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Somali Remittances Campaign

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Somalia Money Remittances

A Campaign by Oxfam America

Case Study

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April 2015

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Author Note

This in-depth case study is written as a partial fulfillment of the requirements for a Master of Sustainable Development: Policy Analysis and Advocacy at the SIT Graduate Institute in Brattleboro, Vermont, USA.

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Abstract

The world changed after 9/11, and so did the US banking regulations. One change was that it has become increasingly difficult for families and communities in Somalia to receive remittances from relatives and friends living in the United States. Those funds are essential to the livelihoods of 40% of the population, especially women and children. It further has a negative impact on the national economy of one of the world's poorest countries. However, US banks has become increasingly willing to assume the costs of complying with the government's Anti-Money Laundering and Combatting the Financing of Terrorism (AML/CFT) regulations or to risk the penalties for failing to meet those regulations. The problem grew to crisis levels in 2011, as the country was experiencing a devastating drought. At that point, Oxfam America, responding to requests from its local development partners, agreed to use its well-developed policy research and advocacy capacity in an effort to resolve the problem. This case study documents, evaluates and draws lessons from the first three years of Oxfam's ongoing campaign on remittances into Somalia.

Introduction

In the midst of World War II, 1942, and in response to the plight of refugees in Greece, a group of Quaker intellectuals, social activists, and Oxford academics formed the Oxford Committee for Famine Relief, which later became known as Oxfam (from the words **Oxford** and **Famine**.) Oxfam America (OUS) was founded in 1970 in Washington, DC by a group of volunteers in response to the crisis in Bangladesh with a loan from Oxfam Great Britain. OUS relocated to Boston 1973 (Inside Oxfam America, 2015).

Oxfam America is a humanitarian and development International Non-Governmental Organization (INGO) that strives to find lasting solutions to hunger, poverty, and injustice. OUS is part of the 17 Oxfam confederation affiliates. Oxfam America envisions a just world without poverty, as they believe that poverty is solvable. OUS believes that the best approach is to look for the conditions that cause poverty. OUS's work falls into four main categories: saving lives, overcoming poverty and injustice, campaigning for social justice, and promoting public (Inside Oxfam America, 2015). This approach has allowed OUS to achieve a global reach and build a positive public image.

For many years, Oxfam has been campaigning and advocating to raise and amplify the voices of the voiceless. The Worldwide Influencing Network (WIN) is a new Oxfam strategic plan that aims at reallocating resources towards country teams to do more policy advocacy work, since they have primary legitimacy in their own countries to do so. It is hoped that WIN becomes a more holistic influencing model focused on the power, attitudes, and beliefs that underlie poverty and injustice. Thus, in its new Strategic Plan, National Influencing Guidelines (2013) by Oxfam International indicates:

By 2020, Oxfam will have contributed to achieve more profound and lasting change

in the lives of people living with poverty and injustice. We will have done this at a far greater scale by creating a world-wide influencing network (WIN) of One Program teams, united by a common vision for change, adequately resourced, able to use the full range of influencing techniques at their disposal, and actively participating in a wider movement to fight against the injustice of poverty. (p. 6)

There are three approved priorities for the first phase of WIN by Oxfam's Executive Directors (EDs):

1. Achieving a giant leap forward in national-level influencing in the South;
2. Strengthening people's voices and mobilising for impact in the digital age;
3. Strengthening Oxfam's position as a thought leader (National Influencing Guidelines, 2013, p. 7).

This in-depth case study was initiated for OUS Monitoring, Evaluation, and Learning (MEL) Team that supports the WIN strategy. The research was conducted during my six-month fellowship as a Policy Influence Evaluation Fellow in that Team, from September 2014 to February 2015. WIN documents campaigns primarily for internal use as well as publishes some of them for the wider audience. This in-depth case study was based on a protocol designed in collaboration with SIT Graduate Institute Professor Jeff Unsicker.

During my fellowship, I wrote five short case studies. They capture a synopsis of the campaigns, including a clear picture of the campaign's goals, methods, results, and lessons learned. The lessons are shared with the campaign team and other campaigning teams to reflect upon and utilize. In fact, it is this process of reflection and learning that fulfill the

'learning' component of the MEL.

As I have observed, there is an increased effort within WIN to bolster the advocacy capacity of country teams that tend to involve influencing International/US policies. This in-depth case study is an example of how local organizations can engage Oxfam when it is necessary to influence international/US policies that are impacting people's lives. At other times, it specifically focuses on the country level, with little to no involvement of international/US policies. For instance, as part of the global GROW campaign, I wrote two case studies—one on Cambodia and the other on Colombia—targeted at corporations' practices that impact poor people's lives. *Cargill, Land and Power in Colombia* (see appendices) is a case where three Oxfam affiliates worked with Colombia's country team and other local organizations to stop a bill the Colombian government was preparing to present to the Congress. The bill was designed to facilitate and legalize large-scale concentration of land intended for small farmers.

Methodology

This case study is based on a research protocol prepared in collaboration between Oxfam America and SIT Graduate Institute that sets out guidelines for conducting in-depth case studies on influencing work. It is intended to support the documentation of influencing work conducted by Oxfam staff in-country and in the United States in support of country priorities. Basically, case studies aim to provide a learning process to support Oxfam's ambition to build a Worldwide Influencing Network (WIN). This case study is based on semi-structured interviews conducted with the Somalia Remittance/ Humanitarian team who worked in the campaign and other stakeholders including the Policy Advisor, Campaign Manager, Communication Staff, Coordinators, Congressman Staff

and Somali diaspora representatives. The interviews took place in January 2015, and they were conducted via phone, Skype, and in person with some follow-up questions via email. The case study also draws on secondary resources and internal documents provided by the Campaign Team. The protocol has 13 sections (see appendices). Due to the unavailability of any official *M&E* for the campaign, the paper will briefly discuss M&E as per Oxfam National Influencing Guidelines. One of these sections, *Impact*, is beyond the scope of this paper. On the other hand, *Effectiveness*, *Outcomes* and *Contribution* will be discussed jointly in one heading.

The process of writing case studies is straightforward. Data is collected from existing documents about the campaign. Those documents were given to me along with a cover page—a paragraph describing the campaign, key documents, and key people to interview if needed. In some cases, interviews were conducted, especially for this case, and on other cases internal documents and/or a longer case study were sufficient. In all cases, however, Senior Campaigns Coordinator and Campaign Manager revise the document and add or edit some of the information. After I go over those edits, I will send it back for a final approval and then send it to the Senior Campaigns Coordinator to post it on Padare, OUS's internal website. For the Somalia Remittances case, OUS Policy & Campaign Evaluation Manager, and Sustainable Development Chair at SIT Graduate Institute, revised the drafts (see appendices).

When I started reading and drafting Somalia Remittances case, I felt very connected with the issue and the campaign as a whole as a Yemeni. First, Yemen has a sea border with Somalia, and both countries have many cultural and traditional commonalities. Many Yemeni tribes migrated to Somalia and formed communities there long time ago. During

the Somali Civil War, a great number Somalis sought refuge in Yemen. But above all, putting Yemeni-Americans in the shoes of Somali-Americans who are unable to support their families in Yemen financially made me feel devastated. I decided to know more about this remittances campaign, and so I discussed it with my fellowship supervisor at OUS and my academic advisor at SIT. We agreed to pilot-test the in-depth case study protocol on the same campaign. I wrote the Terms of Reference and identified key individuals to interview in January 2015. I conducted all the eight interviews and wrote the first three of the 13 sections of the protocol from January to February 2015. I went back to school but continued writing the case in the Course-Linked Capstone category as a partial fulfillment of my MA degree in Sustainable Development from SIT Graduate Institute.

Context

The Republic of Somalia is one of the countries of the Horn of Africa. It is bordered to the north by the Gulf of Aden, Djibouti to the northwest, to west by Ethiopia, the Indian Ocean to the east and Kenya to the southwest. It occupies a total area of 637, 657 sq. km, almost five times the size of Alabama; slightly smaller than Texas. The population comes to 10 million in 2014 with total GDP of US\$ 5.8 billion, US\$ 600 per capita. Muslims constitute about 99.8% of the population, the majority of whom belong to the Sunni branch of Islam (*The World FactBook*, 2015). Somali and Arabic are the official languages spoken in Somalia.

The Civil War that broke out in 1990 and the subsequent violent conflicts led to the state being classified as a failed state with no functional government since 1991. This war also ensued the flourishing of extremist groups such as Al-Shabab. The current form of government is federal parliamentary republic.

The first Somalis to arrive in the United States were sailors who came in the 1920s and settled in New York. The largest immigration to the US from Somalia, and to other countries, was during the 1990 Somali Civil War. Estimates of the Somali diaspora in the US according to the World Bank data is 100 thousand, concentrated in Minnesota, Ohio, New York, Washington states. According to Global Migrant Origin Database, the number of remittance senders from the US is 56,286 who approximately between remit \$200 - \$400 million annually into Somalia, an amount comparable to US development and humanitarian aid to the country (\$242 million) in 2012 (as cited in Orozco and Yansura, 2013, p. 9).

During the drought and food crisis of 2011 in Somalia, the worldwide Somali diaspora played a key role in helping their families survive through remittances. Somalis around the world remit about \$1.3 billion dollars a year into Somalia, an average amount that exceeds the total world humanitarian assistance in 2012 (861 million) "a year in which donors provided Somalia with an unusually high amount of money to aid recovery from the 2011 drought" (Orozco and Yansura, 2013, p. 10). Remittances are not only important to the improvement of the Somali wellbeing, but also crucial to lifting the Somali economy since it is the "largest or second largest economy after telecommunication" (OUS Senior Humanitarian Advisor, Personal Communication, January 2015). Somaliland officials told Oxfam that remittances constitute 25-40 percent of its GDP (Orozco and Yansura, 2013). Hence, the continuation of remittances into Somalia is essential to recover from the protracted humanitarian, economic, and political crises.

Account closures began to affect Somali-American MTOs as early as 1990 and spiked in the years following the attacks on the World Trade Center and Pentagon in 2001. While there are legitimate security concerns that money transfers could support violent and

extremist groups in Somalia, there is strong evidence these remittances allow Somali civilian recipients to spend them based on their needs and priorities, such as food, shelter, healthcare, sending children to school, setting up small businesses, and investing in communities. Remittances to women, in particular, result in investments in education, health, and nutrition. These funds further support community resilience, prevent violent extremism, and reduce the need for international humanitarian assistance. The remittance system also plays an essential part in funding humanitarian operations in Somalia, which use remittances to their in-country teams for operational costs such as staff salaries and program costs, i.e. cash transfers and cash for work programs.

Somali-American money transfer operators (MTOs) play a central role in the remittance process, providing the service of transferring cash from the US diaspora to recipients throughout Somalia. Somali-American MTOs require US bank accounts to facilitate transfers. Somali-American MTOs have invested in compliance systems, policies, and training to adhere to US Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) regulations. Nevertheless, US banks have branded Somalia as a high-risky destination and have closed MTOs' bank accounts at twice the rate of closures of Latin American MTO accounts, without providing specific justifications.

The Advocates

1. Oxfam America (OUS)

Oxfam America (OUS) is a global organization working to right the wrongs of poverty, hunger, and injustice. OUS is one of 17 members of the international Oxfam confederation, which works with people in more than 90 countries to create lasting solutions. OUS's vision is "a just world without poverty" (Oxfam America, 2015). OUS is one

of the few INGOs that have a hybrid model to development. That is, it not only seeks to solve poverty through program implementation, but also researches reasons that perpetuate poverty and designs campaigns to influence decision makers, including government officials and the private sector. OUS has a long history of advocacy and influencing work in the US and abroad. OUS's influencing work spans from climate change, food, agriculture, livelihood, aid effectiveness, private sector engagement, resilience, active citizens and accountable states, disaster & conflict, gender justice, to resource rights and trade.

OUS is a well-established humanitarian INGO that works in both development programs and policy advocacy. It has a great capacity and well-qualified staff. OUS has approximately 450 staff of whom around 100 work in Policy and Campaigns division, 225 in Programs division, 35 in Executive office and operations (HR/IT/Finance) division and 90 in Communications and Fundraising division. (*OUS Global Staffing and HR Operations Manager*)

Oxfam has worked with local Somali organizations to implement projects on the ground in Somalia for 40 years. With 4 million people in crisis during the drought in 2011, Oxfam worked through local partners to provide water and sanitation, emergency food security and livelihoods, and nutrition interventions to hundreds of thousands of people affected by conflict and drought. Through local partners Oxfam has assisted over 1.5 million people in Somalia with some form of assistance since the food crisis response started on July 1, 2011 (East Africa food crisis Oxfam's response in Somalia until Dec. 16, 2011).

This strong relationship and trust that Oxfam has built with local organizations encouraged local partners to ask OUS to get involved when those organizations were alarmed by the closures of Money Transfer Operators by US banks. OUS began its work on remittances to Somalia in December 2011 to prevent the potential threat this remittance cut-off poses on the livelihood of the Somali families.

The initial exploration of the issue and trips within the US and Somalia by OUS Policy Advisor along with further conversation with Degan Ali, Adeso chair, who expressed her concern about the accounts closures and emphasized the importance of remittances to Somalia, made it clear that OUS has to get involved in the issue. At this point, the humanitarian team decided to fund research and Adeso agreed to participate in the research to gain a comprehensive picture of the remittance issue and possible solutions culminating in the research report *Keeping the Lifeline Open* in June 2013. The research was conducted by the Inter-American Dialogue and co-branded by OUS and Adeso. The report gives a clear overview of how Somalia remittances work and outlines clear recommendations to banks, US policy makers, MTOs, US government officials, and Somali authorities in order to ensure the continued flow of remittances to Somalia while addressing genuine security concerns.

It is important to note that Oxfam is currently the only US-based humanitarian organization actively working on remittances within the US. Although CARE and World Vision have worked on remittances in Somalia and in the UK, only Oxfam America works on remittances in the US. Oxfam contributes policy expertise and plays a convening role between the US and Somali government officials, the private sector, and the Somali diaspora.

2. African Development Solutions (Adeso)

Adeso is a humanitarian and development NGO with a long history of working in Somalia. Originally founded by Fatima Jibrel in 1991 as the Horn of Africa Relief and Development Organization in Connecticut, USA, Adeso has a bottom-up approach to development in Africa and they envision " an Africa that is not dependent on aid, but on the resourcefulness and capabilities of its people" (Adeso, n.d.). Adeso is well-placed to fulfill this vision as an insider African organization with credibility and strong bonds with African communities. Adeso has been working with African communities for over 20 years to improve the community's wellbeing in such areas as the environment, society and finance. Adeso's work can be broken down into four areas, which are "a) Developing skills for life and work, b) Providing humanitarian aid, c) Reinvigorating the economy and d) Influencing policy" (Adeso, n.d.).

Policy

Money Transfer Operators (MTOs) play a central role in the remittance chain. The system is centralized and falls under two groups:

The first group of agents work exclusively for one MTO as salaried staff and/or receive some commission based on the volume of transactions they handle. The second group is composed of independent agents who have contractual relationships with one or more MTOs and who are responsible for their own operating costs. According to interviews with MTO agents and executives in Somalia, most agents work exclusively for one MTO. (Orozco and Yansura, 2013, p. 13)

Based on interviews conducted for the report, Somali-American MTOs focus on building trust and relationships, and both agents and customers identified trust as the key to successful money transfer business in Somalia. According to a Somali Imam, “mutual trust is an essential component of Islamic law, and, by extension, of Islamic financial services” (Orozco and Yansura, 2013, p. 13).

MTO executives also noted that Islamic law and reputational concerns require that MTOs avoid doing business with known criminals.

As one agent in Somalia explained:

Our reputation is at the core of our business success; our ability to attract good employees and customers is dependent on our reputation remaining intact. Even if we do everything else right [but] through a single mistake allow a customer to undertake illegal transactions ... through our branch, we will not only risk our lives but also our reputation could be irreparably damaged.

(Orozco and Yansura, 2013, p. 13) [see box 1 for a step-by-step of MTOs](#)

[remittance process.](#)

Box 1:

1. MTOs receive the money from the sender (a member of the diaspora), their contact info and a valid ID, cash they want to remit, receive commission, and gets details about the recipient.
2. The agent screens the names of the sender and the recipient through the Specially Designated Nationals (SDN) List, the US Treasury Department Office of Foreign Assets Control (OFAC) roster of individuals and entities subject to counterterrorism and other sanctions; if the check returns no results, the transaction can proceed.
3. The agent submits the transaction by updating the amount, the sender's and the recipient's details, and instructions as to where to deliver the funds to a clearinghouse, usually at the MTO headquarters. Submission is generally done electronically.
4. The clearinghouse reviews and confirms that proper due diligence has been followed and, if satisfied, approves the transaction. The details immediately appear on an online database so that the sending agent, the headquarters, and the paying agent can all see the transaction. If the clearinghouse is not satisfied, it suspends the transaction and asks the sending agent to provide additional information.
5. The receiving agent then deposits the cash in a local bank account to be transferred to the company bank account.
6. The paying agent views the transaction information and notifies the recipient either by telephone or by text message.
7. The recipient goes to the nearest branch, provides his or her details, proof of identity, and the name and the location of the sender.
8. The paying agent confirms the details given against the transaction records in the database. If the details match and the receiver's identity is confirmed, the agent generates a receipt from the system. Once the recipient signs the receipt, the agent pays the money and the system automatically informs the sender (usually by text message) that the money has been paid to the recipient. The transaction is completed. (Orozco and Yansura, 2013, p. 12)

Somali-American MTO account closures have undermined the US-based Somali diaspora's confidence in the US government and financial sector and have endangered the lives and livelihoods of Somalis. To avoid the adverse consequences of further account closings, the Somali authorities, the US government, banks, and MTOs need to find a solution to allow remittances from the US to Somalia to continue (Orozco and Yansura, 2013).

a. The Problem

Somali-American MTOs require US bank accounts to operate. They have invested in compliance systems and training to adhere to US anti-money laundering regulations. Nevertheless, US banks claim that Somalia is a high-risk destination for remittances and have closed MTOs' bank accounts without providing specific justifications at twice the rate of closures of Latin American MTO accounts. Account closures began to affect Somali-American MTOs as early as 1990 and spiked in 2001 onwards. These closures have disrupted an economic lifeline to Somalia, hindered business growth, encouraged informality among remittance senders, and strained relations between the Somali-American community and US officials (Orozco and Yansura, 2013). MTO bank account closures had been a common practice in the US, UK and Australia in a precautionary measure to respond to the Anti-Money Laundering (AML) and Combatting the Financing of Terrorism (CFT) regulations. From a financial inclusion standpoint, many believe this is a step in a very devastating direction.

At the beginning when OUS started to get involved in the remittance issues, there was a feeling that some banks are discriminating against Somalia, and that is why there were suggestions of campaigning against those banks. But as the Keeping the Lifeline Open report was released, the campaign team understood that it is not discrimination on the part

of banks, but rather it is a US government problem that unfolds clearly into two reasons articulated by Senior Humanitarian Advisor in: a) “A broad trend in the banking sector called de-risking due to certain drivers such as the financial crisis and consolidation of banks.” b) “High penalties on banks that violate US money-laundering regulations compared to the low revenue banks generate from.” (OUS Senior Humanitarian Advisor, Personal Communication, January 2015). So it is both reputational and legal risk.

OUS commissioned research to gain a comprehensive picture of the remittance issue and possible solutions culminating in the research report “Keeping the Lifeline Open” in June 2013, which was co-branded with Adeso and Inter-American Dialogue (which conducted the research). The report gives a clear overview of

Somalia remittances and outlines clear recommendations to banks, US policy makers, MTOs, US government officials, and Somali authorities to ensure the continued flow of remittances to Somalia while addressing genuine security concerns (See box 2).

Recommendations from the Report (box 2):

1. [US] Banks should expand services to Somali-American MTOs.
2. US policymakers should prioritize remittance to Somalia.
3. The us treasury department should help integrate Somali-American MTOs into an automated clearinghouse (ACH)
4. MTOs should improve training and monitoring of agents
5. MTOs and regulators should collaborate on best practices
6. MTOs should develop mobile money transfer technology for Somalia
7. The us government should help Somalia regulate its payment systems
8. Somali authorities should actively regulate international money transfers

There was a bill introduced by Congressman Ellison (Rep. D. MN) and OUS's supported the passage of this bill. When Ellison's bill started moving in Congress, Congressman Adam Smith (Rep. D. WA) got interested and wanted to learn more about

Money Remittances Improvement Act of 2014 explained (box 3):

A bill that passed in the United States House of Representatives during the 113th United States Congress. The bill would "allow the Treasury secretary to use state examinations for certain financial institutions instead of federal reporting requirements." The bill would make it easier for nonbank financial institutions such as money service businesses to provide payments internationally.

the issue. OUS was able to work with Smith's staff and convinced them to work with Congressman Ellison's bill and Congressman Smith became a co-sponsor of the bill which helped push the bill through Congress and House on the summer and was signed into law by President Obama on August of 2014 as the Money Remittances Improvement Act ([see box 3 for the bill highlights and appendices for the original bill](#)).

The bill streamlines the remittances process by "allow[ing] the Treasury secretary to use state examinations for certain financial institutions instead of federal reporting requirements" (Marcos, 2014). The bill is also supposed to make it easier for nonbank financial institutions such as Money Service Businesses (MSBs) to provide remittance payments internationally. The bill reduces the regulatory burden on MSBs and US banks dealing with them, which have come under a tight scrutiny of the US government. Therefore, state examiners can focus on the most problematic cases or MTOs instead of being spread thin, looking at the whole sector. As OUS Senior Humanitarian Advisor puts it, "By focusing on the real problems, the system becomes more secure, which, in theory, makes it more bankable" (OUS Senior Humanitarian Advisor, Personal Communication, January 2015). Although OUS supported the passage of the bill, it regarded it as a modest proposal with no guarantees that it would make a difference in strengthening access to

banking services for Somali-American MTOs. OUS Senior Humanitarian Advisor describes the primary significance of the bill as “ a symbolic gesture by Congress in support of banking for MTOs” (Personal Communication, January 2015).

For a period leading up to January 2015, Somali MTOs have been heavily reliant on a single bank, Merchants Bank of California, to transfer between 60 to 80 percent of the total remittances sent to Somalia from the U.S. (Welsh, 2015). Although OUS succeeded in preventing Merchants from closing accounts in the summer of 2014, as originally scheduled, due to pressure from the Office of the Comptroller of the Currency (OCC), Merchants Bank announced that it would terminate all of its Somali MTO accounts on February 6, 2015. Consequently, many Somali MTOs, including the largest by volume and coverage, were planning to discontinue money transfers if the account closures move forward as planned. While it is difficult to assess how much money Somali-Americans will be able to send following the account closures, between \$200m-\$400m/year could be at stake (Orozco and Yansura, 2013). MTOs could manage to continue their business based on, for example in the UK, a wholesale MTOs who have existing accounts that MTOs with no accounts can transfer money through. This is a vulnerable process as banks can still pressure those wholesale MTOs to end business with MTOs with no accounts. Other means leave diaspora with illegal channels of transfer with no official oversight, usually costly and put the sender’s (diaspora) money at risk of fraud.

b. Policy Change Goals

There were a number of policy alternatives and solutions discussed and pushed by OUS in the campaign and campaign spikes. The proposed solutions included mending current banking regulations. OUS was also discussing the possibility of the New York

Federal Reserve Bank to open accounts for MTOs to maintain the flow of remittances. OUS message to the Department of Treasury and US Department of State was to ensure that Somali Americans are able to continue to support their families in Somalia.

US Department of State and US Department of Treasury have been also working with the Somali Central Bank to strengthen its financial system to be able to integrate it in the international financial network. This is one of the campaign's long-term goals that, if fulfilled, would reduce reliance on remittance and strengthen the remittance system.

OUS further decided to influence Merchants bank to reverse their decision to close Somali-American MTO bank accounts. The purpose was to win time to continue its campaign so that the government can take more serious actions to solve the issue of remittances once and for all.

The Politics

Ingrained within the first Amendment to the US constitution, Freedom of Speech and Expression is protected by law. Thus, NGOs such as Oxfam America have the power and latitude to advocate and influence legislations and regulations of the US government. OUS advocates and influence US government on a number of issues. On this issue, OUS has identified at least three targets for its campaign and subsequent campaign spike. OUS aimed to influence the Department of Treasury to ensure legal and secure channels for the Somali diaspora to remit money to their families in Somalia. OUS also supported the introduction and passage of the Money Remittances Improvement Act in the House and Senate as well as attempted to influence the private sector represented in Merchants Bank to delay their decision to close MTO bank accounts. Since WIN attempts to build the capacity of national influencing teams and many, like myself, are not U.S. politically savvy,

the following section describes the institutions the campaign targeted to make easier to understand the politics involved in the campaign.

This paragraph was removed for confidentiality consideration.

The US Treasury Department is the executive agency responsible for promoting economic prosperity and ensuring the financial security of the United States (U.S. Department of The Treasury, 2011). The mission of the Treasury Department is to: Maintain a strong economy and create economic and job opportunities by promoting the conditions that enable economic growth and stability at home and abroad, strengthen national security by combating threats and protecting the integrity of the financial system, and manage the U.S. Government's finances and resources effectively. (U.S. Department of The Treasury, 2011)

US Banking regulations are fragmented. These regulations fall under the supervision of at least three institutions within the Treasury: the Federal Deposit Insurance Corporation (FDIC), the Federal Reserve Board, and the Office of the Comptroller of the Currency (OCC). They are also subject to the State rules where these banks are located. The main issue that US banks have with MTOs is that US banking regulations require banks to comply with AML and CFT regulations. Huge fines are imposed on banks that violate these laws. Since Somalia is viewed as a risky destination, banks avoid dealing with Somali-American MTOs. It's a simple cost-benefit analysis. Since working with remittances and MTOs doesn't generate as much revenue as other transactions, and the penalties are greater than the profits, banks choose to 'de-risk' or avoid dealing with Somali MTOs altogether. The laws that the Department of Treasury states for transparency in the words

of David Cohen, Under Secretary of the Treasury of Terrorism and Financial Intelligence, are:

At its core, financial transparency requires financial institutions to implement certain basic controls:

- they must know who their customers are;
- they must understand their customers' normal and expected transactions;
- and they must keep the records and make the reports necessary for regulators and law enforcement to take action to hold accountable those who abuse the financial system. (Cohen, 2014).

The State Department is the equivalent of Ministry of Foreign Affairs in many countries. The Department's mission is to:

Shape and sustain a peaceful, prosperous, just, and democratic world and foster conditions for stability and progress for the benefit of the American people and people everywhere. This mission is shared with the USAID, ensuring we have a common path forward in partnership as we invest in the shared security and prosperity that will ultimately better prepare us for the challenges of tomorrow. (U.S. Department of State, 2014)

The United States Agency for International Development (USAID) is the leading US government agency that works to "end extreme global poverty and enable resilient, democratic societies to realize their potential" (USAID, 2014). President John F. Kennedy created USAID in 1961. Using less than 1 percent of the total federal budget, USAID works

in over 100 countries on various areas such as economic prosperity, democracy and good governance, human rights, global health, food security and agriculture, and education to mention a few (USAID, 2014). What OUS aimed to achieve with the State Department and USAID is that they work—to fulfill their mission—with the Somali government to bolster their financial institutions, chiefly Somali Central Bank so as to be part of the global financial network and be able to manage remittances from and outside of Somalia.

There are three branches of the United States federal government: Congress, the legislative branch, the President, the executive branch, and the Supreme Court, or the judicial branch. Congress is responsible for passing laws and is divided into two chambers: the House of Representatives and the Senate. The number of representatives in the house varies vis-à-vis the number of population in that state. If a state has a large population, there will be more representatives in the house. However, only two senators are elected for each state to represent the people in the Senate. Of the three main branches of the US federal government, Congress is the only branch directly elected by the American people. Members of the US House of Representatives are elected every two years by the people of that State. Senators used to be appointed by state legislatures. Under public pressure, the 17th amendment to article that was added to the US constitution in 1913 that gave the people the right to elect their Senators. Due to the dependence of both Representatives and Senators on voters, they become largely accountable to them. Each representative represents the people of a single constituency, or district.

There are at least 109, 000 Somalis in the United States (World Bank as cited in Keeping the Lifeline open). The heaviest concentrations are found in the Twin Cities (Minneapolis and Saint Paul) in Minnesota, followed by Washington, DC; Columbus, Ohio;

New York City; Buffalo, New York; Kansas City; San Diego; San Francisco; Seattle metro areas (*Somali community in US: Demographics*, n.d.). Since most of the diaspora are American citizens and have the power of voting, Congressmen are accountable to their needs and demands. It goes without saying that most of the Somali diaspora would be considerably impacted should remittances be entirely discontinued and would find themselves unable to support their families back home. Thus, Representative Keith Ellison (D-MN) from district seven in Minneapolis, MN, where the majority of Somali diaspora resides, introduced a bill to the Congress that would become the Money Remittances Improvement Act of 2014. Soon, another Representative, Smith (D-WA), from Washington, where another Somali majority resides, co-sponsored the bill and helped push it through the Senate and the House.

The campaign work had no direct opponents to its tasks. Resistance to granting OUS's asks was obvious on the part of Department of Treasury to make urgent steps for more time was needed to painstakingly analyze the risks associated with any of the policy alternatives. This resistance stems from the Treasury's concern of taking any solution that may facilitate laundering money and financing of terrorism. US banks also resisted keeping the accounts open for MTOs based off their fear of violating AML/CFT regulations.

Strategy

When OUS was requested to work on the remittances issue by Somali partner organizations, OUS tasked its Senior Humanitarian Policy Advisor, Scott Paul, with exploring the possibilities to get involved in the issue. Scott Paul travelled to Minnesota in May 2012 and Somaliland the following August to explore the root causes of the problem and potential for Oxfam involvement. OUS then commissioned further research to gain a

comprehensive picture of the remittance issue and possible solutions culminating in the research report '*Keeping the Lifeline Open*' in June 2013. The research report was co-branded with Adeso and Inter-American Dialogue, the organization that conducted the research. The Inter-American Dialogue was chosen mainly as their senior fellow Manuel Orozco, a well-respected researcher by US banks, the World Bank and on Capitol Hill, has conducted extensive research, policy analysis and advocacy on issues relating to global flows of remittances, and migration and development worldwide. OUS believed that having a specialist conduct the research brings credibility to the content and findings. The research aimed at providing evidence to how remittances are crucial for Somali life, livelihood, and Somali economy and made clear recommendations for US government, agencies, private banks, and MTOs.

The report release was accompanied by launch events in Washington, DC, Seattle, Minneapolis, Nairobi and the UK. Approximately 60 people attended OUS's report launch event in the Rayburn House Office Building in DC. Scott Paul spoke with researcher Manuel Orozco and Representative Keith Ellison (D-MN) on a panel moderated by OUS board member and former NPR Correspondent Anne Garrels. The audience included foreign affairs and financial services staff, USAID and State Department officials, and members of the Intelligence Community; roughly half of the audience members appeared to be junior-level staff or interns (WIN Case Study, *Somalia Remittances*, 2014). The report was widely distributed. According to the same WIN case study, OUS distributed 600 report copies and Adeso few hundred and via email, including to key targets, including government officials, State Department and USAID officers. (WIN Case Study, *Somalia Remittances*, 2014),

The Remittance work had three main objectives. Each one was advanced through different strategies and specific tactics.

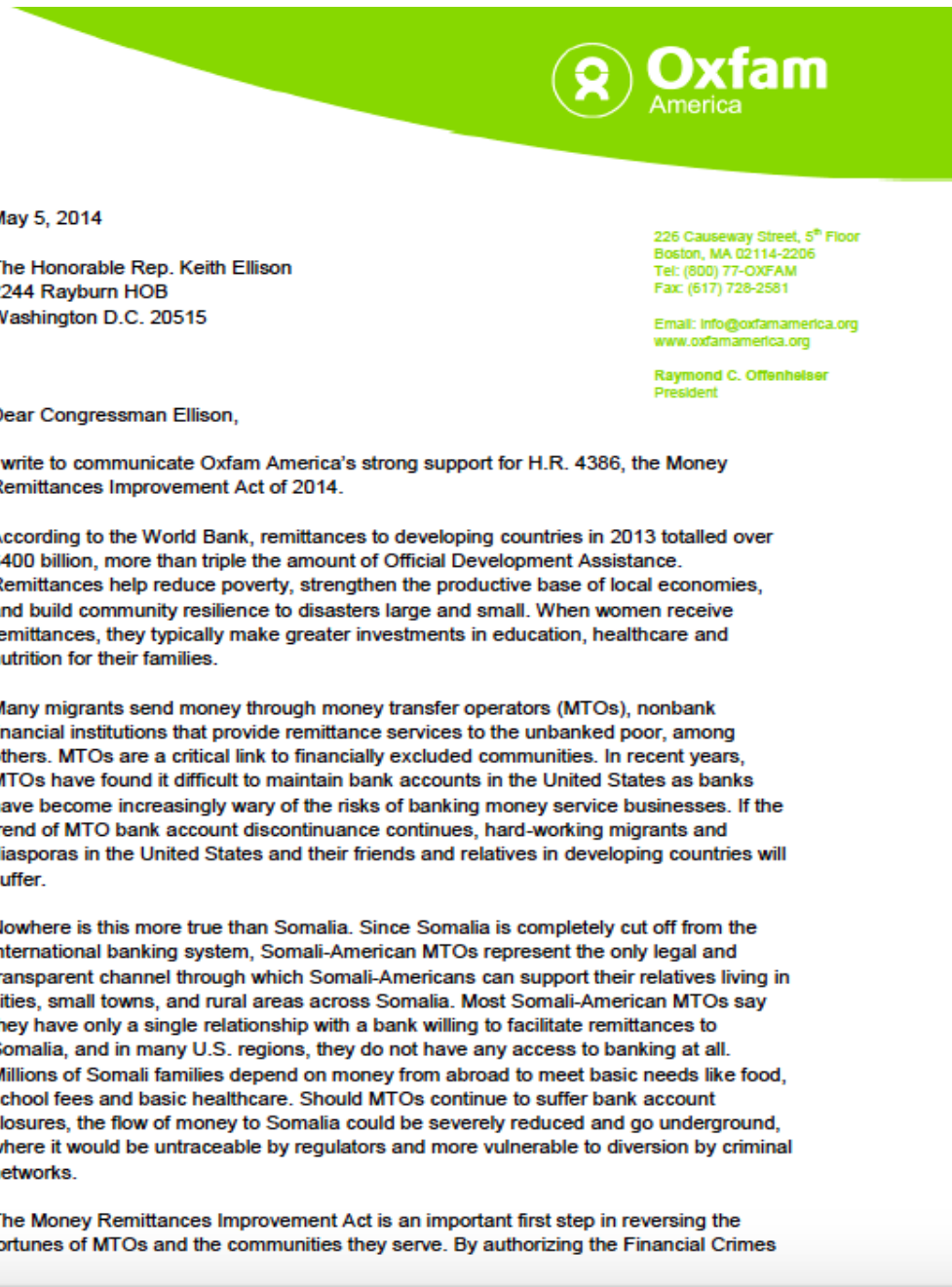
i. Passage of the Money Remittances Improvement Act.

OUS tactics include convening events, diaspora led events, round tables, and media work. Senior Humanitarian Advisor wrote four remittance blogs on Oxfam's blog page, which had a combined 908 unique page views and 360 shares during this period. Oxfam also hosted one event in Seattle and spoke at two events in Minneapolis that were attended by members of the Somali Diaspora, congressional staffers, Somali imams and community leaders.

When Representative Ellison (D-MN), who represents a district where the largest Somali diaspora in the US reside, was introducing the bill in the Spring of 2014, OUS worked in his district to mobilize the diaspora to create a positive incentive for him to continue to lead on the issue. OUS further wrote a letter of support to Rep. Ellison regarding the bill, (see picture and appendices.) Oxfam collaborated with the Somali Youth and Family Club, directed by Hamdi Abdulle, a community organizer, to host the first event, a round table, in Seattle. The round table was attended by diaspora members, money service representatives and also engaged elected officials such as the mayor of Seattle who sent one of his advisors, Rep. Adam Smith (D-WA), representative of a district where the majority of the Somali diaspora lives in Washington State, who also sent one of his staffers. Senior Humanitarian Advisor presented the findings from the *Keeping the Lifeline Open* report to the audience. This resulted in further communication with Rep Smith office and when Ellison's bill started moving in Congress, Rep. Smith was interested and wanted to learn more about the issue. OUS was able to convince Rep. Smith's staff to hold a round

table of multiple stakeholders, including private banks and MTO representatives. Having heard from attendants, especially banks, that they are closing Somali MTO accounts due to pressures from the Office of the Comptroller of the Currency (OCC) and that it is a government problem, Representative Smith's staff agreed to work with Ellison's office on the bill, and Smith became a co-sponsor. This helped push the bill through Congress over the summer. President Obama signed the bill into law in August 8, 2014.

The remittance report, Adeso and Oxfam were well-represented in international media outlets and the report led to solid news coverage the last quarter of 2013, earning 17



media hits tallied by OUS." (Final Remittances Report, Feb. 2014).

- ii. Getting the Treasury Department** to ensure that all Somali-Americans are able to send money to their loved ones through formal and legal channels. OUS targeted the Treasury in this campaign spike and used social media to be the primary vehicle for engaging people, the diaspora in particular, and to take actions directed at the Treasury. According to the recent report by Oxfam, *Hanging by a Thread* (2015), such pressure led the US government to take some modest but important steps to keep remittances flowing to Somalia.
- iii. Pressing Merchants Bank to keep Somali MTO accounts open.** The spike involved a petition and utilized social media to inform the public audience. It also involved diaspora-led events, panel discussions and individual tactics such as [the film](#) on US of Somali families affected by remittances cut off. OUS has also engaged with senior officials within the MTOs and industry associations representing them on how to strengthen their business practices (compliance) and the industry as a whole through collective action. OUS has been in discussions with approximately 25 MTO officials including one at the CEO level, two global directors and 10 US executives. Bank representatives also attended the roundtable hosted by Rep. Smith in Seattle, WA suggested by OUS.

Adeso has led outreach to the MTO Executives and contributed research conducted in Somalia. It also created an [infographic](#) and disseminated information through its networks. Separate from the spike, Adeso has also played a valuable role in liaising with MTO executives in Dubai. Overall, OUS strategies have contributed to developing a strong network with key decision makers that can be utilized in further campaign in and outside of the remittances field. According to the Final Remittances Report, the average rating of contacts made in the remittances campaign is comparable to the overall rating of all

Hill	Admin	Int'l	State Level	Total Contacts	Average Rating
34	51	25	6	116	2.09

government affairs contacts during FY13 Q2. The following table was tallies by OUS in the final report:

KEEPING THE SOMALI LIFELINE OPEN

What would happen if family and friends living overseas were no longer able to send money to loved ones in Somalia?

\$1.3 BILLION

Is the amount Somalis living overseas send approximately each year to family and friends living in Somalia to help them meet their basic household needs, open and sustain small businesses, send children to school, and invest in their communities.

Today, this lifeline is under threat due to banking rules in the US, UK, and elsewhere, and millions of lives hang in the balance.

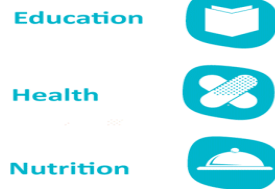
Money received from family and friends overseas provides a lifeline for many Somalis, allowing them to meet immediate needs, including:



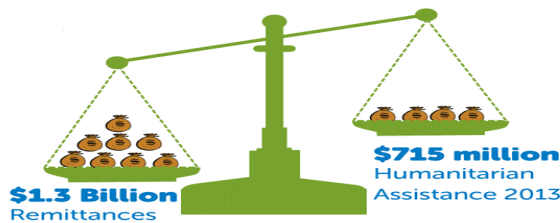
OVER 40%

of Somalis rely on money sent from relatives & friends abroad to meet their basic needs

MONEY SENT TO WOMEN, IN PARTICULAR, RESULTS IN INVESTMENTS IN

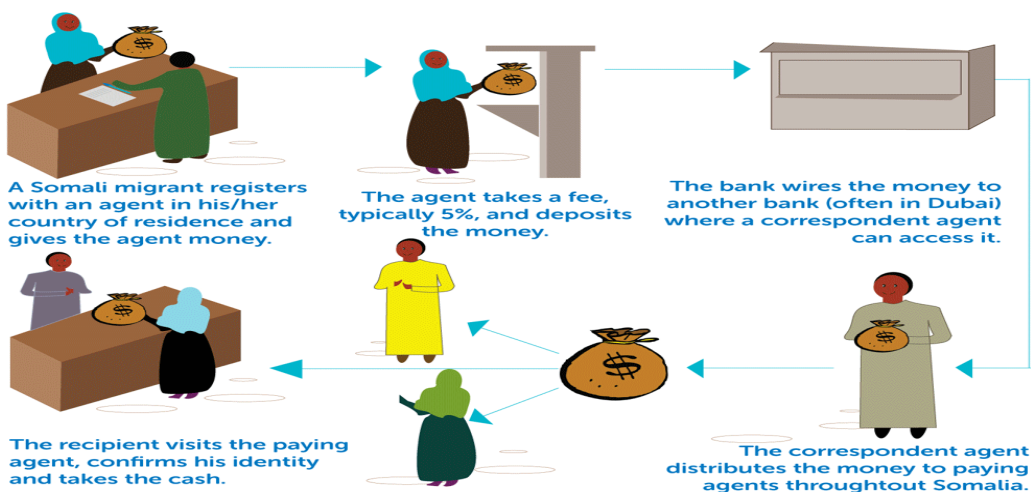


MONEY SENT FROM FAMILY AND RELATIVES OVERSEAS REPRESENTS A LARGE SHARE OF THE COUNTRY'S ANNUAL INCOME



REMITTANCES REPRESENT **25-45%** OF SOMALIA'S **GDP**

HOW MONEY MOVES FROM OVERSEAS TO SOMALIA, WHICH HAS NO FUNCTIONING BANKING SYSTEM



Diaspora Engagement

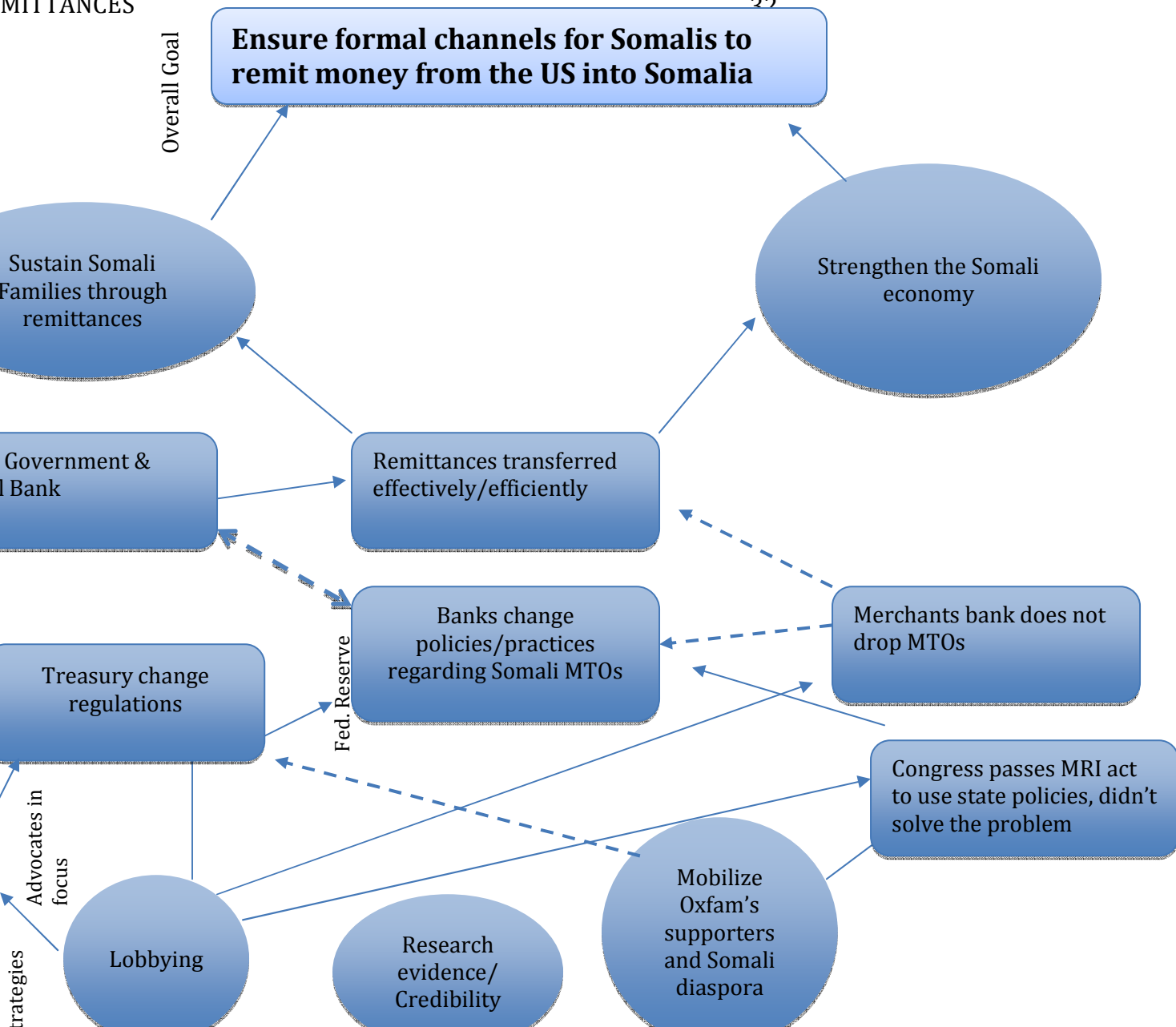
The role of the diaspora was very crucial to obtaining traction and partial gains for the campaign. Diaspora engaged in many events the campaign organized as well as self-organized some events. They called on elected leaders to enact policy, rallied and demonstrated directly in front of the Treasury office in St. Paul, MN and were effective. Diaspora was an important part of the campaign's strategy and was committed to the issue, as it affects them and their families in such a direct and personal manner.

The campaign identified members of the Somali diaspora who are highly respected and have expertise in organizing. Although it took some time to find the right individuals, the campaign made use of existing organizations such as the Service Employee International Union (SEIU), which regularly organizes workers such as janitors and taxi drivers in campaigns, connected Oxfam with Somalis in Minneapolis. Additionally, the campaign work with Congressman Keith Ellison, who is one of two Muslim Congressmen, helped access wider Somali community in mosques such as Imams and influential community leaders.

Theory of Change for Somalia Remittances Campaign

REMITTANCES

22



Monitoring and Evaluation

There were not any Monitoring and Evaluation plan in place during the campaign. In fact, as the campaign is still in process, there has not been any internal or external evaluation conducted to measure its success and impact. There are, however, two internal case studies: one 3-page case study conducted in March 2014 and another 7-page case study completed in early February 2015. Both cases highlight OUS's contributions to some of the changes in policy regarding remittances. They also highlight OUS's development in terms of campaigning on remittances and gaining contacts and connections with the US government, Somali diaspora, Somali MTOs and US banks.

Communication

Oxfam has a set of principles, known as National Influencing Guidelines, to guide its influencing efforts in the countries in which they operate. These are principles regarding partnerships, namely working *with civil society and social movements, working with governments, working with the private sector, gender guidelines on southern influencing*, among others. For the purpose of this paper, only principles on working with governments will be assessed in the following table, since the campaign main target was a governmental institution, U.S. Department of Treasury.

Oxfam realizes that governments vary considerably in their approach to executing their responsibilities towards their citizens. Hence, Oxfam employ, as per the relevant theory of change, various approaches to ensure support of people's rights. The following table assesses the practices in the campaign against the

relevant principles; whether campaign practices complied with or deviated from those principles in the US context.

Guideline Principles	Assessment
Oxfam does not get involved in the party politics of government. But Oxfam cares deeply about how those who are in power relate to people who are vulnerable and marginalised, our constituency.	The campaign was non-partisan and worked with different major player to ensure the passage of the MRI act. Complying with this principle has helped to the MRI act passage in a congress that is very divided, with no opposition.
Oxfam is particularly interested in working with government in situations where policy or legal change and/or improved implementation would benefit large numbers of people living in poverty.	This principle was at the core of the campaign. OUS's involvement was in response to requests by Somali local organizations. The report OUS commissioned showed that at least 40% of the Somali economy will be impacted in case of remittances disruption. OUS's mission is to fight poverty, hunger and injustice. This principle has been completely complied with.
Oxfam's multiple methods of engaging and/or working directly with government are adjusted according to local circumstances. Decisions about how to best work with each government are made on a case-by-case basis, considering local factors.	This principle is typical of campaigns. It's been followed by the campaign team when identifying most influential decision makers and best practices to influence them.
Oxfam may provide support to partners working with government, or, in some cases, even directly to Government units themselves.	N/A
While fully supporting government to discharge its rights responsibilities, Oxfam also seeks to maintain a degree of separation from government in order to preserve the independence of our work.	OUS complied with this principle since no government influence on their work was identified.
Oxfam may play convening roles to assist government to work more effectively with other parties, such as academia, civil society, people's organisations, unions, faith-based organisations, and the private sector.	OUS fully complied with this principle as some of the influencing tactics included convening government officials (Treasury, Congress and USAID) with private sector and civil society. One example is the roundtable that OUS organized in Seattle with Congressman Smith's staff, bank and MTO

	representatives.
Oxfam may have a linking function to help national governments engage more productively with regional and international bodies.	OUS influencing included urging Treasury and State Department to support the Somali Central bank. This principle has been followed in the campaign by linking US Government with the Somali Government.
When Oxfam works on national advocacy efforts directed at government, Oxfam seeks to strengthen our national-level partners and to give them more prominence.	If we apply this principle on OUS relationship with it's sole ally, we would find a deviation from the principle. Adeso didn't gain prominence or publicity as OUS reputation and organization of events prevailed. According to an internal case study Adeso was <i>"barely mentioned at the Hill launch event because it did not directly support the event, even though it was noted as a sponsor of the paper... The effect of this decision was to further minimize the Adeso partnership and Adeso's role."</i>
Oxfam applies the same high levels of financial accountability for our government partners that it maintains for our civil society or academic partners.	N/A

Assessment of Campaign Communication

According to the Humanitarian Communication Officer, OUS Communication Department tried to show how remittances affect the daily life of Somalis in such a concrete way that US citizens could understand. In order to capture the extent to which OUS communication was effective, it will be gauged against a framework developed by the Center for Story-based Strategy (2013), known as F.R.A.M.E.S.

Framing the Issue

OUS and Adeso conveyed the issue of remittance disruption to Somalia from a humanitarian lens. OUS mission is to fight poverty, hunger, and injustice around the world. Similarly, Adeso's mission is to create the atmosphere for Africans to

thrive. Hence, the frame focused on capturing the humanitarian impacts that disruption of remittance would cause. This is clear from their communication tactics such as the video, research, blog posts, among others. The general message was:

Remittances cut-off is a cut of Somalis lifeline.

Reframe Opponent's Story & Reinforce Our Frame

The campaign did a great effort to reframe the image of Somalia from a risky destination for the flow of remittances to a country recovering from being a failed state. This is conspicuous in providing evidence that remittance money is spent on basic needs and services such as food health and education. Additionally, the campaign emphasized the humanitarian aspect and the importance of remittances to the 40% of Somalis and the fact that remittances constitute one third of the Somali economy. Therefore, the issue was reframed from preventing terrorism and money laundering to preventing people from going hungry. Perhaps, one aspect that could be stressed further is the financial inclusion prospective. This aspect could have engaged more stakeholders and, more importantly, garnered more supporters.

Accessible to the Audience

The Somalia remittances campaign was indeed one of the most accessible to the main audience. It was not hard, according to interviewees, to engage the diaspora in an issue that directly affects them. Diaspora (see section on strategy) organized some events and attended most of the events organized by the campaign. An area of improvement might be encouraging all diaspora to invite some of their fellow Americans to take part in events and actions directed at campaign targets.

This will make the campaign supporters expand beyond diaspora and Somali workers.

Meme

A meme means that messaging and communications should be something accessible, relatable, and memorable for the main audience. Creating an image in the minds of audience is a powerful tool to get their support. The campaign has a superb meme: *Keep the Lifeline Open for Somalia*. It conjures up an imagery that remittances is a lifeline; rather the heartbeat of Somalia and, should it be cut, Somalis will be lifeless, dependent, and poverty-stricken.

Emotions

The campaign communication was not only intellectual and commonsensical, but above all emotional. It appealed to the emotions and values of the audience and helped trigger an emotional response that led to taking actions. Anyone would feel upset at US regulations when watching the video or reading the infographic, both showing the suffering that Somalis would go through if remittances are disrupted.

Simple and Short

Regardless of the complications of US AML/CFT regulations, the fact is that people's life is at the bottom of the story. The campaign paid a considerable focus to this human story and amplified it, and made as simple as possible. At least 40% (4 million) Somalis would be hugely affected by the remittance disruption. The campaign team utilized the powerful story and made it a moral and legal responsibility on the part of the US administration, Treasury and Congress to ensure

formal channels for the flow of remittances to Somalia from its diaspora in the States.

Effectiveness, Outcomes and Contribution

In policy advocacy, attribution of contribution becomes a difficult task. A fair evaluation of the campaign, however, would feature remarkable contributions from OUS involvement in the campaign to the campaign outcomes. OUS took on a courageous decision to get involved in a campaign they had no time to prepare for. The humanitarian team then solicited support from other teams, such as Government Affairs, Private Sector, Organizing and Alliances, Media, and Research teams. It is also important to note that OUS has no prior experience in remittances when they worked on this campaign. By taking on the remittances issue, OUS became the only US INGO to work on remittances.

Oxfam had three periods of intense campaigning, or ‘campaign spikes,’ a) support passage of the Money Remittances Improvement Act and b) Pressure US Department of State and Department of Treasury to change bank regulations and work with the Somali Central Bank to strengthen the bank’s financial system, and c) convince Merchants Bank to reverse its decision to close Somali MTO accounts. One campaign spike, from December 2011 to April 2014, culminated in the signing of Money Remittances Improvement Act into law by President Obama in April 2014. The second campaign succeeded in pressuring the Department of State and Department of Treasury to take some steps towards ensuring the flow of remittances into Somalia. The third spike, in May 2014, focused on Merchant’s Bank and was ultimately unsuccessful.

According to a recent Oxfam publication, *Hanging by a Thread (2015)*, OUS influencing work directed at the US government further have helped pressure government actions towards improving remittances into Somalia over the past three years. These actions include important steps to strengthen Somalia's financial system. This is reflected in the formation of a National Security Council-led interagency working group on remittances to Somalia, which demonstrates that the government has come to appreciate the consequences of a disruption in remittance flows. The U.S. Department of Treasury and USAID have worked together with the Central Bank of Somalia to help improve its public financial management system, setting the ground for the Central Bank of Somalia to become financially self-sufficient. In order to be able to connect with the international financial network, the Treasury Department is helping the Central Bank of Somalia to build its supervision unit. However, the most promising step of all was the Treasury's commitment in September 2014 to set clear expectations for banks dealing with high-risk MTOs. This commitment is seen, according to OUS recent research, as a promise that reflects real political commitment "to addressing the systemic challenges facing the most difficult-to-serve money transfer corridors" (*Hanging by a Thread, 2015*).

OUS's third campaign spike targeted at Merchants Bank decision to close Somali MTO accounts was successful in temporarily reprieving Merchants decision for six months. The campaign spike involved a petition, a day of international twitter action, a couple of diaspora-led events including a rally and another public panel as well as media and lobbying work. Individual tactics were very effective, such as [a](#)

[video](#) featuring Somali-Americans that highlighted how Somali families would be affected if remittances are disrupted. Despite these efforts, Merchants Bank went ahead with the account closures on February 6, 2015. In multi-stakeholder campaigns such setbacks are normal. On the positive side of this spike, OUS gained specific strategies on influencing financial institutions and won a six-month period of time in which they kept working on influencing other targets.

OUS's work on remittances also built OUS's own capacity to do effective policy work in this area. It strengthened Oxfam's relationships with the US Somali diaspora community and raised Oxfam America's profile on remittances in the US, being the only international NGO conducting remittance advocacy in the US. It demonstrated Oxfam's ability to play a convening role between governments, the diaspora, and the private sector on this issue.

Lessons Learned

There is so much that can be learned from the campaign and from writing a case study on it. Writing this case study has been a very rewarding learning experience. I have conducted 8 interviews with a number of stakeholders including OUS staff, a member of each of OUS in-country staff, Adeso, Rep. Smith's staff, Global Center on Cooperative Security, and Somali diaspora. Some of the interviews were followed up with few questions to be clarified via emails. I audio-taped all interviews and transcribed some of them. I was also taking quick notes of the most important points discussed. I gained more confidence with every interview I did. I noticed an improvement in my interviewing skills in terms of type and clarity of

questions asked; follow up questions, notes taking, and following up with interviewees.

This case study is special. It is the only case where two policy experts were revising it, Gabrielle Watson and Jeff Unsicker. It seemed that I was under a showering of questions every time the draft was sent to them for review. It turned out that those questions were helping me understand more about the campaign. It was not by any means meant to make it difficult for me. In fact, that helped me not only feel accomplished about my efforts on this case, but also helped me develop a critical lens when writing the longer case study. I always asked myself similar questions that were posed to me for the shorter case, which helped me further analyze and better understand the campaign.

Lessons learned from the campaign are many. In terms of policy advocacy, this case is rich with lessons. But to me, a few lessons stand out. I learned that putting a human face or story on the campaign is very crucial to gain media coverage and influence targets. OUS was able to garner national and international media and engage digital audience via social media by virtue of the human side of the campaign. I think Merchants bank was also influenced to a certain extent by the story, especially the video and research results. That is why they postponed their decision to close Somali MTO bank accounts for six months. In addition, showing evidence based research results along with the human story is a powerful tool to influence government, State Department, and USAID in particular. The results clearly indicate that the crux of the issue lies within the US banking regulations and

portrays a sense of urgency to take actions to help remittances flow smoothly without any disruption.

In the wake of the February 6th account closures by Merchants Bank, it becomes apparent that getting the Money Remittances Improvement Act, while a positive step, was not sufficient to keep remittance flows open. The Act did not stop the private bank decision to close MTO bank accounts. It also has not facilitated the ability and capacity of nonbank financial institutions, such as money service business, to remit money internationally. So, an act passed by the Government does not necessarily mean solving the problem.

It is possible to develop the space to work on an issue at the request of partner organizations and find internal support for it, even if a specific issue is not an OUS priority, is initially perceived as risky. The humanitarian team was able to successfully solicit support and staff time from the Government Affairs, Private Sector, Organizing and Alliances, Media, and Research teams, even though remittances are not an agency priority.

The portrayal of partner organizations is crucial at external events. Adeso was barely mentioned at the Capitol Hill launch event because it did not directly support the event, even though it was noted as a sponsor of the paper. OUS also decided not to read the Somali Prime Minister and researcher's written statements because of a general sense that it would not be appropriate to read written statements aloud. The effect of this decision was to further minimize the Adeso partnership and Adeso's role. Better communication about Adeso's role in the event during the planning process would have fostered a better relationship. In order for

OUS practice to match its rhetoric and desire to form Southern-based NGO partners, communication and collaboration with Southern-based NGOs needs to encompass all phases of the project and the nature of the relationship needs to be communicated clearly to other stakeholders in the organization.

It is necessary to thoroughly explain a partnership and previous work that originated in collaboration with one affiliate to other affiliates as the partnership expands. The Adeso-OUS partnership was originally confined to a single affiliate, which then expanded to include OGB. The links with the country team were limited mainly because of a change of staff over a key period of drafting the report. This meant the Oxfam in Somalia team did not give adequate input into either the report or the relationship with Adeso, which would have helped to strengthen the partnership at the outset.

In an attempt to improve work with diaspora, OUS Senior Humanitarian Advisor recommends conducting a thorough research of diaspora and talk to lots of people to ensure they have the necessary networks and skills to be more effective partners. OUS Humanitarian Advisor stressed the importance of listening to what the diaspora care about in order to build a long-term trust and relationship.

One good practice that the campaign team learned that came out of the early outreach meeting in the summer of 2013 is to share reports with stakeholders to get their input before the final publication. Scott Paul sent copies of the draft report to some participants before an event in Seattle and sought feedback. The feedback was helpful as Scott was updating the report. For the new report that will be launched in

mid February 2015, Scott sent a draft of the report to be shared with communities in Seattle, Minneapolis, and Columbus.

References

- Adeso. (n.d.). Retrieved 2015, from <http://adesoafrika.org/about-us/mission-vision-values/>
- Center for Story-based Strategy, F.R.A.M.E.S, Tools & Worksheets, (2013). Retrieved from: http://www.storybasedstrategy.org/uploads/4/5/4/4/45442925/2-css_frames.pdf
- Cohen, D. (2014). Addressing the Illicit Finance Risks of Virtual Currency. Retrieved 2015, from <http://www.treasury.gov/press-center/press-releases/Pages/jl236.aspx>
- Final Remittances Report*, (Feb. 2014). Retrieved internally from Oxfam America.
- HANGING BY A THREAD; *The ongoing threat to Somalia's remittance lifeline*, (2015). Retrieved from <http://adesoafrika.org/wp-content/uploads/2015/02/bn-hanging-by-thread-somalia-remittances-190215-embargo-en.pdf>
- Inside Oxfam America. (2015). Retrieved from <http://www.oxfamamerica.org/explore/inside-oxfam-america/>
- Marcos, C. (2014). House passes measures to expand credit unions. The Hill. Retrieved from <https://thehill.com/blogs/floor-action/house/205406-house-passes-measures-to-expand-credit-unions>
- National Influencing Guidelines*. (2013). Retrieved internally from Oxfam International.
- Orozco, M., & Yansura, J. (2013). Keeping The Lifeline Open, *Remittances and Markets in Somalia*. Retrieved 2015, from

<http://www.oxfamamerica.org/static/media/files/somalia-remittance-report-web.pdf>

Somali community in US: Demographics. (n.d.). Retrieved 2015, from

http://www.allied-media.com/Somali_American/Somali_American_demographics.html

The World FactBook, Somalia. (n.d.). Retrieved May 2015, from

<https://www.cia.gov/library/publications/the-world-factbook/geos/so.html>

U.S. Department of State. (2014). Retrieved 2015, from

<http://www.state.gov/s/d/rm/index.htm#mission>

U.S. Department of The Treasury. (2011). Retrieved, 2015, from

<http://www.treasury.gov/about/role-of-treasury/Pages/default.aspx>

United States Agency for International Development (USAID), 2014. Retrieved from:

<http://www.usaid.gov/who-we-are/mission-vision-values>

Welsh, T. (2015, February 19). Remittance Cutoffs Threaten Somalis. USNews &

World Report. Retrieved from

<http://www.usnews.com/news/articles/2015/02/19/remittance-cutoffs-threaten-somalis>

WIN Case Study, *Somalia Remittances*, (2014). Retrieved internally from WIN documents, Oxfam America.

Appendices

Appendix A Cargill, Land and Power in Colombia, A WIN Case Study.

WIN CASE STUDY

Cargill, Land and Power in Colombia

Summary

As part of the GROW campaign, Oxfam in Colombia along with Oxfam Great Britain (OGB), Oxfam Intermón (OES), Oxfam America (OUS) and allied national organizations in Colombia worked together to stop a bill the Colombian government was preparing to present to Congress. The bill was designed to facilitate and legalize large-scale concentration of land intended for small farmers. Oxfam contributed to an informed debate in Colombia on rural development, equitable access to land, and protection of the rights of small farmers and supported small farmers' organizations by publishing a rigorous study that backed their proposals and demands. and thus strengthened their ability to get their voices heard. Oxfam had three major outcomes: 1) the high public profile of a research report, Divide and Purchase, prepared by Oxfam in Colombia; 2) the wide dissemination and coverage of the case by the media; and 3) the government's commitment to not only withdraw the bill but also to not submit it again.



Divide and Purchase Report Event, Colombia
Photo by Oxfam in Colombia

Introduction

One of the central themes of the Oxfam GROW Campaign is access to land, ways of acquiring it, and practices involving land concentration and monopolization. Land is a topic of interest for GROW in Colombia, as the increasing concentration of this resource constitutes a threat to small-scale agriculture and food production, and also reproduces and perpetuates the high levels of poverty and inequality prevalent in the country. Concentration of land ownership is also recognized as one of the main causes of the armed conflict in the country, and is thus one of the central issues of the current peace talks taking place between the Colombian government and the Fuerzas Armadas Revolucionarias de Colombia (FARC) guerrilla group.

As part of the GROW campaign, Oxfam in Colombia along with Oxfam Great Britain (OGB), Oxfam Intermón (OES), Oxfam America (OUS) and allied national organizations in Colombia worked together to stop a bill the Colombian government was preparing to present to Congress. The bill was designed to facilitate and legalize large-scale concentration of land intended for small farmers. Oxfam contributed to an informed debate in Colombia on rural development, equitable access to land, and protection of the rights of small farmers and supported small farmers' organizations by publishing a rigorous study that backed their proposals and demands. and thus strengthened their ability to get their voices heard. Oxfam had three major outcomes: 1) the high public profile of a research report, Divide and Purchase, prepared by Oxfam in Colombia; 2) the wide dissemination and coverage of the case by the media; and 3) the government's commitment to not only withdraw the bill but also to not submit it again.

What was the goal?

Given the interests of the GROW Campaign, the political situation in Colombia, and the evolution of the research, four goals were defined for the campaign spike:

1. To contribute to an informed debate in Colombia on rural development, equitable access to land, and protection of the rights of small farmers.
2. To draw the attention of the government (the legislative and executive branches, Congress, and control bodies) to the need to establish effective regulations on large-scale purchases of land.
3. To exercise pressure to prevent reforms that legalize practices such as those of Cargill.
4. To support small farmers' organizations by publishing rigorous studies that back their proposals and demands, and thus strengthen their ability to get their voices heard.

What was the result?

There are three results that stand out in this case. The first is the success of a global research report, Divide and Purchase, by Oxfam in Colombia. The report was on a Colombian economic justice issue that has regional and global implications - the undue concentration and accumulation of land, a theme prioritized in the global GROW campaign. The report was used as part of the global campaign, which was a first for Oxfam in Colombia. The second result is the broad dissemination and coverage of the report in the media, which is a result of its quality, relevance to the current Colombian situation, and the highly effective work carried out with the media and social networks. The success of the report's launch reflects recognition of Oxfam and its convening power in Colombia, as well as the organization's ability to analyze and make best use of the current Colombian situation. Oxfam in Colombia worked with key allies throughout,

including discussion of initial research findings and involvement in the report launch. The results of the launch also demonstrate Oxfam's skill in positioning itself, building its profile and creating openings for civil society with a good research report. It further created a forum for discussion in which the opinions of all parties could be voiced (state regulatory agencies, Congress, private sector, and small farmers' organizations). The last result is that the government not only withdrew the bill, but also did not submit it again.

How was change achieved?

As part of the GROW campaign, OUS included the identification of and research on possible land grabbing cases involving US investors. In 2012, OUS contacted and financed Oxfam in Colombia to conduct an exploratory study. The work to develop, publish and launch the report was carried out jointly by OUS and Oxfam in Colombia, and the launch activities in 2013 and follow up in Colombia were done by Oxfam in Colombia with support from OGB in LAC (Latin America and the Caribbean).

After completing the initial research, there were requests from allies in Colombia to quickly reveal the findings of the study. Colombian member of Congress Wilson Arias made a formal request to Oxfam to present its findings. After consultation and agreement with allied national organizations, Oxfam decided to present the initial results in a closed meeting in June 2013 with media, opinion makers, members of Congress and allies. The preliminary results were published in the media, including in *Time Magazine*. This caused a multiplier effect in the Colombian national media, which fueled a scandal that had already erupted involving Colombia's Ambassador to the US, whose law firm had brokered the irregular land acquisitions by Cargill and other companies. OUS and Oxfam in Colombia decided to publish an Oxfam report using the research results, and OUS contacted Cargill about it, resulting in several meetings in which it was agreed to submit the report to the company for review and respond well in advance of publication. After receiving the report, Cargill initiated further dialogues with Oxfam: with OUS and OGB at the highest level (Executive Directors); in Bogotá with the country team; and in several other conversations with OUS. In most of these meetings, Cargill asked Oxfam, either directly or indirectly, to not publish the report. The report was launched in September 2013 in Colombia at an event with members of the media, government entities and NGOs.

The report launch drew further attention to the scandal in Colombia on the irregular acquisition and accumulation of land (baldíos) in the Altillanura region by Cargill and others, giving an important boost to work by Oxfam and allies in Colombia to halt the Ministry of Agriculture's initiative seeking to legalize such practices. The baldíos are lands which, under the Constitution, should be given to landless small farmers, yet the reforms to the law would enable companies to accumulate them, leading to further concentration of land holdings. Oxfam's report and work with allies brought greater attention to the issue and raised opposition to the idea of such reforms.

Oxfam in Colombia brought together a broad group of allies to jointly hold a press conference in November 2013, which was widely covered by the media (17 national and 24 international media hits) and trended on social media as the most popular issue tweeted in Colombia the morning of the launch. A few days later the Ministry submitted a bill to Congress, but the Cabinet head ordered it withdrawn so as to revise and resubmit it. Following the launch, Oxfam

convened a broad group of stakeholders, including some non-traditional allies, to speak out jointly against the new law that was about to be introduced. Members of Congress also spoke out and presented their own evidence against the law. Oxfam's convening power and elevation of the issue's profile enabled allies to have more impact and pushed government oversight entities to pay more attention to the problem of undue concentration of landholdings through acquisition of baldíos. This way, Oxfam and allies kept up the pressure in Colombia against the proposed reforms.

The issue was raised at the negotiating table between the government and the FARC. The high profile of the issue brought it to the attention of the intermediary in the peace negotiations between the Colombian government and the FARC. Oxfam's report had already pointed out that Cargill's actions and any legislation that would make these actions legal would be incoherent with agreements reached at the negotiating table. Intervention by the intermediary pushed the government to commit to not reintroduce the bill to reform the sale and acquisition of baldíos. In addition, a ruling by the *Superintendencia de Sociedades* (corporations superintendency) ordered the multinational Monica Semillas to return money from state subsidies awarded to shell companies that were set up by the multinational in order to break up land purchases. The ruling sets a precedent which will discourage private enterprises from using corporate mechanisms to circumvent the law.

What were the key lessons learned?

Good research on a topic that is nationally relevant and well-timed can raise an issue's profile in country, galvanize and support allies and have an impact on policy outcomes. Keys to success are robust research and the country team's willingness to use its convening power with allies and other stakeholders to follow through with advocacy. Sometimes it can be helpful for Oxfam to take a highly visible, public stance and put its own research and positions forward in support of allies and a policy agenda shared with allies.

It is important to assess the external context in country and not just the interest to Oxfam with regard to the initiative and to ensure joint ownership between country team and affiliate or global team from the outset. The timeline should be set by the country team and flexibility to accommodate opportunities should be allowed. The case was identified knowing the context in Colombia and understanding that research findings could reveal information relevant to the situation in the country as it was evolving. The concept was discussed jointly by OUS and the Oxfam GROW team in Colombia as well as the Country Leadership Team, and the research was of mutual interest to all involved. OUS and Oxfam in Colombia agreed to joint ownership of the research and the process.

It is important to know and follow all affiliate, regional and private sector procedures for review, sign-off risk and assessment from the beginning, and ensure close and regular communication in the small core team, so that if questions or concerns arise from affiliate management at any level, they can be easily addressed. The overall support by the three affiliates for publishing the report despite requests and pressure from Cargill was important for the country team.

It is important to assess synergies between national and international media coverage, which might be different for different countries. In this case, coverage by one international outlet spurred more extensive national coverage, which in turn spurred more international media

interest. Some national media outlets initially indicated the issue was too sensitive for them to cover, but once there was international coverage, national media outlets were able carry the story.

Finally, it is important to consider the potential for regional relevance of national influencing work, since reports can also be useful for the influencing agendas in other countries of the region even when there is no regional advocacy target for the issue. Country influencing opportunities can spur regional interest and might generate unintended effects in other countries, so it is worth including some regional planning around national launches. At minimum, other countries in the region should be informed from the preparatory stage of the research and at the launch.

Appendix B

Money Remittances Improvement Act (Actual Act)

H. R. 4386

One Hundred Thirteenth Congress
of the
United States of America

AT THE SECOND SESSION

*Begun and held at the City of Washington on Friday,
the third day of January, two thousand and fourteen*

An Act

To allow the Secretary of the Treasury to rely on State examinations for certain financial institutions, and for other purposes.

*Be it enacted by the Senate and House of Representatives of
the United States of America in Congress assembled,*

SECTION 1. SHORT TITLE.

This Act may be cited as the “Money Remittances Improvement Act of 2014”.

SEC. 2. COMPLIANCE AUTHORITY FOR CERTAIN REPORTING REQUIREMENTS.

(a) **COMPLIANCE WITH REPORTING REQUIREMENTS ON MONETARY INSTRUMENT TRANSACTIONS.**—Section 5318(a) of title 31, United States Code, is amended—

- (1) in paragraph (5), by striking “and” at the end;
- (2) by redesignating paragraph (6) as paragraph (7); and
- (3) by inserting after paragraph (5) the following:

“(6) rely on examinations conducted by a State supervisory agency of a category of financial institution, if the Secretary determines that—

“(A) the category of financial institution is required to comply with this subchapter and regulations prescribed under this subchapter; or

“(B) the State supervisory agency examines the category of financial institution for compliance with this subchapter and regulations prescribed under this subchapter; and”.

(b) **COMPLIANCE WITH REPORTING REQUIREMENTS OF OTHER FINANCIAL INSTITUTIONS.**—Section 128 of Public Law 91–508 (12 U.S.C. 1958) is amended—

- (1) by striking “this title” and inserting “this chapter and section 21 of the Federal Deposit Insurance Act (12 U.S.C. 1829b)”; and

- (2) by inserting at the end the following: “The Secretary may rely on examinations conducted by a State supervisory agency of a category of financial institution, if the Secretary determines that the category of financial institution is required to comply with this chapter and section 21 of the Federal Deposit Insurance Act (and regulations prescribed under this chapter and section 21 of the Federal Deposit Insurance Act), or the State supervisory agency examines the category of financial institution for compliance with this chapter and section

H. R. 4386—2

21 of the Federal Deposit Insurance Act (and regulations prescribed under this chapter and section 21 of the Federal Deposit Insurance Act).⁷

(c) CONSULTATION WITH STATE AGENCIES.—In issuing rules to carry out section 5318(a)(6) of title 31, United States Code, and section 128 of Public Law 91-508 (12 U.S.C. 1958), the Secretary of the Treasury shall consult with State supervisory agencies.

Speaker of the House of Representatives.

*Vice President of the United States and
President of the Senate.*

Appendix C

Somali Remittances Campaign, WIN Case Study.

WIN CASE STUDY

Somalia Remittances: Keeping the Lifeline Open

Summary

In December 2011, Oxfam America (OUS) began working on the issue of remittances to Somalia at the request of Somali partner organizations that were alarmed by the closing of Money Transfer Operator (MTO) accounts by US banks. Oxfam's main partner for this work was African Development Solutions (Adeso), a humanitarian and development NGO with a long history of working in Somalia. This work succeeded in supporting the passage of the Money Remittance Improvement Act in April 2014. The subsequent campaign spike succeeded in delaying Merchants Bank decision to close Somali MTO bank accounts for six months, which on February 6th of this year decided to close the Somali MTO accounts. On a process outcome standpoint, OUS's work on the issue is significant because it was originally taken up at the request of the Somali partner organizations and allowed Oxfam to strengthen relationships with the US Somali diaspora and raising OUS's profile on remittances in the US, especially because OUS is the only international NGO conducting remittance advocacy in the US. It also demonstrated the capacity of OUS to play a convening role between governments, the diaspora, and the private sector on this issue.



A woman buys household goods in Badhan, Somalia. Daniel Gerstle / ©Adeso

A woman buys household goods in Badhan, Somalia. Daniel Gerstle/ ©Adeso

Introduction

Remittances to Somalia amount to approximately \$1.3 billion a year, 16% of which comes from the United States, an amount comparable to US humanitarian assistance to Somalia (\$242 million) in 2012. Remittances are a lifeline for many Somalis, providing them with a means to meet their immediate needs for food, shelter, clothing, and other basic necessities as well as open and sustain small businesses, send children to school, and invest in their communities. Over 40% of Somalis depend on money sent by relatives abroad and, due to this imminent remittance disruption, over 56 thousand Somali-Americans and Somali migrant workers would be unable to support their families back home. Furthermore, this remittance cut-off is likely to destabilize communities, empower criminal groups, and deprive families of the support they need to survive and thrive.

Somali-American Money Transfer Operators (MTOs) actively seek to comply with US regulations and have made significant strides toward reducing risk through monitoring, record keeping, and agent training. Still, the Somalia remittance pipeline is under serious threat. Despite their efforts, Somali-American MTOs are often perceived as representing a high risk for illegal activities, such as the financing of groups and individuals listed by the US government as terrorists. Many banks closed MTO accounts, which made it difficult for MTOs to maintain operations, disrupted remittances from the US to Somalia, and, in particular, jeopardized the survival of Somali families during the 2011 famine. This sent an alarm to Somali partner organizations as further bank account closures could result in a total remittance cutoff, which would endanger more Somali lives and interrupt economic development in the country as a whole. Partner organizations requested OUS to use its advocacy capacity to influence decision makers in the US. OUS believes that if all the stakeholders—the Somali authorities, the US government, US banks, and Somali-American MTOs—make a concerted effort, they can prevent these disruptions and greatly enhance the security of the remittance system.

What was the goal?

For this campaign and Merchants campaign spike, OUS had the following goals:

1. Push the US Government to prioritize remittances to Somalia and commit to preventing a significant disruption in the flow of money to Somalia through emergency measures.
2. Through direct communication and media work, convince Merchants Bank to reverse its decision to close Somali MTO accounts.

What was the result?

One campaign spike culminated in the signing of Money Remittances Improvement Act into law by President Obama in April 2014. When Representative Ellison (D-MN) was introducing the bill, OUS worked in his district to mobilize the diaspora to create a positive incentive for him to continue to lead on the issue. When Ellison's bill started moving in congress, Representative Smith (D-WA) got interested and wanted to learn more on the issue. OUS worked with his office

to hold a round table of multiple stakeholders including private banks and MTO representatives. Representative Smith's staff agreed to work with Ellison on the bill and Smith became a co-sponsor of the bill, which helped push the bill through Congress on the summer and became law on April of 2014.

The bill would "allow the Treasury secretary to use state examinations for certain financial institutions instead of federal reporting requirements." This means a streamline in the remittances process; making it easy for the diaspora to send money to loved ones in Somalia. The bill would also make it easier for nonbank financial institutions such as money service businesses to provide remittance payments internationally. In the words of Representative Ellison (D-MN) the "Passage of the Money Remittances Improvement Act is cause for celebration for all diaspora communities, including the Somali and Hmong communities I am proud to represent in Minnesota."

OUS influencing work directed at the US government further helped pressure government actions towards improving remittances into Somali. The recent Oxfam publication, [Hanging by a Thread](#), mentions that the US government has taken some modest but important steps to help put Somalia on a stronger financial footing. This is reflected in the formation of a National Security Council-led interagency working group on remittances to Somalia, which demonstrates that the government has come to appreciate the consequences of a disruption in remittance flows. The Treasury and USAID have collaborated with the Central Bank of Somalia to help improve its public financial management system, paving the way to become financially self-sufficient. The Treasury is helping the Central Bank build its supervision unit, a much-needed capacity for any country that aims to connect to international financial networks. But most promising is the Treasury September 2014 promise to clarify expectations for banks dealing with high-risk MTOs; a promise which reflects real political commitment to addressing the systemic challenges facing the most difficult-to-serve money transfer corridors.

Oxfam's work succeeded in strengthening relationships with the US Somali diaspora and raising Oxfam America's profile on remittances in the US. It also highlighted the potential for OUS to play a convening role between governments, the diaspora, and the private sector on this issue. OUS's work on the issue is significant because it was originally taken up at the request of Somali partner organizations and allowed Oxfam to develop solid relations with the Somali government and diaspora. Although other NGOs are working on remittances within Somalia, Oxfam is the only international NGO conducting remittance advocacy in the US.

OUS's subsequent campaign spike targeted at Merchants Bank decision to close Somali MTO accounts was successful in temporarily reprieving Merchants decision for six months. The campaign spike involved a petition, a day of international twitter action, a couple of diaspora led events including a rally and another public panel as well as media and lobbying work. Individual tactics came off very well such as [the film](#) that was prepared mainly in the US of Somali families affected by remittances cut off.

Until recently, Somali MTOs have been hugely reliant on a single bank, Merchants Bank of California, to transfer funds abroad. Although OUS succeeded in delaying Merchants decision for about six months, due to pressure from the Office of the Comptroller of the Currency, Merchants Bank announced on January 27th, 2015, that it would terminate all of its Somali MTO accounts on February 6th. This is a trend within the banking sector known as de-risking—

avoiding high financial and reputational risks of violating Anti-Money Laundering (AML) and Combatting the Financing of Terrorism (CFT) regulations. Consequently, many Somali MTOs, including the largest by volume and coverage, are planning to discontinue money transfers if the account closures move forward as planned. While it is difficult to assess how much money Somali-Americans will be able to send following the account closures, between \$200m-\$400m/year could be at stake. MTOs could manage to continue their business based on a, for example in the UK, wholesale MTOs who have existing accounts that MTOs with no accounts can transfer money through. This is a vulnerable process as banks can still pressure those wholesale MTOs to end business with MTOs with no accounts. Other means leaves diaspora with illegal channels of transfer with no official oversight, usually costly and puts the sender's (diaspora) money at risk of fraud.

How was change achieved?

[Add a paragraph that presents the overarching timeline or phases of the work, and influencing strategies for each phase. (Who were the targets, what was the change being sought, and how did we hope to achieve it?) For example, there was a phase of awareness-raising, a phase to support passage of the Remittance bill, another phase to influence Merchants' bank, and there was also work with treasury. You need to show how tactics and activities described here (and evidence of their effectiveness) helped advance specific influencing strategies. Why did they do the different activities? Did they have the effect they wanted? It's more interesting to know the *result* of the tactics than the counts of how many media hits or participants at events.]

When OUS was requested to work on the remittances issue by partner organizations, OUS tasked its Senior Humanitarian Policy Advisor with exploring the possibilities to get involved in the issue. OUS then commissioned further research to gain a comprehensive understanding of remittances to Somalia and possible solutions resulting in the research report "Keeping the Lifeline Open" in June 2013. OUS influencing work helped support the passage of the Money Remittances Improvement Act of April 2014 co-sponsored by Rep Ellison (D-MN) and Rep. Smith (D-WA). OUS also targeted the Treasury with influencing work. Social media turned out to be the primary vehicle for engaging people, the diaspora in particular, to take actions directed at the Treasury. According to the recent report by Oxfam, *Hanging by a Thread*, such pressure led the US government to take some modest but important steps help put Somali on a stronger financial footing. OUS conducted a subsequent campaign spike targeted at Merchants bank decision to close Somali MTO accounts in May 2014. The spike involved a petition, utilized social media to inform the public audience, diaspora led events, panel discussions and individual tactics such as [the film](#) on US of Somali families affected by remittances cut off.

OUS Senior Humanitarian Policy Advisor Scott Paul travelled to Minnesota in May and Somaliland in August 2012 to explore the root causes of the problem and potential for Oxfam involvement. OUS then commissioned further research to gain a comprehensive picture of the remittance issue and possible solutions culminating in the research report "[Keeping the Lifeline Open](#)" in June 2013, which was co-branded with Adeso and Inter-American Dialogue, the organization that conducted the research. The research aimed at providing evidence to how remittances are crucial for Somali life, livelihood, and Somali economy and made clear recommendations for US government, agencies, private banks, and MTOs. The report release was accompanied by launch events in Washington, DC, Seattle, Minneapolis, Nairobi and the UK. The report was widely distributed (OUS distributed 600 report copies and Adeso few

hundred) and via email, including to key targets, including government officials, State Department and USAID officers.

Scott Paul wrote four remittance blogs on Oxfam's blog page, which had a combined 908 unique page views and 360 shares during this period. Oxfam also hosted one event in Seattle and spoke at two events in Minneapolis that were attended by members of the Somali Diaspora, congressional staffers, Somali imams, community leaders and Representative. After the event in Seattle, Jonathon Scanlon, Oxfam's Senior Alliances Advisor, convinced Representative Adam Smith (D-WA) staff to host a multi-stakeholder roundtable in which Oxfam participated. As a result, Rep. Smith agreed to work with Ellison office on the remittance bill and became a co-sponsor of the bill.

OUS engaged directly with executives from three target banks—Sunrise, US Bank and Wells Fargo. OUS has also engaged with senior officials within the MTOs and industry associations representing them on how to strengthen their business practices (compliance) and the industry as a whole through collective action. OUS has been in discussions with approximately 25 MTO officials including one at the CEO level, two global directors, 12 UK executives and 10 US executives. Bank representatives attended the roundtable hosted by Rep. Smith in Seattle, WA.

The report positioned OI and OGB to lead on the issue in the UK, where Oxfam received extensive media coverage for its work. A full link to all international media coverage on remittances, including coverage outside the timeframe of this report can be found here: <https://sumus.oxfam.org/node/135140>. The amount of positive local media coverage that remittances generated was surprising. The ability to send remittances affects the diaspora on a daily basis, and there are many great personal stories within the diaspora that highlights the importance of remittances. It is easier to engage the diaspora on an issue that directly affects them, and the report was a valuable tool for outreach.

Adeso has led outreach to the MTO Executives and contributed research conducted in Somalia. It also created an [infographic](#) and disseminated information through its networks. Separate from the spike, Adeso has also played a valuable role in liaising with MTO executives in Dubai.

What were the key lessons learned?

Lessons learned in this campaign and its subsequent spikes are drawn from interviews with campaign staff, allies and partners and internal documents.

In the wake of the recent development in the issue of remittances with the MTO account closures by Merchants on February 6th, it becomes apparent that getting a law passed is one thing, but getting it implemented and its impact to be reflected on the affected population is another. The Money Remittances Improvement Act seems to have little to no influence on private bank decisions to disrupt remittances by closing MTO bank accounts. It also has not facilitated the ability and capacity of nonbank financial institutions, such as money service business, to remit money internationally.

It is possible to develop the space to work on an issue at the request of partner organizations and find internal support for it, even if a specific issue is not an Oxfam America priority, is initially perceived as risky, or does not neatly sit within established work. The humanitarian team was successfully able to solicit support and staff time from the Government Affairs, Private Sector, Organizing and Alliances, Media, and Research teams, even though remittances is not an agency priority.

The portrayal of partner organizations is crucial at external events. Adeso was barely mentioned at the Hill launch event because it did not directly support the event, even though it was noted as a sponsor of the paper. OUS also decided not to read the Somali Prime Minister's and researcher's written statements because of a general sense that it would not be appropriate to read written statements aloud. The effect of this decision was to further minimize the Adeso partnership and Adeso's role. Better communication about Adeso's role in the event during the planning process would have fostered a better relationship. In order for OUS practice to match its rhetoric and desire to form Southern-based NGO partners, communication and collaboration with Southern-based NGOs needs to encompass all phases of the project and the nature of the relationship needs to be communicated clearly to other stakeholders in the organization.

It is necessary to thoroughly explain a partnership and previous work that originated in collaboration with one affiliate to other affiliates as the partnership expands. The Adeso-OUS partnership was originally confined to a single affiliate, which then expanded to include OGB. The links with the country team were limited mainly because of a change of staff over a key period of drafting the report. This meant the Oxfam in Somalia team did not give adequate input into either the report or the relationship with Adeso, which would have helped to strengthen the partnership at the outset.

One good practice that the campaign team learned that came out of the early outreach meeting in the summer of 2013 is to share reports with stakeholders to get their input before the final publication. Scott Paul sent copies of the draft report to some participants before an event in Seattle and sought feedback. The feedback was helpful as Scott was updating the report. For the new report that will be launched in mid February 2015, Scott sent a draft of the report to be shared with communities in Seattle, Minneapolis, and Columbus.

Appendix D

PROTOCOL for CASE STUDY SELF-ASSESSMENTS of NATIONAL LEVEL POLICY INFLUENCING CAMPAIGNS and INITIATIVES (Protocol sections only)

A case study of a policy influencing intervention will typically be a 20-40 page written document, plus a short executive summary and an appendix containing relevant documents (campaign plans, reports, campaign communications, examples of media coverage, etc.) and list of sources (interviews, documents, literature, etc.)

The typical outline of a case study document:

Executive summary	
Introduction	Brief overview of the campaign, including a timeline of events, and description of the case study research process
Context	Historical background and the major political, economic and social factors that influenced the advocacy but were beyond the advocates' control
Advocates	Organizational capacity and resources
Policy	Problems that are being addressed, their causes, and the proposed changes in laws, regulations or other policies, including the evidence for each
Politics	Visible and hidden policy making process and actors; direct and indirect constituents; allies and internal champions; opponents
Strategy	Theory of change; combination and sequence of influencing methods (collaborative and/or confrontational)
Monitoring and Evaluation Plans	Plans (including indicators), if any, for monitoring and evaluations of process effectiveness, outcomes and impact
Effectiveness	Assessment of the degree to which campaign <u>and</u> M&E plans were effectively implemented/adjusted, including the various outputs, and factors that influenced effectiveness
Outcomes	Progress toward or changes (if any) in policy and in power – including changes in policy making processes, and capacity of civil society advocates to protect policy changes and/or push for more
Contributions	Process tracing analysis of the causal factors behind outcomes and estimation of relative contribution of Oxfam and/or its partners
Impact	Actual or projected impact of the outcomes
Lessons learned	Insights about aspects of the campaign plan and implementation that resulted in success (or failure), with a focus on those that can inform future advocacy