



Independent observer
of the Global Fund

REPORT REVEALS THAT SEVEN CCM APPLICATIONS WERE DECLARED INELIGIBLE DURING ROUND 9 PROPOSAL SCREENING

Last year, seven applications from CCMs were deemed to be ineligible for consideration by the Technical Review Panel (TRP) as a result of the Round 9 screening process. This is in sharp contrast to Round 8, when no CCM applications were screened out. In each of Rounds 6 and 7, only three CCM applications were found to be ineligible.

All 14 applications from Non-CCMs were deemed ineligible. This is similar to what happened in previous rounds. (Non-CCMs are national organisations other than the CCM – usually NGOs or faith-based organisations [FBOs].)

This information is contained in a document recently released by the Global Fund, entitled “Report of the Round 9 Screening Review Panel.” Copies of the report are available under “Screening Review Panel Report: Round 9” at www.theglobalfund.org/en/ccm/guidelines.

All 118 applications submitted in Round 9 were screened for eligibility. Only proposals deemed to be eligible were passed on to the TRP for review. There are a number of eligibility criteria; they vary depending on the type of applicant.

The screening was a two-part process. First, the applications were reviewed by an initial screening team, made up of 20 people trained by the Country Programs Cluster in collaboration with the CCM Team (both units are in the Global Fund Secretariat). The initial screening team rated each application as fully compliant (FC), indeterminate compliant (IC) or non-compliant (NC). An “IC” rating meant that the members of the initial 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 initial screening team. The SRP was made up of senior representatives of several different units in the Global Fund Secretariat. For those applications rated FC by the initial screening team, the SRP reviewed a small sample of the applications. The SRP was satisfied that the screening team had rigorously and appropriately reviewed the sample, so it voted to accept all FC recommendations as a block. For applications rated IC or NC by the initial 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 regional teams in the Country Proposals Cluster and from local fund agents (LFAs).

Of the 118 applications, 97 were ultimately determined to be eligible. A breakdown of the numbers is shown in the Table 1.

Table 1: Results of the Round 9 screening process

Applicant type	Number of applications submitted	Results of initial screening			Final determination by the S	
		FC	IC	NC	FC	NC
CCM	91	64	25	2	84	7
Sub-CCM	2	1	1	0	2	0
RCM	3	2	1	0	3	0
RO	8	6	1	1	8	0
Non-CCM	14	0	2	12	0	14
TOTAL	118	73	30	15	97	21

FC = fully compliant / IC = indeterminate compliant / NC = non-compliant

Below, we provide more information from the “Report of the Round 9 Screening Review Panel” on the screening process for (a) applications from coordinating mechanisms; (b) multi-country applications; and (c) applications from Non-CCMs.

Applications from Coordinating Mechanisms

In its “Report of the Round 9 Screening Review Panel,” the Global Fund provided details of the screening that was done for the 91 applications submitted by coordinating mechanisms. The initial screening team

and the SRP 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 criteria, known as “the six CCM minimum requirements,” are as follows:

1. 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.
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 the proposal.
4. CCMs are required to put in place and maintain a transparent, documented process to nominate the principal recipients (PRs) and oversee programme implementation.
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.
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.

CCMs found to be non-compliant

Seven CCMs were found to be non-compliant with one or more of these requirements and, as a result, were deemed ineligible. Table 2 provides a list of these countries and identifies which requirements they failed to meet.

Table 2: CCMs ineligible for Round 9, showing requirements not met

CCM	Requirements				
	1. Non-government members selected by own sector	2. Membership of people living with the diseases	3. Process to solicit and review submissions	4. Process to nominate PRs and oversee grant implementation	5. Broad input in proposal development and grant oversight
Argentina	NOT MET	Met	NOT MET	NOT MET	NOT MET
Eq. Guinea	Met	Met	NOT MET	NOT MET	NOT MET
Kazakhstan	Met	Met	Met	Met	Met
Kyrgyz Republic	Met	Met	Met	NOT MET	Met
Mali	Met	Met	NOT MET	Met	NOT MET

Mauritania	Met	Met	Met	NOT MET	Met
Syria	NOT MET	Met	Met	NOT MET	NOT MET

Notes:

1. CCM Kyrgyz Republic was found to be ineligible with respect to its HIV/AIDS proposal only. The CCM's TB proposal was deemed eligible.
2. CCM Mali was found to be ineligible with respect to its TB proposal only. The CCM's malaria proposal was deemed eligible.

With respect to the first requirement – that CCM members representing the non-government sectors be selected by their own sector(s) based on a documented, transparent process, developed within each sector – the SRP said that while CCM Argentina had a process that was documented and transparent, it did not allow for NGO representatives to be selected by their own sector. In the case of CCM Syria, the SRP said “there was no evidence of a sector-wide meeting to nominate NGO representatives and the selection process that did take place was neither transparent nor adequately documented.”

All three CCMs that failed to meet the third requirement – that CCMs put in place and maintain a transparent, documented process to solicit and review submissions for possible integration into the proposal – also missed the fifth requirement – that CCMs 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. The two requirements overlap somewhat. With respect to proposal development, the following is a summary of what the SRP said about the three CCMs:

- Argentina. The proposal was developed by consultants who interviewed a limited number of civil society organisations (CSOs) for their input. The process failed to engage a broad range of stakeholders.
- Equatorial Guinea. The CCM issued a public call for proposals only two days before the deadline for response, which was “inadequate to ensure meaningful input from a broad range of stakeholders.”
- Mali. The CCM did not issue a public call for submissions. There was no opportunity for input by a broad range of stakeholders.

The fifth requirement also refers to the need to ensure the input of a broad range of stakeholders, including CCM members and non-members, in grant oversight. The SRP said that CCM Syria's oversight plan included only CSOs represented on the CCM, and that this was insufficiently broad.

Five of the seven countries deemed ineligible failed to meet the fourth requirement – that CCMs put in place and maintain a transparent, documented process to nominate the principal recipient (PR) and oversee programme implementation. This is actually two requirements in one. Kyrgyz Republic and Mauritania failed to meet the PR nomination part of the requirement; Argentina and Syria did not meet the programme oversight part. Equatorial Guinea failed on both counts.

With respect to PR nomination, the SRP determined that CCM Equatorial Guinea's PR selection process was not sufficiently transparent. The CCM nominated the Ministry of Health as PR without, according to the SRP, “strong consideration of civil society organizations which had expressed interest.” In the case of Kyrgyz Republic, the SRP said that the CCM went through two separate processes to nominate the PR, one after the other, and that neither process allowed for meaningful participation by all CCM stakeholders. As for Mauritania, the SRP said that the CCM placed advertisements seeking expressions of interest from

potential PRs on 26 and 27 May 2009, and then met on 28 May 2009 to select PRs for each of its three proposals (HIV, TB and malaria). The SRP determined that the process was not sufficiently transparent.

With respect to programme oversight, the CCMs from Argentina, Equatorial Guinea and Syria all failed to submit a written plan for how the CCM would do oversight. The Argentinean CCM promised to deliver a plan by 14 August 2009, but failed to do so. (The deadline for applications was 1 June 2009.) The Syrian CCM did submit a plan, after the application deadline, but it included only CSOs represented on the CCM, which the SRP said was not broad enough.

With respect to the sixth requirement – that 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 – the SRP said that CCM Kazakhstan did not have a conflict of interest plan, despite the fact that its two nominated PRs for Round 9 were from the Ministry of Health, as was the Chair of the CCM. Furthermore, the SRP said, the Chair had taken part in the discussions concerning PR selection. The SRP said that CCM Syria failed to provide a conflict of interest plan at the time of proposal submission, even though the nominated PR was from the same entity as the CCM Chair (i.e., the Ministry of Health), and only submitted the plan a day or two before the SRP met to conduct the screening.

Deliberations of the SRP on applications initially designated as “indeterminate compliant”

A section of the report describes the deliberations of the SRP with respect to the 23 coordinating mechanisms that the initial screening team classified as indeterminate compliant (IC) and that the SRP eventually decided were fully compliant (FC).

In many instances, the SRP relied on additional information obtained from the CCM, from the regional teams in the Country Proposals Cluster, or from the LFAs in making its determinations. In some cases, the SRP concluded that the proposal was essentially a re-submission of a Round 8 proposal, and that the CCMs involved had already been determined to have met the requirements at the time of the Round 8 screening.

On occasion, the SRP awarded an FC classification because the country was operating in a challenging environment or because civil society was particularly weak in that country. For example, the security situation in Iraq made it impossible for non-government sectors to set up a process to select their representatives on the CCM. The CCM was formed through a restructuring of the National TB Committee. In addition, the Ministry of Health and several other agencies nominated representatives. The SRP commended the CCM “for its efforts to ensure an open and transparent process in a difficult environment.”

Bhutan and Suriname were cited as examples of countries with a weak civil society sector. The SRP said that it was acceptable for Bhutan to have minimal civil society involvement in the proposal development process because “there is very limited civil society organization around the three diseases...” The SRP said the limited civil society engagement in the proposal development process in Suriname was explained by the fact that there are a limited number of organisations with TB expertise and by the fact that there is low TB prevalence in Suriname.

In a number of cases, the SRP gave applicants the benefit of the doubt. For example:

- Guinea Bissau. The CCM instituted an open process to solicit and review submission for its proposal, but failed to submit adequate documentation concerning the submissions received and the criteria used to evaluate them. The SRP said that “while the process was not exemplary, it was not sufficient to determine the CCM as NC [non-compliant].” The SRP said that the Global Fund Secretariat should work with CCM Guinea Bissau to ensure better documented processes in future rounds.

- Papua New Guinea. The CCM received 82 submissions following three sets of public calls. Expressions of interest from these organizations were appraised by the CCM Secretariat. However, according to the SRP, the CCM did not specify the number of proposals which were incorporated into the proposal, and the process was weakly documented. The SRP nevertheless found the CCM to be FC [fully compliant] on the basis that a number of consultations, multi-sectoral meetings and workshops with national and sub-national stakeholders and key development partners took place throughout the proposal development process.
- Yemen. The CCM did not make a public announcement to solicit expressions of interest from potential PR candidates; rather, the nominations were made in a closed meeting. The CCM clarified that the closed meeting was held to help mitigate potential conflicts of interest. The SRP said that it “discussed the appropriateness of the closed meeting and acknowledged that the CCM had the right to make a decision among its membership only as long as there was no effort made to exclude any group from expressing an interest to become a PR.”
- Cameroon. The CCM placed a public call for expressions of interest from potential PRs and sub-recipients (SRs) in a local newspaper, but only gave interested stakeholders until 8 a.m. the next day to apply. During the SRP clarifications process, the CCM explained that it had also placed television and radio advertisements which had run for up to four days, but it did not provide any documentation to support this claim. However, given that a large pool of PR and SR candidates from both international and local organisations emerged from the process, the SRP concluded that the radio and TV advertisements did in fact run.
- Dominican Republic. The CCM formed a commission made up of representatives from government, one NGO, the Pan-American Health Organization (PAHO) and USAID, to assess potential PRs. The CCM did not place an advertisement for expressions of interest. Instead, it evaluated five organizations which either had experience as PRs or “complied with PAHO’s criteria.” The CCM decided to nominate two PRs, the Vice Ministry of Public Collective Health and PROFAMILIA (an NGO). Thus, the CCM’s PR nomination process was restricted mainly to an evaluation of existing PRs. The SRP noted that the CCM was proposing pre-existing PRs from government and civil society, and concluded that “a different level of transparency based upon past performance, concern for discontinuity of services, and scale-up considerations” was appropriate in this instance.

Multi-Country Applications

In its report, the Global Fund provided details of the screening that was done for the three applications submitted by regional coordinating mechanisms (RCMs) and the eight applications from regional organisations (ROs). The RCMs have to meet the same requirements as CCMs. In addition, they have to obtain the approval of the CCMs in all countries included in their proposals. For their part, ROs also have to obtain endorsements from national CCMs in all of the countries included in their proposals.

The SRP reviewed three applications from RCMs and ROs that the initial screening team had classified as IC. The SRP determined all three to be FC. RCM CCLAB (Regional Coordinating Mechanism of Central America) had failed to submit endorsements from two national CCMs, but the endorsements were obtained during the SRP’s clarifications process. RO COPRECOS (HIV/AIDS Prevention and Control Committee for the Armed Forces and National Police of Latin America and the Caribbean) failed to provide endorsements from national CCMs in those countries where activities were to be implemented starting in the third years of the grant. The SRP decided that it would be sufficient for the RO to obtain these endorsements at the time of Phase 2 renewal. RO MENAHRA (Middle East and North Africa Harm Reduction Association) failed to submit endorsements from the CCMs in Iran and Tunisia. An endorsement from the Vice-Chair of the Iran CCM was later obtained and was considered adequate. In the absence of an endorsement from CCM Tunisia, the RO decided to remove all elements in the proposal related to Tunisia.

Applications from Non-CCMs

In its report, the SRP provided details of the screening that was done on the 14 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.

If a Non-CCM submits an application on the basis that its country suppresses or has not established partnerships, it has to demonstrate that it contacted the CCM in an attempt to get its suggestions included in a national proposal.

At 14, the number of applications from Non-CCMs in Round 9 was down from 20 in Round 8 and 16 in Round 7. The SRP deemed all 14 Non-CCM applications ineligible. Twelve applicants were screened out based on the fact that they did not apply under any of the eligibility criteria outlined above. Furthermore, they did not adequately explain why they did not direct their proposal through the CCM in their respective countries. Finally, the SRP said, none of the twelve proposals were from socially marginalized community groups seeking special consideration because of stigma and discrimination.

The other two Non-CCM applicants – Catholic Relief Services Madagascar and Shiklo Malaria Research Unit of the Faculty of Medicine at Mahidol University in Myanmar – were discussed in detail by the SRP. However, both were deemed ineligible for funding because “they failed to adequately demonstrate the application of the Non-CCM eligibility criteria...”

Lessons learned and recommendations

In its “Report of the Round 9 Screening Review Panel,” the SRP made some observations concerning lessons learned from the Round 9 screening, and also advanced a few recommendations.

The SRP said that the Global Fund acknowledges that the requirement for membership on the CCM of persons living with the diseases may be more relevant for HIV and TB, and not easily applicable to malaria. In addition, the SRP said, people living with the diseases should represent a constituency and, whenever possible, be selected through an open and transparent process. The Global Fund Secretariat is currently considering recommending some changes to the substance and language of this requirement to make it more clear and to improve the capacity of CCMs to effectively meet the requirement.

The SRP pointed out that a significant number of Round 9 applicants faced challenges with the fifth requirement – that CCMs 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 – because it is closely associated with both the third and fourth requirements. 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.” The SRP also said that future applicants would benefit from greater clarification on “how best to ensure and demonstrate an open and transparent process to review proposal submissions.”

The SRP noted that, for Round 9, many CCMs had a conflict of interest plan in place, and that some CCMs demonstrated further understanding of the requirement by documenting instances where the policy was applied. However, the SRP said, the requirement does not formally oblige CCMs to demonstrate

implementation of the conflict of interest plan, thus “leaving room for inadequate compliance with the principle behind the requirement.”

The SRP said that, increasingly, CCM members come from institutions and organisations that are SRs. However, the current requirement regarding conflict of interest only applies to the circumstance where PRs and CCM Chairs or Vice-Chairs come from the same entity. The SRP “recommended that conflict of interest policies be designed to apply to all members of the CCM.”

The SRP said that there is a need for greater understanding among applicants of when a Non-CCM application is appropriate, and what category is most relevant to justify a Non-CCM application. In addition, the SRP said, Non-CCM applicants need more guidance on what documentation and processes are necessary to adequately support their request for funding outside of the CCM model.

The SRP observed that 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.” The SRP made almost identical observations in its reports on the screening processes for Rounds 7 and 8. The SRP noted that the Global Fund Secretariat is working to better define “key and vulnerable populations” and is exploring the potential for eligibility of non-CCM proposals on the basis of target population.

Editor’s note: Most of the information for this article came from the “Report of the Round 9 Screening Review Panel.” Supplementary information was obtained from the Global Fund Secretariat.

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