



Independent observer
of the Global Fund

Round 10 Screening Panel Screened Out Five CCM Applications

Five of the 92 applications submitted by country coordinating mechanisms (CCMs) were screened out as a result of the Round 10 screening process. This information comes from a report on the screening process prepared by the Global Fund's Screening Review Panel (SRP) and recently released.

(The screening is done when the applications are first submitted. Applications that don't meet the Global Fund's eligibility requirements are screened out, which means that they are deemed ineligible for consideration by the Technical Review Panel (TRP) and are not forwarded to the TRP for review.)

The five CCM applications screened out in Round 10 was two less than the number of CCM applications screened out in Round 9.

In Round 10, two of the fourteen applications from regional organisations (ROs) were screened out. However, all five applications from sub-national country coordinating mechanisms (Sub-CCMs) and regional coordinating mechanisms (RCMs) were screened in (i.e., deemed eligible).

There was only one application from a Non-CCM, the Somalia Aid Coordination Body, and it was screened in. In contrast, in Round 9, all 14 applications from Non-CCMs were screened out. (Non-CCMs are national organisations other than the CCM – usually NGOs or faith-based organisations [FBOs].)

This article provides information on the screening process, which took place in September 2010, and the results of the screening. (This article is not about which proposals were recommended for approval by the TRP and later approved by the Board; this topic was covered in GFO 135, available at www.aidspace.org/gfo.)

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Introduction

All 112 applications submitted in Round 10 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 the Global Fund Secretariat’s Country Proposals Team. This initial screening team applied one of three possible ratings to each application: 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 one or more of the eligibility criteria. The team rated 73 applications as FC, 39 as IC and none as NC. Second, the 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 the 39 applications rated IC by the initial screening team, the SRP examined each one individually.

Of the 112 applications, 105 were ultimately determined to be eligible. A breakdown of the numbers is shown in the Table 1.

Table 1: Results of the Round 10 screening process

Applicant type	No. of applications submitted	Results of initial screening			Final determination by the SRP	
		FC	IC	NC	FC	NC
CCM	92	61	31	0	87	5
Sub-CCM	2	2	0	0	2	0
RCM	3	2	1	0	3	0
RO	14	7	7	0	12	2
Non-CCM	1	1	0	0	1	0
TOTAL	112	73	39	0	105	7

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

Below, we provide more information from the SRP’s report on the screening process for (a) applications from coordinating mechanisms and (b) applications from regional organisations.

Applications from coordinating mechanisms

In its report, the SRP provided details of the screening that was done for the 97 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; (b) the proposal development process; and (c) the nomination of the principal recipient (PR). 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, and ensure the input of a broad range of stakeholders, including CCM and non-members, in the proposal development process.
4. CCMs are required to put in place and maintain a transparent, documented process to nominate PRs.
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 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 this inherent conflict of interest.

CCMs found to be non-compliant

Five CCMs were found to be non-compliant with one or more of these requirements and, as a result, their applications 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 10, showing requirements met and 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	5. Process for grant oversight	6. Writ of in
Albania	Met	Met	Met	NOT MET	Met	Met
Belarus	Met	Met	Met	NOT MET	Met	Met
Bhutan	Met	Met	Met	NOT MET	Met	Met
Bolivia	Met	Met	NOT MET	NOT MET	Met	Met
Egypt	NOT MET	Met	NOT MET	Met	Met	Met

The applications from these five countries contained a total of 10 disease components. Four of the five countries deemed ineligible had problems meeting Requirement 4 – i.e., that CCMs put in place and maintain a transparent, documented process to nominate the PR. This is similar to the pattern observed in the Round 9 screening.

For three of these four countries, the SRP cited inadequate management of conflicts of interest involving the CCM chair or vice-chair and a nominated PR. With respect to Albania, the CCM chair and the

nominated PR were both from the same organisation, yet the chair presided over the meeting where the PR was nominated, and the chair participated in the vote. The CCM's COI policy was not applied. In Belarus, the CCM vice-chair and one of the nominated PRs were both from the same organisation, yet the vice-chair participated in the selection process, and the CCM's COI policy was not applied. In Bhutan, it was exactly the same story, except that it was the chair and not the vice-chair that had the conflict. In addition, the SRP said that the process in Bhutan was not sufficiently transparent because only the Ministry of Health was considered for the PR post.

With respect to Bolivia, the SRP said that the process for nominating the PR for Bolivia's HIV and TB proposals was not sufficiently transparent or documented. For the HIV proposal, no documentation was provided, so there was no evidence that a transparent process took place. For the TB proposal, the nomination was determined by a CCM sub-committee and endorsed by the CCM's executive committee. CCM meeting minutes documenting the PR nomination process were not provided, nor was there any information on the membership of the executive committee. Also, for both the HIV and TB proposals, the CCM failed to respond to numerous requests for information from the Global Fund Secretariat.

Two CCMs failed to meet Requirement 3 – i.e., that the CCM put in place and maintain a transparent, documented process to solicit and review submissions for possible integration into the proposal, and ensure the input of a broad range of stakeholders, including CCM and non-members, in the proposal development process. In the case of Bolivia, the SRP said that the process for proposal development was not sufficiently transparent or documented. No documentation was provided, so there was no evidence that a transparent process took place or that a broad range of stakeholders was involved. As was the case with Requirement 4, described above, the Bolivia CCM failed to respond to requests for information. The SRP said that Egypt's TB proposal development process was not sufficiently transparent. The CCM did not make an open call for proposals. And the proposal was developed by a technical committee consisting of only five CCM members. In the opinion of the SRP, the process failed to ensure the input of a broad range of stakeholders.

One CCM – Egypt – failed to meet Requirement 1 – i.e., 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 determined that the process was inadequate. In spite of repeated requests, no documentation was provided to demonstrate how the non-government members were selected for the CCM by their own sectors.

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

A section of the report described the deliberations of the SRP with respect to the 27 coordinating mechanisms that the initial screening team classified as indeterminate compliant (IC) and that the SRP eventually decided were fully compliant (FC).

In most instances, the SRP relied on additional information obtained from applicants. Sometimes, the SRP consulted the regional teams in the Secretariat's Country Programs Cluster and with LFAs. In a few cases, the SRP concluded that the application was essentially a re-submission of a Round 9 proposal, and that the CCMs involved had already been determined to have met the requirements at the time of the Round 9 screening.

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

- Cape Verde. While its proposal was being developed, the CCM made a public call through the newspaper, radio and online, requesting interested stakeholders to submit ideas for possible inclusion in its proposal. Various civil society organizations were directly contacted by email. Seven submissions were received, five from the public sector and two from non-government entities. An

existing CCM technical committee was mandated to analyse the submissions. However, the committee met to review the submissions only a few days before the proposal deadline, when most of the proposal had already been developed. In response to requests for clarification, the CCM said that proposals from government bodies were incorporated into the proposal during its development, and that the two submissions from the non-government sector “would be incorporated into the proposal through its implementation.”

- Bangladesh. The CCM submitted a consolidated TB proposal for Round 10. It nominated the same PRs that were currently implementing their Round 8 grants. As a result the CCM agreed to continue with the same PRs – BRAC Bangladesh and the Ministry of Health. No additional or alternative PR candidates were considered by the CCM. As well, there was no evidence that the CCM’s conflict of interest policy was applied to the PR nomination process. Responding to a request for clarification, the CCM said that a transparent and documented process for PR nomination had taken place when the PRs were originally selected for their Round 8 proposal, and that the conflict of interest policy was applied at the time. In its report, the SRP noted that all of the CCM requirements apply to consolidated proposals, and that consolidation should not be confused with a resubmission. Nevertheless, the SRP decided that although the CCM’s PR nomination process was not ideal, “this history was not sufficient to determine the CCM non-compliant.”
- Eritrea. The Chair of the CCM in Eritrea, the Minister of National Development, was out of the country when PR selection took place. In his absence, the Minister of Health filled in as chair for the meeting at which the Ministry of Health was nominated to be PR. The SRP said that this was a conflict of interest situation but added that, technically, the current CCM requirement only restricts the CCM chair and/or vice-chair (not an acting chair) from taking part in the PR nomination process. So, the CCM was determined to be compliant.
- Honduras. The CCM formed a committee of three non-CCM members to evaluate two PR candidates for its TB proposal, one NGO and one government. At the time of proposal submission, the committee had not yet presented its report to the CCM and the CCM had not yet nominated the PR. Since the CCM was not scheduled to meet before the close of the SRP’s sessions, the CCM decided to select the PR by email. The CCM nominated the Coverage and Financing Extension Unit of the Ministry of Health to be PR. The SRP’s report did not contain any information on the composition of the selection committee, or on who participated in the email exchange.
- Indonesia. The Ministry of Health was nominated as PR for Indonesia’s TB proposal. The CCM chair, who is a representative from the Ministry of Health, took part in the selection process and voted. When asked for clarification, the CCM stated that there was no conflict of interest because the CCM Chair and the PR work for two different departments within the Ministry of Health. In finding the CCM fully compliant with Requirement 4, the SRP took into account the fact that the team responsible for reviewing PR candidates represented a broad range of stakeholders and did not include a representative from the Ministry of Health or any other PR candidate.
- Benin. One of the CCM’s two vice-chair positions is held by the Ministry of Economy and Finance. One of the nominated PRs was the Ministry of Health, which receives government financial resources directly from the Ministry of Economy and Finance. In spite of this inherent conflict of interest, the CCM does not have a documented conflict of interest plan. The SRP deemed the Benin CCM to be fully compliant with the COI requirement (Requirement 6) on the basis of the fact that, in an effort to mitigate conflict of interest, the CCM vice-chair from the Ministry of Economy and Finance did not take part in the PR nomination process.

Multi-country applications

In its report, the Global Fund provided details of the screening that was done for the three applications submitted by RCMs and the 14 applications from ROs. RCMs have to meet the same requirements as CCMs. In addition, they have to obtain the endorsement of the CCMs in all countries included in their proposals. For their part, ROs have to obtain endorsements from the CCMs in all of the countries included

in their proposals.

The SRP reviewed eight applications from RCMs and ROs that the initial screening team had classified as IC. The SRP determined that the sole RCM applicant in this group and five of the seven RO applicants were fully compliant, while two of the RO applicants – Réseau Africane de Formation sur le VIH and the University of West Indies – were deemed to be non-compliant. In both cases, the ROs failed to secure endorsements from the CCMs in all of the countries included in their proposals. The Réseau obtained endorsements from only one of four CCMs, and the University got endorsements from only two of 10 CCMs.

Observations and lessons learned

In its report, the SRP made some observations concerning lessons learned from the Round 10 screening. The SRP noted that some applicants need support to institute more rigorous processes and stronger documentation to enable them to comply with the requirements. According to the SRP, in 2011 the Global Fund Secretariat will provide technical support to applicants, where appropriate, giving priority to the 39 applicants found indeterminate compliant during the initial screening process for Round 10, five of which were ultimately deemed to be non-compliant.

The SRP identified two areas where applicants faced considerable challenges in Round 10: (1) the need to have a conflict of interest policy in relation to PR nomination; and (2) the capacity of non-government constituencies to organize a transparent and well-documented process to select their representatives.

Requirement 4, concerning the PR nomination process, posed the greatest challenge to Round 10 applicants. Twenty-one CCMs had trouble with this requirement, four of which were ultimately deemed non-compliant. The SRP said that many applicants had weak documentation on how the nomination of the PR took place and who took part in the discussions and voting.

The SRP said that while Round 10 applicants generally provided strong documentation to demonstrate that public calls were made to solicit submissions for possible integration into the CCM's proposal, often applicants were weak in describing their process to review submissions and detailing how the inputs were reflected in the final proposals (Requirement 3). The SRP said that to fulfil Requirement 3, applicants should "reach beyond known networks of stakeholders to acquire nationwide input into the proposal development process" and that most-at-risk populations should be included in this process.

To assess compliance with Requirement 5, the SRP verified that all applicants had a documented plan to oversee programme implementation, and that the plan outlined the role of a broad range of stakeholders in carrying out specific oversight activities. The SRP said that Round 10 was the first time that all applicants have been determined fully compliant with this requirement.

With respect to regional applications, the SRP noted that ROs and, to a lesser extent, RCMs, have found it challenging to secure endorsements from all of the relevant national CCMs. "Regional applicants cite inaccessibility of CCMs as the major obstacle to securing endorsements, while CCMs note that regional applicants often submit proposals for endorsement very late in the proposal development process, especially at a time when CCMs are focused on their own national proposals."

The SRP said that proposals from RCMs and ROs are useful in situations where several countries can address AIDS, TB and malaria more effectively as a group rather than only on a national basis – one example of this is the small island states in the Caribbean and the Pacific. The SRP also said that proposals from RCMs and ROs can provide additional value to already existing national programmes, such as cross-border malaria initiatives. Finally, the SRP said that multi-country proposals can help address needs ignored by some national programmes due to unfavourable policies on key and vulnerable

populations including injecting drug users, men having sex with men, and sex workers.

The SRP noted that the number of Non-CCM applications in Round 10 was significantly lower compared to previous rounds, but that Non-CCM applications in both Rounds 9 and 10 have had more success in meeting the relevant eligibility criteria. The SRP said that

“the Global Fund Secretariat recognizes that the Non-CCM application option remains an important opportunity for groups highly marginalized and/or criminalized as a result of severe stigma and discrimination in government policies, particularly regarding proposals addressing HIV/AIDS.”

The SRP added that the Global Fund is working to provide Non-CCM applicants with improved guidance on the documentation and processes required to support funding requests outside the CCM model.

The information for this article is from the “Report of the Round 10 Screening Review Panel.” Global Fund, January 2011, at www.theglobalfund.org/en/ccm/documents (see “SRP Reports”).

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