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Getting to Grips with the Global Fund Operational Policy Manual: Part I

Several months ago, I wrote an article about Global Fund language which generated many responses. I was surprised that all the responses were favourable; no-one attempted to excuse the examples I gave of the misuse of words and lack of clarity. It remains to be seen whether the use of language in the Global Fund will improve. In the meantime, I thought I would look at some of the Global Fund policy and procedural manuals beginning with the Operational Policy Manual (OPM) to see how that reads.

By way of background, I should explain that, in my time as a management consultant, I have developed and written numerous manuals on topics including accounting and management information systems, privatization policies and processes, codes of business ethics, corporate governance, and corporate governance auditing. I mention this because I know that developing a manual of policies and procedures is not easy. Placing topics in the most logical order is harder than it may sound; one soon finds additional topics to include, others that require further clarification to take account of variations and exceptions and, subsequently, amendments are needed to reflect changes in the scope of activities and policy and organizational changes.

That said, the OPM was developed many years ago (version 2 in 2014) and so I was expecting a manual that is readily understandable by both internal and external users. My review – here and in subsequent articles – is of the latest version (version 2.33) published in September 2021.

Anyone who has looked at the OPM can see that it is not a manual; it is a mystery tour. How can I say this? Well, when you buy a car – a model that you are not acquainted with – and you want to better understand the controls or find out how to open the bonnet or whatever, what do you do? Look up the driver's manual. And lo and behold! The manual has what is called a table of contents up front and, at the back, an alphabetical index by topic. The OPM does have what is named a contents table but this is

simply a list of Operational Policy Notes (OPNs) and not the full contents; and there is no index. So I shall not refer to it as a manual but simply 'OPM' or 'volume'.

My initial encounter with this volume leaves me further unimpressed because what I have read so far has served to confuse instead of inform me. Topics appear to have been inserted without checking that the terms used have already been defined. If you are not already highly familiar with the Global Fund's internal policies and procedures and organisation structure, you will have to search other publications and sources to understand both the context and topics covered.

The OPM opens with what sounds like a contradiction. The heading is "For External Users" but the first sentence then says "This Operational Policy Manual has been developed to assist Global Fund Secretariat staff in providing guidance..." The reader must therefore assume that, despite the opening heading, the OPM is not for external users but for Global Fund staff. Perhaps the opening heading should read: "For External Readers".

Get a suitcase ready for the volumes you will need to carry

Before we embark on our mystery journey through this OPM, I must point out the word 'Policy' in the title. Maybe it is only about policies and not a full description of the procedures. I say this because this is only one volume of what should be a compendium of related volumes. For example, for funding request (FR) design, submission and review, related volumes that the reader is referred, in addition to the OPM, include:

- Framework Document (Global Fund Governance and Core Documents) (February 2012)
- Country Coordinating Mechanism Policy Including Principles and Requirements (May 2018)
- Code of Ethical Conduct for Country Coordinating Mechanism Members (February 2021)
- Global Fund Grant Regulations (2014)
- 2020-2022 Strategic Initiatives
- The Global Fund Sustainability, Transition and Co-financing Policy (April 2016)
- Guidance Note on Sustainability, Transition and Co-financing (May 2020)
- Instructions for Completing the Detailed Budget Template (December 2019)
- Guidelines for Grant Budgeting (December 2019)
- Modular Framework Handbook (October 2019)
- Guidelines on Country Dialogue, Funding Request Development, and Grant Making
- Allocation Methodology for the 2020-2022 Allocation Period (May 2019)
- Applicant Handbook 2020-2022 (June 2021)
- C19-RM applications website
- Funding Model Guidelines – Funding Request Applications

– Applicant Guidance

– Funding Request Submissions & Status

– Register of Unfunded Quality Demand

– Grant-Making

– Catalytic Multicountry funding

– Applicant Guidance

- Webinar on Requests for Proposals for Catalytic Multicountry funding as part of the iLearn series on the 2020-2022 funding cycle.
- Catalytic Multicountry Funds: 2020-2022 Funding Cycle (June 2021)

- Validation of Continuation Request Template and Instructions
- Value for Money Technical Brief (November 2019)

I have never been on the Global Fund staff and so the above list may be incomplete (I know I have forgotten to mention the policies related to Challenging Operating Environments and Additional Safeguards). And you can imagine how much longer the list would be if we were to add documents related to grant implementation. To the outsider, it looks like there is great scope to consolidate and simplify the policy and procedural documents and guidelines – and include a table of contents and index.

I haven't much hair left on the top of my scalp but, if I were a Country Team member, I think I would soon lose/pull out the rest in frustration at having to be acquainted and deal with so many documents.

Despite the challenge, let's begin with the OPM Introduction and work through the volume according to the 'table of contents'.

A non-Introduction

An introduction to a manual should describe its use and users, how it is structured, and provide readers with a contact for enquiries and suggestions; and, in the case of the OPM, it should also explain the use of the Operational Policy Notes (OPNs). The Introduction to the OPM does none of these things; it is very short (less than half a page) but it is very clear. It ends with the sentence: "As the Country Team is the primary mechanism to achieve effective and efficient oversight of the Global Fund grant portfolio, the OPM begins with guidance on how Country Teams should function and defines individual Country Team members' responsibilities."

The mystery tables

However, what follows is not a guidance on how Country Teams should function. What follows are three pages of tables: (i) Revised Portfolio Categorization Criteria – Approved by EMGC in May 2018; (ii) 2017-2019 Allocation Cycle: Portfolio Categorization – Country and Multi-country; and (iii) 2020-2022 Allocation Cycle: Portfolio Categorization – Country and Multi-country. There is no explanation given to these tables, so the reader is left wondering why they have been inserted at this stage and what use they are. In this situation, the best one can do is ignore them and read on about how the Country Teams should function.

But no: the guidance on how Country Teams should function still does not follow. The reader will have to wait to see if that guidance ever appears. Instead, the manual moves on to Section 1: Access to Global Fund Financing. This explains:

"An applicant submits a concept note to the Secretariat reflective of the indicative funding allocation (as determined by the Secretariat), its national strategy, and the outputs of an extensive multi-sectorial country dialogue process between the applicant, technical partners, donors (including the Secretariat) and civil-society organizations. Once the concept note is reviewed by the Secretariat and the TRP, the GAC determines an upper budget ceiling and the grant-making process begins.

The CT enters into negotiations with CCMs and their nominated PRs to develop disbursement- ready grants for submission to the Board approach through the GAC."

I should first say that I think the above statement is inaccurate in suggesting that the Secretariat determines the funding allocation as I feel sure that the Strategy Committee and others are involved in the allocation process. Yes, this is 'nit-picking', but all OPM contents should be accurate.

So the opening process involves an ‘applicant’ but without a definition of who qualifies to be an applicant. And, to understand these opening paragraphs, the reader must already know the meanings of a ‘concept note’, the ‘indicative funding allocation’, and the acronyms ‘TRP’, ‘GAC’, ‘CT’ and ‘CCM’. Why isn’t there a list of acronyms up front? Also, surely the use of the term ‘concept note’ ceased several years back when it was replaced by ‘Funding Request’ (which is exactly what the concept note was)?

Get ready to open your suitcase

This is followed by an Operational Policy Note (OPN) on the Design and Review of Funding Requests (for the 2020-2022 Allocation Period). We can safely assume that this is one of several OPNs, in which case it would be useful for reference purposes to allocate a reference number/code to it.

The OPN begins: “Funding requests that are designed well and are reviewed effectively help the Global Fund achieve maximum impact, in line with Global Fund’s 2017-2022 Strategy: Investing to End Epidemics”. The reader is left to decide whether or not s/he should refer now to that document but would wisely conclude that that document does not contain information on FR design and review procedures.

The OPN next contains a colour diagram, which remains unexplained, with what appears to be the heading ‘National Strategies’ but is not about the FR design and review process.

After that diagram the reader is informed that the FR design and review process is guided by four documents and a set of core differentiation principles. The first document is the Global Fund Framework Document. The reader has now to go to this separate document, the opening page of which is dated 2001 but the page footer shows that this is the February 2012 version. If you know what you are looking for, you will find in sections VI, VII and VIII some parts that are relevant to grant applications and review; but they are not really clear about the procedures. Even if you do not know what you are looking for, you will probably be none the wiser. For the moment let’s not bother with this and the other three documents mentioned (the Global Fund Strategy, the Sustainability, Transition and Co-financing Policy and the Technical Review Panel’s Terms of Reference).

Core differentiation principles approved by the Board’s Strategy Committee are now listed. What is a ‘core differentiation principle’; indeed, what is a differentiation principle? The answer is to be found in a footnote: “The TRP will assess funding requests with a differentiated lens instead of a standardized “one-size-fits-all” approach (for example, for programs in challenging operating environments, countries in transition, etc.)”. This is surely fundamentally important, requires more explanation, and should be up front in the main text?

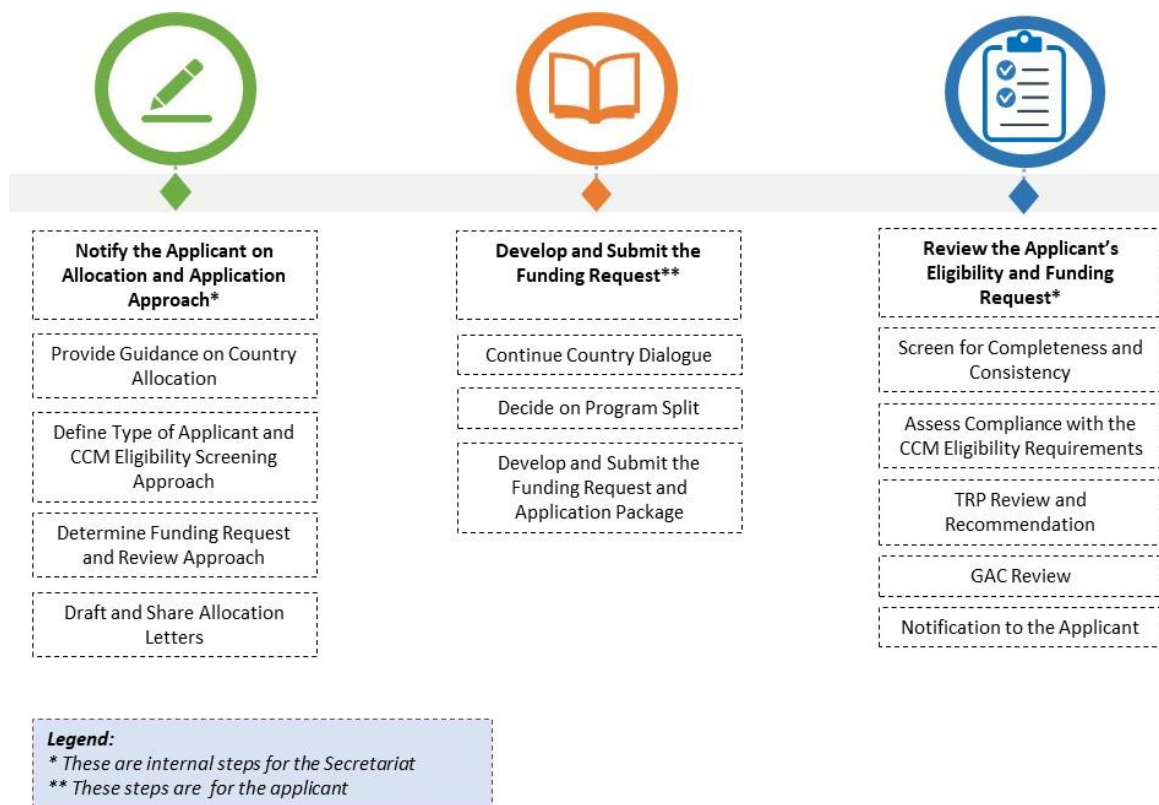
Six core differentiation principles are listed (‘core’ is never explained; and no ‘non-core’ principles are mentioned):

1. Differentiated level of independent review.
2. Country ownership.
3. Tailored process for FR development and review.
4. Simplification and refocusing on implementation.
5. Focused and timely program revision for greater impact.
6. Streamlining and refocusing on key information for decision-making.

Reading through these principles, it appears that, apart from (a), which clearly relates to the differentiated country situations, all of (b) to (f) apply to every FR design and review. The manual should say so.

Now the OPN states that it defines the rules and requirements for accessing the country and combined country allocations for the 2020-2022 allocation period onwards.

But what follows is this diagram:



This is an impressive diagram that surely requires some explanatory narrative. Instead, the narrative launches into the first step, to “notify the applicant on allocation and application approach’. In explaining this step, the manual states that “Eligible applicants receiving an allocation will be notified through the allocation letter with the following information: (i) allocation amount for eligible disease components; (ii) type of applicant and approach to Country Coordinating Mechanisms’ (CCM) eligibility screening; (iii) the application approach; (iv) guidance on co-financing requirements and commitments; and (v) other information relevant to the country/component.”

So, according to the manual, we already have ‘eligible applicants’. For this to be the case, there must be a process already followed that has provided the eligible applicants. Where are the policies and procedures for that; and why are they not at the beginning? This is, after all, an operational (policy) manual.

Next, the OPM provides guidance on country allocations and access and use of allocations. It begins by defining the Country Allocation as “the initial upper ceiling of funding made available by the Global Fund for each eligible country across all eligible disease components for the applicable allocation cycle, in line with the Allocation Methodology. This funding may be supplemented by other sources of funds (please see Annex 1), or may be reduced, for example, due to outstanding recoveries in extraordinary circumstances, or if co-financing commitments from the previous allocation period have not been met.

Unused funding from the previous allocation period (e.g., undisbursed funds, in-country cash balances, cash balances at a procurement agent level), and any recovered funds relating to disbursements made with grant funds arising from the previous allocation period cannot increase a country allocation. Please see the Global Fund Guidelines for Grant Budgeting for further details.”

To understand this clearly, the reader must already be familiar with – and understand – terms such as

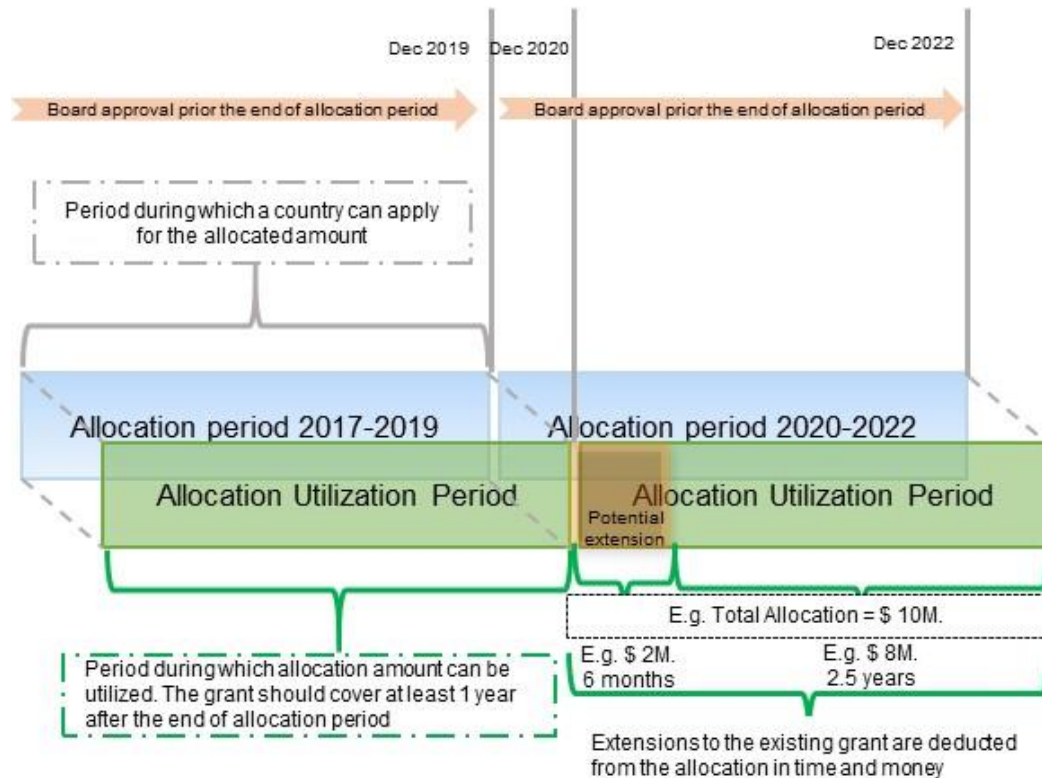
'eligible countries', 'eligible disease components', 'applicable allocation cycle', 'Allocation Methodology', 'outstanding recoveries ...', 'co-financing commitments' or, at the very least, look up the two documents referred to.

To read about other sources of funds, the reader has been referred to Annex A, on which if you are prepared to search, you will find 13 pages. Annex A informs the reader that: "Subject to the eligibility criteria specific to each source of funding, applicants may receive funding from the following sources during the funding request design and submission:" So now we are informed that an applicant can receive funding during the FR design, before grant approval; but we are not told how. Or have I misunderstood this?

To continue: in terms of the timeframe to access allocations: "For each country, the allocation for eligible components can be accessed, jointly with other components or separately by each component, once per allocation period." So, we see how important it is to understand what an 'eligible component' is because there is only one chance in the three-year allocation period. To an outsider a single chance seems harsh. There must be a good reason for this; but it is not provided here. The good news is that a footnote advises the reader that 'Portions of the allocation may be used earlier than at the start of the new implementation period ...'. What 'portions' and why are unclear.

Your imagination is now required

This is followed by a figure that is not referred to, but it looks as though it might be useful if only it had an explanation:



I can see that I am never going to pass a Global Fund entry exam because I do not know what to write about this. What is its purpose? This is an example of contributors to and assemblers of this volume who have not thought about the users unfamiliar with the topics.

But, at long last, something readily understandable is provided: definitions of the four types of applicants for Global Fund funding and the differentiated screening approach for CCM eligibility requirements 1 and 2. These definitions should have appeared earlier. We can already see that this manual needs some

restructuring and reordering.

I'm worried that by now you are getting indigestion; so, I think I had better stop. In the next article I may even be able to move on to the funding request and review processes.

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