



Independent observer  
of the Global Fund

## MOST CCMS THAT HAVE SUBMITTED CONCEPT NOTES ARE NOT FULLY COMPLIANT WITH MINIMUM REQUIREMENTS

Country coordination mechanisms are facing challenges integrating the new requirements for performance improvement. Just four of the 84 CCMs that have completed performance assessments are fully compliant with minimum requirements. Of 80 performance improvement plans in development, only 10 are on track. These shortcomings appear to be of little consequence, however, as most CCMs are still being allowed to submit concept notes since 'sufficient progress' towards implementation is being made.

According to the [CCM performance assessment spreadsheet](#), which is regularly updated on the Global Fund's website, the four minimum requirements included in the assessments were:

- Oversight planning and implementation (Requirement 3)
- Membership of affected communities (Requirement 4)
- Process for electing non-government CCM members (Requirement 5)
- Management of conflict of interest (Requirement 6)

(There are two additional CCM minimum requirements which are assessed when the concept notes are submitted.)

Each requirement contains several elements, and in each element, CCMs are rated 'fully compliant' or 'working towards compliance'. Then an overall rating is given.

El Salvador, Haiti, Moldova and Mozambique were, as of 6 February when the data for this article were pulled, the only CCMs rated fully compliant for all four requirements. Mozambique's full compliance was assessed at the end of 2014, almost two months after it submitted its concept note.

Working towards compliance across all four requirements were 37 CCMs: Afghanistan, Albania, Angola, Azerbaijan, Belarus, Bolivia, Botswana, Burkina Faso, Cape Verde, Chad, Democratic Republic of Congo, Republic of Congo, Ethiopia, Gambia, Ghana, Guinea, Guinea-Bissau, Kyrgyzstan, Liberia, Mauritius, Namibia, Niger, Nigeria, Papua New Guinea, Paraguay, Peru, Romania, Rwanda, Sao Tome and Principe, Sierra Leone, South Sudan, Tanzania, Thailand, Timor Leste, Togo, Vietnam and Yemen.

The remaining 43 CCMs were compliant in one or more of the four areas. See the table below for details.

Table 1: Number of CCMs that were fully compliant, by requirement

Requirement	Number of CCMs fully compliant
Requirement #3: Oversight planning and implementation	12
Requirement #4: Membership of affected communities	33
Requirement #5: Process for electing non-government CCM members	23
Requirement #6: Management of conflict of interest	17

All 80 CCMs working towards full compliance across the four minimum requirements have submitted improvement plans containing actions and timelines. Yet just 10 of them are on track, with the remaining 70 CCMs reporting that implementation is at least three months behind schedule for one activity or more.

The problems described above are not new. Even under the rounds-based system, many CCMs struggled to meet the minimum requirements, including in the later rounds when the enforcement of the requirements became more stringent.

#### Link between performance assessments and submission of concept notes

Under the NFM, as was the case under the rounds-based system, CCMs have to meet minimum requirements to be eligible to submit a concept note. This meant that CCMs had to complete performance appraisals prior to submitting their concept notes.

CCMs that were fully compliant with the requirements, or that were not fully compliant but were making good progress in the implementation of their improvement plans, were allowed to submit their concept notes.

Deciding whether a CCM not already fully compliant was deemed to be making good progress in implementing their improvement plans required a judgment call on the part of the Secretariat. In the final analysis, almost all CCMs in Windows 1-4 were given the green light to submit their concept notes.

René-Frédéric Plain, head of the Global Fund's CCM Unit, told Aidspace that CCMs whose implementation plans were shown as being delayed if just one action being behind schedule were usually considered to be making good progress. He also said that contextual factors were taken into account. For example, a CCM from a country experiencing a civil war or an Ebola outbreak might be allowed to submit its concept notes even if several aspects of its improvement plan were behind schedule.

Around 10 improvement plans that were proposed were rejected as insufficient, said Plain. Massive reforms were undertaken by some CCMs as a result. Others pushed back against the Secretariat's decision. It is not known which countries were involved.

Monitoring of the improvement plans is an ongoing process, with some CCMs found wanting having to delay submission of concept notes for additional disease components while they get their plans on track.

Universally, improvement plans are stalling, according to the Secretariat, and speeding up implementation has been identified as a priority for country teams in 2015. The plans usually cover a period of one year. But, on average, after six months, only 20% of the actions in the plans have been completed.

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