



Independent observer
of the Global Fund

GLOBAL FUND GUIDANCE PAPER ON CCM OVERSIGHT MISSES THE MARK

The role of the CCM in overseeing the implementation of grants is not well understood by most CCMs. As a result, CCM oversight is not working in most countries. Thus, the recent release by the Global Fund of a “Guidance Paper on CCM Oversight” (see previous article) is a step in the right direction. However, I doubt that the guidance paper will do much to help CCMs (and other stakeholders) understand how oversight can work.

Part of the problem is that the reporting relationships, and the chain of command, involving the CCM, the PR and the Global Fund are very unusual and not particularly intuitive, and are even more unusual when one adds the Local Fund Agent (LFA) into the mix.

It is the CCM that informs the Global Fund (via the proposal form) what it would like the grant to consist of, and that informs the Fund who it would like to serve as PR. Yet it is the PR that then has a contractual relationship with the Global Fund, and that reports to the Fund on how well the grant is going. The CCM is supposed to “oversee” the grant; yet it does not have any formal powers over the PR in the way that a board (such as that of the Global Fund) has clear authority over the working staff.

Add to this that the head of the PR is usually a member of the CCM, and is often a senior government official, and the complexity and ambiguities get even greater.

This situation requires that a clear understanding – and possibly a formal agreement – be developed between the PR and the CCM regarding (a) how the PR will fulfill its formal reporting obligations to the Global Fund, (b) how the PR will keep the CCM informed of grant progress, (c) how the CCM will check that it is satisfied with grant progress, and (d) how the PR will draw upon the skills of the CCM’s members

when there are any major problems in implementation.

Any guidance on oversight should start by acknowledging these basic realities and needs. The Global Fund's "Guidance Paper on CCM Oversight" contains only some of this, and it does so in limited detail and in language that is bland, sometimes repetitive and sometimes confusing.

As well, in my opinion, the guidance paper defines "oversight" far too broadly. Why, for example, is proposal development listed as a component of the CCM's oversight role? The CCM is not responsible for overseeing proposal development; rather, it is responsible for actually doing it!

There are other components that the guidance paper includes under the umbrella of CCM oversight – specifically, Phase 2 renewals, the development of RCC proposals, donor coordination, and alignment with health systems – that either don't fit under the concept of "oversight" or that would be better dealt with in separate papers. Explaining how CCM oversight of grant implementation can work is a big enough challenge for one paper. The Fund's guidance paper seems to conflate oversight with the entire role of the CCM, including the functions of individual CCM members in their "other" lives.

What is needed is a more practical tool to assist CCMs with the oversight process. In addition to what is described above, this tool should:

- list ways in which the CCM can organize itself to carry out its oversight responsibilities;
- provide a list of the types of oversight activities the CCM should consider;
- present suggestions for a process to identify serious problems with grant implementation;
- provide examples of the types of problems that can arise during grant implementation;
- describe different ways that problems can be resolved; and
- include examples of how some CCMs have worked with PRs to resolve these problems.

(Note: Some of the concepts in the above bullet points were included in a presentation at the International AIDS Conference in Mexico City in August 2008 by Catherine Severo of Grant Management Solutions, for Management Sciences for Health.)

Finally, I am concerned with the overall tone of the guidance paper. It speaks in terms of "Global Fund expectations" concerning what CCMs should be doing in grant oversight. There are no contractual relationships between CCMs and the Global Fund. It shouldn't be about what the CCM can do to help the Global Fund. It should be about what the CCM can do to help improve the health of the country.

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