

Update on changes in payments of IDP allowance (CMU Resolution # 332)



Overview of findings of the Protection Cluster Monitoring Tool on the impact of changes in payments of IDP allowance – April 2024

BACKGROUND

In order to address the internal displacement of almost 5 million people caused by the escalation of war in February 2022, in March 2022 the Cabinet of Minister of Ukraine (CMU) introduced an IDP allowance by its [Resolution # 332](#). According to the CMU, this allowance implemented by the Ministry of Social Policy (MoSP) is intended to provide social support for vulnerable internally displaced persons (IDPs) and to encourage the employment of IDPs of working age.¹

Under the legislative framework, the following IDPs can in principle be granted the IDP allowance:

1. IDPs who are (re)displaced after January 1, 2022 from the frontline and occupied territories.
2. IDPs whose housing was damaged or destroyed.
3. The children of IDPs.

The allowance is being paid monthly and amounts to 3,000 UAH for people with disabilities and children; and 2,000 UAH for other IDPs.

In December 2023, the CMU introduced additional requirements for granting or continuing payment of the IDP allowance. Specifically, unemployed IDPs of working age are required to take measures for their employment. In addition, the CMU introduced financial criteria: the IDP allowance should not be paid to IDPs (or their families) who, inter alia, purchased a vehicle, land or housing exceeding 100,000 UAH, or possess a bank deposit exceeding 100,000 UAH etc.

On 1 March 2024, CMU approved a new round of amendments that designate 10 vulnerable categories of IDPs who can continue to receive payment of the IDP allowance for the next 6-month period, providing that their monthly average income per household member does not exceed 9,444 UAH. The CMU prescribed that IDPs from 10 vulnerable categories who are eligible for the continuation of IDP allowance will either:

1. Be eligible for the **automatic extension** of the payment (for example, pensioners with low pension, people with disabilities of group I and II, orphans and children deprived of parental care, etc.), or
2. Will have to **re-apply for the payment** (IDP households containing children or people in need of care and **individual** IDPs, e.g. unaccompanied children or pregnant women). The list of 10 vulnerable categories was extended to 15 categories in the next round of amendments of 22 March 2024.²

According to the Ministry of Social Policy (MoSP), the March 2024 amendments represent a **shift in the approach to payment of IDP allowance from blanket to a more targeted approach**, which donors financing this scheme have advocated for. In addition, the more targeted approach promotes IDP employment and integration, and provision of more targeted access to social benefits such as the government rental subsidy, childcare support.

¹ Given the widespread use of the term "IDP allowance" in international humanitarian and development community, the document refers to "IDP allowance". The actual term as per Ukrainian legislation, translated literally, is "housing assistance to IDPs".

² More on this last amendment in the section on Action taken by the Protection Cluster.

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KEY FIGURES RELATED TO CHANGES IN PAYMENTS OF IDP ALLOWANCE

According to the approximate numbers provided by the MoSP on 26 April 2024, out of around 2.5 million IDPs receiving the IDP allowance until 29 February 2024, as of 1 March nearly 1.5-1.7 million vulnerable groups of IDPs will be eligible for the extension of the IDP allowance (around 540,000 - for automatic extension and around 1-1.2 million - after re-application). Nearly 800,000-1 million non-vulnerable IDPs of working age will cease to receive the allowance as of 1 March. At the time of writing, a total of 961,000 eligible IDPs continued receiving the IDP allowance - either due to automatic extension or following re-application.

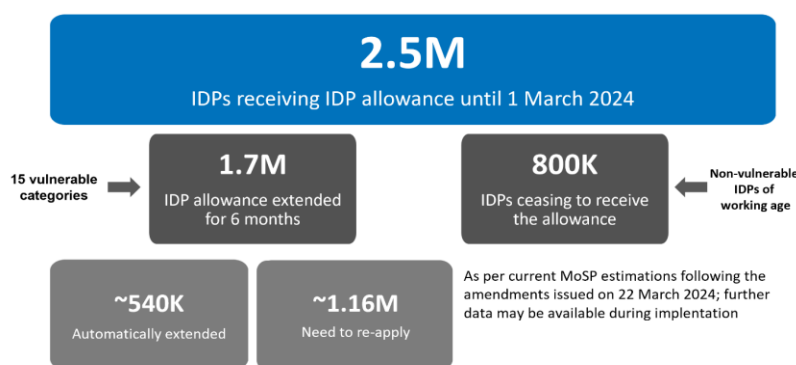


FIGURE 1: RESOLUTION 332: IDPS IMPACTED – KEY FIGURES

ACTIONS TAKEN BY PROTECTION CLUSTER IN COLLABORATION WITH ICCG

Considering the significance of the above legislative changes and potential impact on IDPs, including possible increase in protection risks such as development of negative coping mechanisms or return to unsafe areas, the Protection Cluster (PC), in collaboration with Inter-Cluster Coordination Group (ICCG), has undertaken several measures to mitigate these risks and contribute to evidence-based advocacy.

Firstly, the PC along with the MoSP and national NGOs prepared **information materials** (slides, video, Q&A, scripts, poster) for IDPs and social protection entities. Secondly, PC (national and sub-national level) launched a call to its partners in coordination meetings to **monitor the situation** of IDPs following the amendments to the CMU's Resolution # 332, to step up **awareness raising** among IDPs regarding the amendments and their eligibility, and to enhance protection **counseling and legal aid** for IDPs upon rejection after re-application. The PC rose awareness of the **implications of the amendments to the CMU's Resolution # 332 for wider humanitarian programming** through: dedicated discussions in the Humanitarian Country Team (HCT), ICCG, Cash Working Group, Camp Coordination and Camp Management (CCCM) Cluster, Shelter and NFI Cluster, Accountability to Affected Population (AAP) Working Group, and Child Protection Area of Responsibility, and engaged at operational level to support local actors to address issues related to the IDP allowance raised at regional level.

Significantly, to ensure wider inclusion of vulnerable groups of IDPs into the categories eligible for the extension of payment of the IDP allowance, PC and national NGOs have undertaken successful advocacy efforts in cooperation with the MoSP. As a result of this advocacy, on 22 March 2024, the CMU adopted new amendments to the Resolution # 332 adding 5 more vulnerable groups of IDPs (e. g., IDPs of the pre-pension age and adults with serious medical conditions) who are now eligible for the extension of IDP allowance.

Finally, to support and systematize protection partners' data collection for monitoring impact of the amendments to the CMU's Resolution # 332, the Cluster launched a thematic Kobo monitoring tool on 26 March 2024. The analysis of the data collected through this monitoring tool between 26 March-26 April 2024 is presented below.

ANALYSIS OF THE FINDINGS OF THE MONITORING TOOL – IMPACT ON IDPs

Scope of the analysis

In April 2024, a total of 38 Protection Cluster partners contributed to the monitoring, interviewing 3,031 IDPs who approached them for counseling on the extension of IDP allowance in 440 hromadas in all regions of the country.

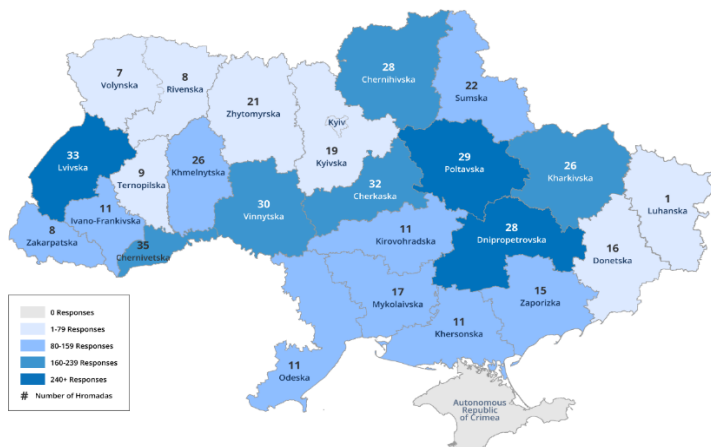


FIGURE 2: IDP ALLOWANCE MONITORING TOOL COVERAGE

IDPs were interviewed in areas of displacement and upon return to areas of origin, and the questionnaire sought information on vulnerability profiles, eligibility for extension in line with vulnerability categories as defined by Resolution #332, status of the application for extension of IDP allowance and reasons for rejection. Partners have also included information on protection risks faced by households, coping strategies by IDPs whose applications for extension were rejected and actions taken by authorities to provide support to IDPs whose applications were rejected.

Highlights

- **Risk of return to unsafe areas or moving to a collective site** by IDPs affected by IDP allowance changes has so far been limited.
- **Top protection risks** reported both by eligible and non-eligible IDPs: **inability to cover basic needs** and **eviction from rented accommodation** (the former corroborated in REACH study based on MSNA data).
- 25% of IDPs report **difficulties in re-application process** (long queues, lack of information).
- **Top actions taken by IDP after rejection:** Application for legal aid, no action, application for humanitarian cash programme, search for employment, rent lower quality accommodation.
- **Only a small group of IDPs** report that – following the rejection – they were **referred by the authorities to employment center or counseled** about additional documents they could provide to prove eligibility for extension of assistance.

Area of displacement vs. area of return: Limited returns to unsafe areas

97% of IDPs interviewed were residing in areas of displacement and only **3% were interviewed upon their return to areas of origin**. Most IDP returnees were interviewed in Kharkivska, Mykolayivska, Khersonska, Zaporizka, Donetska and Dnipropetrovska oblast. Only 15 out of 92 returned respondents reported that they were ineligible for the extension of IDP allowance, while only 12 actually received rejection of their applications.

Half of IDP returnees interviewed were in unsafe areas affected by hostilities and only 1 person was interviewed upon return to occupied territories (the remaining IDP returnees were interviewed in areas that are not directly affected by hostilities). At this stage, it is not possible to establish direct causation between changes in the policy on IDP allowance and return. IDP allowance is only one of the why people take a decision to return to unsafe areas. Only 50% of the interviewed in unsafe areas applied for extension, hence awareness raising efforts on eligibility criteria, re-application

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process and livelihood support options available need to be stepped up. In terms of the profile, the majority of people who returned to unsafe areas are unemployed persons of working age without children (9) and families with one or two children who would not fall under any of the 15 vulnerable categories applied by MoSP.

Analysis by IDP group: eligible for automatic extension, eligible for extension upon application, non-eligible

Out of 3,031 people interviewed, **42% (1284/3,031) deemed themselves to be eligible for automatic extension**, the majority of whom were people with disabilities and older people, including those in need of external care. While the submission of an application is not required for this group, 23% reported they had applied for extension and 4% were rejected. The main reasons for rejection are that the pension exceeds 9,444 UAH and people have lost documents confirming their eligibility for automatic extension.

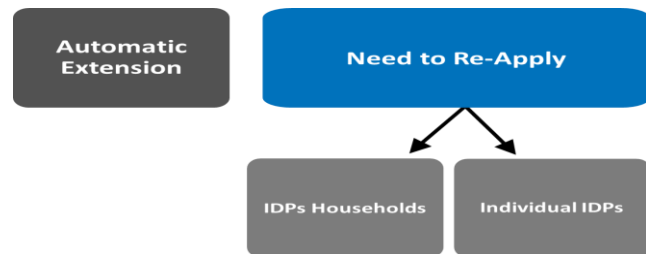


FIGURE 3: IDP ALLOWANCE ELIGIBILITY GROUPS

A total of 9% (284/3,031) of IDPs deemed their households should be eligible for extension upon submission of application. of this group, only 60% have actually applied for the extension of the assistance. The majority report facing difficulties in the process of submitting the application related to long queues in the Department of Social Protection and lack of information on the process of application and their eligibility. Of those who re-applied, 13% received a rejection, due to a failure to provide supporting documents or because their pension exceeds 9,444 UAH. In 47% of cases there was no final decision made on the application; in half of these cases people were requested to provide additional documents and generally were able to provide them.

33% (995/3,031) of respondents deemed themselves to be eligible for the extension of assistance upon submission of application in line with the criteria. Of this group, 65% had reapplied for extension of assistance and 18% received a rejection for extension due to not meeting the eligibility requirements, notably average income exceeding 9,444 UAH, working age family members not registered at the employment centre or did not provide documents confirming eligibility. One of the common reasons for rejection that for families where the husband resides separately in the area of origin, they are unable to confirm his income: the family is unable to confirm that they remain one household, women are unable to provide copies of the documents of the father of their partners when they are not married. For this group, the primary difficulty in the application process is lack of information on their eligibility, required documents and process for applying for extension. The primary protection risks faced by families are inability to cover basic needs, as well as risk of eviction from rented accommodation. The largest social profile amongst those who believe that they should be eligible but who have been rejected is a family with many children (122/302), followed by unemployed people of working age without children (51/302).

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15% of IDPs (468/3,031) who approached partners were not eligible for extension of assistance. 42% of them applied

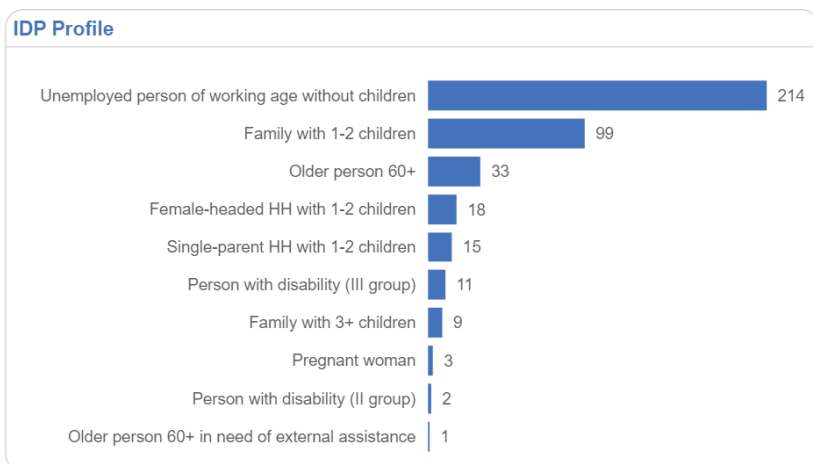


FIGURE 4: IDP PROFILE - RESPONDENTS NOT ELIGIBLE FOR AUTOMATIC EXTENSION

for extension of assistance, and most of them already received a rejection, while 17% are still awaiting a decision. Of those who were requested to provide additional documents, 21% were unable to provide them and 13% required assistance. The majority are unemployed persons of working age and families with 1-2 children. Vulnerability profiles include predominantly people whose income is above the established minimum to be qualified for assistance, but insufficient to cover rent and living expenses. Half of the respondents report they will be unable to cover their basic needs, 15% - are concerned about eviction from rented accommodation, 8% may have to move to a collective site. The

proportion of IDPs not eligible for extension was higher in Dnipropetrovska oblast – with 20% reporting not meeting the established criteria, being unemployed persons of working age, families with one or two children, as well as single people without children having salary slightly higher than the established minimum to qualify for assistance.

Protection risks faced IDPs affected by policy changes

The main protection risk reported by respondents who were affected by the change in the policy (i.e. had to apply for extension or who are no longer eligible for assistance) was inability to meet basic needs, which correlates with 2023

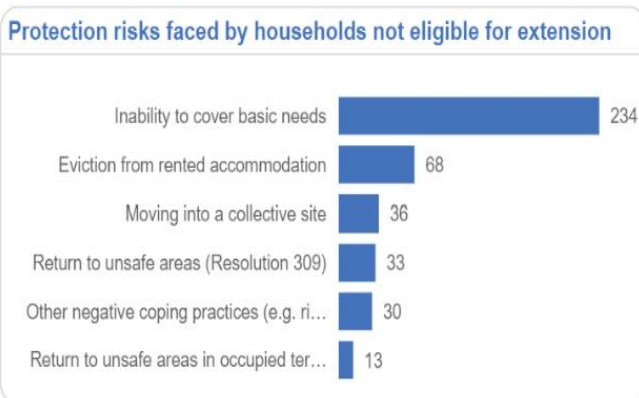


FIGURE 5: OVERVIEW OF PROTECTION RISKS

MSNA findings highlighted by REACH,³ whereby IDPs were struggling to meet their basic needs even before changes in IDP allowance were implemented. For those who are no longer eligible for extension of the IDP allowance, this risk is further exacerbated. The second reported protection risk is eviction from rented accommodation - 15% of all respondents. The proportion of people reporting this concern is higher in Poltavvska and Dnipropetrovska oblasts than across the country, with 30% of respondents in Poltavvska oblast and 20% of respondents in Dnipropetrovska oblast expressing this as a concern. 8% of the respondents reported that they might return to unsafe areas as a result of the policy change, with higher rates in Zakarpatska (24%) and Poltavvska (17%) oblasts. While only 6% of respondents reported that

they are considering a move to a collective site if assistance is discontinued, this risk is reported to be slightly higher in Chernivetska, Lvivska and Dnipropetrovska oblasts. Overall, there are no particular geographic trends in the profile of respondents who were affected by the changes in the policy. Cost of accommodation is a large part of IDPs' expenditure and in regions mentioned above, particularly in Dnipropetrovska, Poltavvska, Chernivetska and Zakarpatska the cost of rent is the highest⁴, exceeding the MoSP minimum average income per person 9,444 UAH required to be eligible for IDP allowance.

³ Presentation in the National Protection Cluster meeting on 11 April 2024.

⁴ [Ukraine Shelter Cluster Rental Market Assessment](#)

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For IDPs who are not eligible for extension of IDP allowance, the proportion of respondents reporting risk of eviction from rented accommodation is higher in Dnipropetrovska oblast (24%, 17 out of 71 not eligible), Rivnenska 77% (10 out of 13 ineligible), Vinnytska 28% (8 out of 29 ineligible). Risk of moving to collective sites is higher in Dnipropetrovska. Risk of return to unsafe areas is higher in Vinnytska and Zakarpatska.

Actions taken by IDPs and authorities upon rejection

Only 23% of surveyed people have received a rejection of their application. Half of respondents who were rejected consider that they are eligible for assistance and are likely to seek legal assistance to help them confirm their eligibility. Upon rejection, most IDPs have not yet taken any action. Of those IDPs who have taken action in response to their rejection, most sought legal assistance; an equal number of people moved to cheaper accommodation with worse quality and started looking for employment. People who were rejected report that mostly no action was taken by authorities, although some were referred to employment centers or counseled about additional documents they could provide to prove eligibility for extension of assistance.

RECOMMENDATIONS:

Protection Cluster:

- Continue to **monitor the impact of changes** in payments of IDP allowance, focusing particularly on increased protection risks for affected IDPs.
- Given the need for strengthened information dissemination documented in the analysis, continue **awareness raising** on amendments and IDPs' eligibility jointly with the CCCM Cluster and AAP WG.
- Step up **protection counseling and legal aid to IDPs** during the re-application process and upon rejection, as well as support and **capacity building to DoSPs and TSNAPs**.
- Engage with the **MoSP and the Ministry of Reintegration** to discuss relevant findings of the monitoring exercise and advocate for strengthened information dissemination, counseling and referrals of affected IDPs to employment centers and social protection schemes.
- Provide **periodic updates to the ICCG and HCT** and flag any concerning trends, if they arise, as soon as possible.

Food Security and Livelihoods Cluster:

- While recognizing employment support requires long-term efforts, there is a need for increased targets and funding for humanitarian livelihood activities for IDPs affected by the changes in IDP allowance such as:
 - **Reskilling Initiatives:** Collaborate with employment centers or vocational training institutes to provide reskilling opportunities tailored to beneficiaries' needs.
 - **Information Dissemination:** Distribute leaflets at General Food Distribution (GFD) centers to inform beneficiaries about available training programs, job opportunities, and entrepreneurial ventures. Utilize digital platforms and community networks for broader outreach.
 - **Mentorship Programs:** mentorship initiatives to offer guidance and support to individuals pursuing reskilling.
 - **Job Placement:** Collaborate with local businesses to create job placement opportunities aligned with beneficiaries' skills and interests.
 - **Feedback Mechanisms:** Implement feedback mechanisms to gather insights from beneficiaries about their needs, preferences, and challenges related to livelihood.
 - **Financial Literacy Training:** Offer financial literacy training and microfinance options.
 - **Skills Workshops:** Organize workshops on agriculture practices, animal husbandry techniques, and other relevant skills to enhance productivity and resilience in rural areas.
- Organize the presentation on amendments of resolution #332 in the National FSL Cluster meeting.

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Shelter / NFI Cluster:

- The monitoring exercise highlights concerns around evictions, switch to lower quality accommodation or relocations to collective sites / unsafe areas as a result of withdrawal of IDP allowance. Hence, there is a need for increased targets and funding for relevant, targeted humanitarian shelter interventions, such as cash for rent, for IDPs affected by the policy changes who meet the targeting criteria of the Shelter Cluster. Note: it is key to have a clear exit strategy linked to cash for rent for targeted individuals according to the Shelter Cluster Rental Guideline.
- Jointly with Protection Cluster and other key stakeholders, advocate with the Government to implement the rental subsidy scheme.

CCCM Cluster and AAP Working Group:

- Support information dissemination and awareness raising on the amendments to Resolution # 332 and IDPs' eligibility for the extension of payment of the IDP allowance.

Cash Working Group:

- In order to ensure consistent messaging to the authorities, continue to maintain a clear position as regards the eligibility criteria and lack of possibility for multi-purpose cash assistance (MPCA) to “fully absorb” the IDPs affected by the changes.

HCT / ICCG / ICWGs:

- Inform partners about the rationale and key changes in the IDP allowance scheme.
- Guide partners and frontline staff to re-direct IDPs seeking information or raising concerns related to IDP allowance to protection partners and to DoSPs and TSNAPs.
- Advocate with donors to (i) expand funding for humanitarian and recovery programmes that promote IDPs' access to employment initiatives; (ii) advocate with authorities to strengthen employment schemes, referrals to social protection mechanisms, implementation of rental subsidy programme that can be supported through bilateral funding.
- Advocate with local authorities on issues around Resolution # 332 and recall that they have a responsibility towards people in need and should support the most vulnerable through employment schemes.
- Advocate with donors, development actors and the Government to expedite the implementation of long-term programmes offering a holistic package for rental and employment support, so as to avoid that affected IDPs “fall back into the humanitarian caseload”.

Donors:

- Invest in the economy of Ukraine and support development programming to increase access to sustainable employment and livelihoods and access to affordable housing and alternative housing solutions so that IDPs affected by the changes to the IDP allowance policy do not “fall back into the humanitarian caseload”.
- Continue to support the establishment of shock responsive social protection system, including access to rental subsidies for the most vulnerable to ensure access to adequate housing.
- Continue to support humanitarian partners (Protection, FSL, Shelter/NFI, CCCM and AAP WG), particularly with regards to targeted activities such as awareness raising, protection counselling and legal aid, livelihood activities, cash for rent, etc.

Development actors:

- Expedite the implementation of relevant long-term programmes to invest in the economy of the country through boosting private sector and access to jobs, so as to avoid that IDPs affected by the changes of IDP allowance policy “fall back into the humanitarian caseload”.