



Independent observer  
of the Global Fund

## DECIDING WHETHER TO CONSIDER SUBMITTING A NON-CCM PROPOSAL

[The following is a further excerpt from “The Aidspan Guide to Round 6 Applications to the Global Fund”.]

The Global Fund prefers that all applications come from CCMs, and strongly discourages applications from NGOs. (The Global Fund refers to applications from NGOs as “Non-CCM” proposals. Although, in theory, proposals from non-CCMs can be submitted by organisations from any sector, in practice the vast majority of such proposals have emanated from NGOs.)

One of the reasons the Global Fund discourages proposals from NGOs is that the Global Fund wants to promote partnerships among the stakeholders. Another reason is that the Fund does not want to be swamped with multiple applications from one country, with objectives pointing in different directions. But some proposals from NGOs have been funded in the first five rounds, and there may be circumstances where NGOs should consider submitting a proposal in Round 6.

The Fund’s Round 6 Guidelines for Proposals state that organisations from countries in which a CCM does not exist may apply directly, but must provide evidence that the proposal is consistent with and complements national policies and strategies.

For countries where there is a CCM, the Guidelines state that proposals from organisations other than CCMs are not eligible unless they satisfactorily explain that they originate from one of the following:

- countries without legitimate governments (such as governments not recognized by the United Nations);
- countries in conflict, facing natural disasters, or in complex emergency situations; or

- countries that suppress or have not established partnerships with civil society and NGOs (including a CCM's failure or refusal to consider a proposal for inclusion in the CCM's consolidated proposal).

The Guidelines state that a non-CCM proposal must demonstrate clearly why it could not be considered under the CCM process, and provide documentation of these reasons. The Guidelines further state that if a non-CCM proposal was provided to a CCM for its consideration, but the CCM either did not review it in a timely fashion or refused to endorse it, the steps taken to obtain CCM approval should be described; and arguments in support of the CCM endorsement, as well as documentary evidence of the attempts to obtain CCM approval, should be provided.

For the most part, in the first five rounds of funding, proposals from NGOs have been funded only in very limited circumstances – i.e., either there was no CCM in existence in the country; and/or the country or the region was torn apart by war. (A large number of NGOs submit proposals each round, but the vast majority are deemed ineligible and are screened out by the Secretariat.)

In Round 1, when many CCMs were still being formed, the Global Fund approved four proposals from NGOs.

In Round 2, two proposals were approved from NGOs in Madagascar where, at the time, there was no CCM in existence. However, because a CCM was being formed in Madagascar when the proposals were being submitted, the Global Fund stipulated in its grant agreements for these programmes that once the CCM was formed, the CCM must oversee the implementation of the programmes.

In Round 3, the Fund approved a proposal from an NGO in Russia, where, at the time, there was no CCM in existence.

In Rounds 3 and 4, the Global Fund approved proposals from NGOs in Somalia and Côte d'Ivoire, two war-torn countries. (The NGO for the Somalia proposal was an International NGO.) In Round 5, the Global Fund approved another proposal from an NGO in Côte d'Ivoire.

There have only been two instances of proposals from an NGO being funded outside the circumstances described above. One was a proposal to provide prevention services to injection drug users in Thailand, and it was funded in Round 3. Several factors made this situation unique:

- The government was not funding prevention activities targeting injection drug users.
- A military and police crackdown on drug traffickers and individual drug users was underway.
- The NGO submitting the proposal said that it had been informed that some members of the CCM would not support any proposal that included prevention programmes for injection drug users.

The second instance was a Round 5 proposal from a group of NGOs in the Russian Federation. Again the target audience was injection drug users. Previous proposals from the CCM in that country had not targeted injection drugs users, and the CCM was not planning on submitting a proposal for Round 5. The TRP agreed that the proposal from the NGOs addressed clear service gaps and met “a clear and compelling need.”

For Round 6, therefore, we suggest that NGOs consider submitting a proposal only:

- if there is no CCM in the country (which now is very rarely the case);
- if they are working in a country or region severely affected by war or natural disasters; or
- where services are not being provided to a particular vulnerable group, and the existing CCM has indicated that it is not prepared to submit a proposal that addresses this population.

In all other cases, NGOs are best advised to work through the CCM. As indicated in the previous section,

exactly how NGOs become involved in the applications process will depend on the process that the CCM uses to prepare proposals. It may also depend on the degree of satisfaction that NGOs have with this process. If NGOs are unhappy with the process, one option they might consider is to prepare a proposal and then attempt to get the CCM to adopt it as its own proposal.

The Round 6 Guidelines for Proposals leave open the possibility that proposals will also be accepted from NGOs working in countries that either suppress or have not established partnerships with civil society. To the best of our knowledge, to date no proposals have been accepted based on this criterion.

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