

Community Engagement in Global Fund Country Coordinating Mechanisms:

Findings from the RISE Study

22 April 2024



Abbreviations

CCM	Country Coordinating Mechanism
CLM	Community-led monitoring
COI	Conflict of interest
FBO	Faith-based organization
GBMSM	Gay, bisexual, and other men who have sex with men
GC7	Grant Cycle 7
HTM	HIV, tuberculosis, and malaria
KP	Key population
LFA	Local Fund Agent
NGO	Nongovernmental organization
OIG	Office of the Inspector General
PR	Principal Recipient
RISE	Representation, Inclusion, Sustainability, and Equity
SR	Sub-Recipients
SSR	Sub-Sub-Recipients
TRP	Technical Review Panel

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1. Executive Summary

The Global Fund to Fight AIDS, Tuberculosis and Malaria is a health financing partnership, supporting over 100 countries to combat the diseases since 2002. Central to the Global Fund model are Country Coordinating Mechanisms (CCMs), country governance bodies that convene a variety of stakeholders to develop and submit Funding Requests to the Global Fund and oversee grant-supported programs. In addition to ensuring that Global Fund support delivers impact, CCMs are additionally a key strategy for fostering the founding principle of partnership and country ownership, by that everyone involved in the fight against the three diseases be involved in the decision-making process.¹

The Global Fund has prioritized the strengthening of CCM functioning and has also emphasized maximizing community engagement as a core objective in its 2023–2028 Strategy. The RISE (*Representation, Inclusion, Sustainability, and Equity*) study was launched to gather high-quality empirical data on the meaningful participation of communities and civil society in CCMs. Building on the lessons learned from the Global Fund, RISE was designed as a mixed-method, participatory research study, using community-developed indicators and developing recommendations collaboratively as a coalition of civil society CCM representatives, Global Fund advocates, and global academic and technical partners. This study aimed to identify drivers of community engagement, measure barriers to community oversight, and identify opportunities to strengthen the model.

The findings from the **RISE study affirmed the vital role of CCMs in the Global Fund partnership and found**

numerous examples of multisectoral partnership and community empowerment, with respondents widely describing the CCM as a valuable space and reporting seeing growth in community engagement. The study identified several opportunities to further build community engagement with CCMs and Global Fund processes. These included engaging communities in core Global Fund processes, equipping representatives and their constituencies with the resources and tools to fully participate, and empowering participants with the agency, autonomy, and safety to actively contribute their voice to decision-making processes. These opportunities range from policy considerations (such as ensuring that Global Fund policies are understood, implementing new transparency mechanisms for Global Fund data, and strengthening whistleblowing pathways), to governance (such as ensuring sufficient representation on the CCM for community constituencies), and to strengthening Secretariat-led support for CCMs (such as financial facilitation for consultations and technical assistance for representative capacity building).

These findings underscore an important opportunity to strengthen CCM functioning and elevate community engagement with the Global Fund partnership. Implementing the recommendations from the RISE study will require continued collaboration from across the partnership, including the Global Fund Secretariat, communities, civil society and advocates, technical partners, and other global donors. The RISE study provides an empirically derived roadmap for strengthening the Global Fund model, building resilient health systems, amplifying the voices of communities, and accelerating the fight against the three diseases.

2. Background

2.1 What is the Global Fund?

The Global Fund to Fight AIDS, Tuberculosis and Malaria is a multilateral financing partnership institution providing grants to over 100 countries. Since 2002, the Global Fund has worked in partnership with governments, donors, multilaterals, and community partners to save 59 million lives and halve the death rate from the three diseases.²

The Global Fund operates on a three-year funding cycle, beginning with an international fundraising exercise, or Replenishment, that pools resources from donor governments and private sector partners. Country eligibility for funding is determined primarily on the basis of national income level and disease burden,³ and eligible countries are invited to submit Funding Requests up to a predetermined level of allocated funding. Country allocations are similarly based on economic and epidemiological indicators, adjusted for technical and qualitative considerations and bounded by the overall available Replenishment funding.⁴

All Funding Requests are reviewed and ultimately approved by the Technical Review Panel (TRP), an independent body of subject matter experts.

Subsequently, the approved activities are allocated among the selected Principal Recipients (PRs) into one or more grants, which are implemented during the three-year allocation cycle.

2.2 What are Country Coordinating Mechanisms?

A core component of the Global Fund model is country ownership, which emphasizes the ownership of health programs by governments, communities, and other local partners.⁵ As such, Global Fund-supported programs are implemented by PRs (country-based governments and nongovernmental organizations) which in turn subcontract to a series of Sub-Recipients and Sub-Sub-Recipients (SRs and SSRs).

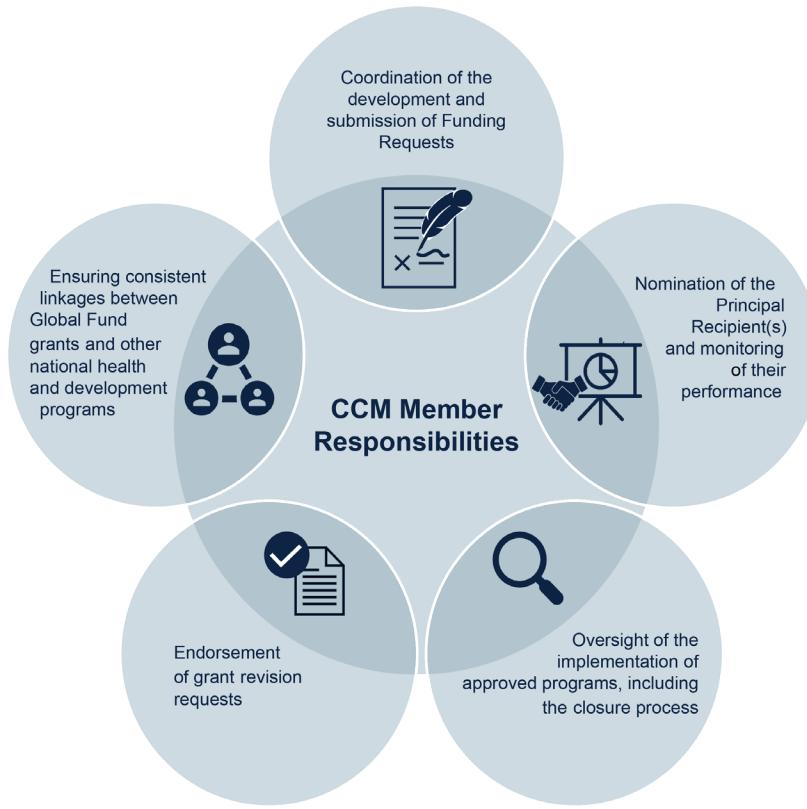
In addition to implementation, countries are themselves

responsible for designing and overseeing Global Fund grants. This role is executed by the Country Coordinating Mechanism (CCM), a national convening body of stakeholders involved in the public health response, generally including governments, bilateral and multilateral development agencies, technical partners, nongovernmental organizations (NGOs), civil society, faith-based organizations (FBOs), private sector, and people living with and impacted by the three diseases.⁶

The CCM is designed to achieve country ownership and inclusivity in several ways.⁷ First, by housing decision-making authority over programmatic objectives, budgets, performance goals, and implementation arrangements within the implementing country, the CCM model can better align Global Fund grants with national priorities and local context. Additionally, the CCM serves as a unique multi-stakeholder venue for dialogue, problem-solving, and advocacy, one that strives to ensure that the perspectives of populations impacted by the three diseases are heard. **CCMs are therefore a key strategy for ensuring impact, sustainability, and coordination.**

According to the Global Fund's CCM Policy,⁶ members of the CCM are responsible for the following areas (**Fig. 1**):

Figure 1. Core responsibilities of CCM representatives



Global Fund CCM Eligibility Requirements

In order to be eligible for Global Fund funding, CCMs must fulfill each of these six requirements⁶:

Requirement 1: The Global Fund requires all CCMs to

1. coordinate the development of all funding requests 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 funding request; and
2. clearly document efforts to engage Key Populations (KPs)⁸ in the development of funding requests.

Requirement 2: The Global Fund requires all CCMs to

1. nominate one or more PR(s) at the time of submission of the funding request(s);
2. document a transparent process for the nomination of all new and continuing PR(s) based on clearly defined and objective criteria; and
3. document the management of any conflicts of interest (COIs) that may affect the PR(s) nomination process.

Requirement 3: Recognizing the importance of oversight, the Global Fund requires all CCMs to submit and follow an oversight plan for all Global Fund approved financing. 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 KPs.

Requirement 4: The Global Fund requires all CCMs, based on epidemiological as well as human rights and gender considerations, to show evidence of membership of

1. people that are both living with and representing people living with HIV;
2. people affected by and representing people affected by tuberculosis and malaria; and
3. people from and representing KPs.

Requirement 5: 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 such constituency. This requirement applies to all non-government members, including those members selected pursuant to Requirement 4 above, but not to multilateral and bilateral partners.

Requirement 6: To support CCMs' leadership role of setting a tone and example of abiding by the highest standards of ethics and integrity, the Global Fund requires all CCMs to

1. approve and adopt the Code of Ethical Conduct for CCM Members;
2. develop or update, as necessary, and publish a Conflict of Interest Policy that applies to all CCM members, alternates, and CCM Secretariat staff; and
3. enforce the Code of Ethical Conduct and apply the Conflict of Interest Policy throughout the life of Global Fund grants.

2.3 The CCM as a platform for strengthening community engagement

In its 2023–2028 Strategy, the Global Fund reaffirmed its commitment to holding communities at the center of its work, with the CCM described as a key mechanism for maximizing their engagement in Global Fund processes.⁹

The Strategy identified the need to strengthen community engagement, improve access to and use of strategic data, and build the capacity of civil society representatives

in the CCM, recognizing that, when there is active engagement of community organizations in the initial design of the program, this engagement facilitates the ongoing involvement of the community in service delivery throughout the life cycle of the grant.

During the 48th Global Fund Board held in November 2022, a community engagement strategy was presented.¹⁰ The strategy defines "minimum expectations" for community

engagement throughout the grant life cycle, including the addition of community engagement language into the allocation letters, the timely provision of information to CCM community members concerning funding applications, the development of the “Annex of Funding Priorities of Civil Society and Communities Most Affected by HTM,” and a requirement for two community briefing meetings to be convened by the CCM during the Grant Making phase.

2.4 Opportunities to strengthen the model

In 2016, the Global Fund Office of the Inspector General (OIG) conducted an audit of CCMs, finding that the approach has successfully promoted participatory decision-making around health programming.¹¹ However, the report identified several gaps, including weak grant oversight, lack of compliance with Global Fund CCM policies, poor sustainability, conflicts of interest, and weak integration with national programs. Additionally, the audit found insufficient engagement of communities and civil society, with 24% of CCMs surveyed not meeting minimum requirements for civil society representation.

Several initiatives have been implemented or proposed to address these challenges, chief among these the CCM Evolution. First approved as a pilot project in 2018 and later expanded to a Strategic Initiative in the 2020–2022 allocation cycle, the CCM Evolution was a project designed to improve engagement of CCM members, strengthen grant oversight, address challenges in governance and operations, and better align with national processes.¹²

Under this initiative, CCM maturity was measured¹³ and tailored support was provided to strengthen performance and governance. The CCM Evolution aimed to provide extensive training for CCM members including orientations, data analysis, and deep dives on conflicts of interest and ethics.¹⁴ In some country contexts, CCMs also elected to have their CCM composition reviewed, receive trainings to strengthen CCM election processes, or receive support to hire CCM Oversight Officers.¹⁴ Overall, **CCM members felt that Secretariat support was aligned with the needs of CCMs and the Evolution project was found by the OIG to have been additive.**¹⁴ However, delays due to COVID-19, under-resourcing of the effort, and challenges with the oversight and management of activities were found to have limited the potential impact of the initiative.¹⁴

2.5 The RISE Study: Measuring meaningful engagement in CCMs

With 2023 marking both the start of the Grant Cycle 7 (GC7, corresponding to 2023–2025) and the first year of the new Strategy, the *Representation, Inclusion, Sustainability, and*

Equity (RISE) study was launched to assess the meaningful participation of communities and civil society in CCMs.

These findings are intended to serve as a tool to support the strengthening of community engagement, as articulated in the Global Fund’s Strategy.

Building on the lessons learned from CCM Evolution and the OIG, RISE was designed as a participatory research study using community-developed indicators and developing recommendations collaboratively as a coalition of civil society CCM representatives, Global Fund advocates, and global academic and technical partners. This study aims to fill a pressing gap in high-quality empirical data on the functioning of CCMs, from the perspective of communities most affected by the programs. These data may be used to pinpoint the specific areas where further improvements are needed to strengthen community engagement, and the levers and opportunities for doing this work.

The RISE study focused on measuring facilitators and challenges along a continuum of participation. This conceptual framework supposes that meaningful CCM engagement requires the following:

- 1. Engagement.** Are community and civil society representatives included, present, and involved in governance structures?
- 2. Equipping.** Are the community and civil society representatives in the governance spaces afforded the tools they need to be able to do their mandated tasks and meaningfully contribute?
- 3. Empowerment.** In their role as representatives on governance structures, are communities and civil society empowered to hold governments, PRs, and other stakeholders accountable for delivering services?

Who is RISE?

RISE is led by an independent steering committee of community representatives on CCMs, global civil society partners, and researchers from 13 organizations across 11 countries. The RISE steering committee was responsible for all aspects of study design, indicator development, results validation, and recommendations.

3. Methods

3.1 Data collection

Data for this community-led mixed methods study came from two primary sources: 1) a globally administered electronic survey and 2) in-depth interviews from a subset of the surveyed countries. The RISE study received a determination of exempt research by Georgetown University's Institutional Review Board.

3.1.1 Quantitative data collection: Survey

An electronic survey was used to collect data between May and October 2023. The survey was distributed through Global Fund advocacy listservs, steering committee contacts, and CCM focal points. Participants were additionally asked to forward the survey to anyone who may be interested in participating or to provide the RISE team with the contact information of recommended participants to the RISE team. Contact information was used

only to reach out to participants and was never stored. All participants were informed of the study's objectives and provided written consent.

Survey questions were developed by the RISE steering committee and covered topics related to meaningful

Are community and civil society representatives included, present, and involved in governance structures?

participation of the community on the CCM, wider community engagement with the Global Fund, and community power to effect change in CCM processes. The survey engaged three categories of respondents: 1) current or former CCM members from the community, 2) current or former CCM members not from the community, and 3)

Figure 2. RISE Survey Flowchart

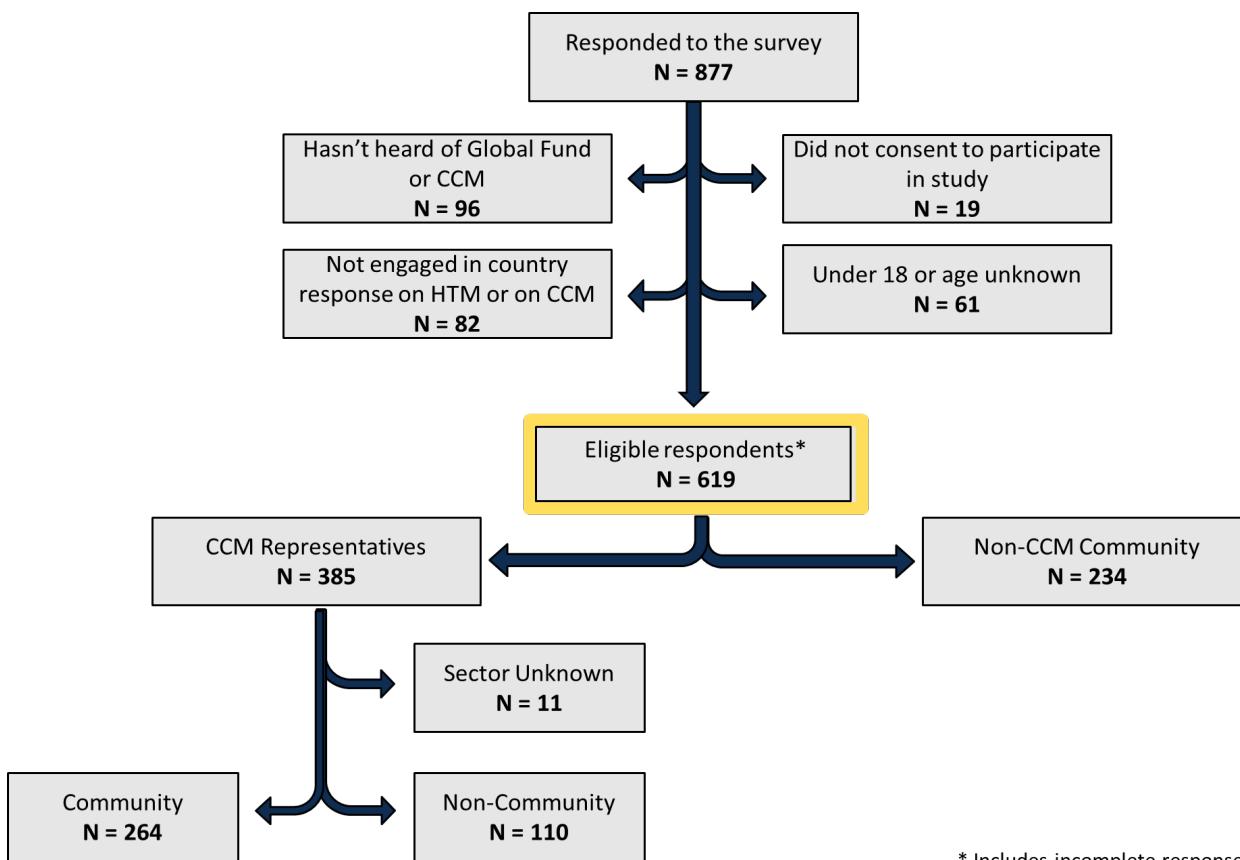


Figure 3: Countries included in RISE survey



community members engaged in Global Fund advocacy who are not on the CCM. "Community" was defined as participants who self-identified as being part of civil society or a community-based organization, a local faith-based organization, or a local NGO. All other participant types including government, international NGOs, bilateral and multilaterals, technical agencies, private sector, academics, etc., were considered "Non-Community." The survey was administered with Qualtrics and was available in Arabic, English, French, Portuguese, Spanish, Russian, and Thai, with survey translations conducted by a professional translator or native speaker. The survey was pre-tested with several members of the target populations and feedback was incorporated into the final survey.

To be eligible to participate in the survey, respondents had to be 18 years of age or older, had to be aware of the Global Fund and the CCM, and had to either be part of the country's public health response (focused on HIV/AIDS, TB, malaria, COVID-19, or human rights) or be a current or former CCM representative. Overall, 877 people responded to the survey, and 619 were considered eligible (**Fig. 2**).

3.1.2 Qualitative data collection: In-depth interviews

In-depth interviews were conducted across seven countries between June and September 2023 with a total

of 46 participants. Countries were purposefully selected to include a variety of political, social, and geographic contexts. Key informants were purposefully selected from survey participants and snowball sampling was used to recruit additional participants. In each country, at least one participant came from each of the study's three target populations (community CCM members, non-community CCM members, and community members not on the CCM). Interviews were conducted by a trained RISE study member either virtually or face-to-face, depending on the study team's location and availability. Interviews were recorded, with participant consent, transcribed with Sonix software, and machine-translated with human review. Transcripts were deductively coded by the RISE interviewers using an interviewer-designed codebook for major themes in Taguette software.

3.2 Participants

Eligible survey participants came from 83 countries (**Fig. 3**), with an average of seven surveys collected per country (country range 1–79). Data from CCM members came from 76 of the 83 total countries. Country-level clustering was less extreme for the CCM member sample (average five surveys per country, range 1–33).

Participant characteristics are described in **Table 1** and **Table 2**.

Table 1: Survey participant characteristics

	CCM Representatives N = 385	Non-CCM Community N = 234
Region: % (n)		
Middle & East Africa	31% (121)	47% (109)
West & North Africa	21% (81)	22% (51)
Central & South America	14% (53)	12% (28)
Southern and Southeast Asia	11% (41)	8% (18)
West & Central Asia	8% (32)	1% (2)
Eastern & Southern Europe	8% (31)	4% (10)
Southern Africa	3% (13)	4% (10)
Caribbean	2% (7)	1% (2)
Sector: % (n)		
Civil society or community org.	57% (221)	71% (166)
Local NGO	30% (114)	45% (105)
Government	9% (36)	NA
Private sector	6% (23)	4% (8)
International NGO	5% (20)	7% (16)
Local FBO	4% (14)	3% (8)
Multilateral	4% (15)	0% (0)
Academic institution	3% (13)	3% (6)
Technical agency	3% (11)	2% (4)
People living with HTM * : n (%)	24% (94)	28% (65)
KP* status: % (n)		
GBMSM*	14% (55)	24% (56)
Sex workers	9% (36)	11% (25)
People who inject drugs (PWID)	8% (29)	7% (17)
Trans people	6% (24)	9% (20)
Young people	3% (11)	9% (22)

Advocacy community: % (n)			
HIV	91% (352)	88% (205)	
Tuberculosis	60% (230)	49% (114)	
Malaria	36% (138)	35% (82)	
Human rights	65% (252)	69% (162)	
COVID-19	57% (220)	48% (112)	

* HTM = HIV, tuberculosis, or malaria, KP = key population, GBMSM = gay, bisexual, and other men who have sex with men

Table 2. In-depth interview participants

Region: % (n)	
West & North Africa	32% (15)
Middle & East Africa	23% (11)
Central & South America	17% (8)
Southern and Southeast Asia	13% (6)
West & Central Asia	11% (5)
Southern Africa	6% (3)

Type: % (n)	
Community CCM member	51% (24)
Non-community CCM member	28% (13)
Global Fund advocate (non-CCM)	21% (10)

Key population: % (n)	
	26% (12)

4. RISE Findings

4.1 Engagement: Community inclusion and participation

At a minimum, for communities to participate in Global Fund processes, they must be included in the rooms where decisions are being made. **RISE data find a high level of community membership in CCMs**, particularly from KPs, and recent improvements in community engagement in Grant Making. RISE findings also show a high level of participation from communities in CCM committees. Study findings highlight an opportunity to address context-specific barriers to CCM membership and to improve the active engagement of community representatives in all CCM work across the three-year cycle. Additionally, increased support for consultations with community members outside of the CCM is needed to better solicit the perspectives and priorities of people impacted by the three diseases.

4.1 Summary: What are the key opportunities to strengthen community engagement on CCMs?

4.1.1 Ensure commensurate community and key population representation on the CCM

4.1.2 Engage community representatives in all core CCM activities

4.1.3 Strengthen communication channels between community CCM members and their constituencies

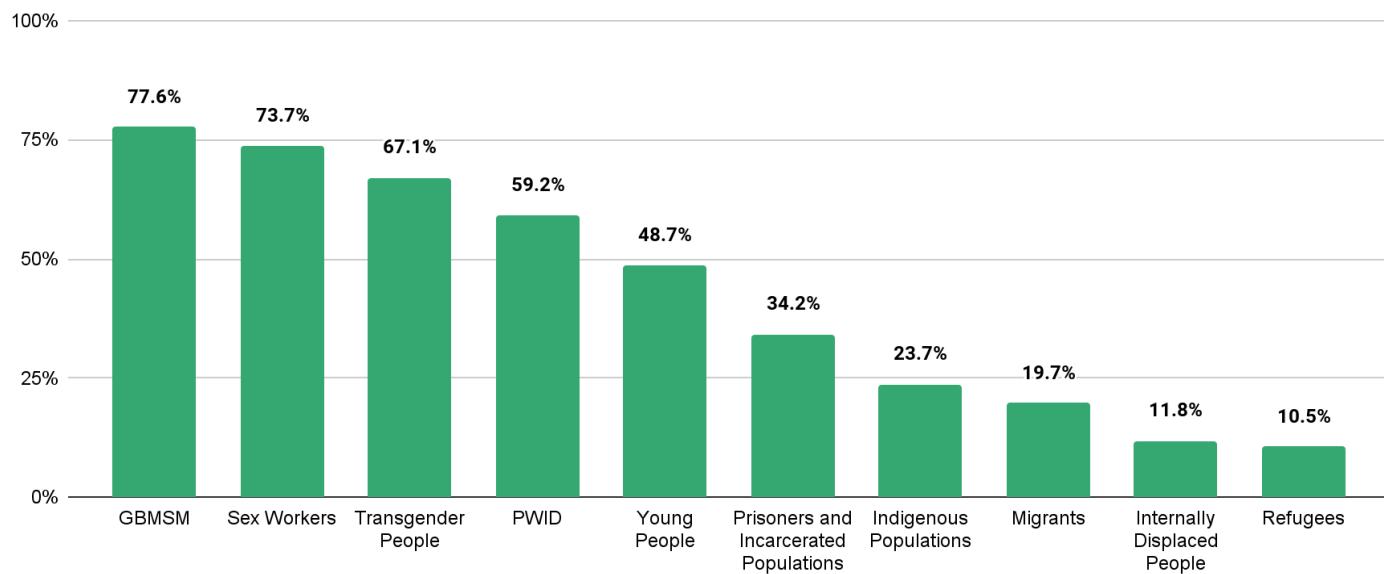
4.1.1 Ensure commensurate community and key population representation on the CCM

The Global Fund CCMs operate as governing boards composed of a group of individuals that represent their respective constituencies. While countries are afforded leeway in determining the exact number of CCM seats and the makeup of its representatives, under Global Fund policy all CCMs must at minimum demonstrate evidence of membership of people living with and impacted by the three diseases and KPs, on the basis of epidemiological and human rights considerations.

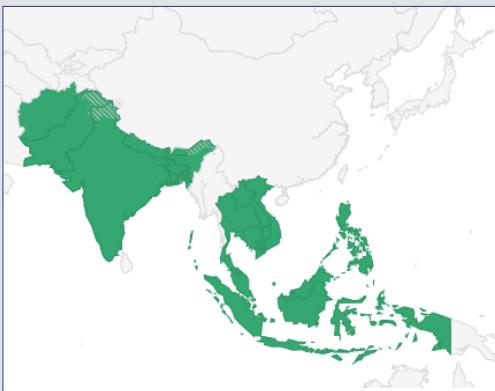
The findings from RISE highlight the importance of CCM representation for the engagement of communities in decision-making. Results from the RISE study find a high level of community (96%) and KP representation (87%) on CCMs. Most commonly, KP representatives identified as gay, bisexual, and other men who have sex with men (GBMSM) (78% of countries), followed by sex workers (74%) and transgender people (67%) (**Fig. 4**). RISE respondents identified that in most cases, each constituency on the CCM is represented by both a substantive member and an alternate member, although alternative arrangements were also reported; in general, **having at least two individuals per CCM seat was highlighted as being important** for ensuring continuity, redundancy, and a wider breadth of expertise and representation.

This representation was described as being deeply important, with respondents describing the importance of adequate

Figure 4. Proportion of countries with at least one KP CCM representative, among countries with data from CCM members (n=76)



SPOTLIGHT: Adding community seats on a CCM in Southern and Southeast Asia



Qualitative data from a country in the Southern and Southeast Asia region showed some important improvements in increasing community power on the CCM between funding cycles. This country significantly expanded the number of KP seats on their CCM to ten representatives, offering a KP seat for both adults and youth from each of the major KP groups. This was seen as a major step forward:

"We expanded to 10 key population representatives, which is I think that's good because prior to this we had only one key population representative. Last year, we changed it to a youth representative for each key population, acknowledging that the trend in HIV trends is also getting younger and younger, and we noted that the need to have a strong voice from young people." (Current CCM Oversight Officer Non-community)

These additional CCM seats were seen by community as an important way to balance power and bolster community voices on the CCM:

"I think that it has made our CCM meeting more interesting and more participatory. I would say just like everybody just, you know, have a chance to speak up and then it's not so dominant between governments and non-government representatives. So it's balanced and everybody will have the equal power dynamic, I would say." (Current CCM Oversight Officer Non-community)

representation as a strategy for decision-making influence. Indeed, in CCMs where decision-making is conducted through majority rule and formal votes, the balance of seats was characterized as an important predictor of power; where government representatives held the majority of CCM seats, RISE respondents described community members as having diminished power. In such contexts, respondents described the **need for additional seats to represent communities** as a key way to increase influence on the CCM. Where CCM membership diverged from the requirements in the CCM Eligibility Policy, there was a need to ensure that CCMs **meet Global Fund requirements around community and KP representation** on the CCM.

"When [they changed the] rules for the functioning of the CCM and it changed directly from the 30 or so [civil society] members to only six, this greatly limits the votes of civil society, because

they will always lose to the government. [...] I think about what they have lost as power or as being able to decide, to be able to comment, to be able to intervene, because there is no longer that possibility." (Non-CCM Community)

In addition to the need for seats representing communities, some respondents described challenges when multiple constituencies were afforded just one seat, which was described as effectively silencing the specific needs of different groups. For instance, granting all of the country's KPs one seat on the CCM was described as a barrier to advocating for the diverse perspectives and needs of different populations. While in some cases representatives can equitably represent the diverse perspectives of their constituencies, in other contexts obtaining additional, population-specific seats was described as a mechanism to better **advocate for population-specific needs**.

"As the youth constituency, we have not been given a full [CCM] seat, we only participate on committees and we stay as co-opted members... But they've always told us [that we are] a minority group, it does not need that seat. You can be put under the key populations, you can be put under the marginalized, you can be put under... I mean, everybody says that." (Current Youth CCM Representative)

While RISE found that most CCMs had strong membership from communities, in some countries, RISE respondents described challenges with ensuring community representation. In some contexts, **community seats were actively removed from the CCM** by government actors, which was perceived to be a strategy for breaking up civil society voting blocs or to minimize the influence of communities on programming and governance. In other countries, government actors were described as being directly or indirectly **involved in the selection of community representatives**, or were themselves serving in the CCM seats intended for communities, KPs, or people impacted by the three diseases. Some respondents described the importance of selecting, and then training,

representatives who are able to act independently and have the capacity to effectively advocate for community priorities.

An important tool for ensuring equitable community representation was CCM members' awareness and understanding of the Global Fund's policies on structuring CCMs. In several cases, CCM respondents described confusion around the proportion of seats meant for nongovernmental actors, which sectors are eligible to take a nongovernmental seat, who is empowered to make decisions about CCM structures, and who is ineligible to serve due to perceived or actual conflicts of interest (COI). Secretariat mediation was described as a valuable tool to respond to CCM governance issues, and respondents identified an urgent need for the Global Fund Secretariat to continue mediating governance conflicts, **to provide clarification on CCM requirements**, and to proactively ensure community representation on CCMs in alignment with CCM policies.

Despite their importance in many countries, the number of seats on the CCM was not always sufficient to ensure

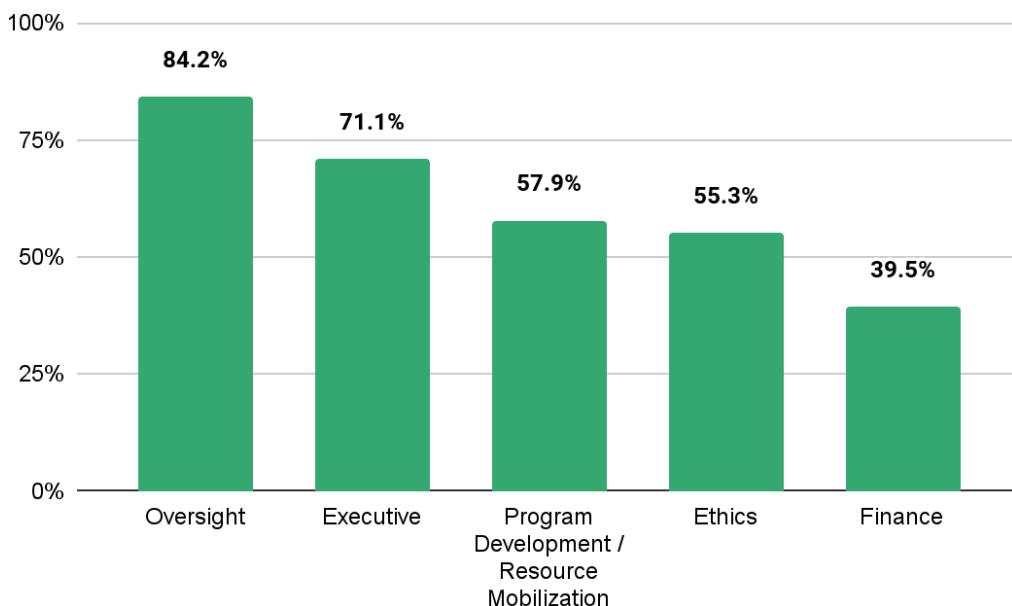
Gender Equity on CCMs

Ensuring the full participation of women in all their diversity in CCMs is vital for upholding the Global Fund's stated commitment to gender equality in the 2023–2028 Strategy. Data collected by Women4GlobalFund (W4GF) and the International Community of Women Living with HIV (ICW) show that there is **still important work to be done to achieve gender parity on CCMs** and ensure that gender-responsive programming is incorporated into Funding Requests and grants. Specifically, W4GF researchers noted that in some settings women living with HIV (WLHIV) experienced increased financial barriers to participation and exclusion from decision-making meetings.¹⁵ Key informants reported that women's priorities were taken off Funding Requests, despite being included in earlier lists of funding priorities.¹⁵

The use of gender-assessments are one key way that communities can identify gaps in current gender programming and the Global Fund **strongly recommends that Funding Requests are informed by a gender assessment**.¹⁶ In-country stakeholder dialogues should inform the gender assessment, and should be designed with full participation of women, girls, trans and gender diverse communities. The TRP noted that more gender assessments were completed as part of GC7 than in previous funding cycles, but that the outcomes of the assessments were "either poorly reflected in Funding Requests, or not used at all".¹⁷ **The Global Fund's Gender Equality Marker (GEM)** is also a key tool for tracking the quality and use of gender assessments for Funding Request development; however, data are not publicly available.

In response to these gaps, work to ensure gender equity on CCMs is needed. This includes increasing representation of women and women's organization on CCMs and in community consultations.¹⁸ CCM representative seats should account for the full diversity of women's identities, including indigenous women, adolescent girls and young women, transgender women, and people of other gender identities. The Global Fund can support this effort by **enforcing guidelines for achieving meaningful gender equity** and full participation of women in CCM spaces.¹⁸ Additionally, the Global Fund can **make public the results of the GEM**, to increase transparency around the quality and uptake of gender assessments and allow for better activism for gender programming.

Figure 5. Proportion of countries with community or KP representatives on CCM committees and working groups



meaningful community engagement. While in some countries CCM voting is a regular practice, in other contexts **decision-making is rarely taken to a formal vote**. Instead, decisions are made through less formal forms of consensus-building, which can create vulnerability to power dynamics, opaque consensus-building, and other forms of incidental exclusion. Despite being adequately represented on the CCM, representatives in these contexts reported challenges to their ability to advocate for community priorities through structured processes and the need for increased transparency and accountability in CCM processes.

Finally, many CCMs delegate authority to committees and working groups, such as committees for grant oversight, resource mobilization, and ethics. Community representatives were frequently included in committees, most commonly in the oversight committee (84% of countries had a community or KP member) followed by the executive committee (74%). Communities were least likely to be included in the finance committees (**Fig. 5**). While representation is high, RISE findings identified the need to deepen the quality of community engagement on committees through more onboarding and training to prepare members for their role. Notably, many CCMs are governed by a secretariat or executive committee, often led by government representatives. In such cases, ensuring **transparency and input into core decisions around CCM functioning** was identified as an important need, given

the Secretariat's central role in determining the CCM's workstream and managing funding for CCM functioning.

4.1.2 Engage community representatives in all core CCM activities

The Global Fund's CCM Eligibility Policy states that CCM representatives have several key roles throughout the three-year cycle, including developing the Funding Request, selecting PRs, and conducting grant oversite.⁶ Notably, while Grant Making is conducted as a legal negotiation between the selected PRs and the Secretariat, communities are required under the CCM Eligibility Policy to be engaged throughout the full grant life cycle.

According to surveyed participants, the engagement of CCM representatives was highest at the start of the cycle, with **83% of respondents having participated in Funding Request** development. Engagement in the Funding Request development typically involved participating in national dialogues and community consultations, and in some contexts involved working directly with writing teams, developing detailed proposals for programs, and costing community priorities.

Despite high levels of participation in this stage, some community CCM representatives found the Funding Request process to be technical and opaque, and thus difficult to engage with. Indeed, national priorities were usually handed off to a writing team, often a small group with

writing consultants who were not always perceived to represent community voices well. In some countries, RISE respondents described that **community priorities were either ignored or were accepted and later removed** from the Funding Request.

"On Sunday morning, I got an email that was circulated to all of us [with the Funding Requests to] go through and endorse. I said okay. [...] Oh my God. The consultant had guided that instead of having CSO [civil society organization] modules scattered, let's have them all under the human rights, [...] and everything had been put Above Allocation. We were at zero. This is Sunday morning. I jumped out of bed, I was like, this cannot be. So I [wrote our civil society] group quickly and I said, 'Please go through this application. Something is not right.' " (Current TB Community CCM Representative)

As such, there was a clear need to establish pathways for communities to engage in Funding Request development beyond consultations or the national dialogue. These pathways could include direct communication channels between the writing team consultants and community representatives, or could involve assigning specific consultants to advocate for community priorities. Respondents additionally described the need for **continued engagement beyond the Funding Request stage**, in order to ensure that community priorities were ultimately included in the grant(s).

"It's interesting, the writing process. They tell you, we have hired consultants to lead the writing, but they are more of the government. They will tell you, 'Civil society, we are sorry, we can't support you. We do not have people on the consultants team who can articulate your issues.' That means as CSOs, we had no consultants to speak for us."
(Current TB Community CCM Representative)

Encouragingly, several respondents reported that the **openness of the grant cycle was gradually improving relative to past cycles**. In particular, Global Fund's emphasis on engaging communities during Grant Making appeared to be impactful in some countries, with more regular feedback and updates being shared with community representatives. Nonetheless, RISE results find that overall participation in later parts of the grant cycle, such as during Grant Making, revisions and oversight, demonstrated an overall decline in engagement.
Participation declined significantly more among community CCM representatives compared to non-community CCM members in these later phases of the grant cycle (**Fig. 6**).

"[Key populations] are only involved in the very initial stages. As the application advanced [...] they kept dropping off, first of all, like they were not welcomed. Then it was very difficult and stigmatizing for them to come into that. So actually towards the tail end, there were only these other parallel engagements that we were having,

Figure 6. Proportion of CCM representatives reporting having participated in key stages throughout the cycle

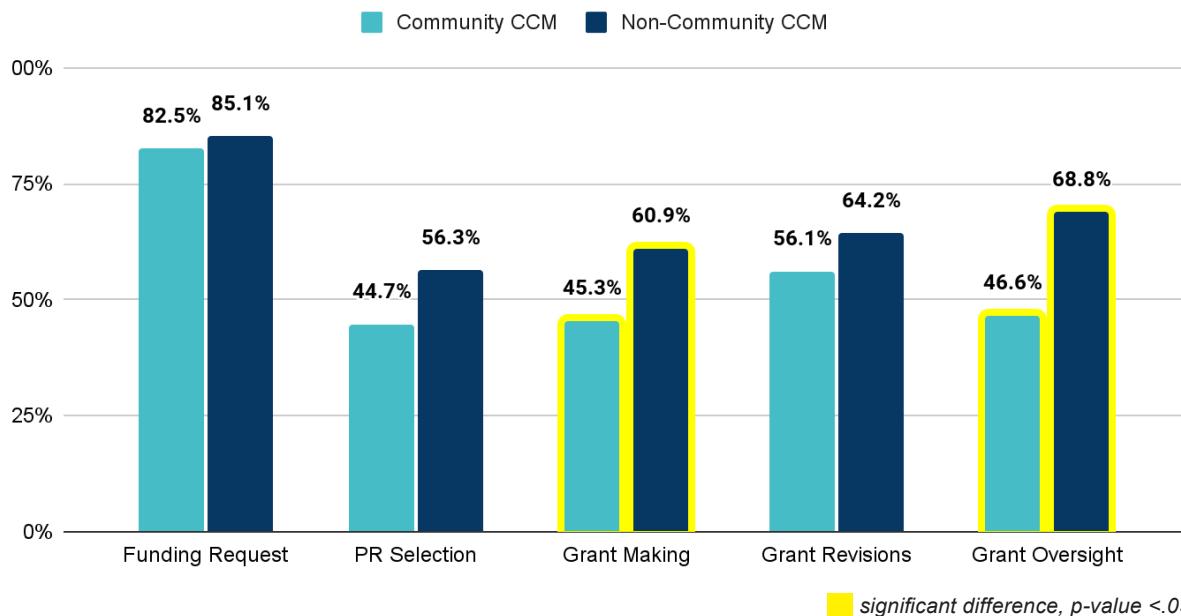


Table 3. Types of CCM member participation across the grant cycle by community status

	Community CCM	Non- Community CCM	p-value
Funding Request Development	82.5%	85.1%	.93
Discuss needs, gaps, and priorities	87.0%	87.6%	.98
Present community evidence	86.5%	60.8%	<.001*
Develop work plan	45.4%	52.6%	.46
Develop budget	30.4%	40.2%	.22
Review final document before submission	54.1%	69.1%	.04*
Grant Making	45.3%	60.9%	.02*
Discuss needs, gaps, and priorities	87.3%	85.1%	.87
Present community evidence	80.9%	58.2%	<.01*
Develop work plan	44.6%	52.2%	.61
Develop budget	34.6%	38.8%	.19
Review final document before submission	61.8%	77.6%	.09
Oversight activities	46.6%	68.8%	<.001*
Review performance of Government/public sector PR	51.4%	72.0%	.01*
Review performance of Non-government PR	58.6%	58.7%	.92
Review performance of SR and SSR (sub-recipients and sub-sub-recipients)	61.3%	70.7%	.33
Review financial reports from the Local Fund Agent (LFA)	26.1%	42.7%	.05

* significant difference, p < .05

officially not much, especially towards the end. But in the beginning there were very rich consultations, but not towards the end where it matters most. (Non-CCM Community Member)

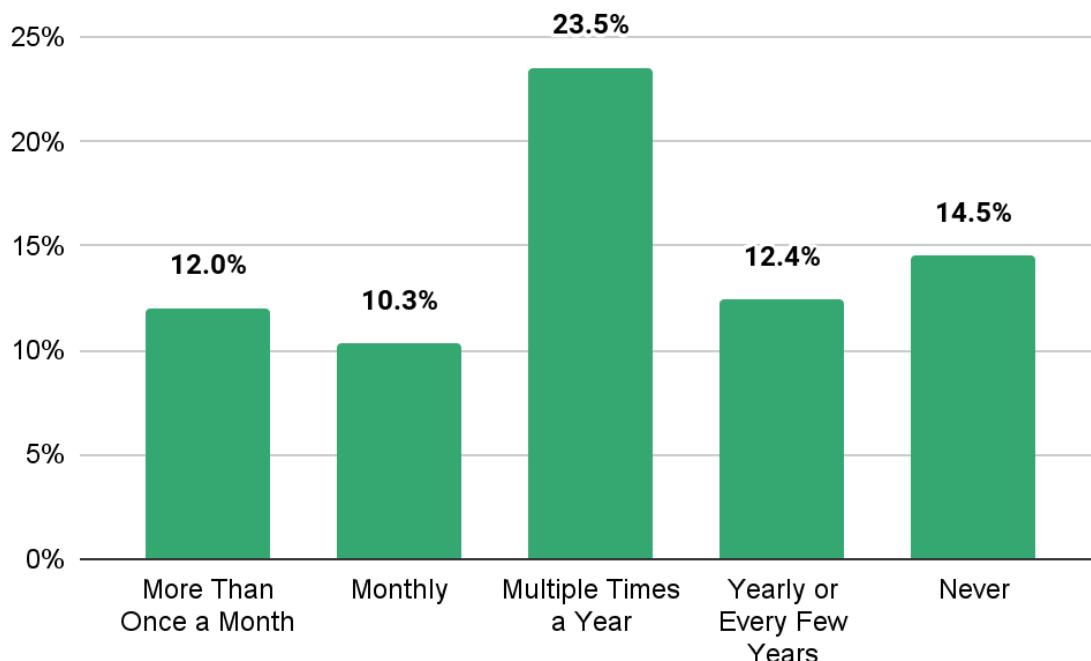
While community engagement is critical through the grant cycle, weak community CCM representative engagement in grant oversight poses potential conflicts, given the prevalent role of government as a PR. Indeed, without strong engagement from community representatives, implementation oversight may effectively be left to public sector representatives to oversee their own performance.

Additionally, the ways that community representatives participated in the grant life cycle were significantly different from non-community representatives, with

communities less likely to be involved in formalized and actionable decision-making. For instance, in Funding Request development community CCM members are more often asked to present on community priorities compared to other CCM members but less often involved in other critical aspects of development like writing budgets and work plans, and significantly less likely to review the final Funding Request before submission. During grant oversight, communities were **significantly less likely to review the performance of the governmental PR** ("PR 1") than non-community CCM members (**Table 3**).

Community engagement throughout the grant cycle is important to promote the inclusion of community priorities beyond the Funding Request and into the final grant agreement. Communities expressed frustration

Figure 7. Frequency of CCM consultations with communities



at not being included in Grant Making conversations, and in several cases described **not knowing which activities were included in the final grants**. These findings suggest a need for CCM representatives and their community constituencies to have easy access to grant documents in order to fulfill their oversight role. At present, the Global Fund does not publish any grant documents on its public website.

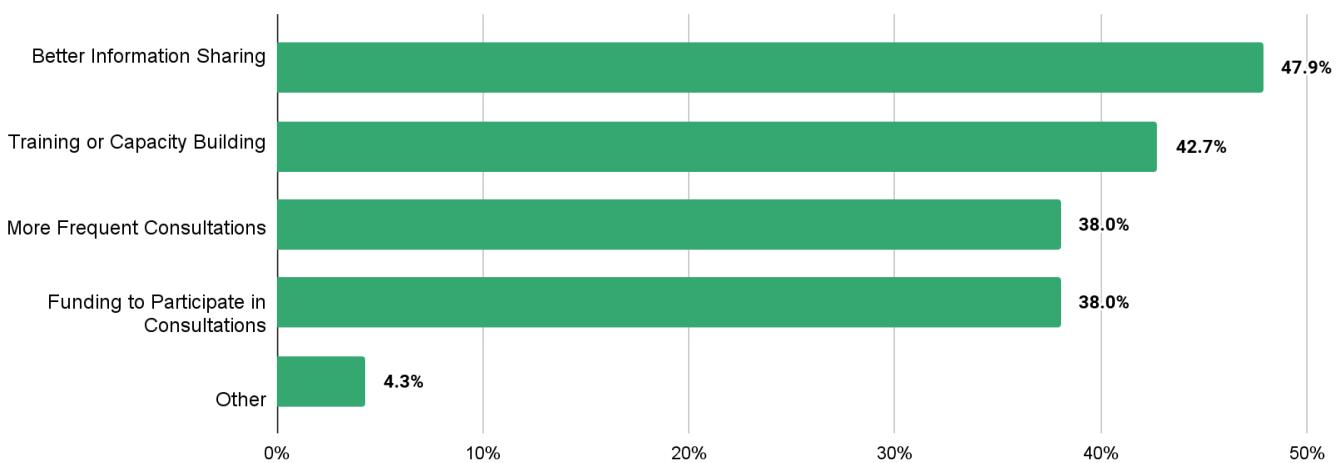
4.1.3 Strengthen communication channels between community CCM members and their constituencies

CCM representatives are selected not as individuals, but as representatives of a specific constituency. As representatives of their communities, CCM members have a core responsibility to hold constituency consultations, which provide opportunities for community members to share their priorities and describe issues with existing programming. According to the Global Fund's CCM Policy, consultations should take place throughout the three-year cycle and should provide communities an opportunity to receive information and provide input, with the goal of strengthening program performance. To be successful, these consultations should be frequent, inclusive, and accessible to relevant community stakeholders.

Among community respondents, a majority knew who their constituency's CCM representative was (70%), and about half (43%) were "satisfied" or "very satisfied" with their CCM representative. RISE results showed that, in general, **community consultations with the CCM were frequent**, with participants most commonly saying they were consulted multiple times per year and 12% saying that they were consulted more than once a month (**Fig. 7**). However, in certain situations, broader outreach for community consultations is needed. RISE survey findings show 27% of respondents reported never being involved in consultations, or were participating on a yearly or less frequent basis. Most community members were eager to engage more with the Global Fund, with 50% of participants reporting that their current engagement with the Global Fund is too little and they would like to be more involved. Notably, **community members who were more regularly engaged with consultations were significantly more likely to be satisfied with their CCM representative**.

Many **respondents described substantive and structured efforts to engage with the community** throughout the three-year cycle. Some CCMs even regularly shared Funding Request drafts with interested

Figure 8. Strategies to improve CCM engagement with community members outside of the CCM



external stakeholders throughout the writing process. However, RISE data showed important opportunities to better support broader community engagement with the CCM. In order to be better engaged with CCM, the community requested **better information sharing from the CCM**, more training and capacity building, more frequent consultations, and funding to participate (**Fig. 8**).

One-quarter of community participants in the RISE sample had ever participated in the selection or election of a CCM representative (25%). Among those that participated in elections, 58% thought the process was “fair” or “very fair.” **Community members who thought the selection process was fair were more likely to be satisfied with their CCM representative.** RISE data suggest that more frequent engagement with the CCM and holding fairer and more open CCM selection processes can be important factors in increasing community satisfaction with CCM functioning.

4.2 Equipping: Access to tools, information, funding, and resources

Meaningful participation requires that community representatives be not only present in decision-making spaces, but also that they have access to the tools, data, and resources needed to actively contribute. RISE

findings highlight broad interest from communities in deepening their participation and a determination to overcome any personal and institutional barriers to this aim. Three opportunities were identified to capacitate this engagement. First, community representatives and their constituencies must be sufficiently resourced to engage in all CCM processes. Secondly, they must have access to documents, analyses, reports, and data in an accessible format. And finally, communities would benefit from greater onboarding, mentorship, and capacity building to improve their effectiveness and impact.

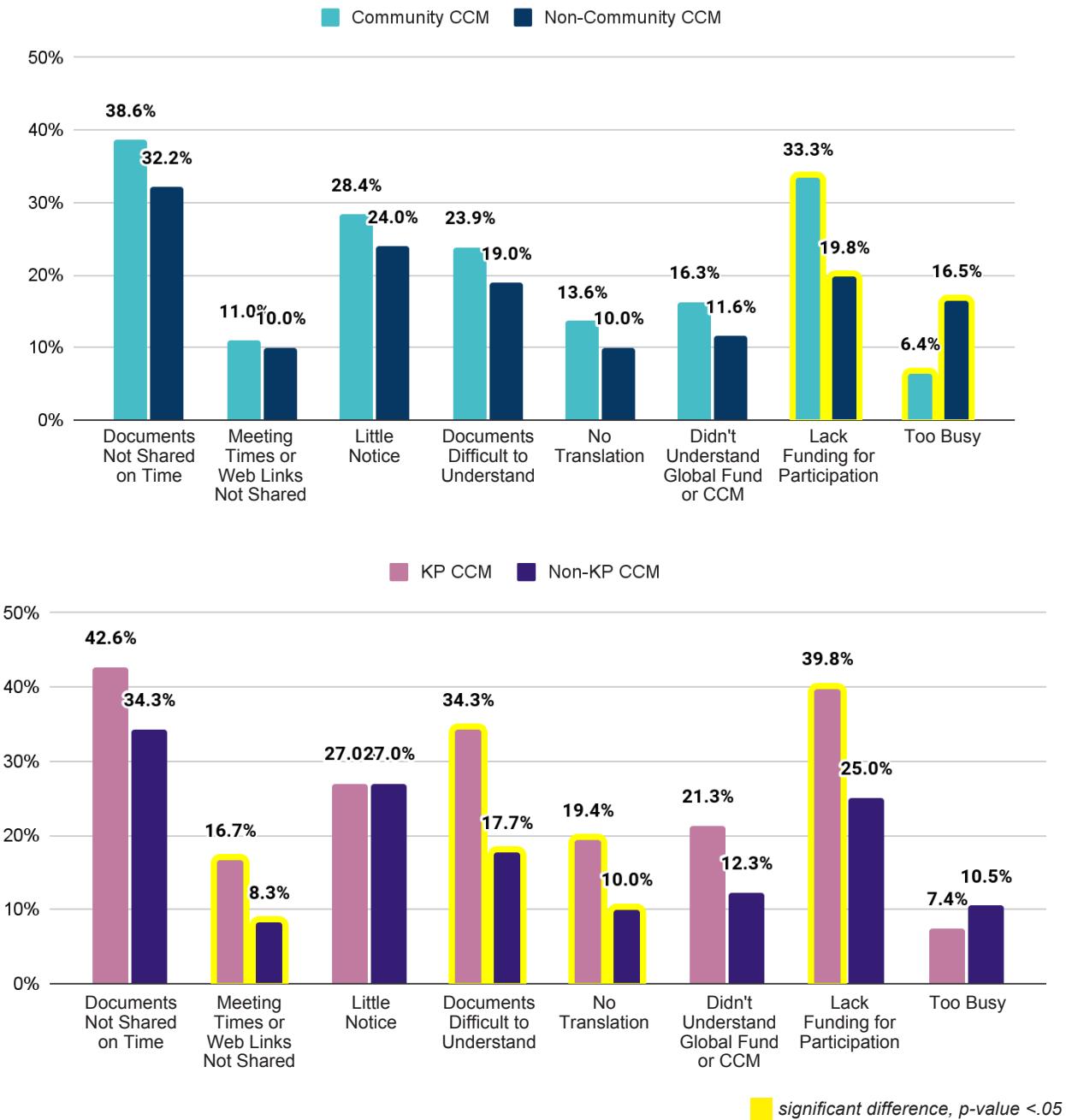
4.2 Summary: What is needed to better equip civil society and community CCM representatives for meaningful engagement?

4.2.1 Strengthened support for consultations and engagement

4.2.2 Greater transparency and access for grant oversight

4.2.3 Improved onboarding and technical support for community representatives

Figure 9. Challenges experienced by CCM representatives, by community and KP status



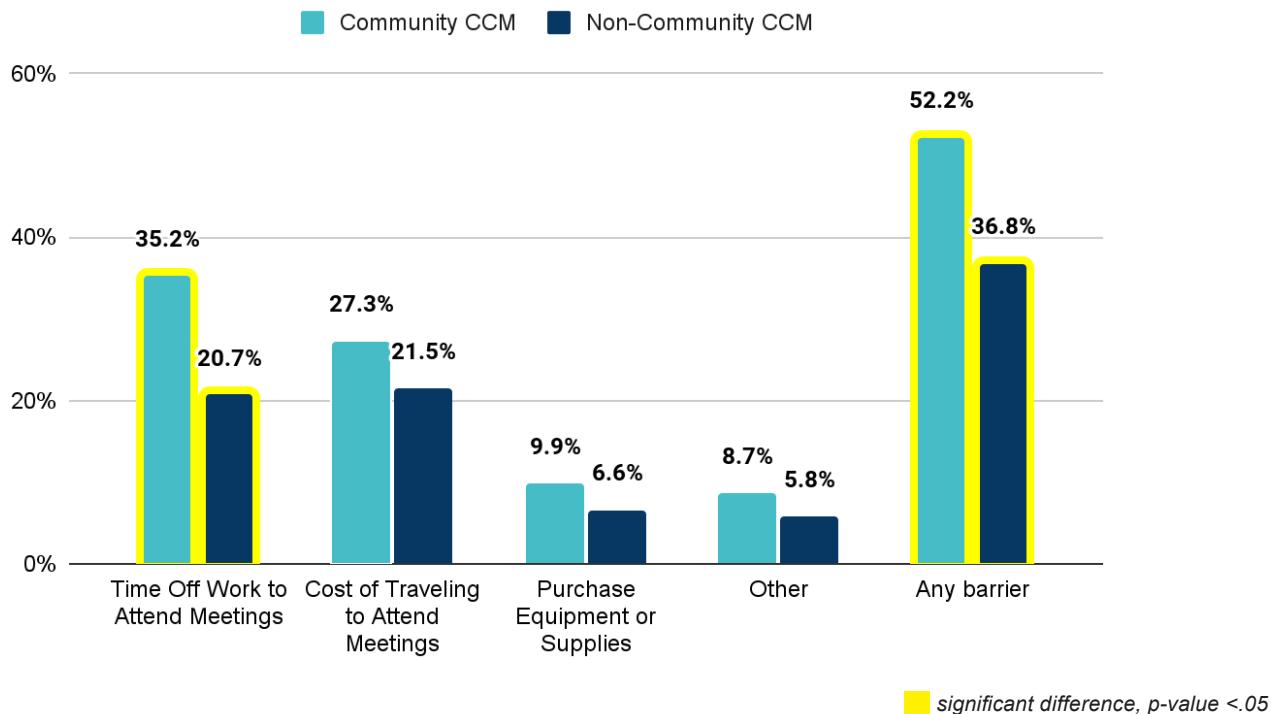
4.2.1 Strengthened support for consultations and engagement

Community members serve as CCM representatives on a volunteer basis, and as such are not formally retained or paid as employees. The Global Fund provides important financial support for the operational costs of CCMs, which is budgeted by the Secretariat separately from grant funding. This funding provides essential resources to facilitate the CCM's operation and activities, including oversight,

constituency engagement, alignment with country structures and processes, and capacity building.¹⁹

Overall, 48% of CCM representatives described the available financial support permitted them to participate in CCM activities with no financial challenges. However, others reported substantive financial and logistical challenges to participation, with community and KP representatives the most impacted by these barriers (Fig. 9). Community CCM

Figure 10. Types of financial barriers to CCM participation



members were significantly more likely to report a lack of funding as a barrier to participation, while non-community CCM members were more likely to report being “too busy” to participate. Commonly reported financial difficulties included needing to take time off work, having to pay for travel, or having to purchase other supplies. Community representatives were significantly more likely to have to take time off work to attend CCM meetings (Fig. 10). In contexts where representatives are salaried employees with funded participation, their own organizations may experience disruptions or challenges backfilling employee time.

In particular, the Funding Request development process was at times described as creating a financial burden for **community representatives, who reported receiving inadequate financial support** for their time and expenses. Where the Global Fund provides funding for community consultations and CCM operations, disbursements were at times delayed or insufficient. While 73% of community CCM members reported that the community receives financial support for participating in consultations, 72% of those said the level of support was not sufficient. In some cases, a lack of transparency led respondents to perceive a lack of funding as an intentional attempt to exclude community CCM representatives.

“Some of the reasons [there is no support to participate in the Funding Request writing] I may not know, but from what I saw, it’s to deny them the opportunity to bargain for what they want. You make them be vulnerable: they can’t afford to travel to the sites, to sit in writing. If they have to travel, they can’t travel every day because it’s costly. When you’re in a hotel here, you can’t get cheap food. You have to eat there, so you end up giving up. But that’s a technique of making you vulnerable and you give up by yourself.”
(Non-CCM Community Member)

In addition to acting as a barrier to consultations, **financial barriers also emerged as a challenge to programmatic oversight**. A major part of grant oversight is accomplished through site visits, requiring CCM representatives to travel across the country, yet community respondents described doing unpaid work, paying for travel out-of-pocket, and having to eat and sleep in separate venues from other CCM representatives during oversight travel.

“Oversight is part of our core functions at the CCM [...] and that is something we have been doing, painfully. [...] It is partly the government’s business and partly Global Fund’s business to ensure that there are enough resources and allocations for the board members to do that oversight role

effectively. But it has reached the point of discouraging some colleagues to be able to do that. For example, I will send you to a different province away from here. But your welfare during that travel is more or less not there [...] It means that a CCM member has to top up from out of their own pocket." (Current PLHIV CCM Community Representative)

Ensuring adequate funding for CCM engagement is a key priority. **Global Fund-supported funding streams are provided for community participation** and are of critical importance to ensuring community members are able to attend CCM meetings. These funds are usually disbursed through the PR. To ensure that these funds are distributed equitably and in a timely fashion, respondents highlighted the importance of better tracking and reporting on CCM funding streams, such as through strengthened reporting requirements. Where government PRs face challenges facilitating CCM work due to the complexities of managing fungible resources or due to administrative delays, the Secretariat should consider more streamlined routes of payment, such as through dual-track financing or direct payments to community networks.

4.2.2 Greater transparency and access needed for grant oversight

Overseeing grant implementation is one of the core responsibilities of the CCM. Empowering the implementing country with the responsibility for overseeing high-quality health programs is a core innovation of the Global Fund model. The CCM contributes to this foundational pillar by convening a forum for governments, civil society, healthcare service users, and other constituencies to conduct oversight. According to Global Fund, this oversight should involve regularly reviewing performance data in collaboration with the PRs and working together to address underperformance and bottlenecks.⁶ In cases where underperformance is recurrent or intractable, the CCM is responsible for identifying a new PR.

In many countries, the grant oversight function is led by a dedicated committee, which is tasked with reviewing grant performance and preparing recommendations for review and feedback from the full CCM. According to surveyed participants, the **oversight committee has the highest community representation** of all committees, with 84% of countries reporting having community, civil society, or key population representation in the committee. Overall, among CCM representatives surveyed by RISE, 53% reported having participated in any oversight activities after grantmaking. Notably, community representatives were significantly less likely to participate in grant oversight than

non-community CCM members (47% vs. 69% respectively).

Programmatic **oversight was described as primarily being done through field visits**. These visits, usually described as occurring on a quarterly basis, involved in-person visits by CCM representatives to clinics, stockrooms, laboratories, or community sites to observe service delivery and to engage with beneficiaries who have been mobilized for the visits. The findings from these visits are recorded in scorecards or reports and are then presented to the CCM. While the field visits were seen as an important mechanism for getting feedback from service delivery sites, several **challenges emerged around field visits as a principal oversight tool**, including a lack of transparency in how sites were selected, the limited reach and scope of in-person visits, and the practice of orchestrating the participation of service recipients, thereby potentially introducing preconceived narratives and bias.

In parallel to site visits, respondents described reviewing data from PRs as an oversight strategy. Some respondents described this oversight working well, with PRs sharing detailed data that were accessible to all CCM members both as raw data and in actionable reports and dashboards. In many contexts, however, community representatives on and off the CCM continue to **struggle with access to timely and relevant information** concerning grant implementation, PR performance, and funding allocation. Indeed, the most commonly reported challenge faced by CCM members was that information was not shared on time (37% of CCM participants), with programmatic data being shared late and often in an aggregated format that did not allow for granular review. Detailed information about targeted achievement and budgets were sometimes described as being technically available to CCM representatives; however, these data were usually aggregated and summarized by CCM secretariats or the PRs and presented in summary form for discussion. CCM representatives would thus be charged with doing independent analyses on raw data, which was challenged by a lack of time, financial support, and technical capacity.

"I think the greatest challenge is holding government accountable. And the best way we can hold government accountable is by empowering the CCM to be a biting dog. Not just to be, you know, this big, big, big strategic board that cannot bite. I mean, it is one thing to make a recommendation, but it's also another thing to ensure that that recommendation is fulfilled. And when the recommendation is not fulfilled within this amount of time,

the CCM has the ability to do x, y, z." (Current Community PLHIV CCM Representative)

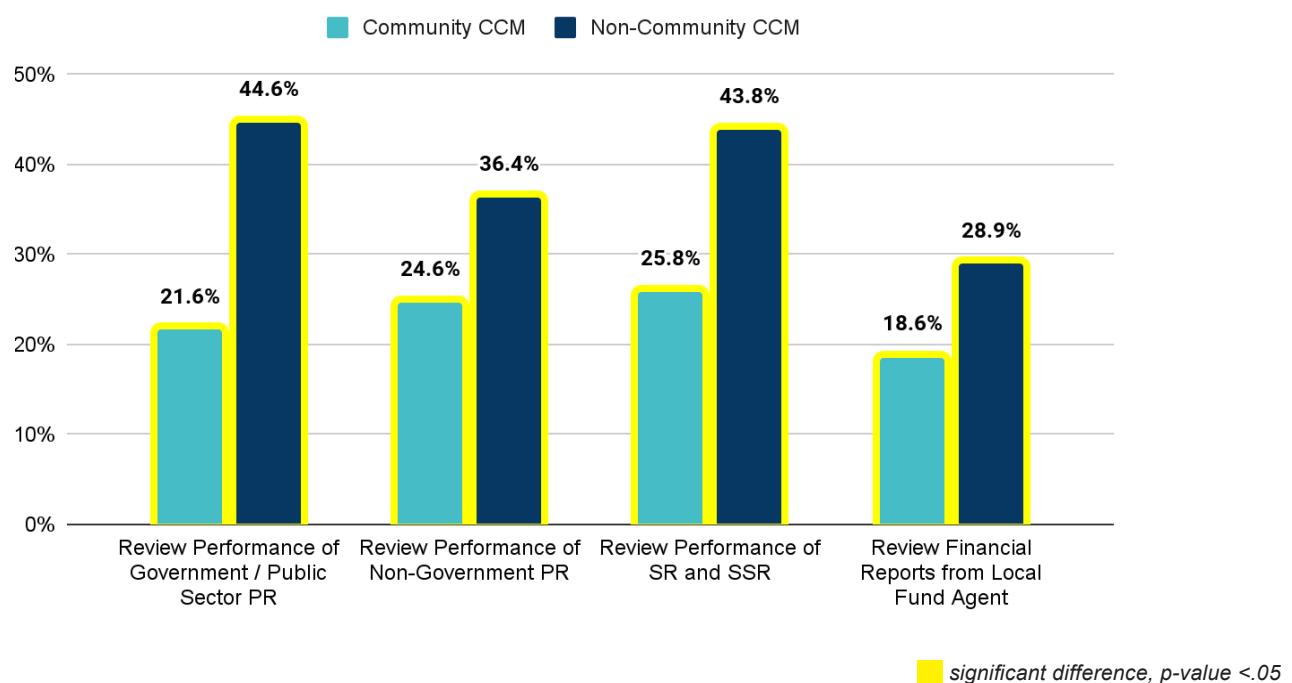
Participants noted that while PRs are required to share data for oversight within the CCM,²⁰ when these expectations are not met, there is little recourse for the community to demand more information from PRs. Indeed, while the Global Fund has several mechanisms for reporting the nine Prohibited Practices,²¹ such as through the OIG,²² no such system exists for anonymous reporting of programmatic and governance challenges to an independent authority. Participants specifically called for avenues to enforce data sharing agreements where they are not being met.

Additionally, some respondents described **governmental PRs being held to different reporting standards than non-governmental PRs**, with performance data from government being shared late, in a highly aggregated format, or not at all. Additionally, while 45% of non-community CCM representatives had participated in oversight of a government PR, just 22% of community CCM representatives reported participating. Indeed, non-community CCM representatives were more likely to be involved in all parts of PR and SR oversight (**Fig. 11**).

"We are always telling them that, come on, you can't obstruct things like this. You need to give us a bigger picture, disaggregate the information. Tell us in this region, this is what is happening in these districts. This is what is happening and [who] is responsible for it. But as I said, there's a lot of complacency. Sometimes I think that the CCM is a lying dog that barks but does not bite. We have barked at the government. We have barked at government, but our hands are tied. We cannot bite government."
(Current PLHIV CCM Community Representative)

Data dashboards represented one potentially useful tool for sharing data. However, currently the data in the dashboards were overall described as being difficult to interpret or not translated into local languages; others noted the **need for capacity building** support to onboard CCM representatives to the dashboards. In no contexts were the dashboards described as a public-facing resource to help communities outside of the CCM engage in programmatic oversight, despite several respondents expressing interest in participating in **community-led oversight**, such as through independent, community-driven field visits and community-led monitoring (CLM). The Global Fund does not anywhere

Figure 11. Types of participation in oversight activities



publish grant data at a level more granular than the Performance Framework's module.

"We want some oversight visits specifically for civil society, where [...] the civil society team [is funded to] monitor and do oversight of these government programs not necessarily dictated by government or by [the CCM] Secretariat. [...] Because if you are having some government officials going to monitor themselves, what we are saying is that the civil society would really play the rightful oversight role and produce a report, but also would come to the board saying that in our visit, [we found this]. That way, it's more independent." (Current Non-Community CCM Representative)

4.2.3 Improved onboarding and technical support for community representatives

Nongovernmental CCM representatives are "selected by their own constituencies based on a documented, transparent process, developed within each such constituency."⁶ In every case documented by the RISE, community CCM representatives serve in seats with defined term lengths and limits.

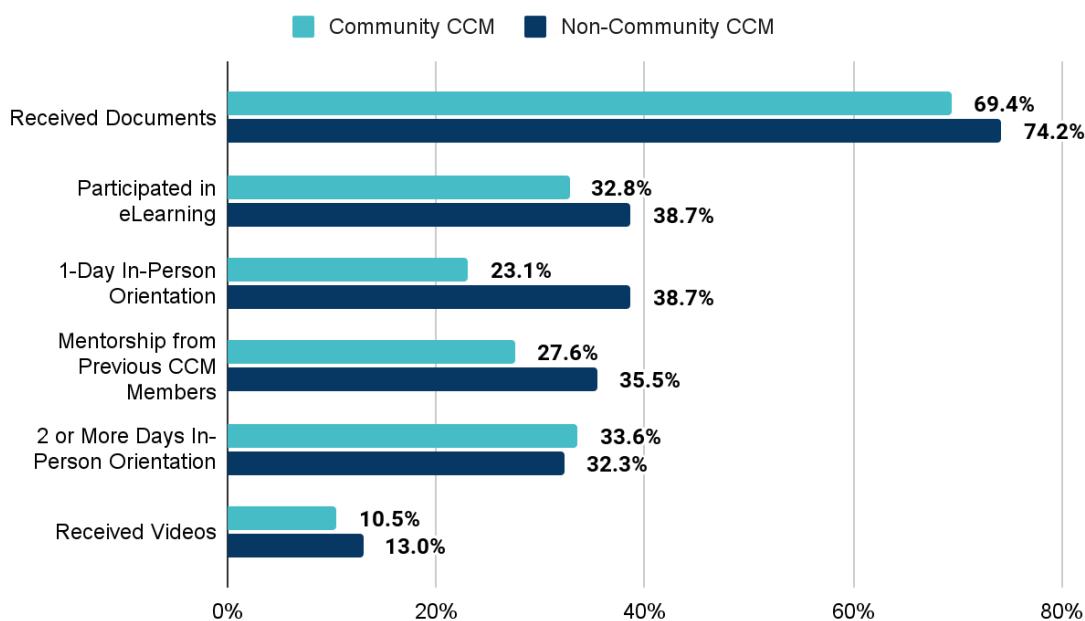
While term limits are an important strategy for preventing entrenched incumbency and corruption, the cycling of community representatives was identified as a challenge

for continuity and institutional knowledge. This challenge was mostly felt by community representatives, given that government representatives are typically not subjected to term limits and are not popularly elected. After being selected, representatives must quickly become acquainted with the Global Fund model and understand the duties and responsibilities of CCM representatives. Community respondents described spending the first one or more years becoming acquainted with the CCM, and **only being able to substantially contribute in the latter parts of their terms.**

"It took me four years for me to start more or less understanding what the CCM was and what it was there for. This process is not an easy one. You fear to speak out at some point because when a person is from the community, they feel very uncomfortable amongst these government organizations, the international organizations, it's headed by the Minister of Health." (Former Sex Worker Community CCM Representative)

Among surveyed respondents, 62% received some form of onboarding when they joined the CCM, most often in the form of receiving documents (**Fig. 12**). Several respondents described **the onboarding process as needing strengthening**, including the need for training documents in preferred languages.

Figure 12. Orientation received by CCM member type



One important facilitator to community participation was the **support and mentorship from current or former CCM representatives**. A total of 29% of RISE respondents report receiving mentorship from a previous CCM member. Mentorship was not only useful in transmitting institutional knowledge, but also in empowering CCM representatives in their role conducting oversight.

"How people mentored me, I'm mentoring in the same way. Our new representative is now in the CCM, but she's facing even more difficulty because the training, like they trained us, nobody's training them anymore...I'm trying to train them. So they say, 'We don't understand this. We're afraid to speak out.' There's also pressure on them from the old CCM members seeing that they're weaker, some of them try to pressure them like vote for this and don't vote for that. I have to explain to them why they shouldn't follow that."

(Former Sex Worker Community CCM Representative)

RISE data find that **informal structures for peer-to-peer onboarding and mentorship are present in many contexts**. However, the recurrent call for strengthened capacity building, especially among community members, suggests a need to better prepare CCM representatives for their roles. Formal onboarding must be delivered in a timely fashion and before representatives' CCM duties begin. Given the steep learning curve for community members not previously exposed to the Global Fund model, orientation should include in-person learnings and not only receiving documents. Several **participants spoke highly of the Global Fund's e-learning course, but found that it was most appropriate as a refresher** for people who already had a strong working knowledge of the Global Fund rather than as orientation material. Given the need to support community representatives with navigating complicated power dynamics and internal politics, Global Fund and its partners should strengthen and develop funded programs to fund peer-to-peer mentorship, cross-country learning, and capacity building within community constituencies.

4.3 Empowerment: Community power on CCMs

In addition to facilitating coordination between governments and donors, Global Fund CCMs are spaces for participatory democracy, where service users and communities are given decision-making authority and oversight over their own governments and public healthcare systems. As such, CCMs hold significant potential to strengthen healthcare service delivery, increase transparency, and build accountability and representation. However, as with all avenues for civic engagement, this potential is fundamentally reliant on

communities and their selected representatives being empowered to meaningfully engage.

A primary objective of the RISE study was to measure and understand the extent to which current Global Fund processes are successfully empowering communities at all levels of grant development and oversight. This includes identifying where there have been good examples of community co-ownership and collaborative power sharing on CCMs, as well as opportunities to improve community power through policy changes or reinforcement of current Global Fund policies.

Summary: What effectively empowers communities on CCMs?

4.3.1. Building community power, autonomy, authority, and capacity

4.3.2. Protecting community representatives from intimidation and discrimination

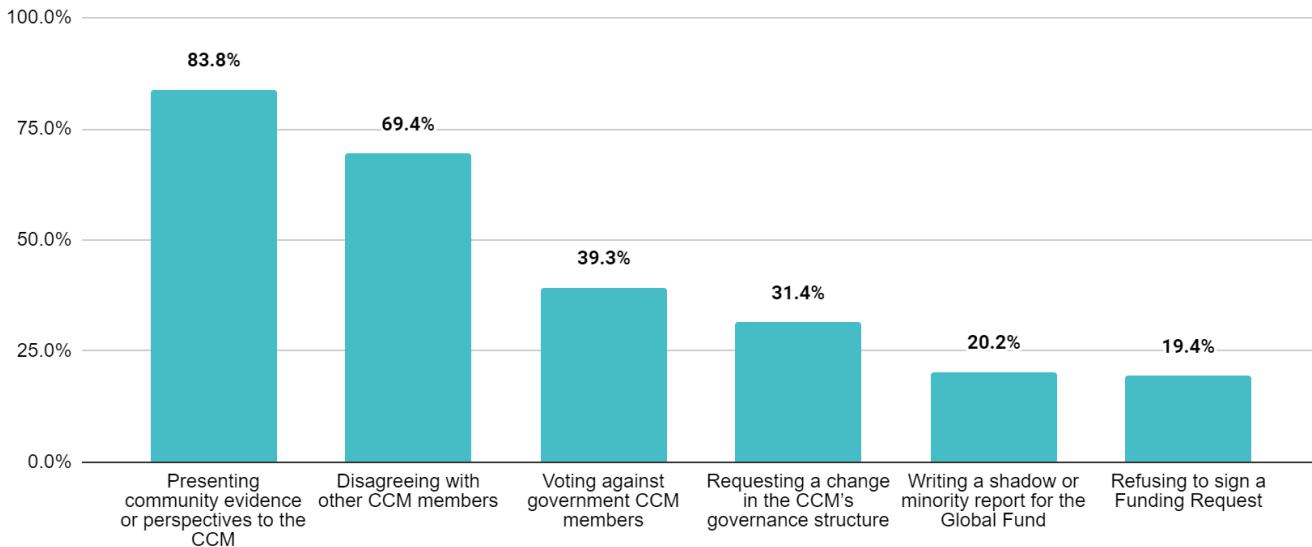
4.3.3. Increase support for communities operating in challenging political environments

4.3.1. Building community power, autonomy, authority, and capacity

The Global Fund is unique among international donors for requiring a multi-sectoral decision-making forum that brings together stakeholders from across the spectrums of influence and power, with each member granted formal voting power. **These spaces are key for grant impact**, long-term sustainability of public health programs, and fostering enhanced accountability and transparency. However pre-existing power dynamics between CCM members are brought to their roles on the CCM. This can influence CCM governance and functioning despite members having equal voting power.

As such, care must be taken to mitigate power differentials between representatives on CCMs.²³ These power differentials can be fueled by unequal access to resources, inequities in funding, societal stigma, and discrimination against community groups. In order to fight against these inherent power differentials, CCM processes must be purposefully designed to combat inequities, equalize power, and support community representatives to elevate community voices. Indeed, while being formally included in decision-making spaces and equipped to participate are necessary prerequisites, **community representatives must additionally have the autonomy and authority necessary to effectively serve on the CCM**.

Figure 13. Community CCM member pushback strategies



Evidence from the RISE study found several key opportunities and strategies for strengthening community power on the CCM. One key moment described by surveyed respondents was the signing off on the Funding Request, in which the documents must be approved by all CCM representatives before they can be formally submitted to the Secretariat. Respondents described this step as an important leverage point and a key opportunity to exercise decision-making authority. Indeed, RISE survey data found that 19% of community CCM members described having refused to sign a funding request (**Fig. 13**).

Notably, in contexts where CCM representatives described not having visibility into the eventual grant(s), this step did not always result in community intervention being funded. To empower community representatives, it is vital that they both see the final grant submission and know their right to refuse to sign on if the document excludes their contributions.

“During the writing, I think it was easier for us to negotiate because they needed your signature at the end, so they would compromise on this and that. But after that, I must be very honest with you: I don’t know what’s in that application.” (Current TB Community CCM Representative)

Another strategy employed by CCM representatives was **requesting changes to the PRs**, in cases where the current implementer was incapable of, or unwilling to, implement the activities in the grant. Notably, this can only

be accomplished where community representatives have access to PR performance data.

Additionally, **20% of Community CCM members said they had participated in writing a “shadow report”** to the Secretariat in order to get their priorities known (**Fig. 13**). Others described developing community consensus statements before the Funding Request negotiations, which was seen as a valuable strategy for having one coordinated voice.

These community-employed “push-back” strategies are vital for building community power—but not universally used by community members. Opportunities for community **CCM members to learn strategies from one another may help disseminate best practices and build collective community power across settings**. Cross-country learning platforms could additionally facilitate peer-to-peer mentorship and problem-solving when communities face governance challenges.

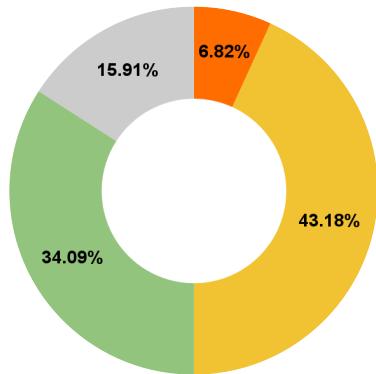
4.3.2. Protecting community representatives from intimidation and discrimination

CCMs are designed to be a democratic and collaborative spaces, and indeed there are few examples of international grantmaking mechanisms which have achieved this level of country ownership and multisectoral cooperation. However, CCMs operate within the political and social contexts of each country, all of which have some form of KP criminalization. These **wider political contexts play a direct role in CCM**

Figure 14. Discrimination and Intimidation of KP CCM members

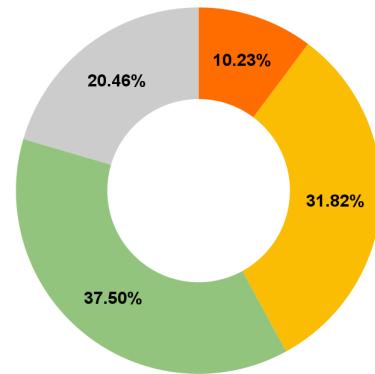
Discrimination among KP CCM members

● Always ● Sometimes ● Never
● Don't Know or Prefer Not to Answer



Intimidation among KP CCM members

● Always ● Sometimes ● Never
● Don't Know or Prefer Not to Answer



functioning and the community's ability to fully engage with the process.

Community CCM member safety and comfort on the CCM is paramount. RISE results found that overall, 41% of community CCM members reported "always" or "sometimes" experiencing

discrimination on the CCM and 36% reported "always" or "sometimes" experiencing intimidation on the CCM. These numbers were significantly higher for KP representatives at 50% reporting discrimination and 42% reporting intimidation (**Fig. 14**). Several KP participants reported acts of **homophobia and discrimination** by their CCM

SPOTLIGHT : Transitioning key population program to a community implementer in Southern Africa



A vital part of CCM oversight functions is to assess the performance of PRs and SRs, and to address underperformance through course corrections. Oversight is resource-intensive and requires conducting oversight visits, timely access to performance data, consensus building, and repeated engagement with implementers to ensure improvement. While conducting oversight is a challenge in many countries, in one Southern African CCM the community responded to weak performance by successfully requesting a transition to a new, community-led PR to implement community programs, which was achieved through consistent advocacy and use of performance data. One CCM representative describes below:

"[S]ome of the PRs that are implementing the key population module, [...] you know its top management, it's all white people and they're all foreigners and they're earning a huge amount of salaries and they just say, 'I'm just here for the next five years.' [...] So civil society picked it up and they were like, 'Now how do we make sure that people who actually need to benefit from these programs are the actual beneficiaries of those programs?' And that's where we started the transitioning process to say we need to strip off [the] the sex workers module and give it to [a community organization]." (Current Sex Worker Community CCM Representative)

colleagues, with discrimination within the CCM leading some community members to decline to serve as representatives in order to protect their safety.

They [the government CCM representatives] had questions of why so much funding is being allocated to the LGBT community, the sex workers. You know, that kind of thing. They have questions about, you know, there were some pretty unpleasant statements being made. It was discussed in the High Council to the extent that they said so, you know, just 'let these gay people die from AIDS' and all that, you know, kind of like that. (Former Sex Worker Community CCM Representative)

Despite these reports of discrimination and intimidation on the CCM, the vast majority of Community CCM **members say that they are comfortable speaking up** in CCM meetings (93%) and presenting evidence to the CCM (90%). Over half of community members (64%) are comfortable disagreeing with other CCM members or voting against government CCM members (60%). However, KP members reported lower ratings of comfort across all categories than for non-KP community CCM

members (**Fig. 15**). These data suggest that KPs are experiencing overt discrimination on CCMs, but that KPs continue to find avenues to speak up in these spaces.

RISE data also revealed widespread exclusion of communities from CCM spaces through a variety of tactics described by participants as "**strategic sanctioning**" (**Table 4**). These constitute actions that may not directly exclude the community from attending but make it uncomfortable or difficult for community members such as being sent information for the CCM meetings too late to attend, not be offered anything to eat for full day meetings, or learning that the meetings had moved away from a central location and not being offered transportation reimbursements.

In more extreme examples of **exclusion**, community members described being physically removed from meeting rooms or having their contributions to CCM documents deleted before final submission (**Table 5**). Both strategic sanctioning and blatant exclusion of community members constitute direct violations of the Global Fund's commitment to community co-ownership.

Figure 15. Degree of comfort with various pushback strategies by KP group

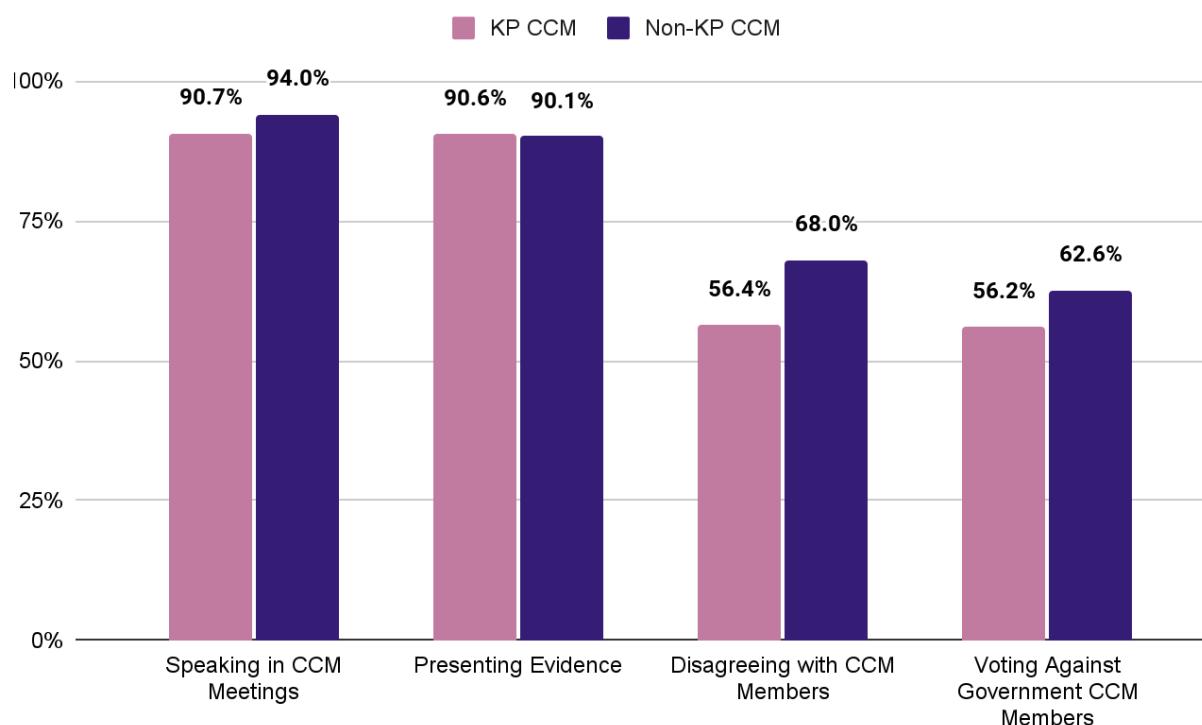


Table 4. Strategic sanctioning of community

Current TB Community CCM Representative

"You are only pleading for like ten slots for CSOs and then they tell you you can go in the meeting, but then they have no meals for you. No, it was so hostile."

Current Youth Community CCM Representative

"I traveled to [capital city], though it wasn't facilitated [financially supported]. Thank God I had something small on my own..., I would make sure I pack enough snacks with me and that would do my dinner. So I would rent a small room within the suburbs."

Former PLHIV Community CCM Representative

"It's almost like if we complain too much, the government can stop us from having a CCM. Kind of like a threat. So you're walking just a very thin line between how much you can say without getting kicked out."

Table 5. Exclusion of community voices

Non-CCM Community

"And our process was really, really ugly. They even physically threw us out of meetings. They change rooms and go to separate rooms. And you didn't know what they submitted. What we had and what they submitted is different."

Previous PLHIV Community CCM Representative

"We always end each time we do our meetings and the person who wrote our minutes of the meeting always leave out certain things that we comment. Things that we say were not written down for approval for the meeting."

Previous PLHIV Community CCM

"I mean, what's the point because in the next meeting we are forced to endorse anyway to sign [the funding request], whatever we say is not there anyway. So it looks as if it's all fine and dandy."

These findings indicate a clear **need for the Global Fund to reinforce and promote its policies around nondiscrimination and the protection of human rights**, and to ensure that these standards are being disseminated through regular trainings, outreach, and direct intervention from the Secretariat. There is additionally a clear **role for Global Fund partners on the CCM, including bilaterals, multilaterals, and other civil society partners, in supporting KP CCM members** and promoting safe spaces for governance.

A commonly-described justification for community exclusion was **conflict of interest (COI)**. Indeed, concerns about perceived or actual COI are perennial and inherent to the CCM's complex role, in which the same set of stakeholders are simultaneously responsible for soliciting donor funding, allocating funding to selected program implementers, and conducting oversight. CCMs are often susceptible to COI; for instance, government stakeholders typically serve an oversight function while

Community CCM members described the process of advocating for inclusion of their priorities as a perennial challenge, but they are encouraged by knowing that the Global Fund does value community engagement.

simultaneously acting as a PR. Similarly, the most qualified community representatives, chosen for their subject matter expertise and positioning as legitimate representatives of their constituencies, are often also leading organizations eligible for funding as SRs or SSRs. To mitigate the risks from COI, the Global Fund requires CCMs to publish and enforce CCM COI policies.⁶

However, RISE respondents reported that **policies around COI and recusals were disproportionately applied to community CCM representatives** and rarely to public sector representatives. Community CCM representatives reported being asked to leave deliberations about funding or grant priority-setting, during which other public sector CCM recipients were allowed to remain. Community members expressed confusion about what their rights were in these situations and if there was any recourse for being

inappropriately removed from a CCM discussion. There is a need for the Global Fund Secretariat to ensure that COI policies equally across all CCM members and to promote opportunities for community members to report when policies have been violated.

4.3.3. Increase support for communities operating in challenging political environments

After reports of community-exclusion or poor CCM functioning are made, Global Fund Secretariat support is vital. RISE data clearly showed that the communities rely on the Secretariat's policies for community engagement and requirements for KP inclusion in order to fight inequities on CCMs. Community CCM members described the process of advocating for inclusion of their priorities as a perennial challenge, but they are encouraged by knowing that **the Global Fund does value community engagement**.

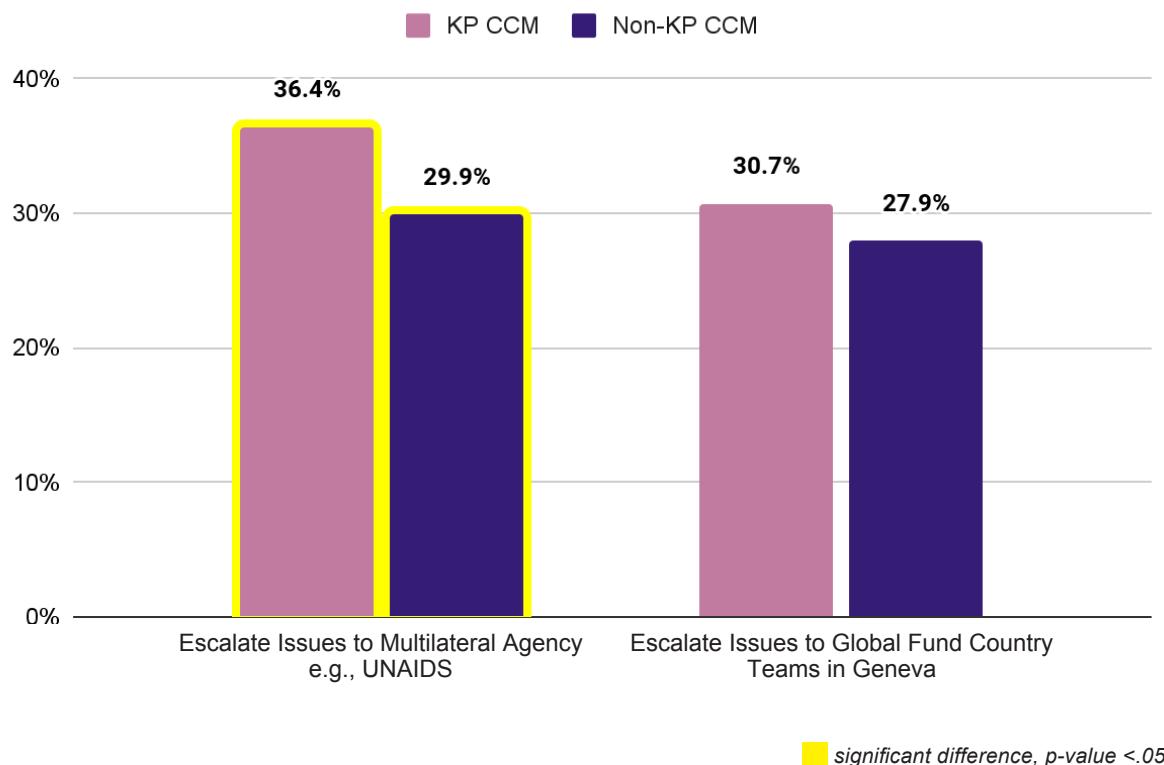
"In our government, the public sector, you have to be a fighter to handle them. Otherwise, they keep marginalizing your issues. But fortunately for us, what kept us going was to know that after all, Global Fund values civil society. So whether you like it or not, civil society, it has to be in this application." (Current TB Community CCM Representative)

Furthermore, Global Fund **guidelines on KP inclusion on the CCM** were described as being vital to ensuring that CCMs had seats for KP representatives. Several participants believed that without this requirement KPs would have no representation on their CCMs.

"I'm quite sure that if there was not a Global Fund requirement to have PWUD [people who use drugs] representation on the CCM, there wouldn't be any—and potentially also for sex workers. And there's a lot of resistance among members of the CCM who come from government related agencies. And you can see their prejudice and lack of understanding, particularly around drug use and drug treatment." (Current Non-Community CCM Representative)

The Global Fund has clear expectations for community inclusion²⁴ and has designed reporting mechanisms for CCM members to lodge complaints with the Global Fund Secretariat in Geneva in instances when these expectations are violated.²⁵ However, for these systems to function as designed there must be **timely response to violations** and the community must feel comfortable using these processes without fear of retaliation.

Figure 16. CCM members who have escalated issues, separated by KP status



RISE data showed that, while the majority (60%) of community CCM members were aware of a system to lodge a complaint, the minority (29%) had ever escalated an issue to Geneva or to a multilateral like UNAIDS (32%). Similar proportions of KP CCM members and non-KP CCM members had escalated a CCM issue to Geneva but a significantly higher proportion of KP CCM members had reported an issue to a multilateral partner than non-KP CCM members (**Fig. 16**). Data may indicate that **multilateral partners outside of the Global Fund may be an additional venue** by which KPs can escalate CCM issues.

Qualitative data showed that **fear of retaliation** was a major barrier to reporting to the Global Fund Secretariat. One participant reported that their name was shared with the Global Fund country team after making an anonymous complaint and another described reporting a violation to the OIG and not receiving any response for one year. Ensuring

that escalation systems are fit for purpose will require publicizing existing mechanisms, providing training for those who may be targets of escalation to handle anonymous whistleblowing effectively, and fostering trust while dispelling misconceptions among communities. Importantly, although the Global Fund has an independent mechanism for reporting fraud and corruption, there is currently **no protected pathway for escalating programmatic or governance disputes** that offers the same safeguards against disclosure and retaliation.

Finally, RISE data highlight the need for strengthened, **proactive monitoring of CCM environments**, extra protections to ensure confidential reporting, and the availability of emergency funding for responding to emerging safety concerns. Ensuring immediate responses to acts of discrimination or intimidation of CCM members would be an important way for the Global Fund to honor its commitment to fostering a safe and collaborative CCM space.

5. Recommendations

The Global Fund CCM model is a unique and innovative strategy to ensure country ownership and to facilitate engagement between governments, technical partners, and communities impacted by the three diseases. Empowered with a decision-making role in resource mobilization, service delivery arrangements, and programmatic and fiduciary oversight, the CCMs are positioned to act as a linchpin of countries' public health and development programming and funding streams. The RISE study findings highlight the immense opportunity that CCMs hold for meaningful community engagement, redressing accountability imbalances, and strategically increasing transparency and collaboration between communities and key public health stakeholders.

The CCM model, as a multi-stakeholder governance structure, is a tool to rise above power structures and national political contexts with the aim of creating a genuinely collaborative space for engagement and decision-making. Several key Global Fund policies and initiatives serve to reinforce this objective, and findings from the RISE study have reaffirmed the contributions of this guidance, support, and oversight. Continuing to support meaningful engagement of communities in CCMs, particularly in contexts with challenging political, programmatic, and financial dynamics, will require a sustained and nuanced approach. The RISE study has identified several key recommendations for strengthening and tailoring this support, which have been developed and validated by the RISE steering committee.

Recommendations to Strengthen Community Engagement

1

Strengthen Secretariat-led initiatives to inform CCM representatives and other Global Fund partners and about CCM policies and guidelines

To address confusion among CCM representatives about Secretariat policies and guidance, outreach and educational strategies should be pursued to **ensure all CCM stakeholders and external communities have visibility** on the roles, rights, and responsibilities of the CCM. This should include regular dissemination of

the guidance around the CCM eligibility criteria, CCM composition, conflicts of interest, the availability of financial support for CCMs, and the code of ethics for CCM representatives. Special attention should be paid to guidance about conflict of interest, to reduce the misapplication of guidance as a strategy for excluding civil society, and policies on CCM membership. These initiatives should build on existing outreach strategies, including through onboarding materials, the Secretariat staff, and the Regional Learning Platforms, and should be further strengthened to ensure all stakeholders in the Global Fund Partnership are informed.

Where guidelines are perceived by CCMs as being too vague, or where policy language is enabling undesirable practices that undermine the principles of community engagement, the Global Fund Secretariat and Board should **review the CCM Policy to ensure it is fit for purpose**.

In addition, the Secretariat should ensure that all **CCM representatives are fully informed of their role in CCM matters**, from Funding Request development and approval to grant oversight, and the Global Fund's "minimum expectations" for community engagement. New CCM representatives should receive onboarding that describes the phases of the Global Fund funding cycle, the roles of the CCM committees, and training on using Global Fund data for oversight. To monitor community CCM representatives' meaningful involvement in all CCM matters, the Secretariat should consider a KPI or other internal metric for tracking community engagement throughout the cycle.

Recommendations for Equipping Community

2

Increase support for community engagement throughout the three-year cycle

Communities are motivated to engage more deeply in CCM matters, but additional **financial support is needed** to facilitate this engagement. This must include financial support to prepare for and attend meetings, conduct consultations, and attend oversight visits. Financial support must be targeted to ensure that community representatives are able to participate in technical discussions around all grant cycle activities, including budgets and workplans.

Reports, documents, and data must be shared in advance of meetings and with sufficient notice to allow analysis and review. Documents must be translated into the country's language(s), and must be shared in a structure and format that is interpretable and clear. Respondents identified a desire to expand and diversify oversight through field visits, as well as creating new mechanisms for sharing community data. The Global Fund Secretariat and its partners can strengthen formal oversight by **supporting additional field visits**, including to sites identified by community representatives on the CCM. Additionally, community CCM representatives and their constituencies should be supported to gather and share community-owned data, such as from CLM.

Capacity building and technical assistance should focus on **practical training oriented toward the technical skills needed to participate** in budgeting and technical oversight, as well as expanding knowledge of the Global Fund model, policies, and regulations. Global Fund and its partners should support **dedicated consultants** hired to support and represent communities throughout the grant cycle.

3

Implement data-sharing mechanism that ensures on-time, accessible, and translated information about grant performance and financing.

RISE data indicate core **challenges faced by CCM representatives seeking information to conduct grant oversight**. Currently, mechanisms for data sharing are dependent on PRs sharing information directly with the CCM, given that granular financial and granular grant data are not available online. CCM representatives, communities, and the PRs themselves expressed that the current processes were dependent on governments sharing data, were burdensome on PRs, and did not result in adequate information sharing to be able to readily and regularly identify and address implementation challenges.

To address challenges around visibility of grant activities, the Secretariat should develop **mechanisms for sharing granular data with CCMs and communities that do not depend on PRs**. This strategy would relieve burden on the PRs, create more equitable opportunities to conduct oversight, and contribute to Global Fund's commitment to transparency. Data sharing must at minimum explicitly include the publication of information on a publicly

accessible website, in order to mitigate power imbalances and ensure equitable access to information. The Global Fund Secretariat must additionally enforce timelines for document sharing and translation, such as through the Grant Regulations agreement,²⁶ to provide CCM representatives sufficient time to prepare and consult before CCM meetings.

4

Build funding streams that support peer-to-peer mentoring of community CCM representatives

A key need emerged to develop a mechanism for junior and new CCM members to receive onboarding, training, and ongoing mentorship from senior or former CCM members. **This activity should include the identification of potential mentors and facilitation.** The program can additionally benefit from external support to provide guidance and additional capacity building (for example, "know your rights" and education about CCM policies). The RISE data clearly show that the workload for CCM representatives far exceeds what is manageable by one representative. As such, this initiative would support an employee or an organization to facilitate the CCM engagement. This work would involve coordinating civil society engagement, conducting analysis of grant data, and contributing to input on CCM matters.

5

Implement reporting mechanisms that ensure sufficient and transparent funding streams for community participation in Global Fund mechanisms

The findings from the RISE study reveal challenges around on-time and sufficient disbursement of funding for CCM representatives and their constituencies for doing governance work, analysis, and consultations. Ensuring that available funding streams for CCM functioning are properly disbursed is key, and the Secretariat should **explore opportunities to better track and oversee the disbursement of funds for CCM operations**. This can include dual-track financing, in which CCM support is disbursed through nongovernmental PRs, or the Secretariat could pursue more direct routes of funding, such as through existing or ad hoc intermediaries.

In addition to enhancing the oversight and tracking of fund disbursement, there is a key need to provide adequate financial support for communities and civil society participating to engage with their CCM representatives.

Financial assistance should be allocated to support a mix of community members to participate in consultations, with particular emphasis on supporting participants living outside of the capital and urban centers. Funding should be earmarked to enable CCM representatives to adequately prepare for meetings and to maintain regular consultations with community members beyond the development of the Funding Request. In support of these consultations, Global Fund and its partners can support individuals or civil society organizations outside of the CCM to formally take a role facilitating community engagement. This dedicated support can play a vital role in bridging communication gaps, fostering collaboration, and ensuring the inclusivity of CCM processes.

Recommendations for Empowering Community

6 Implement a cross-country learning forum for community CCM representatives

An emerging gap from the RISE study was a lack of regional and global opportunities for community CCM representatives to share experiences and strategies for meaningful CCM engagement. Global Fund and its partners should **increase support for new and existing networks of CCM representatives and Global Fund advocates** to strengthen capacity and build collective

power. This activity would build a new learning community for CCM representatives to learn about CCM policies and rights, share lessons learned and best practices, problem solve, and—as needed—engage with the Secretariat. This should involve both in-country workshops and a virtual platform for regular engagement.

7

Strengthen accountability mechanisms for reporting misconduct, abuse; strengthen whistleblowing and expand outreach

While many RISE respondents described being aware of pathways to report challenges, community representatives often did not feel sufficiently safe or protected to use these mechanisms; by contrast, others were not aware of any Global Fund mechanisms for recourse. Special consideration should be given to **anonymous reporting strategies that protect communities from retaliation** from the CCM representatives, the Secretariat, and other stakeholders in the country. In cases where communities and key populations experience criminalization or hostile political climates, the Secretariat and its partners should implement more proactive monitoring of CCM climates, extra protections to ensure confidential reporting, and make available **funding streams for responding to emerging safety concerns**. In parallel to the OIG’s reporting mechanism, the Secretariat should support an independent mechanism for reporting governance and programmatic CCM challenges that are outside of the Global Fund’s Prohibited Practices.

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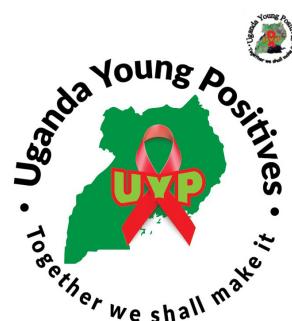
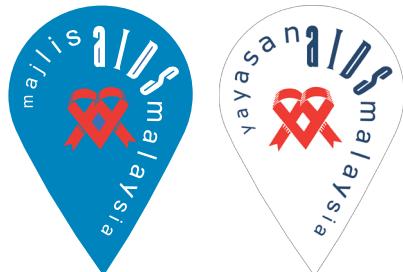
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Endnotes

¹The Global Fund. Local Fund Agent Manual. Section A-Introduction to the Global Fund. 2014. Available online at: https://www.theglobalfund.org/media/3233/lfa_manual03sectiona_manual_en.pdf

²The Global Fund. About the Global Fund. Available online at: <https://www.theglobalfund.org/en/about-the-global-fund/>

³The Global Fund. Global Fund Eligibility Policy. 2022. Available online at: https://www.theglobalfund.org/media/7443/core_eligibility_policy_en.pdf

⁴The Global Fund. Description of the 2023-2025 Allocation Methodology. 18 Jan 2023. Available online at: https://www.theglobalfund.org/media/12675/fundingmodel_2023-2025-allocations_methodology_en.pdf

⁵The Global Fund. Fighting Pandemics and Building a Healthier and More Equitable World: Global Fund Strategy 2023-2028. Available online at: <https://www.theglobalfund.org/en/strategy/>

⁶The Global Fund. Country Coordinating Mechanism Policy Including Principles and Requirements. 10 May 2018. Available online at: https://www.theglobalfund.org/media/7421/ccm_countrycoordinatingmechanism_policy_en.pdf

⁷Sands P. Putting Country Ownership into Practice: The Global Fund and Country Coordinating Mechanisms. *Health Syst Reform.* 2019;5(2):100-103.

⁸As defined in the Key Populations Action Plan, key populations may include women and girls, men who have sex with men, people who inject drugs, transgender people, sex workers, prisoners, refugees and migrants, people living with HIV, adolescents and young people, orphans and vulnerable children, and populations of humanitarian concern, in each case based on epidemiological as well as human rights and gender considerations. Available online at: https://www.theglobalfund.org/media/1270/publication_keypopulations_actionplan_en.pdf

⁹The Global Fund. Fighting Pandemics and Building a Healthier and More Equitable World: Global Fund Strategy 2023-2028. Available online at: <https://www.theglobalfund.org/en/strategy/>

¹⁰The Global Fund. GF/B48/9A. Thematic Discussion: Communities at the Centre. 15-17 November 2022. Available online at: https://archive.theglobalfund.org/media/12480/archive_bm48-09a-thematic-discussion-communities-centre_report_en.pdf

¹¹The Global Fund. GF-OIG-16-004: The Global Fund Country Coordinating Mechanism (Audit Report). 25 February 2016. Available online at: https://www.theglobalfund.org/media/2645/oig_gf-oig-16-004_report_en.pdf

¹²The Global Fund. Country Coordinating Mechanism Evolution: Enhancing Partnership and Sustainability of Health Governance. August 2020. Available online at: https://www.theglobalfund.org/media/10028/ccm_evolutionenhancingpartnershipsustainabilityofhealthgovernance_guide_en.pdf

¹³The Global Fund. Integrated Performance Framework for Country Coordination Mechanisms (CCMs). 29 Sep 2022. Available online at: https://www.theglobalfund.org/media/12364/ccm_integrated-performance_framework_en.pdf

¹⁴The Global Fund. GF-OIG-23-012: Global Fund Country Coordinating Mechanism (Audit Report). 2 June 2023. Available online at: https://www.theglobalfund.org/media/13110/oig_gf-oig-23-012_report_en.pdf

¹⁵Cáceres, A. L. (n.d.). Position Note: Inclusion of Women's and Girls' Needs in GC7 Funding Requests for HIV, Tuberculosis, and Malaria. *Women 4 Global Fund*

¹⁶The Global Fund. Technical Brief: Gender Equality. Allocation Period 2023-2025. 25 January 2023. Available online at: https://www.theglobalfund.org/media/5728/core_gender_infonote_en.pdf

¹⁷The Global Fund. Technical Review Panel Observations Report: Grant Cycle7. Windows 1 and 2. October 2023. Available online at: https://www.theglobalfund.org/media/13448/trp_2023-observations_report_en.pdf

¹⁸Women4GlobalFund. W4GF Statement to the Global Fund 50th Board Meeting 14th-16th November, 2023. November 2023.

¹⁹The Global Fund. Country Coordinating Mechanism Funding Policy. September 2016. Available online at: https://www.theglobalfund.org/media/6376/core_countrycoordinatingmechanismfunding_policy_en.pdf

²⁰The Global Fund. Grant Regulations. 14 September 2023. Available online at: https://www.theglobalfund.org/media/5682/core_grant_regulations_en.pdf?u=636487639000000000

²¹The Global Fund. Global Fund Policy to Combat Fraud & Corruption. GF/B38/06-Revision 2. 14-15 November 2017. Available online at: https://archive.theglobalfund.org/media/7063/archive_bm38-06-policy-combatfraudcorruption_report_en.pdf

²²The Global Fund. Report Fraud & Abuse. Available online at: <https://www.theglobalfund.org/en/oig/report-fraud-and-abuse/>

²³The Global Fund. GF-OIG-16-004. Global Fund Country Coordinating Mechanism (Audit Report). 25 February 2016. Available online at: https://www.theglobalfund.org/media/2645/oig_gf-oig-16-004_report_en.pdf

²⁴The Global Fund. Community Engagement: A Guide to Opportunities Throughout the Grant Life Cycle. December 2022. Available online at: https://www.theglobalfund.org/media/12649/core_community-engagement_guide_en.pdf

²⁵The Global Fund. Whistle-blowing Policy and Procedures for the Global Fund to Fight AIDS, Tuberculosis and Malaria. April 2019. Available online at: https://www.theglobalfund.org/media/2942/core_whistleblowing_policy_en.pdf

²⁶The Global Fund. Grant Regulations. 14 September 2023. Available online at: https://www.theglobalfund.org/media/5682/core_grant_regulations_en.pdf

