



Audit Report

Global Fund

Country Coordinating Mechanism

GF-OIG-23-012
2 June 2023
Geneva, Switzerland

What is the Office of the Inspector General?

The Office of the Inspector General (OIG) safeguards the assets, investments, reputation and sustainability of the Global Fund by ensuring that it takes the right action to end the epidemics of AIDS, tuberculosis and malaria. Through audits, investigations and advisory work, it promotes good practice, enhances risk management and reports fully and transparently on abuse.

The OIG is an independent yet integral part of the Global Fund. It is accountable to the Board through its Audit and Finance Committee and serves the interests of all Global Fund stakeholders.

➤ Email:

hotline@theglobalfund.org

➤ Free Telephone Reporting Service:

+1 704 541 6918

Service available in English, French, Spanish, Russian, Chinese and Arabic

➤ Telephone Message - 24-hour secure voicemail:

+41 22 341 5258



Table of Contents

1. Executive Summary	3
2. Background and Context	6
3. Risk and Performance Snapshot	8
4. Findings	9
4.1 Material delays in implementing the CCM Evolution interventions at the country level will impact the catalytic potential to evolve CCMs maturity	9
4.2 Aspects of the project management of the CCM Evolution Strategic Initiative need to improve to achieve its intended objectives	12
4.3 The management of Technical Assistance provided to CCMs to needs strengthening to ensure quality and timely delivery	14
4.4 The effectiveness of the CCM Hub is hampered by limited systems and lack of guidance to CCMs with challenging or unique contexts	16
Annex A: Audit Rating Classification and Methodology	19

1. Executive Summary

1.1 Opinion

Country Coordinating Mechanisms (CCMs) are core to the Global Fund's contribution to health governance in helping to end HIV, tuberculosis (TB) and malaria while investing in resilient and sustainable systems for health. CCMs are a key element of the Global Fund partnership and play a critical role in realizing the principle of country ownership by undertaking inclusive, transparent, multistakeholder and multisectoral decision-making.¹

The 2016 OIG audit found that CCM oversight over Global Fund-supported programs was weak, and significant issues were identified with the implementation of CCM policies and procedures. Following this review, the Board approved the CCM Evolution Strategic Initiative to enhance the way the partnership works in countries and regions in May 2018. Set to conclude in December 2023, the CCM Evolution Strategic Initiative is expected to increase the maturity of CCMs and optimally support the implementation of the Global Fund strategy.

Many CCMs have benefited from this CCM Evolution Strategic Initiative, attesting their appreciation of the efforts. Its catalytic effect has however yet to be assessed. Although the CCMs that participated in the CCM Evolution's pilot phase from 2018 to 2019 have improved their operations, not all the gains were sustained, and not all of the planned activities were implemented in these countries after the pilot. The Project threshold assessment process has not been fully optimized to support CCMs to prioritize interventions that could move them to more strategic maturity.

Implementation of the Evolution interventions has been materially delayed, mainly due to the disruptions caused by the COVID-19 pandemic and related competing priorities of CCMs and the Global Fund Secretariat's CCM Hub. Additional delays were caused by limitations with the initial project design, the absence of a Monitoring and Evolution framework at inception, as well as the limited availability of technical assistance. As a result, the desired maturity shift of CCMs is yet to be achieved. Despite significant delays in the implementation of the CCM Evolution Strategic Initiative, there is no plan to adjust the project scope or timelines. Implementation of the CCM Evolution Strategic Initiative to improve CCM maturity and to deliver the Global Fund strategy is considered **partially effective**.

Significant improvement in CCM policies and processes has been noted since the last OIG audit in 2016. However, there is limited differentiation in CCM policies and guidelines, or support to CCMs with unique contexts. The OIG noted limited systems for recording and tracking CCM funding and financial performance at the Global Fund Secretariat. Access to timely and quality data by CCMs for decision-making also needs to be improved. The support provided by the Global Fund Secretariat to CCMs to help them execute their mandate is **partially effective**.

1.2 Key Achievements and Good Practices

CCM Evolution Strategic Initiative is a key project with catalytic potential to improve maturity levels of CCMs to deliver on the Global Fund strategy

The CCM Evolution Strategic Initiative is the first large-scale project to focus specifically on building capacity and strengthening processes and maturity of CCMs. Eighteen CCMs participated in the pilot and an additional 93 CCMs are part of the ongoing roll-out (now constituting virtually all CCMs globally). The Board demonstrated its commitment to the CCM Evolution Strategic Initiative by approving US\$15 million investment from the Strategic Initiative modality.² The CCM Evolution Strategic Initiative aims to improve the maturity of CCMs in an inclusive process by strengthening their oversight mandate, improving meaningful engagement and positioning within national structures, as well as improving the effectiveness of CCM Secretariat operations.

Although the CCM Evolution Strategic Initiative is still in the implementation phase, CCMs are already indicating that the Evolution Strategic Initiative has helped them to improve tools and processes. The recruitment of oversight officers is also seen by CCMs as improving their performance in oversight of grants.³ In a survey administrated by

² GF/B42/02 2020-2022 Allocation: Sources and Uses of Funds

³ GF/B42/10 "Evolving CCMs to Deliver on the Global Fund Strategy"

the OIG to CCMs, 81% of 934 of respondents indicated that the evolution activities are relevant and useful to address the needs of the CCMs and to contribute to increased CCM maturity. Another 85% believe that the future gains from CCM evolution would be sustained beyond the CCM Evolution Strategic Initiative period, indicating their positivity concerning the CCM Evolution Strategic Initiative.

Improved CCM processes, and a CCM Hub with clear roles and responsibilities have helped to improve the work of CCMs

The Global Fund Secretariat is continuously supporting the CCMs by updating and adding new guidelines, tools and templates to the Global Fund website. A 'Code of Ethical Conduct'⁴ was rolled out in 2021 for implementation by all CCM members and a comprehensive package of trainings and e-learnings are also available to them. Work to strengthen community engagement in CCMs is aligned with other Global Fund strategic initiatives such as the Community Engagement Strategic Initiative. In addition, the COVID-19 Response Mechanism (C19RM) funding request tools included specific provisions to ensure communities were consulted and participated in decision-making.

The Global Fund Secretariat's CCM Hub team has increased from five to 12 people⁵ since the last OIG audit in 2016. The team manages the contractual relationships with CCMs and works in a collaborative manner with other departments⁶ at the Global Fund to provide CCM-related support throughout the grant lifecycle. The Strategic Initiative has bolstered the CCM Hub's role from operational support and compliance to more strategic engagement and capacity building of CCMs. The roles and responsibilities between the Country Teams and the CCM Hub have also been clarified. This has improved engagement and clarified the support provided to CCMs by the CCM Hub and Country Teams.

1.3 Key Issues and Risks

The Secretariat needs to expedite implementation of the CCM Evolution Strategic Initiative to enhance CCMs' maturity and enable them to optimally support the Global Fund 2023-2028 Strategy

Activities under the Strategic Initiative have materially delayed across all four pillars of the CCM Evolution Strategic Initiative. Improvement in their implementation is needed to be able to fully optimize this catalytic opportunity to strengthen CCMs. In the sampled pilot countries, aspects of gains from the Evolution project were not sustained and not all activities planned during the Evolution Pilot were implemented after the pilot ended.

The COVID-19 pandemic and competing priorities of CCMs and the CCM Hub contributed to delays in the implementation of key interventions. Limitations with the initial project design, absence of a Monitoring and Evolution framework at inception and limited availability of consultants are other contributing factors. As a result, it is not possible yet to determine whether the maturity of CCMs will have increased at the end of the project.

More effective resource planning underpinned by adequate systems and processes would drive achievement of the CCM Evolution Strategic Initiative's intended objectives

The OIG survey showed that CCMs are appreciative of the Strategic Initiative, and claim to have benefitted in various ways, including by receiving support for Oversight and Ethics Officers. Despite pandemic-related disruptions, the CCM Hub maintained progress on the CCM Evolution Strategic Initiative throughout the height of the pandemic in 2020 and 2021, while simultaneously increasing CCM resources for COVID-19-related activities and screening C19RM applications for grant funding.

However, limited resource planning at project inception, suboptimal systems to support effective project outcome monitoring, as well as ambitious timelines, are impacting the effective delivery of the CCM Evolution Strategic Initiative. This could affect the achievement of the CCM Evolution Strategic Initiative objectives. The risk of "in-country governance which includes inadequate national program governance and grant oversight", highlighted by the Risk Department, may not be effectively mitigated, given that roll-out of the CCM Evolution is cited as a critical mitigating action for this risk.⁷

⁴ The Global Fund Code of Ethical Conduct for Country Coordinating Mechanism Members

⁵ Mix of fixed-term staff and defined-duration staff/consultants

⁶ Primarily, Grant Management Department, Strategy Investment & Impact Division, Community Rights & Gender Department, Access to Funding Department, Ethics Office, and the LFA Hub.

⁷ Semi-Annual Risk management report, October 2022 (GF/AFC20/10A)

Enhanced management of Technical Assistance provided to CCMs would speed up delivery of planned interventions

A significant portion (62%)⁸ of the CCM Evolution Strategic Initiative's budget is earmarked for Technical Assistance (TA) to deliver key interventions. However, implementation of TA-related activities has been significantly delayed due to substantial delays in recruiting and deploying TA consultants. Limited processes for quality assurance of TA work and engagement with TA partners risk affecting the quality and timely delivery of technical assistance services.

Improving systems for data collection – and for support to CCMs with distinct contexts – would enable CCMs to perform their functions effectively

Significant improvement in CCM policies and support was noted since the last OIG audit of 2016. In 2018, the Global Fund Board approved the CCM Code of Conduct and the CCM policy.⁹ These policies and guidelines need to be further differentiated for CCMs with unique contexts, including those in challenging operating environments, Federal States, transitioning countries and under the Additional Safeguard Policy (ASP). Improvement is also needed in the provision of adequate and appropriate systems and tools to CCMs and the CCM Hub to enhance access to, and leverage data for, decision-making.

1.4 Objectives, Ratings and Scope

The overall objective of the audit is to provide reasonable assurance to the Global Fund Board on the adequacy and effectiveness of the Global Fund's Country Coordinating Mechanisms. Specifically, the audit assessed the:

Objective	Rating	Scope
Design and implementation of the Strategic Initiative to improve CCM maturity and to deliver the overall Global Fund strategy. This includes assessing the adequacy and effectiveness of CCMs to meet the Global Fund's evolving expectations.	Partially effective	Audit period: 1 January 2020 to 30 September 2022 The audit covered: <ul style="list-style-type: none">CCM Evolution Strategic Initiative and CCM maturity sustainability plans to enable CCMs to adapt to the evolving expectations of the Global FundGlobal Fund Secretariat policies, structures, systems, processes, and guidelines for managing CCMsCCM processes and core areas at country level (in sampled countries)
Effectiveness of Global Fund Secretariat support provided to CCMs for executing their mandate.	Partially effective	

Details about the general audit rating classification can be found in [Annex A](#) of this report.

⁸ US\$7.8 million of the US\$12.6 million earmarked for CCMs activities

⁹ Country Coordinating Mechanism Policy Including Principles and Requirements (Accessed on 17 December 2022)

2. Background and Context

2.1 CCMs are a cornerstone of the Global Fund model

The Global Fund is built around the core principles of country ownership and partnership. Country Coordinating Mechanisms (CCMs) are multi-sectoral partnership bodies at country level that act as the custodians of these principles and are a key feature of the Global Fund partnership. CCMs act as national committees that coordinate the development of, and submit, funding requests. They nominate Principal Recipients, oversee the implementation of grants, and ensure links with other national health and development programs. They consist of representatives of all sectors involved in the response of HIV, tuberculosis, and malaria, including representatives of government, non-governmental organizations, civil society, people living with the diseases, academia, partners (multilateral and bilateral), faith-based organizations, the private sector, and technical agencies. Regional grants have similar governance bodies called Regional Coordinating Mechanisms (RCMs). This report will refer generally to CCMs, but this can also be read as “RCMs” where applicable.

Well-functioning CCMs have the potential to contribute to effective development and oversight of grants, as well as improving mechanisms for broader health governance within countries to sustain disease and health responses. The importance of the role of CCMs is emphasized in the Global Fund Strategy 2023-2028.¹⁰ The Strategy aims to “accelerate the evolution of CCMs and community-led platforms to strengthen inclusive decision-making, oversight and evaluation throughout Global Fund-related processes,” by bolstering the capacity of community representatives to engage in CCMs. It also aims for CCMs to align and integrate with national health structures and governance bodies to strengthen sustainability, to ensure that decision-making is inclusive of all parties, and to have strong oversight functions that can effectively oversee grant implementation.

A total of 110 CCMs/RCMs are overseeing over 300 grants in 130 countries, involving more than 4,500 CCM members. All members are engaged in CCMs on a voluntary basis. CCMs are typically headed by a Chair and a Vice Chair, while a CCM Secretariat coordinates the work of the CCM. The CCM also has one or several committees that focus on aspects of funding request development and grant oversight.

2.2 Overview of the CCM Evolution Strategic Initiative

The OIG audit of the CCM in 2016 noted issues related to CCM governance and processes, as well as opportunities to improve and enhance CCM maturity. In 2017, the Board requested that the Global Fund Secretariat examine ways to evolve the CCM model to sustainably improve the maturity of CCM performance and to support implementation of the Global Fund Strategy.

In May 2018, the Board approved a Pilot of the CCM Evolution project in 18 countries.¹¹ The pilot aimed to improve the performance of the participating CCMs through a baseline assessment, an implementation phase and an endline assessment. It focused on four areas: *overseeing grants*, ensuring *linkages* with national structures, *engaging* key stakeholders, and strengthening how CCMs *function*.¹² The lessons learned from the pilot laid the foundation for the main roll-out of the CCM Evolution Strategic Initiative, a US\$15 million-project spanning from 2020 to 2023,¹³ encompassing 93 CCMs and project managed by the CCM Hub.

The four main areas of intervention were revised as follows:

- **Oversight**, which aims to strengthen the effectiveness of the oversight function.
- **Engagement**, which aims to bolster the participation and engagement of civil society and key affected populations in CCMs, including in decision-making.

¹⁰ Global Fund Strategy 2023-2028

¹¹ GF/B39/04 “CCM Evolution: For Board Decision”

¹² GF/B42/10 “Evolving CCMs to deliver on the Global Fund strategy”

¹³ Original end-date: 30 June 2023, extended to 31 December 2023 through a no-cost extension.

- **Operations**, which aims to improve the effectiveness of the CCM Secretariat, including by upskilling members and strengthening governance.
- **Positioning**, which aims to strengthen the positioning of CCMs within existing national health governance structures to improve long-term sustainability.

A threshold assessment established the baseline level of maturity for the four areas. Based on the results of this threshold assessment, CCMs were asked to select two priority areas to focus on for CCM Evolution. In particular, they were asked to prioritize the areas where they could make the most changes, and not necessarily the areas with the lowest maturity score. These were areas where improvements were vital, to ensure CCMs' eligibility and performance. Upon request and feasibility of implementation, CCMs can also select, and receive support for, interventions from the strategic package.

Figure 1: Overview of CCM evolution interventions and number of CCMs that selected the respective interventions¹⁴

Oversight	No. CCMs	Engagement	No. CCMs
Oversight guidance, e-learning to equip CCMs	All (93)	Providing updated guidance & e-learning modules & tools	All (93)
Providing Oversight Officers to strengthen the function in CCMs	71	Supporting CCM composition review & updating processes	22
Intensive coaching for Oversight Officers & Committees	78	Accompanying CS preparation info sharing pre and post CCM meetings	70
Operations	No. CCMs	Training CCM members on CBM data analysis and tools for decision making	29
Guidance & e-learning to equip CCMs on CCM functions & on COI/Ethical leadership	All (93)	Supporting CS sectors in preparing and engaging in election processes	27
Guidance & support on CCM Secretariat Performance management		Positioning	No. CCMs
Facilitated in-depth Orientation training for entire CCM and new leadership	25	Positioning guidance & e-learning to equip CCMs	All (93)
Facilitated in-depth training on COI/Ethics	22	Positioning mapping and strategic plan development	79
In-depth review & updating of CCM framework documents	25	Positioning plan review and implementation	27
Detailed CCM Reform or Revamp	9	Transition Support - transition prioritized CCMs with development and implementation of transition plan	9

2.3 Global Fund investment in CCMs

Since 2020, the Global Fund has signed more than US\$28 million and disbursed over US\$19 million in funding to CCMs.¹⁵ Global Fund contributions to CCMs increased for the GC6 funding cycle due to additional C19RM (US\$ 2.1 million) and CCM Evolution (US\$ 15 million) resources.

In November 2022, the Board approved the 2023 Operating Expenses (OPEX) budget, which included an allocation of US\$14 million to CCMs (an increase of 7% from the 2022 budget).¹⁶ CCMs will also get additional funding for C19RM and the CCM Evolution Strategic Initiative.

¹⁴ The numbers in this table are based on the threshold assessment results as shared by the CCM hub in the partners meeting held on 27 September 2022

¹⁵ Excludes funding relating to CR19 RM and CCM Evolution Strategic Initiative

¹⁶ GF/B48/02A- Revision 1 "2023 Workplan, Budget Narrative and Operating Expenses Budget"; B48 Decision points "Decision Points for the 48th Board Meeting"

3. Risk and Performance Snapshot

3.1 CCM performance

In the Global Fund Strategy 2017-2022, there were no corporate KPIs aimed specifically at CCMs. However, the 2022 Grant Management Division (GMD) priorities indicate that all Country Teams have the responsibility to support strengthening CCM oversight of grants at the country level as part of Performance and Accountability Metrics 1A: “Deliver on grant targets, particularly in mission-critical countries.”

In 2021, the CCM Hub had two performance metrics:

- *Effectiveness*: % of active CCMs with funding agreements (approx. 100) that have threshold agreements¹⁷ completed: 40% by Q2; 80% by Q4 (reporting Q2/Q4). **The achievement rate was 63%.**
- *Efficiency*: 80% of annual disbursements sent within 45 days of CCM/RCM’s completed submission of a costed work plan and mandatory reporting documents (reporting Q2/Q4). **The achievement rate was 74%.**

The 2022 GMD priorities had three key metrics and targets for the CCM Hub. The metrics are tracked at the end of the year and results will be published in March 2023.

- Strengthening in-country CCM oversight of grants: % of high impact/core CCMs with Oversight Officer in post. Target: 70% high impact/core CCMs (40 countries) with Oversight Officers in place by end of 2022. **The achievement rate was 66%.**
- Rolling out and developing new CCM integrated performance framework: % active CCMs/RCMs with integrated performance frameworks. Target: 60% by year end. **The achievement rate was 80.8%**
- Delivering disbursements efficiently: % of annual disbursements sent within 45 days of CCMs/RCMs completing submission of a costed work plan and mandatory reporting documents. Target 80%. **The achievement rate was 65.9%**

Individual CCM performance is measured through an annual eligibility and performance assessment and also at the funding request stage, when the CCM Eligibility criteria are assessed. Going forward, the eligibility criteria will also be assessed on an annual basis using the new Integrated Performance Framework¹⁸ rolled out in September 2022.

¹⁷ Threshold assessments are performed to identify focus interventions for the Evolution roll-out, and the implementation of evolution activities

¹⁸ The new Integrated Performance Framework is to integrate the various forms of evaluations the Global Fund has used to measure CCMs’ performance into one comprehensive annual report assessing the ongoing fulfillment of eligibility requirements and targeted performance objectives

4. Findings



4.1 Material delays in implementing the CCM Evolution interventions at the country level will impact the catalytic potential to evolve CCMs maturity

The CCM Evolution Initiative has catalytic potential to help CCMs achieve the expected maturity levels, but the interventions are materially delayed due to pandemic-related disruptions and limitations of the pilot phase. There is a need to expedite the implementation to enable CCMs to optimally support the Global Fund Strategy 2023-2028.

The interventions are relevant for the objective of the CCM Evolution Strategic Initiative. Of the CCM members who responded to the OIG survey, 82% cited that the interventions adequately reflect the challenges that CCMs face and that they are likely to contribute to improvements and increased maturity of CCMs. The TERG report of December 2021 also noted that CCM evolution demonstrates catalytic potential to improve the work of CCMs.¹⁹

With less than a year remaining for the CCM Evolution Strategic Initiative to end (in December 2023), the implementation of the interventions is materially delayed due to pandemic-related disruptions and limitations of the pilot phase. If the project does not get back on track, there is a significant risk that the CCM Evolution Strategic Initiative activities will not be fully implemented by the end of the Strategic Initiative, and CCMs may not attain the level of maturity required to support the implementation of the Global Fund Strategy 2023-2028.

Material delays in implementation of all four CCM Evolution intervention areas put project objectives at risk

At the time of the audit, 94% (87 out of 93) of CCMs have completed the threshold assessment meant to define their priority interventions, but almost half (47%) of them were completed in 2022, limiting the implementation timeframe of planned interventions to maximize impact. At the time of the audit, more than half (4/7)²⁰ of the countries where the initiatives are being rolled out sampled by the OIG were finalizing their evolution workplans, with only a year of the CCM Evolution Strategic Initiative remaining. Delays in implementation have been observed across all the four pillars.

The implementation of the **Oversight pillar** continues to be a challenge for CCMs. More than two thirds of CCMs chose oversight as their number one priority for capacity building in the threshold assessment and three quarters (69 out of 93) of CCMs opted to recruit an oversight officer as one of the interventions. The Oversight Officer typically reports to the CCM Chair and is responsible for providing support to oversight planning and implementation, facilitating data-driven decision-making by conducting technical analyses and managing oversight tools, and by providing other technical and administrative support to the CCM oversight committee. Sampled CCMs with oversight officers in place considered the oversight officer to be key to the functioning of the oversight committee.

At the time of the audit fieldwork (November 2022), 42% (29 out of 69) of the oversight officers were not yet hired. Delays in recruiting and onboarding oversight officers²¹ may result in limited impact of the intervention before the CCM Evolution Strategic Initiative ends in December 2023. As of November 2022, funding for these positions, beyond December 2023 was yet to be secured. The sustained impact of the oversight officers may be further limited (they are recruited for a two-year period) by Global Fund policy, which allows financing a maximum of two positions in the CCM Secretariat from grant funds. Often, these positions are the CCM Executive Secretary and the Administrative Officer. As a result, the Oversight Officer position was not maintained as observed in the pilot countries reviewed by the OIG.

The **Engagement pillar** aims to strengthen the capacity and meaningful participation of civil society and community in CCMs. This is to ensure that CCM decision-making is inclusive of these groups and that they are represented in CCMs. Strong civil society and community engagement is fundamental to the CCMs' ability to support implementation of the Global Fund Strategy 2023-2028. However, 79% of the **Engagement** interventions were yet to begin at the time of the audit in November 2022, leaving limited time to ensure maturity gains are embedded

¹⁹ Technical Evaluation Reference Group: Thematic Evaluation on Strategic Initiatives – December 2021 (Accessed 12 December 2022)

²⁰ Bangladesh, Nigeria, Senegal and Zambia

²¹ CCMs are responsible for recruitment of oversight officers. On request, CCMs may request the CCM Hub to provide technical assistance for the recruitment

before the end of the Strategic Initiative. None of the 27 Community-Based Monitoring activities had started as development of the training materials had not been finalized. As of November 2022, 4% (one out of 26) of CCMs had completed engagement for constituencies and CCM election coordination activities, and 5% (one out of 21) of CCMs had completed the CCM composition review.²² Thus, CCMs will have limited time to update and realign their membership representation to support implementation of the Global Fund's 2023-2028 strategy.

The **Positioning pillar**, which aims to strengthen the embedding of CCMs within national structures, is also delayed. As part of this pillar, all CCMs can benefit from local consultancy support to map the national health structures and governance mechanisms in relation to the CCM and development of a positioning plan. CCMs that choose *positioning* as one of their focus areas can also opt for international consultancy support to implement the plan. As of November 2022, a mapping and positioning plan had been completed for four CCMs (out of 75) and another 17 were underway – but the majority (54 out of 75, representing 72%) had not yet started.

Thirty-six CCMs (including RCMs) had opted for support to implement the plan, but this activity had started in only four CCMs at the time of the audit (implementation of the plan cannot start until it is finalized). There is a risk that not all mappings and plans will be completed in time. Considering that implementation support is an optional intervention selected by only some CCMs, there is also a risk that not all plans will be implemented. This can result in low value for money of the investment and risks undermining the related components of the Global Fund Strategy 2023-2028, which stipulates stronger positioning of CCMs within national structures.

The **Operations pillar** aims to strengthen the effectiveness of the CCM Secretariat through for example updating framework documents, training CCM members and – in exceptional cases – reforming non-functioning CCMs. Framework documents had been updated for only one out of 26 CCMs (those that selected this activity) at the time of the audit. This CCM considered the updated framework documents to be very helpful in governing the CCM more effectively. Six (of the 26) additional interventions were in progress but 19 had not yet started. Two out of 21 orientation trainings had been completed.²³ However, the majority of CCMs had scheduled renewals between Q4 2022 and Q2 2023, before the implementation of Grant Cycle 7 implementation cycle.

The above is mainly attributed to (i) limitations in leveraging learning from the pilot phase, (ii) limitations with the initial project design, absence of a Monitoring and Evolution framework at inception of the CCM Evolution Strategic Initiative as detailed in the next finding and (iii) the impact of COVID-19.

Limitations of the CCM Evolution pilot phase impacted delivery of interventions during the main roll-out: At the end of the pilot phase in 2019, endline assessments were carried out with noted maturity²⁴ gains in all pillars except for CCM functioning.²⁵ Following the pilot phase, the Board approved roll-out of the Strategic Initiative to 93 CCMs and RCMs.²⁶ The endline assessment, however, focused on the country-level achievements and did not specifically assess the processes and resources required at the Global Fund Secretariat to support the evolution and systems to manage investments both at central- and country-level. The audit noted that some activities planned during the pilot were not implemented in the sampled pilot countries. These include the stalling of oversight and engagement intervention activities in Nepal after the pilot phase ended and the positioning activities in Guatemala. In Tanzania, the oversight officer position was not maintained after the pilot ended.

Further, the assessments did not focus on how the gains of the evolution would be sustained or mainstreamed in the CCM annual funding and performance management process. As a result, some of the evolution gains observed in the sampled pilot countries were not sustained. For example, while the oversight officer position was deemed key to improving the functioning of the oversight committee, it was not maintained after the pilot phase in three out of the four²⁷ sampled pilot countries due to limited funding.

COVID-19 changed the priorities of CCMs: The CCM Evolution Strategic Initiative was designed prior to COVID-19. During the pandemic, CCMs were given additional responsibilities for preparing funding requests to the Global Fund's COVID-19 Response Mechanism (C19RM) and to oversee its implementation. This affected capacity for

²² Composition review entails assessing the CCM membership composition to ensure all constituencies are represented and membership represents country context and Global Fund priority areas

²³ CCM Orientation trainings are recommended to take place after a renewal of CCM membership, to ensure the results are embedded in CCM practices and easier to transmit to the future members. Majority of CCMs have scheduled renewals between Q4 2022 and Q2 2023, before the implementation of GC7 implementation cycle

²⁴ Maturity levels are defined as Functional; Engaged and Strategic with CCMs expected to progress on a continuum from Functional to Strategic

²⁵ CCM functioning pillar become "Operations" in the roll out

²⁶ GF/B42/10 – Evolving CCMs to Deliver on the Global Fund Strategy (Accessed on 14 December 2022)

²⁷ Tanzania, Guatemala and Nepal (Nepal recently appointed an Oversight Chairperson in August 2022)

some CCMs to prioritize other projects, such as the CCM Evolution Strategic Initiative. The Global Fund Secretariat is working on contingency plans for activities that would not be completed by the end of 2023, with ongoing discussions on how to sustain interventions gains beyond 2023.

Agreed Management Action 1:
The Secretariat will: <ul style="list-style-type: none">• develop an implementation plan to expedite delivery of the remaining CCM Evolution Strategic Initiative activities; and• include and sustain the evolution project gains throughout the grant cycle (including in the pilot countries).
OWNER: Head of Grant Management Division
DUE DATE: 31 December 2023



4.2 Aspects of the project management of the CCM Evolution Strategic Initiative need to improve to achieve its intended objectives

The CCM Evolution Strategic Initiative was adapted to the pandemic environment by implementing activities remotely instead of on site, maintaining the momentum of the project despite competing priorities for CCMs. However, limitations with the initial project design, absence of a Monitoring and Evolution framework at inception, and tight timelines are negatively impacting the delivery of the CCM Evolution Strategic Initiative.

The CCM Evolution Strategic Initiative seeks to bring transformative and innovative changes to the in-country Global Fund grant governance model, which has remained largely unchanged for twenty years. Despite the challenges of the COVID-19 pandemic, the CCM Hub rolled out the project in 2020, and was able to manage it while simultaneously managing increased C19RM funding to CCMs and screening C19RM applications for grant funding.

The role of the CCM Hub has evolved from mainly providing administrative support to Country Teams and ensuring CCM compliance, to more direct engagement and capacity building of CCMs. In addition to providing dedicated administrative support for CCMs, the CCM Hubs aim to provide catalytic support to help CCMs transition to more strategic levels of operation. As of November 2022, the CCM Hub was working on this Strategic Initiative in direct partnership with 93 CCMs and RCMs to assess capacities, identify gaps and agree on strengthening support.

Gaps in resource planning at project inception and limited tools and processes to monitor the impact of the CCM Evolution Strategic Initiative have contributed to delayed activities across all pillars of the CCM Evolution Strategic Initiative – as detailed in the previous finding.

Ineffective resource planning for the CCM Evolution limits the Global Fund's ability to deliver on this strategic initiative on time, with material delays observed

The roll-out of the CCM Strategic Initiative to more than 90 CCMs affected the timely delivery of some of the interventions, given the limited resources for the CCM Evolution Strategic Initiative. Priority was not given to those CCMs with significant challenges and those of high strategic importance. Resource planning was not in line with the ambitious objective of the CCM Evolution Strategic Initiative, considering the planned interventions under the four pillars, the coverage (93 RCMs and CCMs) and the complexity of coordinating the multiple stakeholders involved. The CCM Hub has 12 people currently coordinating 580 interventions in 87 countries, in addition to the other administrative tasks required to ensure the routine functioning of CCMs. One staff member is handling up to 25 countries that cut across High Impact, Core and Focused categories,²⁸ whilst also serving as a focal point for evolution intervention activities.

Further, and in the absence of an operations policy for the CCM hub, the CCM Hub Manager role has been held by four different individuals in the last six years, which presents a risk of knowledge loss and inability to move quickly to implement the CCM Evolution Strategic Initiative. The audit noted that the project team did not include certain functions that are critical to the Strategic Initiative's success. For example, a monitoring and evaluation position and strategic liaison with global partners. The global partners²⁹ provide in-country support to CCMs and could be leveraged for greater impact.

Key mechanisms, documents and procedures for operationalizing the CCM Evolution Strategic Initiative were not designed at the outset of the project. These include a monitoring and evaluation framework. Processes to manage/guide strategic partners investing in CCM strengthening are lacking, and a project exit strategy – with milestones for integrating evolution interventions into business as usual – has yet to be developed. Beyond the Evolution Strategic Initiative, the CCM Hub may also benefit from a more formal operational policy to guide routine tasks and standardize processes at the CCM Hub, as well as procedures for providing feedback to strengthen implementation and to improve the quality of Technical Assistance (TA) delivery.

²⁸ The Global Fund uses three portfolio categories to ensure that operational policies and processes reflect contextual needs for countries

²⁹ The global partners include GIZ, L'Initiative, the Foreign, Commonwealth and Development Office (of the United Kingdom), WHO, UNAIDS

The implementation of processes and systems to support effective management and monitoring of the CCM Evolution Strategic Initiative has been delayed

The CCM Evolution requires robust systems to enable the CCM Hub team to work efficiently and effectively to meet the CCM Evolution Strategic Initiative's ambitious goals. It was allocated US\$15 million to improve maturity in at least two areas in 85% of CCMs, under tight implementation delivery timeframes (2021-2023). Delivery has been hampered by both weak administrative systems (see Finding 4) and monitoring and evaluation (M&E) systems.

As part of the CCM Evolution Strategic Initiative, the CCM hub has developed an Integrated Performance Framework (IPF).³⁰ The IPF combines previous CCM evaluations used by the Global Fund to measure CCM performance into one comprehensive annual report, assessing the ongoing fulfilment of eligibility requirements and targeted performance objectives.³¹ There is no monitoring and evaluation framework including metrics that would measure longer-term effects of the CCM Evolution Strategic Initiative. Impact parameters would specifically monitor transformation of CCMs towards strategic level³² growth. Although strategic level maturity is the highest level of transformation to be able to deliver the mandate of the new Global Fund strategy, there is no specific indicator for monitoring growth towards this. If the Global Fund aims to measure CCM impact, there is an opportunity to enhance the current CCM monitoring arrangements and put in place tools to enable measurement of the Strategic Initiative's longer-term impact.

The above limitations could have been prevented if the CCM Evolution Strategic Initiative had a clear roadmap on how desired outcomes would be reached and the accompanying resources required to implement the CCM Evolution Strategic Initiative. This is a practice often used in international development in project management, called Theory of Change. Further, despite the absence of a monitoring and evaluation position at the CCM Hub, the CCM Hub could not adequately leverage M&E capabilities within the Global Fund Secretariat to support the Strategic Initiative due to competing priorities of the M&E team. The Secretariat deprioritized the CCM Evolution Strategic Initiative during COVID-19 pandemic.

Agreed Management Action 2:
The Secretariat will enhance its monitoring and evaluation to assess the impact of the CCM Strategic Initiative on CCM performance.
OWNER: Head of Grant Management Division
DUE DATE: 31 October 2023

³⁰ IPF is the new performance monitoring tool for CCMs rolled out in September 2022

³¹ Integrated Performance Framework overview (https://www.theglobalfund.org/media/12367/ccm_integrated-performance_overview_en.pdf) – Accessed 12 December 2022

³² The CCM Evolution Strategic Initiative has three levels of maturity: level 1 - functional; level 2 - Engaged; and level 3 – Strategic



4.3 The management of Technical Assistance provided to CCMs to needs strengthening to ensure quality and timely delivery

Technical Assistance (TA) is a critical enabler for delivery of the CCM Strategic Initiative. Delays in recruiting consultants, as well as the lack of a quality assurance framework of TA services and engagement with partners, risk affecting the quality of technical assistance provided.

The Global Fund defines TA as the engagement of people with specific and relevant technical expertise to support various country initiatives or implementation of Global Fund-supported programs.³³ Execution of the Strategic Initiative interventions is underpinned by the support provided through TA. It accounts for 62% of the CCM Strategic Initiative budget. TA for this Strategic Initiative is provided by three service providers³⁴ that were recruited in a competitive and timely manner four months after the Global Fund Board approved the CCM Evolution Strategic Initiative.³⁵ The service providers each cover pre-determined countries based on their regional expertise and presence.

The CCM Hub has established processes for managing TA service providers. Standard templates and tools are available and used by service providers. To minimize gaps in coverage, TA consultants are permitted to work across the three Strategic Initiative service providers, with each covering a different set of countries, allowing for cross-sharing of ideas and best practices. The CCM Hub has e-learning modules, presentations, webinars, and other materials to support consultants to deliver TA services consistently across CCMs.

The CCM Hub's onboarding and orientation for the TA consultants at the beginning of the CCM Evolution Strategic Initiative was comprehensive and adequate. The CCM Evolution Strategic Initiative leverages the competencies and TA consultants of the Global Fund Secretariat's Community, Rights, and Gender (CRG) department. The CCM Evolution Strategic Initiative is leveraging the Community Engagement Strategic Initiative partners to provide engagement support technical assistance. The Community Engagement Strategic Initiative Coordination Mechanism has a system to track TA that is being provided by 11 Global Fund related TA mechanisms, including TA provided to CCMs, to enhance coordination and reduce the risk of duplication. The CRG team is responsible for the provision of technical assistance under the CCM Evolution's *Engagement* pillar. The CRG team also has a system to track TA provided to CCMs by all partners, which reduces the risk of duplication.

The audit noted, however, that significant delays in recruiting and deploying TA consultants (especially locally engaged consultants), and limited processes for quality assurance of TA work and engagement with TA partners, are affecting timely delivery of technical assistance services and may impact the quality of services provided.

Delays in the recruitment and deployment of national consultants have affected the delivery of key CCM Evolution Strategic Initiative activities

TA for the CCM Evolution Strategic Initiative is provided by a mix of international- and national-level consultants. International-level consultants are engaged by the three service providers contracted by the CCM hub, whilst national-level consultants are contracted directly by the CCMs. The CCM hub supports CCMs by providing terms of reference for national-level consultants.³⁶

Delays by CCMs in recruiting and deploying national consultants have significantly impacted TA-related activities especially under the CCM Evolution *Engagement* and *Positioning* pillars. As of November 2022, and with about a year to end the CCM Evolution Strategic Initiative, 35% of the national-level consultants required to implement activities under the CCM Evolution *Engagement* pillar had been contracted, and one third of the consultants were contracted for the *Positioning* pillar³⁷ due to the limited pool of national consultants. Consequently, local consultant activities are behind with only 4% (3/78) activities completed, and 28% (22/78) in progress as of November 2022.

³³ The Global Fund Technical Assistance webpage - <https://www.theglobalfund.org/en/funding-model/throughout-the-cycle/technical-cooperation> (Accessed 12 December 2022)

³⁴ Chemonics and Palladium based in the United States, and Frontline AIDS based in the United Kingdom

³⁵ In addition to managing the three primary TA providers, the CCM Hub is responsible for managing the CRG regional platforms + KVP networks supporting the two Engagement interventions. This includes procurement, communication of assigned countries, and following up on assignment progress

³⁶ As of November 2022, 77 CCMs had elected to implement activities supported by National level consultants

³⁷ Engagement and positioning pillars intervention activities are designed to be provided by both National level and International level consultants. Further, national level consultants support the initial activities under the positioning pillar that are dependent for international level consultants' work.

Furthermore, delays in the development of *Engagement* tools impacted timely deployment of TA consultants for the constituency engagement and election coordination interventions.

Absence of a quality assurance framework to monitor Technical Assistance output jeopardizes the effective transfer of knowledge

The CCM Hub has not put in place a quality assurance framework to monitor the quality of Technical Assistance provided. This was also highlighted by the TERG in their Strategic Initiative Evaluation³⁸ and is a wider point relating to Secretariat management of TA in the OIG audit of Global Fund Capacity building and Technical Assistance report published in April 2020.³⁹ Consequently, this may impact the quality of TA services to CCMs.

Limited engagement with partners providing Technical Assistance to CCMs is creating a risk of overlap and limited value for money

The CCM Evolution TA delivery model has not leveraged other TA-provider mechanisms supported by global partners. These partners have been less involved after the pilot phase of the Strategic Initiative. The OIG found no evidence of proactive strategizing or joint management to target the support provided by partners. After the main roll-out of the CCM Evolution Strategic Initiative, the CCM hub held two high-level calls with partners, but this did not include sharing of relevant information on technical assistance provided to CCMs by the partners.

The CCM Hub has limited visibility and data to monitor the technical assistance activities implemented by partners. The partners independently determine the countries and type of support provided to CCMs, and only in some instances share or report back on their activities to the Global Fund’s CCM Hub.

In addition, the OIG Audit of Global Fund Capacity Building and Technical Assistance – issued in April 2020, highlighted the limited effectiveness of monitoring TA investments due to weak governance and oversight structures and inadequate policies, procedures, and tools. These gaps persist in the Secretariat management of TA to CCMs. The OIG found no wider Secretariat framework for engaging with and monitoring TA provided by partners to CCMs.

As a result of the limited wider visibility of CCM TA and other related TA, there is a need to enhance coordination with and by the global partners, particularly considering the criticality of this area in light of the increased level of “set asides” from the Global Fund’s 7th Replenishment.

Agreed Management Action 3:
The Secretariat will: <ul style="list-style-type: none">• work with the Community Rights and Gender (CRG) department to accelerate the development of the engagement pillar Country Led Monitoring (CLM) tools; and• develop a quality assurance framework for Technical Assistance procured and for the performance of TA providers.
OWNER: Head of Grant Management Division
DUE DATE: 31 January 2024

³⁸ Technical Evaluation Reference Group: Thematic Evaluation on Strategic Initiatives report, December 2021 page 37(Accessed on 12 December 2022)

³⁹ OIG Audit of Global Fund Capacity Building and Technical Assistance report, April 2020 (GF-OIG-20-009 pages 11-12)

4.4 The effectiveness of the CCM Hub is hampered by limited systems and lack of guidance to CCMs with challenging or unique contexts

Significant improvement in processes and systems has been noted since the last OIG audit. Further enhancements are needed for data collection and use, and for supporting CCMs with unique contexts to perform their functions efficiently and effectively.

While the CCM Evolution Strategic Initiative is important to strengthen capacity of CCMs, the day-to-day operations to support CCMs is equally necessary to ensure CCMs function effectively. The audit reviewed both the CCM Strategic Initiative and the systems and mechanisms in place to support CCMs in their regular operations.

The Global Fund policies and guidelines related to CCMs have improved significantly. This includes a revised CCM Policy⁴⁰ and a CCM Code of Conduct based on the Global Fund values.⁴¹ In addition, the Global Fund Ethics Office has been conducting training for CCMs.

The CCM Hub is transitioning from the old performance assessment framework for CCMs, which mainly focused on eligibility performance/compliance to an Integrated Performance Framework (IPF).⁴² This new framework, which includes various metrics used by the Global Fund to measure CCM performance, will produce a comprehensive annual report to measure ongoing eligibility and targeted performance objectives based on the CCM Evolution threshold assessment.⁴³

Despite the progress made, improvement is needed in the systems for data collection and use, as well as support provided to CCMs with challenging or otherwise unique contexts to enable them to perform their role effectively.

Improvement needed in providing CCMs with adequate tools to support data-driven decision-making in overseeing grants

Access to information and relevant data is important for CCMs to provide effective guidance and oversight and to identify trends in their portfolios. CCM members are engaged on a voluntary basis and have limited time to dedicate to their roles. Dashboards can help them to assess Principal Recipient performance and provide adequate oversight over Global Fund-supported programs. However, support to such dashboards significantly decreased following the end of the US Government-funded Grant Management Systems (GMS) project in 2017 and the subsequent discontinuation of support for the software by the service provider in 2020. As a result, seven out of the ten sampled countries struggled to obtain timely and accurate information on Principal Recipient performance as they either did not have functional dashboards or the dashboards had limitations (e.g. they were outdated, incomplete or the CCM had limited infrastructure to sustain them). Nigeria, Zambia and Guatemala had functional dashboards, but Principal Recipients did not provide enough or timely information to populate them. Accessing grant information in a format that eases oversight and decision-making was cited as a general challenge among the sampled countries.

While there is no budget in the CCM Strategic Initiative for a new dashboard solution for CCMs, the CCM Hub is looking at developing an oversight dashboard centrally to extract Principal Recipient data from the Global Fund Partner Portal for the Global Fund data warehouse. This would also decrease the reliance on Principal Recipient reporting to populate dashboards.

The CCM policy requires CCMs to support transition readiness and co-financing tracking. However, CCMs do not have systems for monitoring domestic financing obligations. In Armenia and Guatemala, the Secretariat of the respective CCMs do not have access to information to monitor the fulfilment of co-financing obligations during grant implementation. In Kyrgyzstan, the CCM has developed a monitoring tool, but has yet to use it. In the other seven countries reviewed by the OIG, co-financing is discussed as part of grant applications, but the Secretariats of those CCMs do not have any tools or visibility to monitor compliance.

⁴⁰ Country Coordinating Mechanism Policy including Principles and Requirements (Accessed on 11 December 2022)

⁴¹ My Code My Responsibility – Code of Ethical Conduct for Country Coordinating Mechanism Members (Accessed on 11 December 2022)

⁴² IPF is the new performance monitoring tool for CCMs rolled out in October 2022

⁴³ The CCM Threshold assessment is a tool used by the Secretariat to assess CCM eligibility and identify interventions to focus on during the Evolution roll-out

Limited differentiation in CCM policies and guidelines is impacting the effectiveness of CCMs with challenging or unique contexts

CCM policies are not sufficiently differentiated to reflect countries' unique circumstances – such as those operating in Federal States, transition countries, challenging operating environments – or are under the Additional Safeguards Policy. CCMs in countries with large grant allocation, and with significant needs, receive largely the same resourcing and support as CCMs in smaller countries. For example, the Global Fund Operational Policy Note for CCM funding stipulates that the Global Fund can fund a maximum of two CCM Secretariat positions. These positions are often CCM Executive Secretary and Administration Officer (see also Finding 1). While this can be sufficient for smaller countries, limited staffing can hinder CCMs of larger or more complex portfolios from fully carrying out their mandate.

Countries such as DRC, Nigeria, Pakistan and India, which have federal structures, have similar CCM structures as countries with central government structures. The current standard structure of CCMs does not consider these differences, resulting in sub-optimal stakeholder representation of the key actors that drive health and community services in these countries.

Support to CCMs in countries under Additional Safeguard Policy (ASP) is not differentiated. As a result, access to grant information from providers selected by the Global Fund Secretariat in countries such as Sudan and Nigeria is not clarified, limiting the CCM oversight role. The Global Fund has not developed CCM policies or implemented sustainability initiatives to support CCMs or similar structures in countries that have, or are currently, transitioning from Global Fund support, such as in Armenia and Guatemala.

The limited differentiation in CCM policies and guidelines contributed to CCMs not being fully effective in performing their mandate, including in strategic aspects (monitoring co-financing commitments), and oversight (of portfolio performance). The OIG noted this through multiple audits in 2022, where delayed implementation of activities and poor monitoring of key elements of the supply chain (such as availability of drugs and their traceability) were common themes.

Inadequate systems for recording and tracking CCM funding and financial performance hinder timely visibility of CCM performance

The Global Fund Secretariat's Grant Operating System does not include a CCM funding module. Instead, the CCM Hub records and monitors CCM fund disbursements manually, using tools such as MS Excel and Smartsheet. CCM Hub officers spend considerable time updating these tools, which are prone to the risk of human error and not integrated with each other.

The CCM Hub only tracks disbursements to CCMs and expenditure contracted centrally. It does not have a mechanism to consolidate country-level expenditure and has limited visibility on CCM Hub human resources costs. New technologies could improve management of information, facilitate oversight, save time, and limit the risk of losing historical data or potential risk of tampering with data. The Global Fund has not yet prioritized work in this area, and the CCM Strategic Initiative does not include interventions at the Secretariat level to strengthen data systems and supporting tools in this area.

As a result, the tools do not allow for a global view of CCM disbursements, absorption, and progress implementation of ad hoc projects, which creates monitoring gaps and makes reporting to senior management susceptible to potential human error. There is a risk that decisions are taken based on incomplete or inaccurate information. The Global Fund Secretariat, upon request, could not provide the OIG with the absorption rate of CCMs' expenditure and investment in CCMs from inception.

Agreed Management Action 4:

The Secretariat will:

- explore opportunities for developing technical tools to support both CCMs and the Secretariat in their oversight and decision-making, specifically to centralize Principal Recipient and portfolio risk assessment data, and incorporate the CCM funding management module into existing Global Fund grant management systems to enhance the Secretariat tracking of CCM funding and financial performance;
- enhance CCM guidelines to specifically support those CCMs with unique contexts.

OWNER: Head of Grant Management Division

DUE DATE: 31 January 2024

Annex A: Audit Rating Classification and Methodology

Effective	No issues or few minor issues noted. Internal controls, governance and risk management processes are adequately designed, consistently well implemented, and effective to provide reasonable assurance that the objectives will be met.
Partially Effective	Moderate issues noted. Internal controls, governance and risk management practices are adequately designed, generally well implemented, but one or a limited number of issues were identified that may present a moderate risk to the achievement of the objectives.
Needs significant improvement	One or few significant issues noted. Internal controls, governance and risk management practices have some weaknesses in design or operating effectiveness such that, until they are addressed, there is not yet reasonable assurance that the objectives are likely to be met.
Ineffective	Multiple significant and/or (a) material issue(s) noted. Internal controls, governance and risk management processes are not adequately designed and/or are not generally effective. The nature of these issues is such that the achievement of objectives is seriously compromised.

OIG audits are in accordance with the Global Institute of Internal Auditors' definition of internal auditing, international standards for the professional practice of internal auditing and code of ethics. These standards help ensure the quality and professionalism of the OIG's work. The principles and details of the OIG's audit approach are described in its Charter, Audit Manual, Code of Conduct and specific terms of reference for each engagement. These documents help safeguard the independence of the OIG's auditors and the integrity of its work.

The scope of OIG audits may be specific or broad, depending on the context, and covers risk management, governance and internal controls. Audits test and evaluate supervisory and control systems to determine whether risk is managed appropriately. Detailed testing is used to provide specific assessments of these different areas. Other sources of evidence, such as the work of other auditors/assurance providers, are also used to support the conclusions.

OIG audits typically involve an examination of programs, operations, management systems and procedures of bodies and institutions that manage Global Fund funds, to assess whether they are achieving economy, efficiency and effectiveness in the use of those resources. They may include a review of inputs (financial, human, material, organizational or regulatory means needed for the implementation of the program), outputs (deliverables of the program), results (immediate effects of the program on beneficiaries) and impacts (long-term changes in society that are attributable to Global Fund support).

Audits cover a wide range of topics with a focus on issues related to the impact of Global Fund investments, procurement and supply chain management, change management, and key financial and fiduciary controls.