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The Global Fund Should Move Now to Expand the Non-CCM Window

When is the Global Fund finally going to make it easier for Non-CCMs to apply to the Fund to address the needs of vulnerable populations that have been left out of the national response?

The Global Fund has always discouraged applications from Non-CCMs. (Non-CCMs are national organisations other than the CCM – usually, but not necessarily, civil society organisations.) Under current criteria, Non-CCMs can apply only if they are from a country that is without a legitimate government, that is in conflict, that is facing a natural disaster, or that is in a complex emergency situation – or if they are from a country that suppresses, or has not established, partnerships with civil society. The last includes a country in which the CCM has unreasonably failed or refused to consider a submission from a civil society organisation, through the CCM's established submissions process, for inclusion in the CCM's national proposal.

The criteria state that a Non-CCM proposal must demonstrate clearly why it could not be considered under the CCM process.

The table below shows what has happened to Non-CCM proposals in recent rounds.

Table: Disposition of Non-CCM proposals in Rounds 5-9

Round	No. of proposals submitted	No. of proposals deemed eligible and sent to the TRP for review	No. of proposals recommended by the TRP and approved by the Board
5	64	4	2

6	36	4	1
7	16	3	2
8	20	0	0
9	14	0	0
Totals	150	11	5

Thus, of the 150 Non-CCM proposals submitted in Rounds 5-9, more than 90% were screened out (i.e., deemed ineligible according to the eligibility criteria). The most common explanation provided for screening out these proposals was that the applicant had failed to explain why it had applied outside its national CCM.

Of the 11 Non-CCM proposals screened in for Rounds 5-9, 10 were from countries without legitimate governments or in conflict. The only other Non-CCM proposal screened in was submitted by the Russian Harm Reduction Network. That proposal, which targeted injection drug users, was approved for funding. One other Non-CCM proposal targeting injection drug users was approved in Round 3. The principal recipient (PR) was the Raks Thai Foundation, from Thailand. Thus, in the last seven rounds of funding, only two Non-CCM proposals exclusively targeting a key population have been approved.

Programmes providing services to key populations often don't get off the ground because: (a) many governments don't like dealing with key populations; (b) in most countries, nothing gets through the CCM that the government is opposed to; and (c) very few Non-CCM proposals ever get approved.

For each Round of funding, the Global Fund Secretariat establishes a Screening Review Panel (SRP) made up of senior officials in the Secretariat. Since at least Round 7, the SRP has issued reports on the screening process. In each of its reports on Rounds 7, 8 and 9, the SRP has commented on the eligibility criteria for Non-CCM proposals. In its Round 7 report, the SRP said:

"There may be a need to evaluate the role of non-CCMs and how revisions to our 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 are narrow, [thus] 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."

In its Round 8 report, the SRP said:

"The non-CCM window remains an opportunity for groups marginalized as a result of stigma and discrimination in government policies. The Secretariat could better define 'key and vulnerable populations' and determine eligibility of non-CCM proposals on the basis of the target population."

In its Round 9 report, the SRP said:

"The non-CCM application option remains an important opportunity for groups marginalized as a result of severe stigma and discrimination in government policies, particularly regarding proposals addressing

HIV/AIDS.

“Based on success rates since Round 6, it is clear that more guidance is needed from the GF on when a non-CCM application is appropriate, and on what documentation is necessary to support a request for funding outside of the CCM model.”

So, here we have the SRP, which is part of the Secretariat, recommending that the Secretariat review the eligibility criteria for Non-CCM proposals with a view to expanding the use of the Non-CCM window. And, yet, no action appears to have been taken by the Secretariat (or the Board) on this recommendation.

In a GFO commentary in 2006, Promboon Panitchpakdi, Executive Director of the Raks Thai Foundation, said “the Global Fund needs to do more to strengthen the involvement of civil society, including encouraging the development of NGO components that are not hidden within government-inspired CCM proposals (and/or making it easier for non-CCM proposals to be funded).”

In a GFO commentary in 2008, this author said:

“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 … 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.”

in its 2009 AIDS Epidemic Update, UNAIDS said that even though key populations – such as injecting drug users, men who have sex with men, sex workers, prisoners and mobile workers – are at higher risk of HIV infection, resources for focused prevention programmes for these groups is typically quite low, even in concentrated epidemics.

It is evident that in many countries, the needs of key populations are not being addressed by the national response, at least with respect to HIV. It’s time for the Global Fund to make some changes to the eligibility criteria for Non-CCM proposals so that civil society organisations can help fill this gap.

David Garmaise (david.garmaise@aidspan.org) is a Senior Analyst with Aidspan. Reports of the SRP are available at www.theglobalfund.org/en/ccm/documents. The two GFO commentaries mentioned in this article are “The Imbalance Between Government and Civil Society in Global Fund Processes: A View from Thailand,” GFO 65; and “Report on Round 7 Screening Raises Some Important Issues,” GFO 92, both available at www.aidspan.org/gfo. The UNAIDS 2009 AIDS Epidemic Update is at www.unaids.org/en/KnowledgeCentre/HIVData/EpiUpdate/EpiUpdArchive/2009.

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