

GLOBAL FUND OBSERVER (GFO), an independent newsletter about the Global Fund provided by Aidspace to over 7,000 subscribers in 170 countries.

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David Garmaise writes, "The report [on the screening process] says that in the current era of trying to rapidly scale up the response to the three diseases, the 'non-CCM window of opportunity' may be too narrow. This is a significant observation, yet this aspect of the report seems to have garnered little attention."

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1. NEWS: Aidspace Releases Assessment of the Gender Responsiveness of Global Fund-Financed Programmes in Sub-Saharan Africa

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An Aidspace report entitled, *"Do Global Fund Grants Work for Women? An Assessment of the Gender Responsiveness of Global Fund-Financed Programmes in Sub-Saharan Africa"* has just been published. It is available at no charge, in English only, at www.aidspace.org/aidspacepublications.

The report, by Angela Kageni and David Garmaise, provides findings from an analysis by Aidspace of all 211 approved proposals to the Global Fund that were submitted by countries in sub-Saharan Africa in Rounds 1-7. The study examined the extent to which these proposals included services and activities that were "gender responsive."

(Programmes are said to be gender-responsive when they provide services specifically for women, promote equal access for women to services provided to both men and women, or include activities addressing other factors that contribute to gender inequality.)

For five focus countries – Kenya, Malawi, Tanzania, Uganda and Zambia – Aidspace analyzed not just the proposals, but also the grants as implemented, to determine what results have been achieved for gender-related services and activities.

The report also examines (a) how the lack of sex-disaggregated data hampers efforts to measure the impact of programmes on women; and (b) the role of the Global Fund in promoting gender-responsiveness.

The findings of this report should be useful to CCMs, PRs, the Global Fund, women’s groups, providers of technical support, and others with an interest in promoting the gender-responsiveness of programmes addressing HIV/AIDS, TB and malaria.

The main sections of the report are as follows:

- Chapter 1: Introduction
- Chapter 2: Background – Epidemiology, Gender Equality and Gender Responsiveness
- Chapter 3: Gender Responsiveness in Successful Global Fund Proposals from Sub-Saharan Africa
- Chapter 4: Results Achieved for Specific Gender-Related Activities in Five Focus Countries
- Chapter 5: Sex-Disaggregated Data
- Chapter 6: Review of Global Fund Structures, Policies and Processes Related to Gender
- Chapter 7: Summary and Conclusions

The report includes 21 tables providing study findings in summary form and in detail.

The main findings are provided in the next article.

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2. EXCERPTS: Three Excerpts from Aidspan’s “Do Global Fund Grants Work for Women?”

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The following are three excerpts from “Do Global Fund Grants Work for Women? An Assessment of the Gender Responsiveness of Global Fund-Financed Programmes in Sub-Saharan Africa,” whose publication is announced in this issue of GFO (see previous article).

Excerpt #1: Findings from the analysis of proposals

There was a wide variation in the number of proposals that addressed specific gender-responsive activity areas. Generally speaking, the activity areas that were included most frequently tended to be those that involved providing disease-specific services exclusively to women. For example:

- 66 proposals (75 percent of HIV and HIV/TB proposals) included activities related to the prevention of mother-to-child transmission of HIV (PMTCT);
- 62 proposals (87 percent of malaria proposals) included activities related to the provision of insecticide-treated nets (ITNs) to pregnant women;
- 57 proposals (41 percent of HIV and TB proposals) included activities seeking to reduce stigma; and
- 46 proposals (65 percent of malaria proposals) included activities providing malaria prevention during pregnancy.

The activity areas that were included the least frequently tended to involve addressing the underlying vulnerabilities of women. For example:

- only one proposal (less than one percent of all proposals) included activities involving developing and promoting gender sensitive policies;
- only three proposals (one percent) included activities involving promoting legal and human rights for women;
- only four proposals (two percent) included activities designed to keep girls in school;

- only five proposals (two percent) included activities providing income-generating opportunities for women; and
- only eight proposals (four percent) included activities involving women or women's groups in proposal development.

Excerpt #2: Results achieved in five focus countries

Results [achieved in the grants as implemented] ranged from significantly below [the specified] target to significantly above. In general, for activities involving delivering disease-specific services exclusively to women, results came in under target. On the other hand, for activities addressing the underlying vulnerabilities of women through training and sensitisation, most of the results exceeded targets.

Of the eight activity areas included in this analysis, providing PMTCT and providing malaria prevention during pregnancy were the most "popular." All five countries had targets for both. Distributing female condoms was the least popular; only one country had targets for this activity area.

Excerpt #3: Summary and conclusions

The title of this report asks "Are Global Fund Grants Working for Women?" Based on the research conducted in this study, it is not possible to answer this question in the affirmative. At best, we would have to say, "only partially," or "not yet."

This conclusion is based on the following findings:

- Of the 12 non-disease-specific activity areas included in our Gender Responsiveness Scorecard, the most popular activity area – i.e., the activity area included *most frequently* in the 211 proposals from sub-Saharan Africa – was included in *less than three out of every 10 proposals*. Five of the 12 activity areas were included in *less than one out of every 20 proposals*.
- Of the 11 disease-specific activity areas included in our Gender Responsiveness Scorecard, although three were included in two-thirds or more of the proposals for the disease(s) in question, another two activity areas were included in only about forty percent of the proposals for the disease(s) in question, and the other six activity areas were included in *less than three out of every 10 proposals* for the disease(s) in question.

While it could be said that some progress has been made in delivering services to women, especially pregnant women, there is still a long way to go in terms of addressing the underlying vulnerabilities of women and the inequality they face. This is evidenced by the following findings:

- The activity areas that were included more frequently tended to involve delivering disease-specific services to women – e.g., providing PMTCT, providing ITNs to pregnant women, and providing malaria prevention during pregnancy.
- The activity areas that were included the least frequently tended to involve addressing the underlying vulnerabilities of women – e.g., providing income-generating activities for women, seeking to keep girls in school, addressing violence against women, and promoting legal and human rights for women.

Although about two-thirds of the HIV and HIV/TB proposals included activities providing PMTCT, we did not see any evidence that PMTCT activities were being scaled up significantly in recent rounds of funding, which is something that we might have expected to find.

The fact that that the findings are fairly consistent across all seven rounds of funding is surprising. We would have expected to see an increase in gender-related activities in the more recent rounds of funding.

The very low rates of using data that is disaggregated by sex in both the setting of targets and the reporting of results is a serious concern. Without sex-disaggregated data, it is impossible to track to what extent women are accessing service provided to both men and women. This is something that

CCMs, other applicants and grant implementers need to address.

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3. NEWS: Global Fund Releases Report on the Round 7 Screening Process

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The Global Fund has released a report on its proposal-screening process, entitled “*Report of the Round 7 Screening Panel.*” Copies of the undated report are available at www.theglobalfund.org/documents/ccm/Report_on_the_Screening_Review_Panel-Round7.pdf. (Note: This report relates to Round 7, not Round 8. The screening of Round 8 proposals will probably take place during the coming month.)

All 109 applications submitted for Round 7 were screened for eligibility. Only proposals deemed to be eligible were passed on to the Technical Review Panel (TRP) for review.

The screening was a two-part process. First, the applications were reviewed by a Screening Team, made up of 18 employees of the Proposal Advisory Services division of the Global Fund Secretariat. The Screening Team rated each application as fully compliant (FC), indeterminate compliant (IC) or non-compliant (NC). “Indeterminate compliant (IC)” meant that the members of the Screening Team had some doubts concerning whether the application met the eligibility criteria.

Second, a Screening Review Panel (SRP) reviewed the applications and the recommendations of the Screening Team. (The SRP was made up of representatives of several different divisions of the Global Fund Secretariat, and was chaired by the Director of Operations.) For those applications rated FC by the Screening Team, the SRP reviewed a small sample of the applications. If the SRP was satisfied that the Screening Team had rigorously and appropriately reviewed the sample, it then voted to accept all FC recommendations as a block. For all applications rated IC or NC by the Screening Team, the SRP examined each one individually.

In its deliberations, the SRP did not rely entirely on the information contained in the applications. It also sought clarifications from the applicants, from the Portfolio Management Team in the Secretariat, and from the Global Fund’s partner organisations.

Of the 109 applications, 89 were ultimately determined to be eligible. The numbers break down as follows:

- Of the 84 applications from coordinating mechanisms (CCMs, Sub-CCMs and RCMs), 80 were deemed eligible.
- All seven of the applications from Regional Organisations (ROs) were deemed eligible.
- Three of the 16 applications from Non-CCMs were deemed eligible. (Non-CCMs are national organisations other than the CCM – usually NGOs or faith-based organisations [FBOs].)

Below, we provide more information from the “*Report of the Round 7 Screening Panel*” on the screening process for (a) applications from coordinating mechanisms and (b) applications from Non-CCMs.

A. Applications from Coordinating Mechanisms

In its “*Report of the Round 7 Screening Review Panel,*” the Global Fund provided details of the screening that was done on the 84 applications submitted by coordinating mechanisms. The Screening Team and the Screening Review Panel assessed whether applicants met a number of criteria related to (a) the composition and operations of the coordinating mechanisms and (b) the proposal development process. (These are known as “the six CCM minimum requirements.”)

In its initial review, the Screening Team rated 56 applications as fully compliant (FC), 24 as indeterminate compliant (IC) and two as non-compliant (NC). The Screening Review Panel (SRP) confirmed all 56 FC ratings and both NC ratings. After reviewing the 24 IC-rated applications, the SRP decided that 22 of them were FC, and that the remaining two were NC.

The four applications deemed to be NC were from CCM Brazil, CCM Fiji, CCM Republic of Congo and Sub-CCM Kasai (DR Congo).

In the report, the Global Fund Secretariat concluded that

“The fact that 69 percent of the applicants were fully compliant before SRP review ... demonstrates applicants’ improved ability to document compliance. The improved quality of applicant understanding of the eligibility requirements is a positive development and demonstrates that efforts to improve CCM functioning, governance, and understanding of the proposal specific requirements have been helpful especially in the three countries that failed compliance in Round 6 (CCM Angola, CCM Cape Verde and CCM Iran). The CCM workshops, Round 7 information sessions, and the improved Guidelines for Proposals / Frequently Asked Questions (FAQ’s) have been effective in ensuring that more applicants come through the process eligible.”

The Secretariat added, however, that a good number of applicants had difficulty demonstrating that the PR had been selected in a transparent and documented process; and that several CCMs found it challenging to provide adequate documentation on the selection of sector representation for non-governmental CCM members, particularly when membership had changed from previous rounds.

The following is a summary of what the report said about the screening conducted for each of the six minimum CCM requirements.

Requirement No. 1 – All CCMs are required to show evidence of membership of people living with and/or affected by the diseases.

Applicants were able to demonstrate compliance fairly easily. Only two – CCM South Africa and CCM Sri Lanka – were rated IC initially by the Screening Team in regard to this requirement. Both were determined to be FC by the SRP. In the case of South Africa, the SRP relied on clarifications obtained after the application had been submitted. In the case of Sri Lanka, the Screening Team had based its IC rating on the fact that a representative on the CCM of persons living with and/or affected by the diseases had written to the Global Fund, after having endorsed the proposal, stating that he no longer agreed with the proposal’s strategies. The SRP concluded that while it “regretted the fact that a member of the CCM did not agree with the strategy in the proposal, it was not grounds to declare the proposal non-compliant, since all the CCM members had initially endorsed the proposal.”

Requirement No. 2 – CCM members representing the non-government sectors must be selected by their own sector(s) based on a documented, transparent process, developed within each sector.

The report said that several CCMs had difficulties demonstrating first-rate compliance with this requirement and that when screeners sought to clarify changes in membership with a CCM, “the CCM was not always able to provide good documentation that would sufficiently prove that new non-governmental representatives had been selected by their sectors in an open and transparent process.”

Nine applicants were initially rated IC or NC by the Screening Team in regard to this requirement: CCM Brazil, CCM Ecuador, CCM Fiji, CCM Guyana, CCM Jamaica, CCM South Africa, Sub-CCM Sudan-South, CCM Togo and CCM Ukraine.

In discussing these applicants, the SRP decided that it would deem these CCMs to be FC if they “could prove that at least 50 percent of the NGO sector had sufficiently demonstrated an open and transparent selection process by their sector.” (The requirement concerning the selection process applies to all non-government sectors, but the report only mentions the NGO sector. When the report refers to “50 percent of the NGO sector”, presumably it means “50 percent of the CCM’s NGO members”.) Using this benchmark, six of the nine applicants – Ukraine, Guyana, Ecuador, Sudan-South, South Africa and Togo – were determined to be FC.

With respect to Jamaica, the SRP determined that it was FC because the CCM membership predated the enactment of Requirement 2, and the CCM’s by-laws clearly state that once term limits

have expired, new NGO members will be selected through an open and transparent process. The SRP asked the relevant Fund Portfolio Manager (FPM) to follow up with the CCM to establish processes aimed at improving compliance.

The other two applicants – Brazil and Fiji – were deemed to be NC with this requirement. Brazil's CCM provided very little documentation initially, and did not respond to several requests for additional documentation. In the case of Fiji, seven civil society members of the CCM had expressed concern with their involvement in the proposal processes (and failed to endorse the proposal). After obtaining information from these people and from the CCM leadership, the SRP concluded that “there were questionable and problematic processes for determining CCM membership.”

The SRP said that even though seven of the nine applicants were eventually determined to be eligible, “these CCMs did not fully understand the need for all non-governmental representatives’ to be chosen by means of a self selection process.” The report said that “[t]here was a sense that many applicants who were deemed FC by the SRP barely met the requirement rather than demonstrating first-rate compliance.” The report recommended that more be done to improve CCMs’ compliance and understanding of this requirement.

The report also noted that “membership on many CCMs is not fully representative of the three diseases and tends to be dominated by HIV and AIDS representatives and, to a lesser degree, TB.” The report recommended that Secretariat staff work more closely with civil society and others “to better ensure participation from communities affected by all three diseases.”

Requirement No. 3 – CCMs are required to put in place and maintain a transparent, documented process to solicit and review submissions for possible integration in to the proposal.

Most applicants had no problem demonstrating compliance with this requirement. Four CCM applicants were initially rated IC by the Screening Team – Azerbaijan, Suriname, Vietnam and Uzbekistan. After obtaining clarifications, the SRP decided that all four were FC.

The SRP noted, however, that applicants “did not always provide robust documentation describing the process to review the proposal submissions for incorporation into a final proposal.” It said that it would have liked to see “a more explicit link between the public call for proposals, the review process of the proposals received, and the final proposal.” The SRP also said that while only four applicants were initially rated IC with respect to this requirement, “other applicants could also benefit from a deeper discussion on how best to demonstrate an open and transparent process to review proposal solicitations.”

Requirement No. 4 – CCMs are required to put in place and maintain a transparent, documented process to nominate the Principal Recipient(s) (PR) and oversee program implementation.

The report said that in many applications “there was a general lack of good documentation on the nomination of the PR” and that many applicants “did not meet first-rate compliance” with this requirement.

Initially, 11 applicants were rated IC by the Screening Team, all CCMs – Azerbaijan, Benin, Brazil, Cameroon, China, Jamaica, Kazakhstan, Mali, South Africa, Suriname and Timor Leste. All but one – Brazil – were determined to be FC by the SRP.

For five of the CCMs – Benin, Cameroon, Kazakhstan, South Africa and Timor Leste – the SRP based its decision on the contents of minutes of meetings where the PR nomination was discussed. However, the SRP said while the current guidelines list meeting minutes as an example of acceptable documentation, “applicants would have to supply more substantial information on PR nomination and selection processed in future Rounds.” (The report did not say how the contents of the minutes enabled the SRP to determine that these applicants fully complied with this requirement.)

With respect to the other five CCMs – Azerbaijan, China, Jamaica, Mali and Suriname – the nominated PRs were PRs from existing grants, and so the CCMs did not institute a process to select

the PRs. The report said that this is acceptable providing at least one of the following conditions apply: “(i) the new grant is “scaling up” an existing grant in the country; (ii) the existing PR’s performance has been strong; or (iii) change in the PR would cause disruption to the program.” The SRP determined that all five applicants met at least one of these conditions.

The report noted that in many applications, there was inadequate documentation on the nomination of the PR and that “many applicants had had difficulties to meet the spirit of the requirement.” The report went on to say that many applicants would benefit from “further communication and dialogue from the Secretariat ... about demonstrating full compliance, which was probably the weakest for all of Round 7.”

Requirement no. 5 – CCMs are required to put in place and maintain a transparent, documented process to ensure the input of a broad range of stakeholders, including CCM members and non-members, in the proposal development and grant oversight process.

Initially, five CCM applicants – Bolivia, Brazil, Guinea Bissau, Kazakhstan Sao Tome and Principe – were rated IC with respect to this requirement by the Screening Team. All five were determined by the SRP to be FC, usually after obtaining further clarifications.

The SRP noted that many applicants had problems differentiating between the first part of Requirement No. 5 (the proposal development process) and Requirement No. 3. The report recommended that the Secretariat provide additional guidance on this point.

Requirement No. 6 – When the PRs and Chair or Vice-Chair of the CCM are the same entity, the CCM must have a written plan in place to mitigate the inherent conflict of interest.

Most applicants had no problems demonstrating compliance with this requirement. Initially, two CCMs – Guyana and Republic of Congo – were rated IC by the Screening Team. After receiving clarifications, the SRP determined that Guyana was FC. However, it rated Republic of Congo NC after determining that the CCM had not taken appropriate or sufficient steps to address a significant conflict of interest.

B. Applications from Non-CCMs

In the “*Report of the Round 7 Screening Review Panel*,” the Global Fund provided details of the screening that was done on the 16 applications submitted by Non-CCMs. The Global Fund actively discourages applications from Non-CCMs. It only accepts non-CCMs proposals if they are from countries:

- that are without legitimate governments;
- that are in conflict, facing natural disasters, or in complex emergency situations; or
- that suppress or have not established partnerships with civil society and non-governmental organisations.

The report noted that Round 7 had the smallest number of non-CCM applicants ever (16, compared to 36 and 64 in Rounds 6 and 5 respectively). Most Non-CCM applicants are NGOs that either do not realize a CCM exists in their own country, or have had their proposal rejected by the CCM in question. However, unless they meet one of the criteria noted above, Non-CCM applicants are not eligible.

The 16 Non-CCM applications came from six countries or areas – India, Kenya, Malawi, the Palestinian Territories, South Africa and Somalia. The SRP determined that the only eligible applications were one from Somalia (a country without a legitimate government) and two from the Palestinian Territories (a country in conflict).

The report noted that the number of non-CCM applications has decreased in each successive round and said that this is a “positive development in the improved understanding of the role of CCMs.” However, the report added:

“While this increased understanding of a single, coordinating country proposal is absolutely critical to realizing the Global Fund’s mandate, there may be a need to evaluate the role of non-CCMs and how revisions to the current policy may enhance scale-up beyond the CCM model. If the Global Fund wants to expand opportunities for multi-partner scale-up, then the current non-CCM window of opportunity is narrow, at this stage, limiting the range of funding possibilities. The Secretariat should review the role of Non-CCMs for Round 8 and seek guidance from the Board on additional ways to expand funding opportunities that conform to national plans yet open the avenue towards funding more non-national plan proposals.”

Despite this, the Global Fund made no changes to its requirements prior to Round 8.

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4. COMMENTARY: Report on Round 7 Screening Raises Some Important Issues by David Garmaise

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The “*Report of the Round 7 Screening Review Panel*,” which is the subject of the previous article, raises a number of issues with respect to (a) the application of the six minimum requirements for CCMs and (b) applications from non-CCMs.

The CCM Minimum Requirements

The six minimum requirements for CCMs have been in place for over three years. They were adopted for a reason – to promote greater involvement of the non-government sectors in the operations of coordinating mechanisms (CCMs, Sub-CCMs and RCMs). The coordinating mechanisms have to meet the requirements in order for their applications to be eligible for consideration by the Global Fund.

If one were to judge only by the results of the screening process used by the Global Fund, one would have to conclude that the minimum requirements have had their desired effect. After all, 80 of the 84 applications submitted by coordinating mechanisms in Round 7 were deemed to have met the minimum requirements. The story was similar for Round 6: 93 of the 96 applications submitted by coordinating mechanisms were deemed to have met the requirements.

On the other hand, there is considerable anecdotal evidence that on many CCMs, civil society representatives are far from being equal partners. And questions have been raised over the years about how rigidly the Global Fund Secretariat is applying the minimum requirements when it screens applications. Aidspan conducted an analysis of what applicants said about some of the minimum requirements on the Round 6 proposal forms (see GFO #84, 29 January 2008). The analysis concluded that “we do not really know to what extent CCMs are complying with the requirement that members representing the non-governmental sectors must be selected by their own sectors through a transparent process.”

The “*Report of the Round 7 Screening Panel*” makes it clear that the Secretariat is exercising a considerable amount of discretion when screening applications. The most obvious example is the decision to accept that if the CCM can demonstrate that at least 50 percent of NGO representatives have been selected by their sector through an open and transparent process, the Secretariat can then say that the CCM is fully compliant with the requirement – despite the fact that there is nothing in the requirement itself that says that the CCM needs to be only 50 percent compliant.

It is also clear from the language in the report than many CCMs are struggling to meet the minimum requirements. A few examples:

- “a good number of applicants had difficulty demonstrating that the PR had been selected in a transparent and documented process”
- “...had difficulties demonstrating first-rate compliance”

- “many applicants who were deemed FC by the SRP barely met the requirement”
- “other applicants could also benefit from a deeper discussion on how best to demonstrate an open and transparent process to review proposal solicitations”
- “many applicants had had difficulties to meet the spirit of the requirement”

This raises a number of questions which ought to be taken up by the Global Fund Board:

1. Are the reasons why the minimum requirements were adopted in the first place still valid?
2. Have CCMs not had enough time by now to live up to the requirements?
3. Is it appropriate for the Secretariat to exercise considerable discretion in the application of the minimum requirements?
4. If the Global Fund Board thinks that it is appropriate for the Secretariat to exercise considerable discretion, should there not at least be a process for ensuring that delinquent CCMs are making progress towards meeting the requirements?
5. Does the Global Fund Board consider any of the requirements to be too stringent? If yes, how does the Board suggest the requirements be modified?
6. Has enough been done to educate CCMs about the requirements and how best to fulfil them?

Applications from Non-CCMs

The Global Fund has always discouraged direct applications from NGOs and FBOs. Instead, the Fund encourages them to work through their CCMs. The Global Fund has done such a good job of discouraging applications from Non-CCMs that (a) the number of such applications has declined in every successive round; and (b) civil society advocates have all but abandoned efforts to persuade the Fund to accept more Non-CCM applications.

But now we have a report from the Round 7 Screening Review Panel saying that maybe the Fund should re-think its policy. The report says that in the current era of trying to rapidly scale up the response to the three diseases, the “non-CCM window of opportunity” may be too narrow. This is a significant observation, yet this aspect of the report seems to have garnered little attention. There ought to be further discussion of this at the level of the Global Fund Board and within civil society.

[Note: David Garmaise (garmaise@aidspan.org) is Aidspan’s Senior Analyst.]

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