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Global Fund Board Adopts New CCM Guidelines

New “standards” will not have much teeth

Process of coming up with the wording for the new guidelines was laborious

The new country coordinating mechanism (CCM) guidelines adopted by the Global Fund Board this week strengthen some of the six minimum requirements for CCMs, and add a new category called “standards.” However, the standards will not have much teeth.

The new guidelines contain three types of guidance:

- requirements that represent the minimum criteria that all CCMs must meet in order to be eligible for funding by the Global Fund;
- standards which the Global Fund considers “vital” for effective CCM performance; and
- recommendations that the Global Fund considers “good practice” for CCMs.

The new guidelines were adopted following a long process of consultations with stakeholders, and extensive deliberations by the members of the Portfolio and Implementation Committee.

A draft of the guidelines was presented for approval at the December 2010 board meeting in Sofia, Bulgaria. However, at that meeting, several implementing country governments objected to portions of the guidelines – principally, the “status” of the new standards, and the language on term limits for CCM chairs and vice-chairs. Some implementing country governments were also concerned that the wording of the guidelines did not sufficiently acknowledge different national contexts and government systems, or the role that governments play in coordinating health programmes.

In corridor discussions and side meetings, there were attempts to address the concerns of the implementing country delegations while maintaining a consensus of the various constituencies represented on the board. These attempts failed, and so the item was postponed from the December meeting until the meeting just concluded.

Between the two board meetings, further consultations and discussions were held; a revised draft of the guidelines was then presented to the Board; and the revised guidelines were approved. In the revised draft, several important provisions were considerably weakened compared to the draft that was submitted to the December 2010 board meeting (see below).

In the new guidelines, the six minimum requirements have been strengthened (see table below) and the recommendations have been improved. Overall, the new guidelines are better written and organised than the old guidelines. But the most significant change from the old guidelines is the addition of standards. Some of the standards in the new guidelines are completely new – for example, “CCMs should routinely nominate both government and non-government PRs for each disease program.” Other standards in the new guidelines have been upgraded from recommendations in the old guidelines – for example, “Membership of CCMs should comprise a minimum of 40% representation from non-government constituencies.”

Under the new guidelines adopted by the Board, CCMs are not required to follow the standards to be eligible for funding, but the standards (along with the recommendations) will be used by the Global Fund to appraise overall CCM performance. In comparison, the draft of the guidelines that went to the board in December 2010 accorded significantly more weight to the standards. That draft stated that the Secretariat would monitor compliance with the standards; that CCMs that did not comply with the standards might be asked to explain why; and that “broad or persistent failure to follow CCM standards without justification would prompt technical support to improve CCM performance and may negatively affect access to funding.” These clauses were removed from the final version.

Another provision that was weakened between drafts of the guidelines concerns term limits for the CCM chair and vice-chair. In the draft that was submitted to the December 2010 board meeting, the following text was shown as a standard:

“Election procedures should consider term limits for Chair and Vice-Chair positions.”

In the guidelines approved by the Global Fund Board, this text was “downgraded” to a recommendation, and some text was added, as follows:

“Election procedures should consider term limits for Chair and Vice-Chair positions, keeping country context in mind and recognizing the unique nature of government positions.... Governments may have arrangements for appointing government posts, as well as setting term limits and parameters for rotation. These arrangements for government should be respected by CCMs.”

The NGO and communities delegations on the Global Fund Board expressed concerns about the watered-down language for the above provisions in the final version of the guidelines.

Requirements

As before, there are six requirements in the new guidelines. However, the old ones have been strengthened and re-ordered, two requirements were merged into one, and a new requirement was added on the CCM's oversight role. The table below provides the wording of the six requirements and explains what has been changed.

Table: The six minimum requirements in the new guidelines

No.	Exact wording of the new requirements	Changes from the old requirements
1	<p>Funding applications. The Global Fund requires all CCMs to:</p> <p>i) Coordinate the development of all funding applications through transparent and documented processes that engage a broad range of stakeholders – including CCM members and non-members – in the solicitation and the review of activities to be included in the application.</p> <p>ii) Clearly document efforts to engage key population groups in the development of funding applications, including most-at-risk populations.</p>	<p>The requirements to engage key population groups in the development of funding applications is new. The requirement to document that processes are transparent and documented is new.</p>
2	<p>PR nomination. The Global Fund requires all CCMs to:</p> <p>i) Nominate one or more PR(s) at the time of submission of their application for funding.</p> <p>ii) Document a transparent process for the nomination of all new and continuing PRs based on clearly defined and objective criteria.</p> <p>iii) Document the management of any potential conflicts of interest that may affect the PR nomination process.</p>	<p>The reference to “conflicts of interest” is new, as is the requirement to document how potential conflicts of interest are managed (regarding PR nomination process).</p>
3	<p>Oversight. Recognizing the importance of oversight, the Global Fund requires all CCMs to submit and follow an oversight plan for all financing approved by the Global Fund. The plan must detail oversight activities, and must describe how the CCM will engage program stakeholders in oversight, including CCM members and non-members, and in particular non-government constituencies and people living with and/or affected by the diseases.</p>	<p>This is entirely new. An oversight plan was required before, but not as part of the six minimum requirements that affect funding eligibility.</p>
4	<p>Membership (I). The Global Fund requires all CCMs to show evidence of membership of people living with HIV and of people affected by TB or malaria (where funding is requested or has previously been approved for the respective disease). People affected by TB or malaria include people who have lived with these diseases in the past or who come from communities where the diseases are endemic.</p>	<p>No significant changes. The wording has been improved.</p>
5	<p>Membership (II). The Global Fund requires all CCM members representing non-government constituencies to be selected by their own constituencies based on a documented, transparent process, developed within each constituency. This requirement applies to all non-government members including those members representing people living with or affected by the three diseases, but not to multilateral and bilateral partners.</p>	<p>No significant changes.</p>

No.	Exact wording of the new requirements	Changes from the old requirements
6	<p>Conflict of interest. To ensure adequate management of conflict of interest, the Global Fund requires all CCMs to:</p> <p>i) Develop and publish a policy to manage conflict of interest that applies to all CCM members, across all CCM functions. The policy must state that CCM members will periodically declare conflicts of interest affecting themselves or other CCM members. The policy must state and CCMs must document that members will not take part in decisions where there is an obvious conflict of interest, including decisions related to oversight and selection or financing PRs or SRs.</p> <p>ii) Apply their conflict of interest policy throughout the life of Global Fund grants, and present documented evidence of its application to the Global Fund on request.</p>	<p>This has been strengthened considerably. The old requirement referred to the chair and vice-chair of the entire CCM members.</p>

Note: In the above table, titles for the six requirements (i.e., the text shown in bold) have been added by Aidsplan.

For a commentary on the new CCM guidelines, see next article.

Information for this article was taken from the Report of the Portfolio and Implementation Committee, Document GF/B23/5 (particularly Annex 1), and from Decision Point 17 in the Board decision points paper. Both documents should soon be available at www.theglobalfund.org/en/board/meetings/twentythird. In addition, the guidelines should soon be posted at www.theglobalfund.org/en/ccm/guidelines.

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