







The Anglophone Africa Civil Society and Communities CCM Shadow Report and Scorecard Initiative



THE ZAMBIA CIVIL SOCIETY AND COMMUNITIES CCM SHADOW REPORT







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*Every one of the Country Reports were done using Participatory Action Research: the research was developed, conducted, analysed and written by in-country national civil society activists.

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Abbreviations

AAI	AIDS Accountability International
ССМ	Country Co-ordinating Mechanism
Col/Cl	Conflict of Interest
CG	Community group
CSO	Civil Society Organisation
CS	Civil Society
EANNASO	Eastern Africa National Networks of AIDS Service Organisations
EPA	Eligibility Performance Assessment
FBO	Faith-Based Organisation
FGD	Focus Group Discussion
WSW	Women who have Sex with Women
GF/GFATM	Global Fund for AIDS, Tuberculosis and Malaria
HIV	Human Immunodeficiency Virus
IDU	Injecting drug users
INGO	International Non-Governmental Organisation
KAP	Key Affected Populations
KP	Key Populations
MDR TB	Multi-Drug-Resistant Tuberculosis
MSM	Men who have sex with men
NFM	New funding model
NCM	National Coordinating Mechanism
NGO	Non-Governmental Organisation
NPO	Non-Profit Organisation
OIG	Office of the Inspector-General
PAM	People Affected by Malaria
PATB	People Affected by Tuberculosis
PIP	Performance Improvement Plan
PLWD	People Living with the Diseases of HIV, TB and malaria
PLWHIV	People Living with HIV
PR	Primary Recipient
RFA	Request for Application
SR	Subsidiary Recipient
SSR	Sub-Subsidiary Recipient
SW	Sex Workers
ТВ	Tuberculosis

Problem Statement

Effective Country Coordinating Mechanisms (CCMs) are a vital part of the Global Fund architecture at country level. CCMs are responsible for submitting requests for funding and for providing oversite during implementation. With the introduction of the Global Fund's New Funding Model (NFM) in March 2014, CCMs play an even more important central role, convene stakeholders to engage meaningfully in inclusive country dialogue, agree on funding split, and participate in the development of National Strategic Plan (NSP) discussions for the three diseases at country level.

With the enhanced responsibility, the NFM also introduced more rigorous CCM assessment processes. Previously, CCMs submitted a self-assessment attached to their proposal. Now, CCM self-assessments are facilitated by conducted by an external consultant – either the International HIV/AIDS Alliance or Grant Management Solutions for and on behalf of the CCM Hub. Further, CCMs are also mandated to have a performance improvement plan to accompany their assessment, ensuring that areas of weakness are addressed in an open and transparent manner.

Despite the importance of CCMs in Global Fund decision-making at country level, studies have flagged issues with CCM membership balance, poor representation and limited constituency feedback.^{1,2} Further, the recent audit report from the Office of the Inspector General (OIG) found several persistent shortcomings with CCM performance:

- 10% of the 50 countries reviewed did not have the required oversight committee;
- More than half of the countries did not have specific information on roles, timelines, and budgets in their oversight plans, or they had oversight plans that were outdated;
- 62% of the CCMs were non-compliant with the requirement of seeking feedback from non CCM members and from people living with and/or affected with the disease;
- More than half of the 45 CCMs that have oversight bodies did not adequately discuss challenges with the PRs to identify problems and explore solutions;
- 58% of the CCMs had not shared oversight reports with country stakeholders and the Global Fund Secretariat in the previous six months; and
- 26% did not share the oversight reports with relevant stakeholders in a timely manner that could have ensured well-timed remedial action.

In light of the OIG CCM Audit, and the enhanced role of CCMs in country level disease governance in the Funding Model, there is a need for a wide range of stakeholders to be empowered to demand improved CCM performance. While the move to have an external consultant to facilitate the CCM Eligibility & Performance Assessments (EPA) and the development of Performance Improvement Plans (PIPs) to guide the subsequent strengthening of the CCM is an improvement, the fact that these EPAs and PIPs are not public is an obstacle to accountability.

¹ Oberth, G. (2012). Who is Really Affecting the Global Fund Decision Making Process?: A Community Consultation Report. AIDS Accountability International. Cape Town, South Africa. Online at http://aidsaccountability.org/?page_id=8094

² Tucker, P. (2012). Who is really affecting the Global Fund decision making processes? A Quantitative Analysis of Country Coordinating Mechanisms (CCMs). AIDS Accountability International. Cape Town, South Africa. Online at http://aidsaccountability.org/?page_id=8094

Problem Statement

Vested stakeholders and communities must be able to use CCM assessments and improvement plans as accountability mechanisms to demand better performance.

Added to this is that fact that currently CCM Assessment & Performance Improvement Plans lack questions that speak to quality of performance such as meaningful engagement, use of documentation and information, etc.

Civil society needs to be further engaged with the CCM Assessment & Performance Improvement Plans in order to hold stakeholders accountable. Similarly, these same civil society watchdogs and affected communities must have the tools, knowledge and information they need to be able to measure the performance of the CCM members that represent them and to hold CCMs accountable.

About the research

The project comprises of two types of research:

The Country CCM Shadow Reports

These reports drill down into issues at country level and assess CCM performance from the perspectives of both CCM members as well as the perspective of other stakeholders such as principal recipients and sub recipients. The report is based on the GFATM CCM Audit Progress Assessment Tool but also include various other questions that are seen to be lacking in the existing audits by Geneva. The reason why the research is considered a shadow reporting exercise is that methodologically and in terms of content we are hoping to build and improve on the methods being used by Geneva at this time. Shadow reports are used to supplement and/or provide alternative information to that which was submitted in the original reports. In this work, our aim is the same: to supplement and/or provide alternative information to that found in the original CCM audits.

The Civil Society CCM Scorecard and Country CCM Shadow Reports will not duplicate the Global Fund supported Eligibility and Performance Assessments (EPAs). This is because whilst EPAs are consultant facilitated self-assessments of CCMs that are largely driven by the Global Fund to facilitate accountability using a top down approach; the Civil Society CCM Scorecard and Country CCM Shadow Reports will be undertaken by civil society in country, using a bottom up approach. In addition, the Civil Society CCM Scorecard and Country CCM Scorecard and Country CCM Shadow Reports (PRs) and sub-recipients (SRs)) who interact with CCMs. The research for the Civil Society Scorecard and the Country CCM Shadow Reports was facilitated by civil society resident in country so the exercise could both empower civil society and sustain the culture of demanding accountability from CCMs in country and be replicated across other grant implementers.

The Civil Society CCM Scorecard

A comparative analysis that ranks the participating countries against each other in terms of their performance. Using the AAI Scorecard methodology, data from the Country CCM Shadow Reports is analyzed and countries are graded on their performance, as a means to uncover best and worst practice, who is ahead, who is falling behind, and other similarities and differences that might make for good entry points for advocacy.

Focus Countries

Nine countries participated in the research: Ghana, Kenya, Malawi, Nigeria, Rwanda, Swaziland, Tanzania, Uganda and Zambia.

Expected Outcomes

Long term goal More accountable CCMs. Medium term objective Increased transparency around CCM performance and improvement plans.

Short term aim

Empowered civil society and community groups who can do effective shadow reporting.

Methodology

The technical team (AAI and EANNASO) developed a questionnaire based on the Global Fund Eligibility and Performance Assessments (EPAs) questionnaire (called the Progress Assessment Tool). AAI almost exclusively uses Participatory Action research (PAR) for field research, a best practice in which community and country civil society partners codeveloped the methodology, research tools, conducted the research and wrote the final reports and analysis.

Local civil society, who do not sit on the CCM and do not receive Global Fund money, were identified to do conduct the research at country level, including data collection and analysis. We selected 3 local watchdogs in each of the 9 countries for a total of 27 local watch dogs to be trained, mentored and supported to do the research. The training also equipped civil society with skills to enable them to engage with the CCM Secretariat to plan and schedule the interviews and FGDs. Civil society conducted interviews to collect data using a mix of questionnaire interviews and focused group discussions (FGD). Comprehensive questionnaires with open ended questions and FGD guides were provided to civil society; these allowed for probing and discussions whilst collecting data.

First, the core group of respondents from the CCM for the interview and focus group discussions were drawn from a cross section of CCM members representing the respective governments, faith based, civil society, private sector, key populations, people affected by the diseases, the bi lateral and multi-lateral partners and the CCM secretariat. Civil society conducting the research were expected to undertake a minimum of eight face to face interviews and conduct one focus group discussion of not less than six CCM members.

These interviews and a FGD collectively included all of the following sectors: government, faith based, civil society, private sector, key populations, people affected by the diseases, the bi lateral and multi-lateral partners and the CCM secretariat.

Secondly, civil society also conducted a FGD of 10-12 non CCM members mainly drawn from implementing government and civil society PRs and SRs. The second FGD enabled the research to get the perspectives of non CCM members who have interacted with the CCM. Key areas of discussion included:

- How they have benefitted from the oversight function of the CCM;
- How, when and the outcomes of the oversight field visit;
- If the oversight reports and outcomes are formally shared and published through the CCM website
- Whether women and KPs are adequately represented on the CCM;
- · If civil society members were elected/selected in an open and transparent manner;
- An understanding of the level of meaningful participation of KPs in CCM leadership;
- An understanding of the level of meaningful participation of KPs informal and ad hoc committees;
- The methods of soliciting KP input and then this feedback to the larger constituency;
- Conflict of Interest (COI) e.g. how grant implementers (SRs) who are also CCM members manage COI in CCM meetings etc.

One aim was to build the capacity of the local civil society watchdogs to engage with a variety of different research techniques and data gathering modalities, so the following will contribute to this objective:

- Civil society received training on FGDs at the workshop;
- Civil society completed hard copies of the questionnaires at country level and then also captured the data online into a survey monkey.
- Civil society developed their own 2-3 page analysis of each of the 2 FGDs, talking about key findings (estimate 5-8 findings) and recommending strategic entry points for advocacy (estimate 3-5)
- In addition to this, civil society wrote their own 5-8 page analysis of all of the data as they understood and interpreted it and submitted this to the technical team. This analysis formed the basis of all of the research they conducted, and informed the technical team's analysis of the data.

Sub-grants were made to each of the local watchdogs to support their implementation of the shadow reporting. The content from the country data collectors, once entered into the survey monkey tool, was analysed by AAI, presented to EANNASO and country teams at a meeting in Kigali, Rwanda in February 2017, and feedback from this meeting and from email correspondence from country teams was included to develop the final reports.



Analysis

CCM Performance

All CCMs are required to meet the following six requirements to be eligible for Global Fund financing:

- 1. A transparent and inclusive concept note development process;
- 2. An open and transparent Principal Recipient selection process;
- 3. Oversight planning and implementation;
- 4. Membership of affected communities on the CCM;
- 5. Processes for non-government CCM member selection; and
- 6. Management of conflict of interest on CCMs.

Below is a highlight of the research findings as per the above eligibility requirements:

1. Transparent and inclusive concept note development

From the time Zambia started receiving the Global Fund grants, the country had four PRs. namely the Ministry of Finance (MoF), Ministry of Health (MoH), Churches Health Association of Zambia (CHAZ), and the Zambia National AIDS Network (ZNAN). Zambia has demonstrated inclusiveness, a suitable level of accountability and a transparent approach in its funding request development process. The CCM has since constituted a technical task team (TTT) to develop the FR and is made up of multi-sectoral. The TTT will be chaired by the MoH and co-chaired by CHAZ. The CCM committee responsible for coordinating the process is the Strategic Planning and Investment (SPI) Committee.

The TTT is composed of the core writing team of 25 people and is supported by a wider technical reference team, thereby encompassing all populations. The Zambian team conducting the scorecard initiative had an opportunity to check the preparation process of the concept note development and indeed the calendar of events and programming with regards to concept note development. During the check on the subject matter, the Zambian team conducting the scorecard initiative learnt that the CCM was busy in the field and had gone out in all the provinces to make consultations with regards to obtaining input on emerging issues to add to the new Funding Request. During the period of this exercise (scorecard initiative) the country CCM was engaged in the concept development process and all the program was shown to the Zambian team conducting the scorecard initiative. The program design is inclusive and transparent though still the CCM can do better.

2. An open and transparent Principal Recipient Selection

It was encouraging to learn that the process of selecting the Principal Recipients for Global Fund grants in Zambia is open and transparent. During the focus group discussion for non CCM members and face to face with the CCM members it was clear that the Zambian process of selecting the Principal Recipients of the Global Fund has been marred by some controversy because CSOs are not happy, as CHAZ largely takes interest of FBOs. CSOs have widely

been advocating for a third PR who will strictly take into consideration the interest of the CSOs. As expected the CCM are supposed to choose who the respective PRs in the Country are supposed to be as per their mandate. However, the scenario in Zambia has left some stakeholders not happy as they felt that the process could have been lacking due to limitation by CHAZ to involve CSOs.

Following the Audit, conducted by the office of the Inspector General (OIG) of the Global Fund in 2011, that revealed glaring irregularities and some misappropriation of the funds, both the MoF and MoH and the ZNAN were stripped of their PR status. In the interim, the CCM elected the United Nations Development Programme (UNDP) to be a PR until capacity was built at the MoH, while the ZNAN portfolio was done away with altogether. Though CHAZ took over some of the grants ZNAN was implementing, this essentially meant that there was limited funds that were flowing to Civil Society Organisations (CSOs) as ZNAN was the only PR that could sub-grant to CSOs. The CCM later agreed to a petition that was handed to them by CSOs that the component that was being handled by ZNAN be extended to CHAZ which is already PR so that funds could flow to CSOs. This was done and the CHAZ now handles the sub-granting of funds to CSOs amidst some dissatisfaction by the CSOs who feel that CHAZ prioritises Faith Based Organisations (FBOs) as per their mandate at the expense the larger CSOs and CBOs.

Zambia's initial PRs were the MoH, MoF, CHAZ and ZNAN. All these were chosen by the CCM, but the process was not made public. However, the CCM now plans to publish the PRs for the implementation period 2018-2020. The CCM has since tasked the Oversight Committee to constitute a Technical Task Team to select/assess the existing PRs for suitability for the next Funding Request. The CCM has also tasked SPI Committee to conduct a mid-term review of GF grant implementation and to conduct provincial dialogues to ascertain implementation challenges and to obtain recommendations going forward. It is through the evidence collected from these three activities that will determine if the country needs a third PR for CSOs, as well as to determine the suitability for the existing PRs for the next implementation. However the current position of CSOs indicates that they urgently desire a PR that will take their interest in participation in the global fund. The CSOs in Zambia have indicated an unsatisfactory level of performance with regards to engagement of the CSOs in The Global Fund.

3. Oversight planning and implementation

Among the notable, interesting and pleasing results of the survey is the position of the CCM-Zambia in the area of oversight planning and implementation. It was evident during the exercise that the CCM has the overall responsibility for oversight and is fulfilling this responsibility. It was also noted that CCM-Zambia, at times, does delegate some of the functions of oversight to the Oversight Committee.

It was found that CCM-Zambia ensures that oversight follows grant reporting cycles for reviewing the performance of Principal Recipients, the timely execution of work plans, and achievement of results compared to targets. The one gap is on th communication of its findings to stakeholders, and the issue of not allowing observers to attend its meetings. The invitation to attend CCM meetings is usually through a specific member interest.

Analysis



Question: Oversight: How would you rate the performance of the oversight body?

The CCM-Zambia has delegated its oversight function to an Oversight Committee to improve this task's efficiency. This Committee reviews each grant's financial, managerial and programmatic performance. Specifically, the Oversight Committee ensures that grant implementation is on course and that all implementing partners are meeting targets, goals, and objectives as laid out in the grant's performance frameworks and grant agreements. The research team found information that the Oversight Committee identifies possible gaps and bottlenecks in grant implementation, and makes recommendations to the full CCM-Z on how to address these bottlenecks.

The team conducting the scorecard initiative observed that the Oversight Committee liaises with the PRs before conducting the activity and ensures that site profiles are received before the field visit as per available information on file, and then gathered information during the exercise. While in the field, the PRs accompany the Oversight



ATTENDANCE DOES NOT EQUAL BEING

Committee. The Oversight Committee uses an oversight tool which was developed for that purpose to guide the Committee on gathering information. Two field visits are planned at the beginning of the year while sites are received when the activity is due.

"CCM Zambia does fulfil its mandate on oversight; it allows participation of various groups including the PLWD, KPs and CSO. It is important to note that CCM has its definition for Kps which is in agreement with the legal environment in Zambia and may be different from the definition at global level. I would submit that the current CCM undertakes its mandate transparently and within the agreed time."

"The CCM Zambia does fulfil its mandate, but it is not sufficiently inclusive because it does not practically encourage participation of people with disability."

"There is an oversight committee that has that responsibility. Do they do what they are supposed to do? Yes and No. No, because they are inconsistent. Yes, coz of late they have been doing some oversight activities..."

4. Membership of affected communities on the CCM

The majority of the respondents indicated that membership of all CSO and LNGOs where the KAP belong are elected into the CCM by way of a vote from their constituencies. However, the gap is on the information dissemination of these meetings and the type of invitation to such meetings. The CCM Secretariat uses scheduled CCM constituency meetings as fora to conduct such elections when tenure is about to end.

During the electoral process, the CCM Secretariat is there to monitor that there is transparency and accountability and to guide the meeting in terms of electoral governance issues. The process is that firstly the constituents nominate candidates and elections are conducted. The winning candidate is then duly made a CCM member. Secondly, alternates are also nominated and an election is conducted. The winning candidate again becomes the alternate.



ABLE TO INFLUENCE DECISION MAKING

Analysis

At times, constituents have resolved by unanimous agreement that the candidate who comes second becomes the alternate. It was also discovered that the rural communities are not well represented as most of the membership for CCM Zambia are picked from the areas along the line of the railways.

(CCM requires) "The inclusion of the other KPs groups (LGBTIs and SWs). The voice of CBOs- Older Persons and the adolescents voice."

"Yes, it can be improved, though there is not much gap on the current CCM composition. May be for prisoners, who are not represented because of the legal environment."

"The inclusion of LGBTI and SWs. Also, a representation for Malaria. For Zambia, the issue of LGBTI and CWSs is sensitive. May be could have a seat for the Human rights who would represent LGBTTI and SWs."

5. Process for Non-governmental CCM members selection

The process for Non-governmental CCM members' selection is a two-sided story, from the CCM members and Non-CCM members. For CCM members, the indication is that the process is well managed and engages the stakeholders, while from the perspective of Non-CCM members, especially the CSOs, the process is not clear and needs some improvement especially with regards to flow of information to Non-CCM members on the process.



CSO Quality: What is the quality of civil society sector representation?

"Through Elections by the constituency and this very transparent."

"Yes. CCM Zambia election process of representatives is transparent and it is done at constituency level."

6. Management of conflict of interest on CCMs.

There are some disparities between the information gathered on the above matter. The issue has two sides with different views.

The CCM acknowledge that it is a matter that they do experience and resolve it by ensuring that the affected party declares COI, while from the point of view of non CCM members, which include CSO, they are not sure if the matter is handled with the attention and degree that it deserves. It is difficult for the team to establish a clear position since there is no evidence. It may be necessary to attending a few CCM meetings to be able to establish the real practice.



Question: Are there any conflicts of interest in the CCM?

EPA Tool & Process

In the last EPA, the CCM had technical assistance from GMS to assist them conduct the assessment through document review and interviews of CCM members and non-members.

Secondly, the PIP that was developed from the EPA process was updated from time to time. We summarise in the table below, the EPA strengths, weaknesses, failures, successes, gaps, ease of use and any other relevant findings:

Analysis

Strengths	Weaknesses	Failures	Successes	Gaps
The tool is easily understood.	The tool does not bring out evidence of how effectively implemented activities were implemented. It just satisfies itself with what was implemented.	Many CCM members are not convinced of the need and do not fully appreciate the necessity of the EPA exercise.	The tool identifies CCM gaps and what is going well.	There are capacity gaps among CCM members. There is a need for capacity-building, especially for members of the Oversight Committee.
The indicators are measurable.	Not clear if meeting the indicators is an adequate criterion for compliance.		The indicators provide some level of comfort to stakeholders of what is going on.	There is a lack of feedback from CCM members and non- members on the usefulness of the tool.
The use of graphical representation of the results of the EPA is a strength.			CCM members and non- members immediately relate to findings.	
The uploading of evidence to support findings is a strength.		The uploading document is cumbersome.		

Does your country Performance Improvement Plan (PIP) address the CCM's performance gaps?



Can the existing EPA be improved on?



Yes No

PIP Tool and Process

Strengths	Weaknesses	Failures	Successes	Gaps
The tool is easy to understand.	The tool does not bring out evidence of how effectively implemented activities were implemented. It just satisfies itself with what was implemented.	Many CCM members are not convinced of the need and do not fully appreciate the necessity of the PIP exercise.	The tool identifies the activities to be implemented to improve performance.	Although several issues are identified and put in the PIP, there are usually lack of resources to adequately address all the issues.
The results of the EPA summarised in the PIP are categorised according to indicators. This helps to know what needs to be done for the identified issue/problem	Though an issue may be isolated for implementation in PIP, mechanisms of how successfully that was implemented do not exist.		The PIP is able to report whether or not an activity has been done.	There are inadequate mechanisms to obtain feedback if the PIP implemented activities resulted into improvement.
The use of graphical representation of the results of the EPA is a strength.			CCM members and non- members immediately relate to findings.	If the activities in the PIP do not relate to certain sectors, such members remain distant from the PIP process.
The uploading of evidence		The uploading documents		



is cumbersome.



Findings

At this stage, the Zambian team may not be able to do a comparison with other countries on its finding and hence to some degree the finding will mainly reflect what is obtaining at country level, so below are the findings:

Finding 1:

There is a poor flow of information inside the CCM and to non-CCM members. Most Non-CCM members were ignorant of CCM operations.

Finding 2:

There is a difference in the definition of KAP at country level and global level: it is well accommodating at global level, while it is discriminatory at country level.

Finding 3:

Most of the Local CSOs do not know the mandate of the CCM and its authority.

Recommendations

Priority Area 1: Accountability of the CCM

This can be done by CCM members, the CCM Secretariat and CSOs to raise awareness of the mandate of CCM and engagement of CSOs in holding the CCM and PRs accountable. At least once every quarter, there should be mechanisms to attract the attention of the wider community, and raise the accountability and responsiveness of the CCM.

Priority Area 2: KAP inclusiveness

Increase or broaden the definition of KAP. There is need for uniformity on the KAP definition at country CCM level and at Global Fund level. This activity will be accomplished by CSOs and the CCM Secretariat. (AAI note: the national definition is not de facto set by a CCM, but a CCM can play a powerful lead advocacy role in the expansion of the definition.)

Priority Area 3: Oversight Committee strengthening

The Oversight Committee plays a central role in ensuring that the CCM plays its oversight function effectively. However, there is a lack of adequate capacity, partly because the members of the Oversight Committee are busy with other work. The other reason is that resources for oversight are inadequate. There is a need to capacitate the Secretariat to provide full support to the Oversight Committee. This is particularly important when following up on outstanding issues with PRs.

Priority Area 4: CCM communications

There are no clear communication mechanisms between the CCM and Non-CCM members. The operations of the CCM remain unknown to many people. The Non-CCM members who were interviewed during this research indicated that they did not have enough information on the operations of the CCM.

This means that many communities are not effectively represented, and their experiences and lessons are not taken into account in community responses to the three diseases. There has to be a way of ensuring that communities are adequately consulted on a continuous basis. Therefore, mechanisms should be devised through the CCM Secretariat to ensure effective consultations.

Priority Area 5: Funding for KP engagement

There is a need to increase funding for constituency consultations and engagement, especially to engage key populations. Global Fund should make a deliberate effort to ensure funding is available for key populations. This is particularly the case with rural constituencies.

The CCM Secretariat and key populations groups should collaborate to ensure that this is done.

Recommendations

Other Comments

- 1. There are poor linkages and inconsistency between Global Fund grants and other national health and development programs.
- 2. CCM-Zambia, in general, has effective policies for managing conflicts of interest; however some gaps were noted, particularly around compliance, and this raises questions, especially with regard to PRs being members of the CCM.
- 3. It was found that Assessment (EPA) tools are good but their application or approach (self-assessment) is not appropriate. As a Board-mandated exercise, the CCM EPA is compulsory for all CCMs prior to the submission of a concept note. The objective of this assessment is to evaluate CCM compliance with CCM Eligibility, but the self-assessment is not good enough unless it is followed up with an external assessment.
- 4. There is a weak collaboration of stakeholders; there is no feasibility of CCM. In particular, the model should promote stakeholder collaboration and participatory decision-making in the design and delivery of health programs for the three diseases.
- 5. Despite some progress, made by the CCM-Zambia, oversight continues to be weak especially in oversight planning, and lack of feedback from key populations. For key populations in the case of Zambia, there is inadequate coverage because of the specific Zambian definition of key populations. For these reasons there is lack of inclusion of certain key populations in concept note development. Thus, certain CSO groups are not covered.
- 6. One issue that has usually haunted CCMs, and is true for Zambia, is that the CCM is a non-legal entity. This affects the effectiveness of the CCM in enforcing decisions made by the CCM. The CCM cannot implement any sanctions. They have to rely on the government or the Global Fund. There should be mechanisms, even though it is not a legal entity, to be able to hold PRs answerable.
- 7. It was clear during consultations that capacity-building should be given priority especially for CSOs. The Global Fund expects the civil society organisations to have oversight on the utilisation of Global Fund resources. However, most CSOs do not have the financial and technical expertise to fulfill this oversight function. For this reason, the PRs and SRs usually have a lot of information of the projects being implemented, leaving CSOs disadvantaged. The CSOs are usually handicapped in undertaking effective oversight. Global Fund should invest in this area of capacity-building.





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STRENGTHENING AFRICA'S COUNTRY COORDINATING MECHANISMS THROUGH EMPOWERMENT OF MARGINALIZED COMMUNITIES