



Independent observer  
of the Global Fund

## Global Fund Provides Details on Ineligible Round 4 Proposals

Every Round 4 proposal that NGOs submitted direct to the Global Fund (that is, without CCM endorsement) was ruled ineligible by the Secretariat. Most, according to the Secretariat, had little technical merit. And the few that were strong did not make a legitimate case for bypassing their CCM. However, it is possible that some of those proposals were subsequently repackaged as part of proposals submitted by CCMs.

As reported in a previous issue of GFO, a total of 320 proposals were submitted to the Global Fund by the Round 4 deadline of April 5. About 145 of these were “screened out” by the secretariat as ineligible, leaving only 175 proposals to be forwarded to the Technical Review Panel (TRP) for assessment.

Brad Herbert, the Global Fund’s chief of operations, said in an interview that the screened-out proposals would have cost about \$2 billion over the first two years. These fell into two main groups. The first group, worth about \$800 million, came from organizations that were obviously ineligible. Some were “real oddballs,” he says, such as one from a private company that wanted \$50 million to develop a vaccine, and several from universities in developed nations. “People see funding opportunities, and you get a lot of junk,” he says. One proposal was only two pages long yet asked for major sums of money.

The second group of screened-out proposals, worth about \$1.2 billion, were proposals submitted directly by NGOs rather than via their countries’ CCMs.

Herbert sees the high number of independent NGO applications as a “real concern,” but one that’s on the decline. While in Round 3, 65 proposals came in from NGOs without CCM endorsement, in Round 4 only 34 did. He attributes this in part to the fact that in many cases in Round 4, NGO proposals were integrated into proposals submitted by their country’s CCM, a sign that NGOs are finding it easier to work within (or at least with) CCMs, and that governments, busy implementing Global Fund grants from earlier rounds,

are now more willing to give NGOs a chance.

But Herbert says the decline is also due to aggressive interventions by the Global Fund secretariat. Prior to Round 4 submissions, the secretariat went to all board members, particularly NGO members, to encourage them to get out the word that NGOs should apply through their respective CCMs. Then, when individual NGOs requested an identification number for submitting a proposal, the secretariat wrote to each one urging the group to work through the CCM, and followed up with emails and phone calls. Finally, once the 34 NGO proposals came in, the secretariat went to each of the relevant CCMs and let them know that if the CCM wanted to add its endorsement to an NGO proposal from its country, the Fund would allow that even at such a late stage.

The majority of the independent NGO proposals – 70 percent – came from two countries, India and Kenya. Nineteen small NGOs from Kenya submitted their own proposals direct to the Fund, for example, and most of these proposals lacked any documentation or failed to answer basic questions. (Matthew Black, director of the Kenyan NGO consortium KECOFATUMA, says that the 19 independent proposals from Kenya NGOs doesn't surprise him. KECOFATUMA reached out to some 800 community organizations, encouraging them to apply. "We told them about all possible routes of application, including telling them about successful NGO applications in Round 1, even though we strongly advised against independent applications in Round 4." Black says that most NGOs sent proposals to KECOFATUMA, which in turn submitted a joint civil society application to the CCM. But some may have applied by more than one route, just to cover all bases. See Black's piece, "Unity in Civil Society – Lessons from Kenya," below.)

According to Herbert, only three of the 34 directly-submitted NGO proposals had strong technical merit – one from Nepal, one from Kenya, and one from South Africa. But after investigating, Herbert determined that none of them had legitimate reasons for going around their CCMs. One declared that its CCM was dysfunctional, a claim the secretariat found to be unmerited; another simply chose to submit its proposal independently. In countries with a functioning CCM, the secretariat may only pass independent NGO proposals to the TRP if there is evidence that the CCM is discriminating against civil society, and none of these three proposals passed that test. In the end, all 34 of these independent NGO proposals were screened out.

Herbert points out that he has a track record of being flexible with this guideline; for example, he supported three independent NGO proposals in Round 3, forwarding them on to the TRP, including one from Thailand that dealt with injection drug users. While NGOs play a strong role on Thailand's CCM, Herbert argued that this one particular civil society sector – NGOs dealing with injecting drug users – was indeed suppressed in Thailand. The decision caused some political controversy, but the secretariat and the board stood by it. In Round 4, Herbert says, "there just wasn't enough there to convince me the NGOs were justified in going out on their own."

Herbert calls the India and Kenya NGO proposals a "lost opportunity," and says he wishes they had been integrated into the proposals submitted by their CCMs. For Round 5, he hopes that CCMs will begin to educate their constituencies about the Global Fund process well before the application deadline approaches. He would also like to see partners such as UNAIDS, WHO, and Roll Back Malaria work closely with NGOs and help them figure out how their proposals can be aggregated into a CCM proposal and then disaggregated once funding comes through. "We're still getting too many small, separate NGO proposals," Herbert says. "Even if they're good, we don't want that. The Fund is set up to move large sums of money, and the transaction costs of processing 19 different grants from one country for one round would be prohibitive." The board once considered – and rejected – setting a minimum dollar amount for grant applications, over concerns that it would discourage NGO involvement. The problem, says Herbert, is there's "de facto discrimination" against NGOs now, because by avoiding the established CCM mechanism they're losing their chance to compete for funds. Herbert would like to see the idea of a

minimum dollar amount put back on the table as an incentive for NGOs to aggregate their proposals through CCMs.

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