



Questions raised by Burkina Faso's classification as both a Challenging Operating Environments country and subject to the Additional Safeguard Policy

Context

Burkina Faso is a low-income country in West Africa with a high malaria burden, with 12,231,886 new cases in 2021 and 4,355 malaria-related deaths. The Global Fund began investing in Burkina Faso in 2002. In 2022, the country suffered two coups d'état that reconfigured the political landscape. These coups were rooted in the violent conflict that had been raging between government forces and non-state armed groups since 2015. As a result of these, 41% of Burkina Faso's healthcare facilities in eight of the country's 13 regions faced security problems. While some were closed or looted, others were only able to function minimally.

Against this backdrop, in March 2022 the Global Fund Secretariat designated Burkina Faso as a [Challenging Operating Environments Policy](#) country. Classification in the COE category – based on the External Risk Index (ERI) – is necessary to enable a country to benefit from flexibility, partnership and innovation to ensure service delivery (Box 1).

Box 1: Challenging Operating Environments Policy*

COE-designated countries or regions are characterized by weak governance, limited access to health services, and man-made or natural crises.

April 2016: The Global Fund Board approved the [Challenging Operating Environments \(COE\) Policy](#) to guide operations in COE countries. The policy is based on [three](#) principles: flexibility, partnerships and innovation to and work effectively in these contexts:

[Flexibility](#) to enable greater responsiveness and better compliance with the deadlines for implementing Global Fund investments;

[Partnerships](#) to strengthen in-country governance, improve technical assistance and service delivery;

[Innovations](#) to maximize results throughout the grant cycle.

January 2017: the Global Fund Secretariat issued an Operational Policy Note (OPN) to provide “operational guidance on the Challenging Operating Environments Policy, including flexibilities for country teams to manage COE portfolios in a dynamic and timely manner, within the principles defined in the approved COE Policy”.

December 2022 – [The Technical Evaluation Reference Group \(TERG\)](#) concluded that “there is considerable scope for improving the implementation of the policy to further strengthen programme results in COE portfolio countries”.

*The [African Constituency Bureau \(ACB\)](#) has published information on COEs

Office of the Inspector General (OIG) audit of Global Fund grants in Burkina Faso

Delay by the Global Fund Secretariat in classifying Burkina Faso as a COE country

The second coup d'état in 2022 and the growing insecurity in Burkina Faso forced the Global Fund's OIG to modify its travel plans to visit the country to audit Global Fund grants. It therefore carried out a desk review of the process of classifying Burkina Faso as a COE country in March 2022, and its impact on the management of the country's grant portfolio.

The OIG report explains that [ten indices](#) are used to determine the level of risk according to the ERI or “[The effect of uncertainty on the achievement of an organization's objectives](#)”. The Global Fund Secretariat used only nine, the missing one being “an indicator that measures the likelihood of destabilization or overthrow of a government”, namely “political stability and absence of violence”. Given that Burkina Faso's ERI was adjusted from “high” to “very high” between 2020 and 2021 due to the level of insecurity, it should have been classified as a COE country in 2020 and not two years later.

According to the OIG report, the Global Fund Secretariat did not comply with the OPN regarding the declaration of Burkina Faso as a COE country and “the COE classification was communicated to the country in November 2022, at the same time as the flexibilities granted”. The OIG said that no reason was

given for the delay, as “little or no data was provided on what influenced the decision-making and/or trade-offs in the decisions taken to implement the COE classification, meaning that the process relies heavily on undocumented management judgment”.

The delay in classifying the country as COE was compounded by the delay in developing an integrated contingency plan, which is “a comprehensive emergency response proposal in a single operational plan to help implementing organizations deal with difficult country contexts”. The integrated contingency plan is partly the responsibility of the Ministry of Health. In addition, the country portfolio review, which combines programmatic and financial considerations, was carried out without the portfolio analysis required by the Portfolio Analysis and Operational Strategy (PAOS) guidelines for COE portfolios. The OIG cautiously explained that “the timely preparation and execution of a contingency plan, as provided for in the COE Policy OPN, could have increased opportunities to benefit in a timely manner from COE flexibilities, innovative approaches and new partnerships”.

Additional Safeguard Policy (ASP) for Burkina Faso

In December 2022, Burkina Faso was placed under the ASP. This policy, approved in 2004, is invoked when the Secretariat considers that Global Fund grants “could be put at risk in the absence of additional measures”. In particular, the ASP allows the Secretariat to select implementers and other contractors without the approval of the Country Coordinating Mechanism (CCM) or other implementers. The majority of countries in the ASP category have proven cases of fraud, corruption, etc. (See [here](#) for the ACB's summary of the main differences between COEs and ASPs.)

Conclusion

One must wonder about the chronology of events: Burkina Faso was eligible to become a COE country which would have allowed it to benefit from additional flexibilities from 2020 onwards, but this decision was delayed by two years for unexplained reasons. The Global Fund Secretariat invoked the ASP at almost the same time as it notified the country of the COE flexibilities in December 2022, giving the Global Fund the right to make decisions for the country without consulting the national authorities. Yet Burkina Faso has not experienced any financial mismanagement problems. By contrast, Ukraine was quickly and appropriately classified as a COE from the start of the war with Russia in early 2022, and this country was not subject to the ASP.

The decision taken by the Global Fund Secretariat regarding the Burkina Faso portfolio raises a number of questions.

N.B: A first version of this article was published by the African Constituency Bureau and thereafter in OPM 151. It is a follow up to our article published in February this year ([Burkina Faso under additional Global Fund safeguards: Who's going to be next?!](#))

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