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TIME TO RE-VISIT THE CCM MINIMUM REQUIREMENTS

It appears that the Global Fund Secretariat is becoming more rigorous in its application of the eligibility criteria for proposals from CCMs (i.e., the six minimum requirements). As reported in the previous article, proposals from seven CCMs were screened out (i.e., deemed ineligible) in Round 9, compared with zero in Round 8 and three in each of Rounds 6 and 7.

This is a good thing. Of course, it's unfortunate that these seven proposals could not be considered for funding. But it is vital to ensure that CCMs meet the minimum requirements established by the Global Fund Board. The requirements were based on core Global Fund principles, including partnership, accountability and transparency. Screening out proposals from CCMs that do not meet the minimum requirements is really the only way that the Global Fund can send a message that it is serious about these requirements.

However, more is required. The Global Fund should also (a) simplify the wording of the minimum requirements; (b) improve its guidance on this topic; and (c) assess the impact of the requirements and consider making some substantive changes.

Simplify the wording

The wording of the six minimum requirements, which is presented in the previous article, is repeated here for ease of reference:

1. CCM members representing the non-government sectors must be selected or elected by their own sector(s) based on a documented, transparent process, developed within each sector.
2. All CCMs are required to show evidence of membership of people living with and/or affected by the diseases.

3. CCMs are required to put in place and maintain a transparent, documented process to solicit and review submissions for possible integration into a national proposal.
4. CCMs are required to put in place and maintain a transparent, documented process to nominate the PR and oversee project implementation.
5. Ensure the input of a broad range of stakeholders, including CCM members and non-members, in the proposal development and grant oversight.
6. When the PRs and chair or vice-chairs of the CCM are the same entity, the CCM must have a written plan in place to mitigate against this potential conflict of interest.

This is the wording approved by the Global Fund Board. It has been apparent for some time that there is considerable overlap among requirements 3, 4 and 5. Applicants struggle with this overlap when they fill out the sections of the proposal form that relate to the six minimum requirements. In addition, one only has to read the reports of the Screening Review Panel (SRP) to see that the SRP ties itself in knots trying to explain how it arrived at its decisions for each of these three requirements.

In its latest report, the SRP said that in order to “help improve the application of Requirement 5,” the Global Fund Secretariat will “endeavor to clarify and emphasize the complementarities between the three requirements in future rounds.”

I have a better idea. There is no reason why the Secretariat has to stick with the exact wording adopted by the Board when it is designing its proposal forms and guidelines. If the intent of the Board was quite clear when it adopted the requirements – and, for the most part, it was – then the wording of the requirements can easily be altered to make them more clear and to remove any overlap.

For example, as currently worded, the minimum requirements deal with proposal development in three different places – in Requirement 3, which is solely about proposal development; and in parts of Requirements 4 and 5, which also cover grant oversight. This creates considerable confusion. When the Secretariat is explaining the minimum requirements to coordinating mechanisms and other stakeholders, the requirements concerning proposal development could be described as follows:

CCMs are required to maintain transparent and documented processes to (a) solicit submissions from organisations in-country for possible integration into the CCM’s proposal; (b) review the submissions it receives; and (c) nominate PRs for each proposal it submits. With respect to (a) and (b), the processes shall ensure the input of a broad range of stakeholders, including CCM members and non-members.

When the minimum requirements are listed on a proposal form, where coordinating mechanisms have to demonstrate how they meet the requirements, the component parts of each requirement should be listed separately to avoid confusion. For this purpose, the requirements concerning proposal development could read as follows:

- CCMs are required to maintain a transparent, documented process to solicit submissions from organisations in-country for possible integration into the CCM’s proposal. The process shall ensure the input of a broad range of stakeholders, including CCM members and non-members.
- CCMs are required to maintain a transparent, documented process to review the submissions it receives. The process shall ensure the input of a broad range of stakeholders, including CCM members and non-members.
- CCMs are required to maintain a transparent, documented process to nominate the PRs for each proposal it submits.

Improve guidance

Guidance on the CCM minimum requirements issued by the Global Fund Secretariat is spread over

several documents:

- “The Six Minimum Requirements for Grant Eligibility for Country Coordinating Mechanisms.”
- “Guidelines and Requirements for Country Coordinating Mechanisms.”
- “Clarifications on CCM Minimum Requirements.”
- The most recent “Guidelines for Proposals.”
- The most recent “Proposal Form.”

The Secretariat should assemble all guidance on the minimum requirements into one comprehensive and easy-to-read document.

Make changes?

Are the minimum requirements working? Are they bringing about the changes in how CCMs operate that the Board intended? It is time for an assessment.

It is clear that many CCMs have struggled, and continue to struggle, with some of the requirements. Is this because they don't know how to comply (in which case additional guidance may be required)? Or is it because the requirements themselves are too severe (in which case, changes to some of the requirements may be in order)?

In some cases, CCMs may have met “the spirit” of one or more of the minimum requirements without actually meeting “the letter” of the requirements. For example, the requirements call for CCMs to “put in place and maintain a transparent, documented process to solicit and review submissions for possible integration into a national proposal” and to “ensure the input of a broad range of stakeholders, including CCM members and non-members, in the proposal development process.” In the last few rounds of funding, some CCMs have chosen not to issue a call for submissions. Instead, they have brought the various stakeholders together in a workshop, or similar forum, to develop the broad outlines of a proposal, and they have involved these stakeholders in reviewing drafts of the proposal. Accepting that this meets the spirit of the requirements, the SRP declared the proposals submitted by these CCMs to be eligible. The requirements should be changed to reflect this.

A thorough assessment of the current requirements – an assessment that involves all stakeholders – would undoubtedly lead to additional changes.

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