to use hawala services, and that adds an additional cost to operational budgets.
So just in short, financial access challenges should not be considered a mere inconvenience, but something that has real-life consequences that fundamentally impede timely and effective humanitarian action, leading to real human impacts on the populations we’re seeking to assist, and with potential safety impacts for NGO staff. So I’ll stop there, but happy to go into more detail later in the conversation.

Thanks so much, Kate, for that comprehensive answer. And this point about both principled humanitarian assistance but also effectiveness on the impact of de-risking, I think is very clear on the effectiveness our humanitarian assistance.

I want to turn to you, Sasha. I mean, BHA is the largest humanitarian donor in the world. And, you know, we’ve worked together. And we know that BHA has taken a strong interest in tackling the issue of de-risking. Can you speak to why this is a priority for USAID and for BHA? And why did BHA start tracking this issue, and then also working to resolve it?

Sure. Good morning and good afternoon to some of you. Thank you for the question, Jake, and thanks for inviting me to participate on this panel. I also want to echo Kate in thanking CSIS on convening the U.S. multistakeholder working group on financial access.

So BHA, Bureau for Humanitarian Assistance within USAID, started to proactively track sanctions-related issues, such as de-risking, in 2019. And this was following a September 2018 report by the U.S. Government Accountability Office, GAO, which specifically looked at humanitarian assistance, stating that USAID should improve information collection and communicate to help mitigate partners’ banking challenges.

So this kickstarted cultivating a relationship with the Department of Treasury, which BHA didn’t have. We reached out to the Office of Terrorist Financing and Financial Crimes. We started attending their quarterly meetings with charities, NGOs, and think tanks. And concurrently, we became aware of de-risking as a result of U.S. sanctions on Syria, which were further exacerbated by the presence of multiple terrorist groups.

So while the Syrian OFAC general license included an exception for humanitarian assistance, some of our humanitarian partners continued to get de-risked by intermediary and/or correspondent banks, as you’ve heard from – as you’ve heard from Kate. And very often, banks don’t provide exact reason why partners are de-risked, and cite due diligence concerns. And really, what does that mean, right? In one case, our partner was informed that it was due to secondary sanctions in the Caesar Act. In another case, several of our humanitarian partners were de-risked by a large national bank because of simply operating inside Syria, putting their Syrian programs
and other USAID humanitarian programs being implemented outside of Syria – like in West Africa – in limbo.

In another example, a humanitarian – our humanitarian partner was told by their bank that their funds were placed on indefinite hold. And this hold resulted in more than six months of a partner not being able to implement critical humanitarian work in the protection sector. So ultimately, the partner requested USAID to de-obligate funds from their work, because there was no resolution. And when our partners are de-risked, as you heard from the impact from Kate, it essentially puts our humanitarian partners, who are already implementing programs in highly insecure environments, at more risk. For example, Kate mentioned there are now new security risks because our partners can’t pay their vendors, their staff, suppliers. And there’s obviously programmatic risks, because they’re unable to provide lifesaving aid to thousands of people in need.

These issues were ultimately resolved but resulted in several millions of USAID humanitarian funding being put on hold for several months and, on one case, de-obligated. And lifesaving assistance cannot be delayed, because countless lives are depending on this assistance, which is often in the form of food, shelter, water, medical care, and protection services. Also, Sue mention this in her intro, all of our humanitarian partners have to undergo requirements to first obtain USAID funding – from having annual external audits, pre-award surveys, and pre-award risk assessments. And this is just to get USAID funding. And for BHA, we also require risk assessment and management plan for our NGO partners and extra due diligence for both NGO and public international organizational partners operating in countries with the presence of sanctioned groups and armed actors.

So if we’re already requiring these due diligence measures upfront, why then are our partners continuing to get de-risked? What else do banks and financial institutions need in terms of compliance measures from our partners?

So in a nutshell, we were, one, responding to the GAO audit calling out our partners’ financial access challenges.

Two, in order to do so, we needed to cultivate a relationship with Treasury which was lacking in BHA.

Three, we needed to figure out the core reasons why our humanitarian partners continued to get de-risked, which is why USAID supported CSIS in creating this working group.

Four, we needed to increase coordination within the USG, coordinating with Treasury and colleagues at State, to see how we could resolve some of these
de-risking issues through additional guidance from Treasury’s Office of Foreign Assets Control or obtaining specific humanitarian licenses for us and our partners.

And, five, we needed to learn from other multistakeholder working groups and share best practices, because if it may work in the U.K. or France perhaps we can emulate the same here in the U.S.

So I hope this answers your question, Jake. And I think I’ll stop here. Thank you.

**Mr. Kurtzer:** Indeed. Thanks, Sasha, for taking us back to that – to that moment in time. One of the things that you mentioned, which I think was really interesting, was the need to cultivate that relationship across U.S. government agencies, between USAID and the Treasury Department.

And so I want to turn to you, Alex, now. One thing that came out in the working group process and in the comments so far is that at least in the last two years Treasury has been quite forward-leaning in participating in this exercise, and in a lot of other, you know, efforts towards de-risking and resolving financial access challenges. Can you talk a little bit from the perspective of your office why it’s important for Treasury to engage in these kinds of initiatives, and where you see this issue going, from your perspective and your seat?

**Alexander Parets:** Yeah, absolutely. And I really appreciate the question, Jake. And also thanks to CSIS for pulling us all together. Again, I’ve seen all your faces multiple times now, and it’s always a pleasure to join with you all on these issues.

So, you know, really I think it comes down to three primary issues and areas. One is, you know, we noticed, especially in the recent past, there’s been this increasing regulatory complexity. As we’ve been pushed to use sanctions and other related tools more and more in different parts of the world, against different actors, kind of this compounding effect over time has resulted in operational complexity, operational issues. And oftentimes, you know, as can be kind of reasonably expected, you know, especially for financial institutions, we can only imagine that they see, you know, the compounding effect over time as a need to kind of generally pull back and reassess what they’re doing.

The second piece is, you know, that has created a significant problem in many of these jurisdictions – Yemen, Syria, Somalia, and others. In conversations with our colleagues at USAID and others have really helped kind of illuminate this force. The third piece is that the administration, when they came in in January of 2021, really prioritized this initiative from the
beginning, from when the president issued NSM 1, asking Treasury to review, from a COVID perspective, to what extent we could provide additional guidance and additional authorizations, all the way through when the secretary of the Treasury called for Treasury to conduct our sanctions review.

We saw two real kind of needs, right? One is this community of humanitarian actors, humanitarian organizations, bluntly, unfortunately, isn’t what we generally engage with very, very often. We have kind of point-to-point conversations and engagements, but we tend to hear, from a volume perspective, much more from financial institutions, import-export firms, and others in the market. And we saw that, you know, we had both an information kind of gap generally, and the need to much more directly understand the issues facing humanitarian organizations in a way that we hadn’t necessarily taken the time earlier to, you know, engage with them.

So this kind of venue and other kinds of similar initiatives, and our partnership with USAID, as Sasha mentioned, especially over the last two years, has really kind of helped illuminate the problem. Now, the pivot and the critical part for us is not just as we, you know, love to do inside the government oftentimes, just admiring the problem and then studying and reviewing the issues at play. Now it’s trying to figure out creative and effective solutions to try to mitigate some of these unintended consequences.

Another piece I think that the administration has really been focused on is historically we’ve had a bit of a predisposition to take action and potentially mitigate, or try to mitigate, spillovers after the fact. Thinking that we can, you know, potentially manage the unintended consequences. I think we’ve been pushed much more aggressively now to analyze and assess risks and potential spillovers up front. In order to do that, we need to be talking to our colleagues at USAID. We need to be talking with industry. We need to be talking with the humanitarian actors.

So I think that’s a critical part of our commitment to analyze and assess risks and potential impacts up front. And then on the solutions front, similarly, we need to be able to engage with the implementing agencies on concepts that we’re considering, on potential solutions that we’re considering before we implement. Because we may not necessarily understand the full range of incentives both facing financial institutions, but also impediments facing humanitarian actors.

So really that’s why we’re committed to this initiative. I’m quite excited. I think we’ve done a pretty significant amount of work in the last 18 months, that I think really signals the credibility and the commitment that we have inside the Treasury Department to really drive solutions on these issues. And I’m quite excited for what the future holds.
Mr. Kurtzer: Thanks so much. I want to come back to you after Ali to talk about some of those solutions and looking forward.

But, Ali, I want to turn to you now. You know, this issue – we’ve heard from the government, we’ve heard from the implementers. But can you talk a little bit, from the perspective of the financial service providers, how do you view this challenge? And why did you and your peers – I mean, we were really grateful for a lot of banks joining this process, and money transfer organizations. Why did you feel compelled to engage in this process?

Ali Rathod-Papier: Thank you for the question, Jake. And thank you, CSIS, for the invitation.

I think this is a really important discussion that we’re having. And let me just start by saying how far I think we’ve come, because I know sometimes we get very focused on the path ahead and how many challenges there are still, but back in 2017, now five years ago, when I was still working at Barclays Bank, we partnered with the U.K. Charity Commission to help create some guidance to charities on financial sanctions and how they deal with those. And that was because the sector we found had such a lack of understanding about sanctions at that point, so we were finding it incredibly difficult to work with them as clients. So we’re now at a point where we can sit round a virtual table like this and discuss, you know, the much bigger picture items. It’s really wonderful to see how far we’ve come.

Turning to your question, Jake, so I started looking at this when I was in my prior role at Barclays because they bank a lot of NGO clients. And many years ago I think we realized that, you know, to echo some of the points we’ve had already on this call, there was a real disconnect between some of the issues that the NGOs were seeing and their challenges with financial access and then also, where the banks were coming from in terms of, you know, what they needed from a compliance perspective. We often have a lot of questions. We weren’t necessarily getting satisfactory answers to that. And I think that those challenges made for a lot of very difficult conversations. And it’s probably almost reached a sort of breaking point, where, you know, we just weren’t getting the information we needed. And I think had it continued in that way, you know, there may have been a situation where, you know, Barclays ended up de-risking.

Thankfully, I think we were able to take a step back and think very carefully about, all right, how do we approach this in a different way? And that led to us taking, you know, a handful of much larger international organizations that we began to work with very, very closely, develop specific questionnaires, got a much deeper understanding of where they were coming from, and tried to make sure that we adapted our process to be
fitting for that kind of sector. And the benefit of that was eventually being able to help bankers support a lot of these NGOs and improve our overall risk approach as well. So that’s where I – you know, I come from, a lot of my colleagues have come from, is trying to support an entirely regulated environment, and help support important work.

What I’ll say on the flipside with, you know, how we view this challenge, I think that everyone around this table comes at it from the perspective of this is legitimate aid, this is, you know, U.S.-government backed. But I think it’s important to remember that, like, there are occasionally bad actors out there who try and abuse the system. And I have seen, you know, with my own eyes inside a bank situations where perhaps you’ve got a charity where the kind of parent organization gets designated by OFAC as an SDN and you – (inaudible).

And you spent a huge amount of time doing diligence and understanding, OK, do we now accept this client? Are the connected? They’ll say the right things, but that can happen, where you have organizations that abuse their position and put the banks in a very challenging situation. Also seen, you know, situations where charities have perhaps not understood or wanted to share information about what they’re doing. And said, look, we’re happy to have your cash or your corporate account, but actually we’re going to start carrying cash across borders, and that’s the way we’re going to deal with this situation. So I think that when we’re looking at the big picture, there’s a lot of great and very legitimate, important work that goes on here. But just to contextualize, you know, what we do see in financial institutions on the flipside, there are many situations that are not so welcome.

Mr. Kurtzer: Thanks so much, Ali. I think, you know, what you were talking about at the tail end there strikes me as a question of both real risk to the banks as institutions, but also questions about reputational risk and kind of the business case for this. And I’m going to come back to you in a few minutes about that.

But I want to come back to you now, Alex. You talked a little bit at the tail end about previously resolving things after the fact, but now trying to kind of beat it to the punch. And in the report, many of the recommendations – at least those focused at the USG – talked about harmonized approaches between different bureaus of the – between different agencies of the U.S. government, but also between different bureaus even just within Treasury. You know, given the emphasis that the administration has placed on this issue, when you think about the recommendations in the report, do you think that some of those things that Sue has put out are achievable? And for those of us looking in from the outside, you know, what should we look for to see if progress is being made on the issue?
Mr. Parets: Yeah, no, that’s a great question. So I think generally speaking they are achievable. And that’s primarily driven by two factors. One is, I think folks generally underestimate the value of very, very, very senior administration prioritization on these issues. Like, this is coming directly from the president, from the secretary of the treasury. Like, we’re talking about the commitment is one that is coming from the senior-most levels of the administration to be forward leaning, to try to find practical and implementable solutions to make progress. So because of that, I’m actually quite confident that we’re actually going to continue to make strides on these issues.

I also think, you know, in terms of kind of what you all should be looking at, I think as Secretary of State Blinken announced during UNGA high level week, the United States is throwing its weight and support behind an initiative to try to standardize humanitarian exemptions and authorizations at the United Nations. And that’s important for a number of reasons. One is it shows our commitment to a multilateral approach, because we understand that just making changes inside of the U.S., inside of our system, while very important, doesn’t necessarily provide the kind of holistic global approach to these issues that we really want to be asking for.

And, two, because we know that a lot of the potential kind of areas of concern start with some of the U.N. sanctions programs. So we want to try to make progress at the U.N., and in then in parallel try to adopt the same approach inside of the United States. So I think to the extent that we can – you know, we’re making progress with allies and partners and others at the U.N., I think that will be a good kind of first indicator of, you know, the importance of getting to a global solution, at least on the authorizations front.

And I think what you’re seeing more recently is a commitment, at least across the kind of the U.S., Canada, U.K., and EU on a real commitment to finding solutions. So, for example, our push on the Black Sea Grain Initiative in the U.N., and the U.K’s recent general license. I think that is just a kind of nice example to point to of a – of a global commitment to make progress on these types of issues, and to really open the door for more creative solutions going forward.

Mr. Kurtzer: Thanks, Alex. And it’s just incredibly encouraging to hear you speak to that top-level interest. You know, it’s kind of always the recommendation is senior leaders should take an interest and engage on this. So I want to turn to you, Kate, though, and ask you about the role of Congress. We’ve spoken a lot about roles for executive agencies to take, or recommendations for executive action. But there’s clearly a role for Congress here and a broader constraint within which these challenges exist, including the material
support for terror provisions. So, you know, from your perspective, can you speak a little bit about the role of Congress and where you see opportunities for engagement and advocacy with the Hill to either legislate some of these solutions or provide the political space for the administration?

Ms. Phillips-Barrasso: Yeah. I'm really glad that you asked that, Jake, and that you brought it up. Because I think, you know, a lot of people, even those who are, you know, well-studied, and versed in dealing with some of these challenges, recognize that even with, you know, foreign approved OFAC licensing – and, by the way, I should note that we have really seen the administration take great strides over the last few years in sort of smoothing out some of the kinks in that process – that NGOs even with that really effective and wide coverage and licensing are still at risk of criminal prosecution under the Anti-Terrorism and Effective Death Penalty Act, or AEDPA as it's often referred to in Washington.

So in shorthand, a lot of – it's usually referred to as the material support statute. And it creates real risks for those who operate in the environments where foreign terrorist organizations are present. And so NGOs could actually be criminally prosecuted for providing incidental – what we call incidental and ordinary transactions. For example, things like paying road tolls or even your local electricity bill.

So this is why – I think the most recent example, and one that a lot are familiar with, of having the Ansar Allah or the Houthis listed in Yemen in the waning days of the Trump administration was so problematic. This was, at the time, the largest humanitarian crisis in the world. And having that FTO designation go through meant that many of the organizations working there were then thrown into uncertainty and deep risk at, you know, being concerned – again, recognizing that so much of the country is controlled by Ansar Allah. So even with a decent OFAC license, it would have been very risky for NGOs to consider – to continue operating there.

So I think that there's a huge role for Congress to play. And in fact, there have been some growing conversations with members of Congress specifically to this question. I think we really do need to see this fixed in order to have the complete – you know, it is financial access. There are licensing and designation challenges. But we really do need in tandem to fix the material support statute. It would be an excellent complement to these actions that Alex talked about on improved licensing and this broad-based humanitarian safeguard in in U.N. counterterror and sanctions regimes that the U.S. is pushing currently in New York. So we're very much hoping to see that leadership from Congress. And NGOs will be continuing to advocate, and hopefully partner, in seeing that come into realization.
Mr. Kurtzer: Thanks so much, Kate.

Ali, I want to come back to the point you were making at the tail end of your comments on the previous question about there is real risk. You know, you’ve seen it from the oversight or perspective of the transactions coming through the bank. And one of the things that came up in our conversations was the idea of reputational risk and/or reputational gain for financial institutions to take on working on some of these issues, and to take on that financial service provision for humanitarian actors. So could you talk a little bit about how financial institutions, you know, view the question of reputation within a business model, within a for-profit context? And where there is opportunity to engage further on this idea of reputational gain?

That’s for Ali.

Ms. Rathod-Papier: I assumed it was to me, but I heard Kate’s thing. (Laughs.)

So, yeah, I meant, I spent quite a few years in my career working in a big bank. And I can’t tell you how many people these financial institutions employ to help do the right thing. And there’s so much work that goes on behind the scenes to, like, prevent financial crime, to make sure your diligent to your customers. But not one of those, I think, gets reported. You never hear, like, the big bank did such a wonderful job, you know, preventing this issue from happening. You know, it’s always negative headlines that capture the attention of the public. And I think that that’s what the large financial institutions are trying to prevent, is that kind one, you know, headline that says: Financial Institution Helps Fake NGO Facilitate Terrorism Payments in Yemen. Like, that’s a headline that all of us dread and really don’t want to wake up and read the paper one day to see that.

And so when you’re thinking about reputational risk, you have to balance that kind of fear and that downside and what financial institutions are trying to avoid in that respect by protecting their reputational risk, with the upside that you’re offering for supporting this particular sector. And I think, you know, that’s where the incentive part of the paper is really quite critical, because if you can – if you could attach positive reputational risk to doing some of this work, or you can, you know, make sure that perhaps banks have the kind of safe harbor that is talked about in the paper, I think that could really make a big difference. Because really the upsides have to outweigh the downsides, both from, you know, what could be reported if it goes wrong, but also the amount of work that the financial institutions have to put in to build the controls, to work with their regulators, and all of this kind of thing, if there is, you know, any hint of a mistake here.

Mr. Kurtzer: Thanks, Ali. It’s very interesting.
I want to come back to you now, Sasha, because one of the things you spoke about as part of that initial conversation that you all had with Treasury, and the perspective of BHA, is the amount of due diligence that you, as a donor agency for the U.S. government, require of your partners. So I think it would be really helpful if you could speak on certain – or, speak to or talk us through some of the compliance requirements of your partners and, you know, how that could be either sufficient, or how that should be part of the calculus for financial service providers, knowing the existing steps that the U.S. government is taking to vet and ensure that the money that’s being authorized and appropriated is going to the right place.

Ms. Bennett-Roomipoor:

Thanks, Jake. Thanks for the question. And it’s a good one. I’ll talk about BHA’s specific risk requirements, because the agency has its own requirements and internal control measures in place for organizations to receive USAID funding.

I think banks and financial institutions may require the same set of minimum risk requirements that BHA already has in place. We require all NGO partners to submit a Risk Assessment and Management Plan. This is affectionately known as a RAMP. And the first section of the RAMP, the Risk Assessment and Management Plan, is looking at partners’ organizational internal controls. And we ask three questions targeted on their corporate organizational policies.

So for example, one question is: What is your organizational structure and process for assessing and managing the risks of fraud, waste, abuse, or other misuse of U.S. government resources? Another question is geared towards ensuring, you know, whether there is information exchange on the risks and the operating environment with the following question: Describe how your organization coordinates with local entities and other humanitarian partners and donors to assess and manage risk.

The second section of the RAMP, or Risk Assessment and Management Plan, is for both NGOs and public international organizations operating what BHA identifies as high-risk countries. And those countries are, you know, environments with the presence of sanctioned groups and entities, as well as the presence of other armed actors. And here we ask additional questions that are centered on how partners will mitigate inadvertent support or benefit to sanctioned groups, including material support.

And the genesis of these additional questions, which are eight, are to ensure that the provision of U.S. foreign assistance does not result in violating U.S. laws, sanctions laws, and the material support statute. And you also touched upon vetting. BHA is part of the U.S. – is part of USAID. And USAID requires
partner vetting in seven countries. And we have expanded humanitarian vetting in those seven countries. So I’ll end by saying that our risk requirements are public and Googleable. Thanks.

Mr. Kurtzer: Sue, you know, you’ve worked on this issue for a long time. You talked about the progress that we’ve made. You’ve worked on this from a bunch of different perspectives, including your current position. Having, you know, led the working group in this report, do you have any reactions? I think, you know, from the questions that – from the answers we’ve heard so far, how do you – how do you see the feedback so far from the report, from the different stakeholders? You know, as we start to wind down the conversation, what are some of your key takeaways from the comments so far?

Ms. Eckert: Well, thanks, Jake. I think one of the most important things is that there is now a common recognition of this as a problem. A few years ago, even with the ample evidence, it was still, well, we really don’t know if this is truly a problem. It’s just, you know, this sort of occasional thing some NGOs have experienced, et cetera. I think now there’s widespread acceptance that this is truly a problem. It’s not just a U.S. problem. It’s a problem for all, you know, NGOs. And so in that regard, we have, you know, an international – we have common ground with other countries in addressing this issue.

And, again, the second is, I think, which is a sea change in terms of attitude by the government of being able to sit down and discuss these things. Third, I would say what we have is a much – not just a recognition of the problem, but a much greater understanding of stakeholders of each other. And I think that with that, you know, you can build trust. And from that trust, you can find acceptable solutions. Our stakeholder dialogue is not the first. There is one that has been ongoing for a number of years in the U.K. There’s another in the Netherlands, a Dutch roundtable. There are other countries as well.

But it’s getting beyond the dialogue and getting to specific actions. And that’s where I think it’s really important. And now is a really propitious time to take action to address a number of these issues. So, and finally, I guess, I would just say that the recognition that you don’t have to in any way jeopardize security, you don’t have to give up your counterterrorism objectives, you don’t – they’re not incompatible. Financial integrity, support for counterterrorism initiatives, and providing humanitarian assistance to – you know, to those in need, they’re all – they are compatible and they are complementary goals which actually can be mutually reinforced through collective action.

Mr. Kurtzer: Thanks so much, Sue. So we just have just a few minutes left. So I want to give all of our panelists a chance for a final thought. Maybe – you know, and I want to maybe tee something up for both Sasha and Ali about technological
solutions or innovations in the way of the business model. So, Sasha, I’ll turn to you. Do you have any key takeaways or thoughts for the audience? And, you know, are there innovations out there that you think can help expedite this process or alleviate this challenge?

Ms. Bennett-Roomippo: Sure. So key takeaways or final thoughts? I mean, USAID doesn’t operate in a vacuum. And we, the U.S. government, coordinate a lot internally. To ensure that any sanctions have the appropriate carveouts to enable lifesaving assistance to continue. I do think that that might be a perception, that we don’t work really well together.

As far as the fintech solutions, some of our partners use fintech, like Lotus 20 that was developed by Save the Children, with support for some U.K. banks. Barclays is standard charter. I think if banks can confirm that they’ll be able to ease due diligence measures if humanitarian organizations are using technological tools to verify and validate humanitarian commodities are reaching the hands of the communities in need, there may be more support for these types of solutions. However, I can’t comment on which those are because we really defer to our humanitarian partners to incorporate the best risk mitigation, which may or may not include fintech solutions.

But I think some of the other pragmatic examples which Kate referenced was the use of hawalas or live transfers to secure financial access. Also, you know, having third-party monitoring contractors or firms verify and validate that the aid is reaching people in need, because I think that’s what banks are most concerned about, like, where are the funds and what the funds are using, and who actually, you know, benefits from them. I also think another takeaway, sorry, is that, you know, the U.S. multistakeholder working group is a great forum for all stakeholders. And we need to make sure that it’s not just a tick-the-box exercise and continue to hold ourselves accountable to some of the recommendations. Thank you.

Mr. Kurtzer: Thanks, Sasha.

I want to maybe turn to you, Ali, now. You work now for a fintech startup. So maybe a as a final thought I can just ask you, do you have final thoughts? And if so, would they – would you be able to speak to a little bit about this question of the opportunities that fintech affords to resolve this challenge?

Ms. Rathod-Papier: Yeah, happily. Obviously, working for a fintech I am bullish on technology. I do think that it can be a really positive answer to some of the challenges that we’re having. So, obviously, like, Sasha talked about Lotus 20. That was something I had the pleasure of working on when I was at Barclays. And I think it’s a really interesting solution, especially with dealing with the challenges in due diligence.
And just to add a bit of color, the system works by getting preauthorized merchants, who are able to distribute goods in country and deliver basic necessities. Those merchants go through checks which meet the standard or threshold of Barclays standard charter. They obviously work very heavily on that approach. And the merchant then can accept a voucher which an individual on the ground is given to exchange for, you know, medicine or food or things like that. It's got very low risk of being abused. The vouchers can't be really misappropriated for other instances. And that was a really interesting breakthrough, I think, a couple of years ago, about how you can approach these things very differently.

The other thing that I think kind of comes up is, like, can you use information that perhaps the U.S. government has about charities and the fact that they've been preapproved, and facilitate that by giving it to the banks? And it reminds me of something that is a kind of buzzword at the moment in the fintech world, which is zero-knowledge proof. And you see it a lot in blockchain technology. And that allows a user to verify that a certain piece of information is true, but without actually revealing the underlying information itself.

And I was doing sort of research for this discussion, I actually found that the Red Cross had used this for a project in Somalia, where they used zero-knowledge proof that allows people to show that they were eligible to receive specific medical care without actually revealing their identity, their name, personal kind of sensitive information about themselves. And I think that there will be an opportunity to use something similar perhaps, you know, the U.S. government offering a zero-knowledge proof to the financial institutions to say, yes, we have gone through all of this diligence, we've gone through all of this information with this particular charity. We can give you the proof that they meet all this criteria without the banks having to get a whole bunch of documents and go through it again.

Now, I think that, you know, in terms of how we develop, we're a little bit away from that. You have to get the bank comfortable. You have to get the government comfortable. You probably have to get the regulators comfortable with that as well. But I'd say that that really kind of shows what technology could do, and how we can be thinking about this in a lot more of an innovative way.

Mr. Kurtzer: Thanks, Ali. Alex, I want to turn to you for a final thought and, you know, maybe where you see the most promising opportunities going forward, or any other key takeaways for our audience.
Mr. Parets: Yeah. In terms of promising opportunities, I think some of these fintech opportunities, especially to the extent that they help share common information with various stakeholders in the implementation chain, is really one that’s quite promising. I think another area that I think, you know, is just a common challenge that I think we have to constantly kind of deal with is, you know, there is this kind of predisposed notion that, at least – at least inside of the government, that we’re unwilling, or we’ve historically been unwilling, to take on the potential risk with expanding authorizations or more effectively or more aggressively tackling this issue. There’s the belief that, you know, as Sue I think alluded to, that it’s a bit of a zero-sum, right? If you – if you expand authorizations, that’s only going to provide a net benefit to some of these bad actors, to some of these malign actors.

And I think personally that’s contrary to the risk-based approach. It assumes that, you know, we’re unwilling to take on any risk in order to expand the positive types of activities that we want to see. And I think across the government we need to – and with the Congress and others – we just need to more effectively educate that, you know, we can do both of these things at the same time. We can – we can continue our counterterrorism programs. We can continue our other programs to target bad actors and, at the same time, kind of put in place programs that aide with terrorists – with combating terrorist radicalization, for example, or otherwise provide services to populations at risk.

So I think, you know, from a – from a kind of last thoughts perspective, I think, you know, it’s key to continue that education, that joint education, between NPOs and think tanks and the government, because really that zero-sum kind of no-risk approach really is just a – is not the most effective way to operate.

Mr. Kurtzer: Thanks so much, Alex. And again, acknowledging the complicated nature of your participation in public events, we really appreciate your frank and forthcoming comments today.

So, Kate, final word from you. You know, what’s your final takeaway or your key thoughts based on the conversation and thoughts going forward?

Ms. Phillips-Barrasso: Yeah, thanks. This has been great. And one thing I want to – before I jump into that, I kind of missed an important part of my response on the material support statute that I just want to underscore, especially if any congressional staff happen to be tuning in today or watching the recording going forward. But, you know, the fix to AEDPA I think is really amending it to cover what is allowed for in terms of activities and action under the OFAC licenses. Just saying that that is not – it’s not intended to criminalize humanitarian assistance, and then allowing for incidental and ordinary transactions. So just stating this isn’t meant to inhibit humanitarian actions, saying as long as
there’s a license you’re allowed to do those things and you will not be criminally prosecuted. So just wanted to get that sort of on the record, so to speak.

But moving on, I mean, I think, you know, in terms of closing thoughts, Sue noted in the beginning that there is no one fix to this challenge, right? Like, we have to try everything, whether we’re talking about, you know, improved licensing, you know, experimentation through fintech, better communication between all different parties here. But I – one thing that I did really come to appreciate, especially in some of my internal conversations around this process, is just given the incentives and the perspectives of different actors even, there are going to be places where no matter what the good intent is, that we are still going to experience de-risking. And I think that – rather than that being looked at as something where we are sort of giving up or being weak, we should look forward to that as an area of just recognition. And that because of that, we need to move on, and be creative, and experiment.

One of the major recommendations I would throw my weight behind in this report is all of these safe channel payments. I think the really painful experience of Afghanistan in late 2021 really underscored that there are just going to be places where we are not going to have enough financial access to respond, especially in the magnitude in terms of needs in a context like that.

So we should get experimental on these channels and alternative mechanisms. You know, first, it would be ideal to go through the financial institutions, but where that is not available that we should experiment – try to find these other – these other avenues.

And I think, you know, one thing that Ali mentioned earlier, you know, really doubling down on communicating – you know, providing incentives to financial institutions. I don’t know if that will win the day, but things like comfort letters and nonenforcement policy. Even, you know, Sasha detailed in painstaking fashion how much partners have to demonstrate in terms of due diligence to the U.S. government, some sort of almost stamp of approval for financial institutions saying: If it’s good enough for the U.S. government to partner with this actor, given their rigorous controls, you know, hopefully that would be enough – you know, enough of a guarantee for you. I really think that we should take a big step forward in bridging that gap and providing those incentives and additional coverage, since guidance and licensing hasn’t proven to be enough, unfortunately, in certain environments.

The last point that I’d make is I didn’t recognize, again, with internal conversations, how much the preponderance of this problem is with correspondent banks and intermediary banks. And a lot of the recommendations – we didn’t get to this question – for NGOs about knowing
your financial institutions, we really do that, right? But I think that there is limitations there when you’re talking about intermediary banks and how much we can educate them, and not necessarily always being involved in knowing who they are when we engage in a transaction. So unfortunately, you know, there are limitations, just given that one step removed challenge here. And I think that’s something I have to do a lot more thinking on how to crack that challenge. But I’ll stop there. Thanks so much.

Mr. Kurtzer: Thank you, Kate. And thanks to all the panelists – Alex Parets from Treasury, Sasha Bennett-Roomipoor from USAID, Ali Rathod-Papier from Brex, who am I forgetting – Kate, Sasha, Alex – OK. And of course, Sue, for whom I’m extremely grateful personally for the time and effort that you’ve put into this project, which – you know, I look back on my time at CSIS as probably the most important thing that we worked on. So thank you all, the panelists, for your contributions.

I mean, it seems like we’ve coalesced around a couple of key themes drawn out of, you know, 100-and-some-odd recommendations. That communication among the stakeholders is essential. And there was a lack of communication before, and the more frank and honest communication, banks and nonprofits, nonprofits and government, banks and their – you know, their Treasury counterparts is essential.

The collective commitment to resolving this problem, you know, including political commitment, but also actually creating the incentives and the structures that make it possible for folks at the business case to work through it. And the experimentation. I think Kate’s point at the end of being realistic about the operational environment – like, these challenges are going to manifest. And when they do manifest, that’s an opportunity to try new things consistent with the regulatory framework that we require to both meet our humanitarian goals and our counterterrorism goals.

Sue, I think would probably kill me if I didn’t mention IEEPA, that there are other areas of opportunity. You know, it’s not just fixing material support. It’s not just fixing that, but it’s also this sort of foundational executive action has the opportunity, the way in which its – the emergency powers act for the president, which authorizes a lot of sanctions programs. We can also make sure that this humanitarian exemption language gets back in there in the way that the original language was written. So there are a lot of opportunities for success.

As we finish today, I just wanted to do a quick round of additional acknowledgements. Number one, Sue acknowledged all the participants in the working group. I want to specifically acknowledge the efforts to Sasha, but also Scott Paul from Oxfam, Ashleigh Subarmanian-Montgomery from the Charity and Security Network, and Angelena Bradfield, formerly of the
Bank Policy Institute, who helped convene subgroups that let us dive deeper into the real nitty-gritty of these issues. And of course, the Humanitarian Agenda Team – Jude Larnerd, Sierra Ballard, Hareem Abdullah, and Fiona Joseph, who provided the backbone for a lot of this work. And then finally, once again, USAID’s Bureau of Humanitarian Assistance, who partner with us and support this effort. And acknowledge also all of you all taking the time to listen.

And the last word I will say is that CSIS, the Humanitarian Agenda, is committed to carrying this work forward. And so for folks who are not part of the process to date, we would love to hear from you, get your feedback on the report, your feedback on the event, and your interest in the issue, so we can bring you into future convenings and conversations. And with that, I wish everyone a great day, and we look forward to working with you soon on this and many other pressing issues. Goodbye.

(END)