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# Global Fund Updates CCM Guidelines and Requirements for 2015:

New opportunities for key  
population advocacy

MARCH 2015

ALERT

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NEW TOOLS FOR KEY POPULATION ADVOCACY

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This alert provides information and practical guidance for civil society organizations and key population networks on the updated Country Coordinating Mechanism (CCM) Eligibility Requirements which came into effect on January 1, 2015. [eLinks](#) are provided throughout the document for additional information and clarification.

The Global Fund to Fight AIDS, Tuberculosis and Malaria (Global Fund) rolled out its New Funding Model (NFM) in early 2014. The NFM includes many changes to the process and expectations for recipient countries seeking funding. See ICASO [eAlert on NFM Roll Out](#) for more details.

Enhanced engagement of civil society, people living with and/or affected by the diseases (PLWDs)<sup>1</sup> and key populations<sup>2</sup> in all aspects of the grant cycle is a core principle of the NFM. The [eKey Populations Action Plan](#) details some of the expectations and protocol for this engagement in moving forward. The increased engagement of civil society, PLWDs, and key populations in CCMs is an area of specific concern for the Global Fund. As part of the NFM roll out, the Global Fund has updated the [eGuidelines and Requirements for Country Coordinating Mechanisms](#). The new guidelines, which came into effect on **January 1, 2015**, include specific expectations for key populations, PLWD, and civil society participation in CCMs. This alert highlights some of the new requirements that will have the most impact on key populations.

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- 1 “People living with and/or affected by the diseases” refers to people who are living with HIV, have been diagnosed with malaria or tuberculosis at some point in their lives, or are from a community in which tuberculosis and/or malaria are endemic.
  - 2 The Global Fund currently defines key affected populations as: women and girls, men who have sex with men (MSM), people who inject drugs (PWID), transgender people, sex workers (SW), prisoners, refugees and migrants, people living with HIV, adolescents and young people, orphans and vulnerable children, and populations of humanitarian concern.

# Updated Eligibility Requirements for CCMs

(SUMMARIZED)



**Concept Notes:** Develop concept notes through a documented process which engages a broad range of stakeholders, specifically inclusive of key populations.



**Principal Recipients (PRs):** Nominate PRs at time of application through a documented and transparent process, with specific attention to management of conflicts of interest.



**Oversight:** All CCMs must develop, submit and follow an oversight plan for grants, which engages non-CCM and non-government constituencies in oversight activities.



**PLWD and key population:** CCMs must show evidence of membership of people living with and/or affected by the diseases AND key populations.



**Non-Government Representatives:** CCM members representing non-governmental constituencies must document a transparent selection process which engages the constituency.



**Conflict of Interest:** CCMs must develop, publish and apply a policy to manage conflicts of interest among CCM members. Recusal from decisions posing a conflict of interest should be central to this policy.

# Highlights: Requirements for Country Coordinating Mechanisms (CCMs)

The updated *Guidelines and Requirements* document features six mandatory eligibility requirements for CCMs. These requirements must be met by all CCMs, or funding may be withheld or interrupted.<sup>3</sup> Some of the updated requirements provide key points of advocacy for the greater inclusion of key populations in all CCM processes. The most relevant requirements (1, 3, 4, and 5) are discussed below, while the complete updated eligibility requirements are annexed at the end of the document.



## INCLUSION OF KEY POPULATIONS IN CONCEPT NOTE DEVELOPMENT

The Global Fund requires all CCMs to:

- i. *Coordinate the development of all concept notes 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 included in the application.*
- ii. *Clearly document efforts to engage key affected populations in the development of concept*

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3 CCM compliance with the eligibility requirements is assessed and documented by the Global Fund Secretariat at the time of submission of requests for funding and ongoing on a yearly basis.

This requirement is focused on the country dialogue and concept note development process. All CCMs are required to make both these processes open and engage key populations in them. In addition, the requirement builds on existing [e-country dialogue guidance](#) and provides the basis for enforcement of key population engagement in dialogue and concept note development.

Advocates MUST determine what constitutes “clearly documented efforts” as early in the process as possible and then seek agreement with the CCM on what this will look like. The vague language of this requirement leaves open the opportunity for CCMs to “engage” key populations in a superficial manner to ostensibly satisfy the requirement. It is incumbent upon key population networks and civil society to hold CCMs accountable for meaningful engagement.

In its February 2015 [update to the Global Fund Board](#), the Secretariat described a recent analysis of CCM compliance with Requirement 1 among the 111 concept notes submitted in 2014. According to the report, 59% were deemed “compliant” and 35% were deemed “compliant with challenges.”<sup>4</sup> None of the concept notes were deemed “non-compliant,” which suggests that the application of “compliant with challenges” may be an over-generous description of some CCMs. With regard to “compliant with challenges” CCMs, the report indicates: “The follow up required and the feedback provided to the CCMs in these situations is determined on a case-by-case basis by an internal review panel.” They provide no details on who sits on this panel, or what their process for reviewing and correcting CCM “challenges” will be. Greater transparency is needed immediately on this point, as it is currently the only evidence of a corrective process for CCMs which have not demonstrated significant engagement with key populations in concept note development.

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4 The report indicates that the percentages do not total 100 because some concept notes were not subject to the same requirements.



## **CCM'S GRANT OVERSIGHT PLAN MUST INCLUDE PLWDS AND NON-CCM MEMBERS**

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.

This requirement is less straightforward, but provides an important opportunity for PWLDs and key populations to demand that their voices be heard in the country-level review of grant performance and challenges. One of the operational components of Requirement 3 is that the CCM (or its appointed oversight body) must seek “feedback from non-members of the CCM and from people living with and/or affected by the diseases.” Providing oversight to ensure accountability is a powerful role. Communities are uniquely positioned to perform this role well. As such, PLWD and key population networks will want to push for inclusion on the “oversight bodies” which are required here, regardless of whether or not they sit on CCMs.



## ALL CCMS MUST HAVE PLWD AND KEY POPULATION REPRESENTATIVE MEMBERS

The Global Fund requires that all CCMs show evidence of membership of people that are both living with and representing people living with HIV, as well as representing people living with and affected by Tuberculosis and Malaria. In addition, people from and representing key populations, based on epidemiological as well as human rights and gender considerations, must be included.

This may be the most powerful of the updated recommendations, as far as key populations are concerned. There has been a long-standing requirement that CCMs include PLWD members, which most CCMs have to some degree adhered to. But key population representation in CCMs has been limited in scope and quality, with much less uptake than PLWD representation. However, with this requirement, all CCMs are required to have some specific key population representation (in addition to PLWDs) as of January 1, 2015. This means that CCMs that do not have specific key population representatives in 2015 are at risk of being ineligible for Global Fund grants. While grants will not

*CCMs that do not have specific key population representatives in 2015 are at risk of being ineligible for Global Fund grants*

be suspended immediately due to a lack of key population representation, it will be essential that all CCMs take steps to elect and support key population members in moving forward. Demonstrating a plan for key population representative elections is one thing that can be done immediately by CCMs seeking compliance.



Contained in this requirement is a note that: “The Secretariat may waive the requirement of representation of Key Affected Populations as it deems appropriate to protect individuals.” There is no further explanation of what type of circumstance will warrant such a waiver, or of what the process is to determine whether or not such a waiver is appropriate. This should be clarified by the Secretariat.

Additional ambiguity surrounds the consequences of “non-compliance.” While the document describes all recommendation as “mandatory,” it is unclear at what point non-compliance will result in funding interruptions, or how, for example, key populations will not bear the brunt of funding interruptions that occur on their behalf. Hard compliance deadlines and plans for the protection of key populations will be essential enforcement considerations. A panel comprised of Secretariat officials and key population advocates may be established to monitor compliance with this requirement, as well as to manage appropriate corrective action for CCMs which are deemed “non-compliant.”

CCM membership is the first step towards meaningful engagement of key populations. The Secretariat should pursue a more comprehensive policy which ensures the meaningful engagement of key affected populations through capacity building and documented impact on CCM decisions. In the requirements document, CCMs are directed to [\*\*Ⓜaking Global Fund Country Coordinating Mechanisms work through full engagement of civil society\*\*](#), a 2008 report by the [\*\*ⓂInternational Treatment Preparedness Coalition\*\*](#), which provides guidance on meaningful engagement beyond membership. A full update of this work within the context of the new funding model should be supported by the Global Fund.



**ALL NON-GOVERNMENT CCM MEMBERS  
MUST BE SELECTED THROUGH TRANSPARENT  
AND DOCUMENTED PROCESSES**

The Global Fund requires that all CCM members representing non-government constituencies be selected by their own constituencies, based on a documented, transparent process, which is developed within each constituency. This requirement applies to all non-government members, including those members under Requirement 4, but not to multilateral and bilateral partners.

This requirement is about accountability for PLWD, key populations and civil society CCM members. Transparent and documented elections must be held within all specific constituencies the CCM member(s) are mandated to represent as a condition of greater involvement of these communities. The Global Fund encourages civil society to develop these selection processes on their own, so that they will be contextually appropriate. Technical assistance is available to CCMs and civil society for the development and conduct of good selection processes. Contact [ccm@theglobalfund.org](mailto:ccm@theglobalfund.org) for more information on technical assistance opportunities.

# What can you do?

## LEARN ABOUT YOUR CCM

- Each country has a page on the [eGlobal Fund website](#). Country funding portfolios and CCM membership listings can be found here.
- Many CCMs have their own websites. These sites typically provide information about the CCM, including **membership**, upcoming events such as **CCM meetings** and **country dialogue activities**, **concept note submission timelines**, and **CCM elections**. CCM websites are independently run by each CCM secretariat, and there is therefore no standardized URL format. A simple Google search for “CCM” and the name of a country will generally lead to the CCM website, if there is one. Here is an [eexample from Uganda](#).
- **Contact your CCM Secretariat.** Contact information can be found on the CCM website or the Global Fund country page.

## DETERMINE IF YOUR CCM IS COMPLIANT WITH THE UPDATED REQUIREMENTS

- Are there PLWD and key population representatives and who are they? If so, they are mandated to be in communication with their constituencies. Reach out. Ask to be included in updates and ask what they have been advocating for on the CCM.
- Offer your support to mobilizing communities for greater engagement with CCM.
- The Global Fund Secretariat has committed to monitoring adherence to the Eligibility Requirements discussed in this alert on a yearly basis. Contact your country team at the Global Fund to inquire about the outcome of their most recent assessment. Contact information for Fund Portfolio Managers can also be found on the country page on the [eGlobal Fund website](#).