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CCM Guidelines Fall Far Short of What Was Expected and What Had Been Proposed

Core of proposed guidelines was gutted

by David Garmaise

When draft new CCM guidelines were presented for approval to the Global Fund Board in December 2010, we had a laudatory commentary ready to go. The draft commentary said that the Global Fund deserved to be congratulated for both the product and the process. Unfortunately, last-minute objections from some of the implementing country delegations to certain provisions in the guidelines forced the board to postpone adoption of the guidelines until the board meeting just concluded in Geneva. (See previous article.)

Given the way this issue was handled at the December meeting, and given the changes that have been made to the draft guidelines since that meeting, we no longer feel very good about either the product or the process.

The Global Fund Secretariat spent more than a year consulting stakeholders on how to improve the CCM guidelines. The old guidelines contained six minimum requirements, plus additional guidance that could loosely be defined as “recommendations.” The requirements had considerable weight because CCMs were obligated to meet them in order to be eligible to apply for funding from the Global Fund. On the other hand, the recommendations were entirely optional. Some stakeholders, principally from civil society, wanted to see more requirements added to the guidelines in an attempt to improve the effectiveness of CCMs. Other stakeholders, principally from governments in implementing countries, were opposed to adding any new requirements.

In a [commentary](#) in GFO 136, Bernard Rivers, Executive Director of Aidspace, said that

“the Secretariat handled this minefield well, reminding NGO participants to respect the core country ownership values of the Fund, and reminding implementing governments that the Fund’s other core values – including multi-sector representation, equal participation, accountability and transparency – also had to be reflected in the final outcome.”

The Secretariat found a middle road that satisfied most of the participants in the consultations. The Secretariat proposed that a new category be added to the guidelines, called “standards.” These standards would have less weight than the requirements – CCMs would not be obligated to meet the standards to be eligible for funding – but would have more weight than the recommendations. Under the draft guidelines presented to the board in December 2010, the Secretariat would monitor implementation of the standards; CCMs that did not follow the standards would be asked to explain why; and “broad or persistent” failure to follow the standards “without justification” could “negatively affect access to funding.”

This was the centrepiece of the draft guidelines, around which everything else in the guidelines flowed. But it was all completely gutted in the final version of the guidelines approved by the Board. The final version says simply, “While neither standards nor recommendations represent conditions for Global Fund program financing, these will be used by the Global Fund to form the basis of information to appraise overall CCM performance.” Thus, in the new guidelines, for all intents and purposes, standards have the exact same status as recommendations.

What were the implementing country governments so afraid of? Under the draft submitted to the Board in December 2010, to be at risk of some form of penalty, CCMs would have had to broadly and persistently fail to follow the standards, and they would have had to be unable to provide justification for having done so. Surely, if the CCMs had a legitimate reason not to follow a particular standard, a simple explanation would have sufficed. Further, even if the CCMs broadly and persistently failed to follow the standards, and even if they couldn’t provide justification, they only faced the prospect of some form of penalty. No minimum penalty was prescribed under the draft guidelines.

On the issue of term limits for CCM chairs and vice-chairs, the language contained in the draft guidelines presented to the board in December 2010 was already weak (probably reflecting compromises that had to be made during the consultations). For some reason, some implementing country governments felt the need to weaken the language even further.

All in all, this was not the Global Fund’s finest hour.

David Garmaise (david.garmaise@aidspan.org) is a senior analyst with Aidspace.

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