

# **Independent review Central Emergency Response Fund (CERF) COVID-19 NGO allocation**

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Lydia Poole

## Executive summary

On 4<sup>th</sup> June 2020, the Emergency Relief Coordinator (ERC) announced an unprecedented CERF allocation intended to increase funding to frontline NGOs to enable life-saving activities responding to the COVID-19 pandemic. This decision was made in response to growing concerns expressed in Inter-Agency Standing Committee (IASC) discussions in April and May 2020 that NGOs were struggling to mobilise funds to scale up activities. This “NGO allocation” formed part of range of innovations in CERF funding made in response to the unique challenges of the pandemic.

The allocation channelled US\$25 million to 24 NGOs supporting programming across 6 countries - Bangladesh, the Central African Republic (CAR), Haiti, Libya, South Sudan and Sudan. The allocation focussed on health, including mental health and psycho-social support, and WASH, with a strong consideration for projects addressing gender equality issues and gender-based violence, as well as those supporting the needs of persons with disabilities.

The CERF was established to enhance the UN’s emergency response capacity and can only therefore, contract and disburse funds to UN agencies. Given this, and to make the allocation possible, the CERF had to make a number of adaptations, at speed.

The goal was to develop a *modus operandi* which was “lighter, faster and more direct” than more typical implementing partnership arrangements. To do this, CERF needed to identify a UN agency willing to act as a grant manager and to pass on funds to NGOs on conditions similar to those CERF provides UN agency partner. The CERF secretariat engaged in detailed discussions with UNHCR, UNICEF and IOM, with IOM selected as grant manager given the unique level of flexibility shown in passing on flexibility and grant conditions.

## Overall findings

The NGO CERF allocation was a pragmatic response to an exceptional set of challenges. It was a laudable effort to use the tools that OCHA had at its disposal to fashion a solution to a clear and pressing problem in resource allocation across the humanitarian system. Overall, the allocation met its primary objective of moving money to front-line responding NGOs to enable them to deliver life-saving activities. The CERF allocation was in most cases the first funding - or the first significant funding - NGO partners received.

The allocation strengthened the effectiveness of the response by ensuring coverage of key priorities and gaps. The allocation targeted funds in complementarity with established COVID-19 preparedness and response priorities and against geographic priorities determined with reference to assessments of severity and risk, and under-funding. The size of the allocations allowed NGOs to deliver programmes of meaningful impact and scale, including setting up of critical services such as isolation and treatment centres.

The allocation demonstrated that CERF *can* fund front-line organisations, without following the typical UN agency-partner model, and that it can add real value in situations where a significant additional and rapid injection of funds for NGOs is required.

CERF noted early in the process that the allocation did not constitute a new window, rather it was prompted by the “unprecedented specific challenges” posed by the pandemic and that it was “experimental in nature”. However, OCHA now has a new potential tool in its financing toolbox should it need to deploy such a model again. The allocation also generated many practical lessons that could strengthen any potential future NGO allocations.

## **Key findings and lessons from the COVID-19 NGO allocation**

CERF, and IOM as grant manager, worked quickly and effectively to develop and implement a new process. Guidance and tools were developed and issued promptly, supplemented by training and orientations provided by OCHA, the RCO and IOM at country level. These tools served the process well overall and were considered “light” and easy to use by NGO partners.

The allocation provided partners with considerable flexibility to adapt to unpredictable and unforeseen circumstances. The relationship between CERF and IOM at NY and headquarters, and OCHA and IOM at country-level was noted to have been extremely collaborative and positive and this was a major factor in enabling an agile process and the quick resolution of issues as they arose.

The allocation has generated a greater understanding of fundamental differences in the way NGOs and UN agencies function and in practice for CERF. NGOs require some tools and rules to be tailored and better suited their funding and operating models, most notably, they require greater flexibility in budgetary categories to accommodate the costs of direct programme implementation.

The original anticipated timeline for the allocation process was highly ambitious and speed may have been less critical than originally envisaged. The process from announcement of the allocation to contracting and disbursement of funds took one month longer than hoped for by the CERF. Each stage of the process required more discussion, adaptation of tools and development of guidelines than anticipated. From the perspective of the recipient NGOs however, the process was considered very fast – in some respects too fast. The haste with which proposals were developed contributed to operational challenges and in some cases the need for modifications down the line.

The transparency of the NGO selection process was questioned. In reality, once sectoral parameters, geographical priorities, and

organisational ability to absorb funds and scale up, were taken into account, a relatively small number of potential partners were in fact eligible. Communicating the eligibility criteria, rationale for and priorities of the allocation more widely among NGOs at country level, however, could have helped to manage expectations.

Grant sizes were felt to be relatively large and potentially difficult to spend within the nine-month implementation period by some actors. Greater flexibility to increase the number of partners and reduce grant sizes depending on local circumstances could have allowed a more inclusive and targeted response.

The allocation required substantial investments of time and effort and ultimately relied on goodwill and commitment to make the process work at many levels. As an experimental allocation and in the context of a unique crisis, actors involved were willing to go the extra mile. The real costs of providing the grant management service, which was offered on an exceptional reduced basis by IOM, and the additional workload for RCs, OCHA, cluster leads and others to conduct the allocation process at country level, would need to be realistically assessed to inform decisions on whether to undertake future allocations.

CERF is well suited to provide funding quickly, flexibly, and at scale. In doing so, it relies on established coordination infrastructure and experience. That is not necessarily a good fit with supporting smaller organisations, notably smaller local and national NGOs, nor for situations where there is limited humanitarian coordination capacity. The allocation was not intended to support localisation goals per se – but rather to ensure speedy response to COVID on the front lines. However, the process included a range of thresholds that ultimately made it difficult for local and national NGOs to access funds. In the end, 8 out of 26 grants awarded were to national NGOs. Without concerted efforts at country level within the selection process, it is likely very few national NGOs would have been able to meet the required criteria. There is limited scope for the model to be substantially adapted to facilitate

access for smaller and less well-known organisations without losing speed and scale.

The NGO allocation was more strategic, the process more streamlined and the NGO selection more objective in countries with a Country Based Pooled Fund (CBPF). The CBPF partner capacity assessment process also provided IOM with a relatively robust level of risk assurance. In situations where humanitarian coordination is less established, and where there is no reliable means of objectively assessing partner capacity, it is far more difficult for CERF or a managing agent to be sure that funds are reaching the right priorities and the right actors.

Where there is no continuation of funding, loss of investments are likely to be incurred if facilities and bases are now closed down. In retrospect, the continuity of investments in new areas could have been considered by actors leading the allocation process at country level and strategies to mitigate these risks considered.

While the NGO allocation performed well in a number of key areas, and met its overall objectives, the model cannot address all of the problems in the international funding architecture that pose barriers to ensuring funding reaches the right organisations at the right time. At a strategic level, the allocation raises a number of important questions. In particular, whether CERF is a suitable tool to move funds to front-line responders other than in very specific circumstances.

### **Strategic considerations for CERF**

- In order to manage expectations that have built as a result of the allocation, the lessons from this review should be summarised and communicated clearly by OCHA to the CERF Advisory Group, actors at country level who participated in the 2020 NGO allocation, NGO consortia and interested NGOs.
- In order to guide decisions on potential future replication of an NGO allocation, and based on lessons learned through the 2020 COVID-19 allocation, CERF should summarise the respective comparative

advantages of the grant-manager model (e.g. speed, scale, transparency, multi-sectoral scope) versus the traditional UN partnership model (e.g. technical oversight, coordination, enhanced risk assurance).

- Value for money considerations would need to be much more clearly defined to ensure that the right tool is selected for the particular financing challenge faced. In particular, the real costs of providing the grant management service, which was offered on an exceptional reduced basis by IOM in this instance, and the additional workload taken on by country staff, should be realistically assessed to inform decisions on future NGO allocations.
- The fact that COVID-19 cases were lower than anticipated at the proposal development stage means that results are expected to be lower than initial targets set at the proposal stage. Recalling that the allocation was made on a “no regrets” basis and potentially framing investments in terms of response readiness in the context of high levels of uncertainty, and considering how partners, IOM and CERF adapted to changing circumstances, may prove useful when reflecting on overall effectiveness.

### **Strategic considerations for OCHA**

- OCHA should consider how it builds greater contingent capacity at the global level to support surge funding to NGOs through the existing network of CBPFs and Regionally-hosted Pooled Funds (RhPFs), the first of which is now being piloted. This could include reflection on resource mobilisation for the CBPFs and RhPFs at a central level as part of a system or network of surge financing capacity.
- OCHA could consider what an optimal route for surge funding accessible to local and national NGOs would look like, and where OCHA can add value to this, including through, but not limited to CBPFs and RhPFs, noting that a variety of models and instruments may be required.
- The clearest gap in the humanitarian funding architecture lies in situations

where humanitarian coordination is less streamlined, and where there is no reliable means of objectively assessing partner capacity through an established CBPF. It is far more difficult for the CERF or a managing agent to be sure that funds are reaching the right priorities and the right actors in these settings. Noting that while the risks and challenges are considerable, OCHA could explore options to build institutional capabilities to extend surge funding to front-line responders in settings with less established humanitarian response and financing capacities, including through RhPFs.

### **Technical recommendations for future potential NGO allocations**

- Develop a realistic theoretical timeline for future potential allocations stating recommended numbers of days for each stage in the process, which includes increased time for proposal development and review, and a more competitive and transparent NGO selection process.
- Consider adapting the NGO selection process to allow a longer and more competitive process that invites concept notes or proposals to broaden the potential pool of partners and manage concerns around bias in the selection process.
- Allow greater flexibility at country level to tailor grant sizes and numbers of partners to local circumstances.
- Prepare a stock of standard reporting and guidance templates, including orientation/training tools, that can be quickly adapted and circulated early to enable partners to plan their reporting.
- RC/HCs leading country level selection processes should circulate priorities and eligibility criteria in advance and communicate the outcome of the selection process to help manage perceptions of a “pre-cooked” process.
- Develop score-card templates for partner and proposal assessment that include a mixture of objectively verifiable criteria and judgement-based assessments, that can be adapted at country-level, and used to record the decision-making process.
- Consider developing a list of possible additional criteria to assess the emergency response capacity of partners alongside core criteria, that can be adapted to context. Based on experiences from the 2020 NGO allocation, these could include checks on international procurement experience.
- Develop guidance for review committees to consider exit and transition strategies with particular scrutiny of projects which propose incurring longer-term costs such as setting up new project bases, with rental, service and staffing contracts, or which are likely to create expectations among authorities, partners and communities of continued support.
- Clarify in guidance to prospective NGOs that CERF funding is of limited duration and continuation funding should be sought from alternative sources.
- Consider options to streamline dual reporting to the managing agent and CERF.
- Include a requirement for NGOs to brief clusters on implementation progress to support coordination.
- In order to reduce the number of formal modifications, consider allowing greater delegated authority to grant managers to permit changes to activities within a clear range of parameters on the basis of “notes for the record”, particularly where the grant manager is providing frequent and good quality monitoring, as was the case for IOM under this allocation.
- Consider whether a greater degree of budget variance can be tolerated without triggering a formal budget modification, particularly for smaller grants.

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# 1. Introduction

## 1.1. Background

1. In 2020, CERF made an unprecedented allocation to NGOs as part of the CERF's wider response to the COVID-19 crisis. The NGO allocation channelled US\$25 million via IOM to 24 NGOs supporting programming across 6 countries - Bangladesh, the Central African Republic (CAR), Haiti, Libya, South Sudan and Sudan.
2. The NGO allocation forms part of a range of "innovations" CERF made in response to the unique challenges of the COVID-19 crisis. These innovations focused on directing funds where they were most needed in the response system, enhancing timeliness and flexibility of CERF funding to respond to high-levels of uncertainty in the global response, and a particular thematic focus on gender-based violence programming, which emerged as a significant secondary impact of the global crisis. The five innovations comprise:<sup>1</sup>
  - Global UN block-grants for maximum speed and flexibility (\$95 million);
  - Funding for NGOs to support frontline response (\$25 million);
  - Funding to support gender-based violence programming and support local women-led and women's rights organisations (\$25 million);
  - Greater flexibility in adjusting CERF projects so that UN agencies can adapt to COVID-19-related constraints;
  - Funding to support cash programming to address rising levels of hunger exacerbated by the pandemic (\$80 million).
3. The decision by the Emergency Relief Coordinator (ERC) to use the CERF to channel funds more directly to NGOs was a response to challenges arising in the collective donor response to the global pandemic. By April 2020, it had become clear that much of the initial humanitarian funding for the COVID-19 response had been directed to UN agencies. Meanwhile, NGOs were struggling to mobilise funding both from institutional donors, and from private funders. A meeting of the IASC (Inter Agency Standing Committee) Principals on 28th April agreed an action point to "Arrange for further discussion on the potential need for a new global instrument for NGO funding, considering the pros and cons.", with OCHA as designated lead to take forward this discussion.<sup>2</sup>
4. Throughout May 2020, OCHA considered the possibility of a CERF allocation for NGOs. CERF is not set up, however, to channel funds directly to NGOs. CERF was established in UN General Assembly (GA) resolution 46/182 to occupy a particular niche in the humanitarian financing landscape, that is, to serve as the UN's global emergency response fund designed to enhance the UN's emergency response capacity and promote more timely and coordinated UN-led humanitarian action globally.<sup>3</sup> CERF can only, therefore, contract and disburse funds to UN agencies. To change this would require a new GA resolution. To find a more direct route for NGOs to access CERF funding therefore, CERF had to find an alternative, which would involve routing funds via a UN agency acting as a managing agent. This option was envisaged as "lighter, faster and more direct" than through the more typical implementing partnership arrangements.<sup>4</sup>

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<sup>1</sup> UN CERF (2020) CERF COVID-19 Allocations: CERF Advisory Group Meeting, November 2020. [https://cerf.un.org/sites/default/files/resources/CERF%20COVID-19%20Allocations\\_final.pdf](https://cerf.un.org/sites/default/files/resources/CERF%20COVID-19%20Allocations_final.pdf)

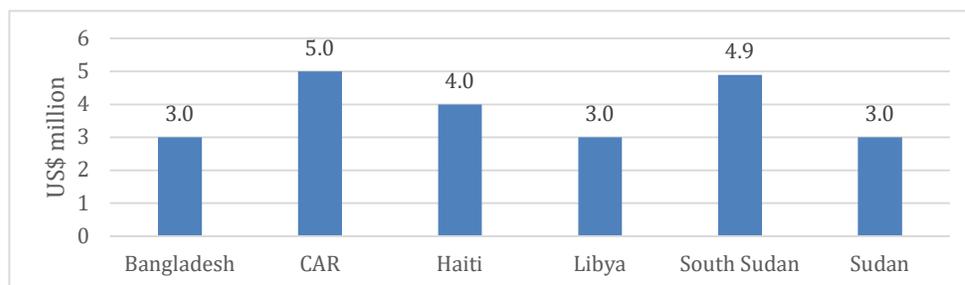
<sup>2</sup> OCHA (2020) KEY MESSAGES FOR THE ERC, IASC Principals Meeting, Thursday, 21 May 2020. (internal document dated 21<sup>st</sup> May 2020).

<sup>3</sup> UN CERF (2017) Direct NGO Access to CERF – Discussion Paper. 11 May 2017. [https://cerf.un.org/sites/default/files/resources/cerf\\_ngo-access-cerf\\_20170511\\_en.pdf](https://cerf.un.org/sites/default/files/resources/cerf_ngo-access-cerf_20170511_en.pdf)

<sup>4</sup> OCHA (2020) Providing more direct funding to NGOs through CERF for the COVID-19 response (internal document dated 11<sup>th</sup> May 2020).

5. Throughout May 2020, the CERF secretariat engaged also in detailed discussions with UNHCR, UNICEF and IOM on the feasibility of acting as potential grant managers. Options including a global level block grant, a country-level NGO selection process, and a third hybrid option were discussed with the three potential partners. The country-led process was felt to align most closely with the intention of the allocation, to channel funds to front-line responding NGOs.<sup>5</sup> IOM was able to offer greater flexibility in terms of who they could engage as partners<sup>6 7</sup>, as well as a flexible and light approach to monitoring, comparable to conditions CERF applies to UN agencies<sup>8</sup>. IOM had also previously acted in a grant manager function for CERF allocations in two countries without a substantial established humanitarian coordination and funding architecture, demonstrating their ability to operate in more developmental settings.<sup>9</sup> On 29<sup>th</sup> May, IOM was informed they had been selected to act as grant manager.
6. On 4 June 2020 the ERC announced the NGO allocation at an ad-hoc meeting of the IASC Principals, informing the Principals that OCHA “planned to pilot the allocation of \$25 million from the CERF, to be managed by IOM, for disbursement to a number of NGOs in six countries” and that “those funds would be disbursed by 4 July and would focus on health, including mental health and psycho-social support, and WASH. There would also be a strong consideration for projects addressing gender equality issues and gender-based violence, as well as those supporting the needs of persons with disabilities.”<sup>10</sup> The stated objective of the NGO allocation was to “increase funding to frontline NGOs”.<sup>11</sup>
7. The allocation was made through the CERF Rapid Response (RR) window. Ordinarily, RR allocations have a six-month duration. The grant agreement with IOM, however, was given a 12-month duration and ran from 29 June 2020 to 28 June 2021.
8. Six countries were selected to receive funding, three of which had OCHA managed Country-Based Pooled Funds (CBPFs) (CAR, South Sudan, and Sudan).

*Figure 1: Country allocation envelopes<sup>12</sup>*



<sup>5</sup> OCHA (2020) Update on more direct NGO access to CERF three options (internal document dated 20th May 2020).

<sup>6</sup> Ibid.

<sup>7</sup> IOM reduced its programme support cost rate from the standard 7% to 5%, plus a number of direct support staff related costs.

<sup>8</sup> Internal CERF email correspondence 29<sup>th</sup> May 2020.

<sup>9</sup> CERF (2017) Direct NGO Access to CERF – Discussion Paper. 11 May 2017. [https://cerf.un.org/sites/default/files/resources/cerf\\_ngo\\_access-cerf\\_20170511\\_en.pdf](https://cerf.un.org/sites/default/files/resources/cerf_ngo_access-cerf_20170511_en.pdf)

<sup>10</sup> IASC (2020) Summary Record and Action Points, New York, 4<sup>th</sup> June 2020

<sup>11</sup> IOM (2020) CERF Project Proposal: IOM’s support to life-saving assistance for the COVID-19 response. Updated 23<sup>rd</sup> September 2020.

<sup>12</sup> Based on data from OCHA’s internal NGO allocation tracker.

## **1.2 Methodology and approach**

9. The research questions were refined during the inception process and are grouped under headings of efficiency, effectiveness, relevance, and impact. The full list of research questions is listed in the Review Matrix in Annex 3. In this report, findings are organised under headings of efficiency, effectiveness, relevance and impact, which are considered together to reduce repetition of evidence and discussion.
10. Evidence for the review was drawn from:
  - review of documents including internal email correspondence, guidance notes, proposals and proposal chapeau documents, interim reports, CERF's stakeholder survey results, and country-level COVID-19 response plan documents;
  - data provided by CERF on the allocation and data from the OCHA Financial Tracking Service (FTS);
  - key-informant interviews with stakeholders within CERF and IOM New York and Geneva and at country-level with a sample of 22 representatives involved in the strategy development, NGO selection and proposal review processes, and 16 recipient NGO representatives (out of a total of 24 NGO funding recipients). In total, 10 stakeholders at global level were interviewed and 38 stakeholders across the 6 recipient countries.

## **1.3 Limitations**

11. The research phase of this review was carried out between March and May 2021. The majority of projects were in the final stages of implementation and many of the original staff members involved in the strategy development, NGO selection and proposal development and review phases of the allocation had moved on.
12. Stakeholders interviewed were for the most part drawn from actors directly involved in the process including NGOs who benefitted from CERF funding. There is likely to be some positive bias, therefore, in responses.
13. Final reports for the projects were not available during the review. Therefore, it has not been possible to provide a summary or assessment of project achievements.

## 2. Findings

### 2.1 Efficiency

#### Summary

##### What worked well

- CERF, and IOM as grant manager, quickly established and adapted the necessary guidance and tools to guide the NGO allocation. This was supplemented by training and orientations provided by OCHA, the RCO and IOM at country level. These tools served the process well overall and were considered “light” and easy to use by NGO partners.
- The allocation provided partners with considerable flexibility to adapt to unpredictable and unforeseen circumstances.
- In countries with CBPFs a high level of complementarity was achieved in targeting and coverage of needs, and the CERF allocation was able to capitalise on the systems, relationships and analysis which had already been invested in via the CBPFs. The CERF allocation was more strategic, the process more streamlined and the NGO selection more objective in countries with a CBPF.

##### Areas for improvement or reflection

- Staffing costs for projects providing front-line delivery are likely to substantially exceed CERF’s existing rule of thumb guide for UN projects that considers around 10% of the overall budget should be allocated to staff costs.
- Dual reporting to both CERF and IOM created additional transaction costs for NGOs.
- The process from initial discussions to the first disbursements to partners took longer than originally envisaged. However, there were no obvious delays, rather there was simply more work required than the timeline had allowed for, particularly given this was a new process. Moreover, this later disbursement date did not adversely affect programme implementation, given that COVID-19 cases were still relatively low, and in hindsight the process would have benefitted from allowing partners longer to design their interventions and refine their proposals.
- Despite the positive findings on flexibility overall, a relatively high number of modifications and no-cost extensions were ultimately required, which added a considerable administrative burden.
- Routing documents for approval via both IOM and CERF incurred many additional work hours and particularly for project modifications and no-cost extensions, slowed decision-making.
- A number of concerns arose from the NGO selection process at country-level, including the objectivity with which partners were assessed and selected “on merit”.
- Localisation was not a stated objective of the allocation. However, the relatively large grants made the allocation far less accessible for national NGOs. There may be limited scope for CERF to address this problem without losing the advantages of speed and scale.
- In countries with no country-based pooled fund, there was no equivalent robust and objective means of assessing partner capacity nor sufficient sharing of information on partner capacities between UN agencies, which left IOM as grant manager potentially exposed to risk.

- Was clear guidance provided by CERF and IOM and were roles and responsibilities clearly assigned?
  - *Was the issuance of guidance sufficiently timely to allow NGOs to develop their responses?*

14. CERF was able to adapt existing tools and processes and rely on in-country experience with CERF grants among Resident Coordinator/Humanitarian Coordinators (RC/HC), OCHA and Resident Coordinator Office (RCO) teams, and sectors/clusters, however, many aspects of the process had to be thought through from first principles. CERF was clear that the process should be “light” and that NGOs should be treated on similar terms to UN agencies, notably, they would use the same proposals, budgetary guidance, and reporting.
15. Notable differences from regular CERF processes include:
  - Both IOM and OCHA/RCOs at country level, IOM New York, IOM and CERF at headquarters level reviewed NGO proposals, budgets and modification requests;
  - Disbursements to recipient NGOs were spread across two or three tranches, whereas UN agencies typically receive one disbursement at the beginning of the grant;
  - A partner selection committee had to be established at country level;
  - NGOs received grants of up to nine month’s duration, in line with CERF’s COVID-19 allocations to UN agencies, but in contrast to the regular maximum six-month duration of RR grants;
  - The maximum possible no-cost extension was one month so as not to exceed the expiry of the IOM grant at the end of June 2021.
16. As a new process, CERF and IOM had to quickly develop guidance to orient the many actors who would be involved in the allocation. CERF and IOM New York and IOM headquarters in Geneva developed global and country level guidelines and a Q&A document, which were completed on 15th June 2020. The guidance and Q&A explained the rationale and thematic focus for the allocation. They also outlined roles and responsibilities and provided a detailed description of the composition of NGO selection panels and provided guidance on criteria to assess potential partners against. The global guidance also explained the logic for selecting IOM as grant manager. The process of developing the guidelines was noted as being positive and collaborative and the guidelines were well received at country level.
17. At country level, relationships between OCHA and IOM were noted by both parties in each country to have been collegiate and collaborative. Roles and responsibilities were not described in detail in the guidance but were relatively well understood for the most part. When small issues of confusion arose, such as who would be responsible for contacting NGOs to request reports, these were resolved quickly and amicably. NGO partners interviewed noted that the respective roles of OCHA, and of IOM as grant manager, were well-understood.
18. NGOs were provided with CERF proposal and budget templates. OCHA and IOM provided orientation and trainings on these tools and on the process in each country. For example, OCHA, IOM and the RCO in Bangladesh provided additional orientation and training for NGOs in the templates and process, which was well received. Trainings were also provided in the local language in recognition of the fact that including among international NGOs, most staff in Bangladesh are nationals.

19. CERF templates were provided, and proposals and reports expected in English. In countries where English is not the working language, this caused some delays, while documents were translated, and presented challenges in particular for national NGOs.
20. The majority of NGOs interviewed found the templates easy to use, with several noting that the CERF templates are far less onerous than those of many bilateral donors or UN agencies. In fact, NGOs struggled more with the brevity of the template and many provided an excess of detail for CERF's requirements.
21. A common and significant problem with CERF's budgetary practice however quickly emerged. CERF typically allows a maximum of around 10% of the budget to be allocated to UN staff costs, to ensure that the majority of funds are channelled to provide assistance and services to those in need. CERF occasionally accepts higher staffing rates, if there is a good justification, e.g., when the response needs to be scaled up to meet the demands of a new emergency, for activities that are inherently staff-heavy, and/or when these costs include personnel who directly provide services to affected people (e.g., doctors, nurses). Applying this rule of thumb from UN projects to NGO projects, presented challenges. Many of the NGO projects, notably those based in health facilities, hygiene promotion activities, and call centres, were extremely staff intensive. Staffing therefore in reality comprised a large proportion of the budget. A lot of back and forth between NGOs, IOM and CERF was reported on this issue. In CAR, this issue was flagged at the beginning of the process, and OCHA CAR was able to negotiate a flat rate of 16% for staffing costs, on the basis that the CBPF in CAR had developed a locally established threshold of 20% staffing costs. In all other cases, negotiations happened on a case-by-case basis. Some NGOs felt that the CERF funds fell well short of meeting real staffing costs. In several cases INGOs reported subsidising staff costs with funding from other donors to make up the shortfall in staffing costs. That said, CERF demonstrated considerable flexibility: of the 26 projects, 22 had staffing costs in excess of 10% of the overall budget, including 8 with rates between 20-25%, 2 between 26-30%, and 2 in excess of 37%.

Additionally, some NGOs expressed frustration about the amount of time spent negotiating specific budget lines. Inclusion of senior technical and project management staff was noted as a particular point of contention on which little or no flexibility was given. In another instance, an NGO requested a budget modification to increase staffing costs, which was refused, with the NGO subsequently proposing returning the unspent balance.

It is clear that NGOs and UN agencies programme and operate in very different ways. CERF grants to UN agencies often involve significant procurement and sub-contracting and therefore staffing costs may in relative terms be low or are may not even be possible to discern within broad "implementing partner" budget categories. Direct implementation however is likely to require far higher direct staff costs. UN agencies are also likely to have additional sources of funding, including core funding contributions, to help cover indirect staffing costs. In retrospect, CERF could have anticipated NGO staffing rates would have been higher than UN agencies and had they communicated a higher tolerance for staffing costs at the outset, considerable time and energy could have been saved negotiating specific budget lines.

22. Once proposals had undergone technical clearance by cluster coordinators and OCHA and reviewed by IOM to confirm compliance with IOM's administrative requirements at country-level, they were shared with the selection committee for further review and comments. Next, OCHA submitted the package of proposals to the CERF secretariat, along with an OCHA compiled "chapeau". The chapeau summarised country-level

COVID-19 related humanitarian needs, priorities for the NGO response, how the ERC's four priority areas<sup>13</sup> had been taken into account and a summary of the selection process.<sup>14</sup>

23. Internal discussions within CERF in late May indicated that NGOs contracted via IOM would match CERF requirements and not IOM's regular partner reporting requirements.<sup>15</sup> CERF and IOM's country guidance indicates that NGOs should provide an interim and a final narrative report using the CERF project reporting template.<sup>16</sup> In addition, IOM was required to conduct country-level monitoring, including field visits where feasible (10 visits per country), and though not clearly stated in the CERF Global Guidance for the allocation, IOM could also require additional light reporting.<sup>17</sup> IOM country teams requested monthly reporting on key project indicators and also arranged monthly check in calls with partners as well as scheduled monitoring visits and financial spot checks.
24. As with proposal templates and guidance, it took time for CERF and IOM to agree and adapt existing tools. As a result, CERF reporting templates were provided to NGOs somewhat late. In CAR for instance, one NGO had already completed its project (which was unusually 7 months' duration rather than 9) and was writing their final report before the template had been received. While in Bangladesh, IOM had conducted trainings with NGO partners on reporting but had not yet received the CERF template. Partners noted that it would have been helpful to have received reporting templates earlier.
25. Guidance on modification of activities and budgets was provided to partners around the time of the interim report. No particular challenges with the timeliness of this guidance were noted. In practice however, partners required substantial practical support from IOM to compile their modification and no-cost extension requests.
26. Overall, the guidance, tools and division of labour between OCHA and IOM supported the process well and the relationship between CERF and IOM at New York and headquarters, and OCHA and IOM at country-level was noted across the board to have been extremely collaborative and positive and this was a major factor in enabling an agile process and the quick resolution of issues as they arose.

- Was the allocation process, both at headquarters and country level – by both OCHA and IOM - conducted efficiently?
  - *Were there any delays that could have been avoided?*
  - *Was the workload associated with the allocation process considered reasonable?*

27. The ERC's initial communication on the NGO CERF allocation to the IASC on 4<sup>th</sup> June 2020 indicated his expectation that funds would be disbursed by 4<sup>th</sup> July. This set a very tight timeline for CERF and IOM as grant manager to agree and develop guidance and tools, for country teams to agree strategic priorities, establish and conduct selection processes, for NGOs to develop and revise their proposals, and for IOM to contract and disburse funds to NGOs.

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<sup>13</sup> In 2019 the ERC set out four priority areas to be given due consideration in CERF proposals: (i) the support for women and girls, including tackling gender-based violence, reproductive health and empowerment; (ii) programmes targeting people with disabilities; (iii) education in protracted crises and (iv) other aspects of protection .

<sup>14</sup> CERF IOM NGO COVID-19 allocation – Country Guidance, 15 June 2020.

<sup>15</sup> Internal CERF email correspondence dated 28<sup>th</sup> May 2020.

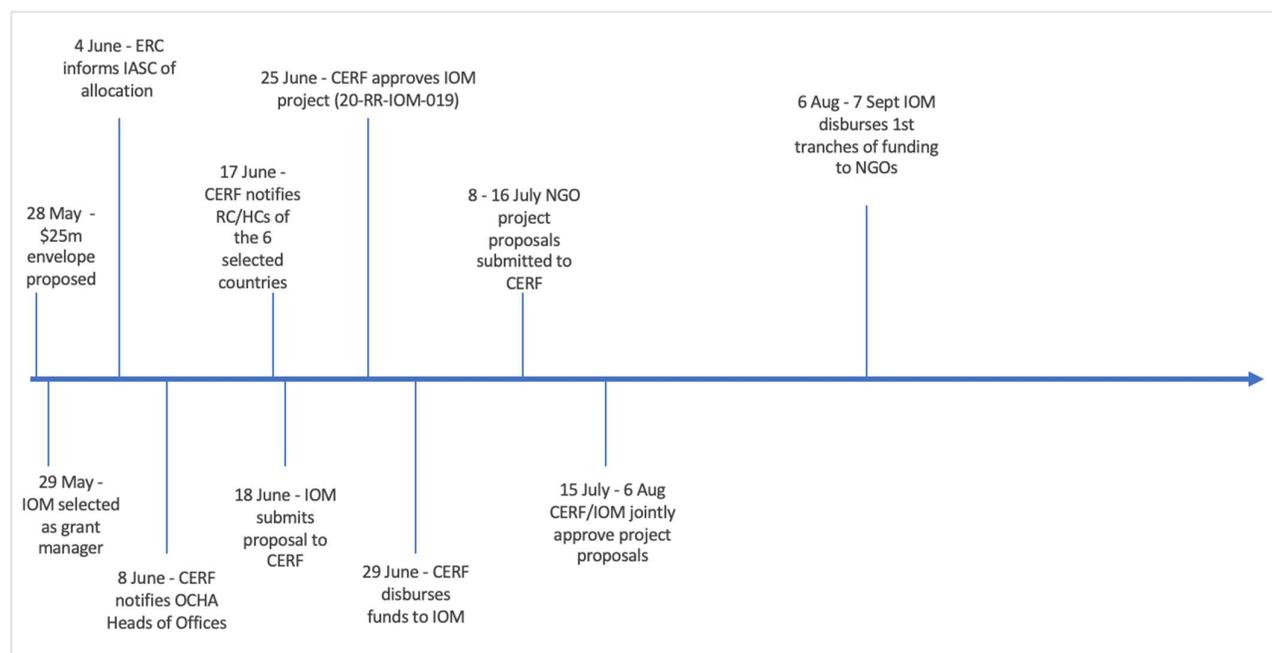
<sup>16</sup> CERF IOM NGO COVID-19 allocation – Country Guidance, 15 June 2020.

<sup>17</sup> CERF IOM NGO COVID-19 allocation – Global Guidance, 15 June 2020

28. The original anticipated timeline was highly ambitious. Each stage of the process required more thinking through, discussion, adaptations of tools and development of guidelines and took longer to complete than anticipated. It should be noted however, that all parties involved, including the CERF secretariat, IOM New York and IOM Geneva HQ, RC/HCs, OCHA, RCOs, cluster/sector representatives and NGOs invested a great deal of effort and time to complete the allocation as quickly as possible and demonstrated a strong commitment to make the allocation work.

29. OCHA’s notional timeline drafted on 4<sup>th</sup> June 2020 anticipated that IOM HQ and CERF would have completed a project proposal to enable disbursement of funds to IOM between 8<sup>th</sup> and 17<sup>th</sup> June 2020.<sup>18</sup> The IOM project was submitted slightly later, on 18<sup>th</sup> June and endorsed on 25<sup>th</sup> June. IOM, for their part, had to engage their own legal, financial and audit teams to rapidly adapt IOM’s systems and tools to support the allocation, including ensuring adequate risk management controls were in place for what were relatively large grants, where IOM was not responsible for partner selection.

Figure 2: Timeline of CERF COVID-19 NGO allocation



30. OCHA’s timeline also anticipated that selection committees at country-level would operate in parallel with HQ efforts to contract IOM , in the weeks of 15<sup>th</sup> and 22<sup>nd</sup> June and that NGOs would develop their proposals in the weeks of 22<sup>nd</sup> and 29<sup>th</sup> June with RC/HCs submitting consolidated packages of proposals to CERF in the week of 29<sup>th</sup> June.<sup>19</sup> The extent to which country teams were able to meet this schedule varied. CAR was able to stick largely to the timeline, with the HC informing the HCT of the pilot on 16<sup>th</sup> June and the process concluded with proposals submitted to the CERF secretariat by 3<sup>rd</sup> July. Others took longer however, with the final submissions coming in almost two weeks later, on 16<sup>th</sup> July. The effort required to meet the timelines should be recognised. For example, NGOs reported in some cases that they had only three days to prepare their proposals and worked round the clock and over a weekend to meet the deadline.

<sup>18</sup> OCHA (2020) CERF COVID- NGO allocation -Timeline (internal document dated 4<sup>th</sup> June 2020).

<sup>19</sup> Ibid.

31. The contracting of NGOs also took longer than would be the case with UN agencies, where a Letter of Understanding (LoU) is already in place. IOM had to draft new contracts with each NGO, establish their banking details in their payment systems, and conduct a light risk assessment which would inform the schedule of payment disbursements. International NGOs who did not have delegated authority to sign memoranda of understanding (MoUs) in-country also took additional time to review and sign MoUs at headquarters level. As the process became more familiar however, the time between proposal approval, contracting and final disbursement reduced to around ten days.
32. CERF had anticipated that NGO project implementation would commence from July 2020. Disbursements to NGOs, however, did not start to arrive until 6<sup>th</sup> August 2020, just over a month later than the ERC's anticipated date of 4<sup>th</sup> July 2020 communicated to the IASC. CERF's own internal lessons learned review of the process, indicated that were they to conduct the process again, there could be ways to shorten it - if for example, the grant manager was to prepare agreements in parallel with finalising the projects. However, the total time savings would remain small.
33. From the perspective of actors at country level involved in the NGO selection and proposal review process, and the recipient NGOs, the process was felt to have been very fast. Moreover, although NGOs were indeed struggling to secure funding to initiate COVID-19 response programming, there were sound operational reasons why the emphasis on speed in the allocation process was not as necessary or desirable as it may have appeared at head-quarters level. Firstly, in most of the six countries, COVID-19 cases initially remained relatively low and health facilities were not overwhelmed. In hindsight, the response comprised emergency investments in readiness to respond rather than a full-scale emergency response and, therefore, the urgency to disburse funds to NGOs was less acute than earlier envisaged. Secondly, the haste with which proposals were developed contributed to operational challenges and in some cases the need for modifications down the line. For example, in several cases, NGOs noted that they were unable to conduct needs assessments at field level during the proposal development stage and proposed working in facilities or areas where they subsequently discovered that other actors were already operating.
34. Both at headquarters and at country-level, most key informants indicated that while they understood that as a new process additional work was required to adapt existing tools and processes, they were surprised at and under-estimated the amount of work involved in realising the allocation. Nevertheless, despite challenging circumstances and heavy workloads, all of the actors involved in the strategy development and NGO selection process, demonstrated a high degree of commitment and willingness to react extremely quickly to meet the requirements and timeline of the allocation.

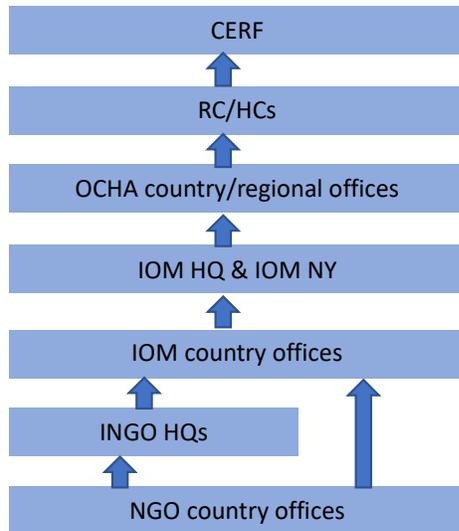
The allocation also placed strain on existing capacities and systems. IOM was able to rely on their existing in-country capacities but in most country offices and at headquarters, the investment in time was felt to have exceeded the amount recovered in overhead and direct costs, both at headquarters and country level, and IOM's high-level of services relied to a considerable extent on goodwill and commitment to demonstrate proof of concept. For OCHA and RCOs at country-level, particularly OCHA offices with CPBFs, the allocation process was similar to CERF and CBPF processes and well within their capacity and experience. However, the allocation required significant additional work from OCHA and RCOs at a time where in some cases teams were under-staffed owing to the pandemic, and already dealing with a heavy burden of multiple ongoing CERF allocations and CBPF allocations.

35. Regular monitoring and reporting to IOM generated a considerable additional workload according to some NGOs. One NGO noted for example that monthly reporting to IOM was not stipulated in the contract and

they should not have been required to provide two sets of reporting.<sup>20</sup> Other NGOs found the monthly reporting excessive while others did not have particular complaints.

36. Many respondents commented on the number of desks which documents had to pass through before they were finally approved (see Figure 3). This was noted to have slowed the approval time for modifications and no-cost extensions in particular, which passed through IOM country offices, IOM headquarters and CERF before being approved. And overall actors directly involved in these processes questioned the cost-efficiency and transaction costs arising from a model that required routing documents for approval through both OCHA and IOM.

Figure 3: Review and approval process for NGO proposals, project modifications and no-cost extensions



- Was the selection of NGOs appropriate and transparent?
  - How were the criteria to select NGOs developed and what factors were taken into account?
  - Were these criteria shared transparently?
  - Was the selection process efficient and transparent?

37. In order to streamline and speed up the selection process, CERF’s country-level guidance indicated that NGOs should be “selected on merit and only then prepare proposals” and advised that a general call for proposals or concept notes should not be made (see Figure 4 for outline of steps in the NGO selection and proposal development and approval process).<sup>21</sup> The reverse is more typically the case for NGOs where, with the exception of framework agreements, they submit proposals which are assessed on technical merit on a competitive basis.

<sup>20</sup> Monthly reporting and follow up was however required from IOM against a set of indicators agreed with CERF as part of the global agreement and detailed in “Annex E Programmatic Monitoring Template”.

<sup>21</sup> CERF IOM NGO COVID-19 allocation – Country Guidance, 15 June 2020.

Figure 4: Steps in NGO selection and proposal development, review and approval process proposed in CERF-IOM Country Level Guidance

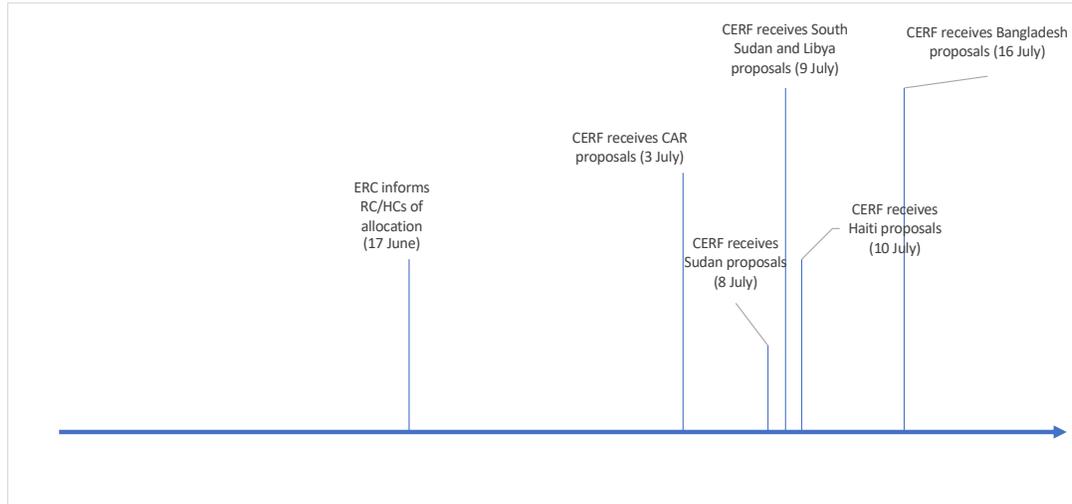


38. Bangladesh elected to follow a more open and competitive process, inviting NGOs to submit concepts, which would be reviewed by the selection committee against a set of eligibility criteria, assessment of the extent to which they met the strategic priorities and of quality.<sup>22</sup> After selection, NGOs were invited to submit a full proposal. CAR invited NGOs to submit full proposals and conducted a simultaneous review of capacity and proposals. Seven proposals were submitted in CAR, of which four were selected. The other four countries followed the recommended process of selecting NGOs and then inviting them to submit proposals. Notably, Bangladesh submitted their package of proposals considerably later than the other five countries (see Figure 5).

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<sup>22</sup> Approved Chapeau Bangladesh, 26<sup>th</sup> July 2020

Figure 5: Timeline of NGO proposal submissions to CERF



39. CERF provided guidance on the composition of NGO selection committees. They should be convened by the RC/HC and chaired by OCHA or the RCO. They should include WASH and health cluster/sector coordinators and co-coordinators; NGO consortia where applicable; OCHA or the RCO; protection cluster coordinators, and gender experts; with IOM participating as an observer.<sup>23</sup> Where CBPFs were present, it was suggested that the HC may opt to use established CBPF mechanisms to select NGOs rather than establishing a committee.
40. In the event, each country did establish a full selection committee, and while composition varied depending on local coordination structures, they all met the parameters recommended by CERF.<sup>24</sup> Notable variations were the inclusion of the co-chairs of the Strategic Executive Group for the Rohingya refugee crisis in Bangladesh (that is, the RC, UNHCR, IOM and the ISCG Secretariat) as well as a representative from OCHA's regional office. In Haiti, the committee included government representatives from the health and WASH departments.<sup>25</sup> And in South Sudan the committee included representatives from the OCHA COVID-19 Secretariat and the WHO COVID-19 incident manager.<sup>26</sup> In Libya the representative from UN Women was unable to attend selection committee meetings but reviewed relevant documents.<sup>27</sup>
41. CERF provided guidance on criteria that should be used to assess NGO partners as an annex to the country-level guidance (see Box 1).

<sup>23</sup> IOM and the CERF decided early in the process that in order to avoid any conflict of interests, IOM should not be an active decision-making participant in the NGO selection process but would be present in discussions on an observer basis.

<sup>24</sup> In CAR, the HC informed the HCT of the CERF allocation on 16<sup>th</sup> June 2020 and a selection committee was composed on 27<sup>th</sup> June, comprising the health, WASH and protection cluster coordinators, the head of the INGO forum and OCHA, with IOM as observer. Approved Chapeau CAR – 13th July 2020.

<sup>25</sup> Approved Chapeau Haiti

<sup>26</sup> Approved Chapeau South Sudan

<sup>27</sup> Approved Chapeau Libya

- Substantive programmatic engagement within the Health and/or WASH cluster, reflecting technical expertise and implementation capacity within the Health and/or WASH sectors, in particular for the identified priorities of the allocation;
- proven strength on cross-cutting priorities;
- existing operational capacity and presence, including:
  - absorption capacity and proven track record of managing grants of similar size
  - ability to immediately scale-up programming and implement all activities within the agreed CERF project implementation period
  - relevant geographical coverage through existing sub-offices or presence through network with partners, including through standing partnership agreements with national NGOs for quick facilitation of potential sub-granting and/or implementation arrangements;
- the partner must be an existing partner of the UN, i.e. have passed the capacity assessment or due diligence process of at least one UN agency, or where applicable, if the NGO has applied for being an eligible partner for CBPF funding it must have cleared the CBPF due diligence process/capacity assessment and must not be in the high-risk category;
- Any additional criteria required for IOM to contract the NGO as partner.

42. In some cases, country teams also developed additional criteria and approaches to assessing partner capacity. In Libya, no additional criteria were added, though special consideration was made of participation in relevant sectoral coordination forums, capacity to scale up rapidly and operational presence.<sup>29</sup> In Haiti, as set out in the proposed standard criteria, specific consideration was given to the operational presence of partners including whether they had established partnerships with local NGOs. South Sudan and Sudan included the criteria that partners must be rated as low or medium risk by the respective CBPFs.<sup>30</sup> Bangladesh required NGOs to have a project in Health or WASH already registered in the Joint Response Plan.

43. The processes varied considerably in the extent to which assessments were based on judgement or included more objectively verifiable criteria and a documented and transparent assessment process. The objectivity of assessments of capacity against the global criteria provided by CERF was questioned by a number of actors interviewed, with some questioning the depth of knowledge and objectivity of sector/cluster coordinators in assessing NGO capacity and past performance, particularly in countries where sectors are less active and fewer NGOs regularly participate.

44. CAR developed a scorecard which was used to introduce greater objectivity into the assessment process.<sup>31</sup> The selection committee used the scorecard to score a long-list of NGOs on their capacity against the global criteria provided by CERF. Partner proposals were also scored against a set of additional “mandatory and exclusive criteria” developed at country-level that included targeting areas with crisis severity rankings of 3-4 and at higher risk of COVID-19 (see Box 2). NGOs scoring below a total of 11 on these criteria were automatically rejected. Project proposals and budgets were then assessed against a set of criteria that included disaggregation of beneficiaries and consideration of priority cross-cutting issues. Partners were rated

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<sup>28</sup> CERF IOM NGO COVID-19 allocation – Country Guidance, 15 June 2020.

<sup>29</sup> Approved Chapeau Libya. Approved Chapeau Haiti.

<sup>30</sup> Approved Chapeau South Sudan; Approved Chapeau Sudan.

<sup>31</sup> Approved Chapeau CAR – 13<sup>th</sup> July 2020.

(yes, partially, or no) against these criteria with written justifications of the rationale for their selection or rejection provided.

*Box 2: Additional selection criteria developed for the CAR NGO selection process<sup>32</sup>*

**Mandatory and exclusive criteria**

- The project is aligned with the CERF IOM INGO strategy agreed upon by the HC/HCT, namely the treatment of COVID-19 cases and integrated health response approaches
- The NGO is planning to implement the project in areas with severity 3-4 and at a higher risk of COVID
- The Budget is coherent with the logframe, the activities suggested and the CERF criteria

**Programme and budget criteria**

- The project takes into account priority cross-cutting issues (protection, GBV, mental health/ PSS, cash, persons with disabilities, AAP)
- The beneficiaries are clearly identified (gender, age, sex and diversity, category)
- The project is adapted to the context and indicates the complementarity with other actors/ funding
- The direct staff involved in the project is coherent with the activities suggested

45. The transparency of the NGO selection process was questioned in all countries, including, most notably, in Bangladesh where the RCO in fact did take a number of additional measures to ensure greater transparency and a more open process.

46. In reality, the pool of potential partners from which the committees could select was already substantially narrowed by the parameters of the allocation which limited the scope to NGOs active in the health and/or WASH sectors; additional NGO selection criteria applied at country level; and as a consequence of strategic priorities identified at country-level, including geographical focus, and specific activities, such as isolation and treatment centres. Once all of these factors, and the organisation's ability to absorb funds and scale up, were taken into account, in most cases, a relatively small number of potential partners were eligible. For example, in Libya there are already relatively few active NGOs, particularly national NGOs, and the selection committee struggled to find NGOs both eligible and willing to submit a proposal. In Sudan, the geographic focus on specific under-served states meant that in several states, there was only one NGO present in the relevant sectors.

47. Communicating the eligibility criteria and rationale for and priorities of the allocation more widely, could have helped to manage expectations, however. For example, CAR communicated the parameters and criteria of the allocation to the NGO forum very early in the process, invited open submissions of proposals and provided feedback to applicants on the rationale for their selection or rejection.

48. In countries with a CBPF, the selection committees were able to refer to existing capacity assessments. In non-CBPF countries, the criteria that prospective partners should be an existing partner of the UN was not felt in some cases to provide adequate assurance. In countries where there is no dedicated risk management unit, there is no mechanism to share information on partner experiences, leaving open the possibility the selection committees could select partners who had demonstrated performance or accountability concerns in partnership with a UN agency. This was raised as a point of concern by IOM who was referred partners whom they had not had the opportunity to assess and verify themselves.

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<sup>32</sup> CERF IOM NGO COVID-19 allocation – NGO Selection Committee Outcome. Excel document dated 1<sup>st</sup> July 2020.

- Was complementarity with CBPF allocations ensured in the relevant countries?
  - *At what stages was the CBPF consulted?*
  - *How were CBPF allocations taken into account?*
  - *What potential synergies or duplications were there?*

49. In the three countries with CBPFs the Humanitarian Financing Units (HFUs) played a key role in the CERF allocation and were involved from the earliest stages. The CERF allocation benefitted from CBPF infrastructure, experience, and tools, including notably, existing capacity assessments of NGO partners, and established relationships and experience in conducting multi-stakeholder strategy development and prioritisation processes.<sup>33</sup>
50. CERF recommended that “complementarity between CERF NGO funding and the CBPF funding towards Covid-19 response should be sought where applicable.”<sup>34</sup> In each of the three countries with CBPFs there was a high degree of complementarity in allocations and in each case, the CERF allocation was able to build from analysis and prioritisation undertaken through earlier CBPF COVID-19 allocations. In CAR for example, the CERF allocation did not prioritise Bangui or the Western regions of the country, which had been prioritised in a recent CBPF allocation of more than \$3 million.<sup>35</sup> In addition, a further CBPF allocation of \$9 million under the emergency reserve was announced on 17<sup>th</sup> June 2020 and this notably omitted the health sector, to ensure complementarity with the CERF NGO allocation.<sup>36</sup> In South Sudan, counties were prioritised which had not received funding through the earlier CBPF standard allocation – although it should be noted, that the standard allocation did not prioritise COVID-19, and other criteria for geographical prioritisation were applied, including case numbers and situation on major transport hubs.<sup>37</sup> And in Sudan, three allocations of the Sudan Humanitarian Fund (SHF) had taken place, including an initial \$500,000 allocation to WHO and an allocation through the Emergency Rapid Response Mechanism in early April of \$1.2 million to support nine NGOs in eight states to commence public health messaging activities.<sup>38</sup> In May a special COVID-19 allocation targeting 13 states took place, allocating \$10.5 million. The CERF allocation targeted four additional states which were not included in the SHF special COVID-19 allocation, plus two states which had received low levels of funding through the SHF allocation.<sup>39</sup>
51. In addition to opportunities for achieving complementarity in coverage of needs, the CBPFs and CERF have other comparative advantages that can be used in complementary ways. Notably, CBPFs may be better suited to providing smaller grants and providing a more accessible route to funding for national NGOs. CAR for example did not select any national NGOs under its CERF allocation, noting that local and national NGOs would be covered under the planned CBPF reserve allocation, which could better cater to their absorption and implementing capacities.<sup>40</sup>

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<sup>33</sup> OCHA in Sudan noted for example that they “did not find any challenges with the fund allocation, NGO selection and proposal review processes. This is mainly due to earlier similar SHF allocation, the presence of Covid-19 CPRP and well-established relationship with the relevant sectors, experts and NGO partners. This CERF allocation is a replicated of a similar SHF allocation, which NGO partners and the sectors are already familiar with.” Strategic Allocation Overview, Sudan, CERF NGO Allocation (20-RR-IOM-019), Interim Report (15/11/2020).

<sup>34</sup> CERF IOM NGO COVID-19 allocation – Q and A, 15 June 2020

<sup>35</sup> Approved Chapeau CAR – 13<sup>th</sup> July 2020

<sup>36</sup> Ibid.

<sup>37</sup> Approved Chapeau South Sudan

<sup>38</sup> Approved Chapeau Sudan

<sup>39</sup> Ibid.

<sup>40</sup> Ibid.

- Did the agreements with NGOs meet timeliness and flexibility requirements?
  - *Were the contracting and disbursement processes sufficiently timely?*
  - *Were contractual and reporting requirements sufficiently flexible?*

52. Contracting and disbursements by IOM took place relatively quickly in most cases. Contracting in CAR, which was the first country to go through the contracting process, was noted to have been slower however and one NGO in CAR also noted that their second tranche disbursement was delayed, while interim reports from all other partners were compiled, which caused them problems paying staff salaries.

53. IOM was able to provide some flexibility to partners where procurement delays meant that they had not incurred sufficient expenditure to trigger their next disbursements, by allowing partners to submit expenditure forecasts instead as evidence of anticipated expenditure.

54. One notable feature of this allocation is the high number of modifications and no-cost extension requests. CERF received 21 reprogramming and/or no-cost extension requests, of which 20 were approved and one withdrawn. This was in large part a function of the unpredictable nature of the pandemic itself. CERF and IOM also erred on the side of caution given these were partners they had not worked with in the past and were more inclined to require a formal documented modification process than would have been the case for UN partners. The challenging and often unpredictable operating environments in which the projects were delivered also contributed to the high incidence of modifications and IOM encouraged and supported partners to reprogramme funds to accelerate implementation and avoid underspending. Hyper-inflation in Sudan for example meant a number of projects had to request budget and activity modifications relatively early on to reflect the far higher costs of procurement and salaries. In a number of cases, NGOs faced security challenges accessing their project areas, notably in CAR. Negotiating permissions to operate with local authorities also took time in some cases. Disrupted global supply chains and national lockdowns made procurement and transport of supplies challenging. However, the haste with which proposals were compiled was also a clear contributing factor to the high rate of modifications and budget revisions.

55. CERF's rules on budget flexibility allows for up to 15% variance between budget categories within direct project costs. Above this threshold, or where there are changes in staffing or programme support costs a formal request for redeployment of funds is required.<sup>41</sup> This provides a reasonable level of flexibility overall, however, it disadvantages smaller projects where a variance of greater than 15% may represent a relatively small sum of money.

56. The modification process in most cases resulted in a positive outcome and IOM and CERF were noted as being very supportive and accommodating and keen to enable flexibility. IOM for example worked closely with partners to revise and develop their modifications before they were submitted to CERF. However, a number of NGOs and IOM country offices noted that the time taken to secure a response was relatively long, which caused a degree of anxiety among partners, heightened because many of them submitted requests for modification and no-cost extensions at a relatively late stage of the grant cycle. The length of time taken to receive a response on modifications and no-cost extensions was understood to be a result of the number of desks the modifications had to pass over before receiving final approval from CERF.

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<sup>41</sup> "A formal request for redeployment of funds must be sent by the agency to the ERC through the RC/HC when the adjustment pertains to a cumulative shift of more than 15 percent between budget categories of the direct project costs or any change to staff costs or programme support costs. Approval of the entire budget change must be requested from the ERC prior to implementation of the change." CERF (2018) CERF Handbook, p 32. [https://cerf.un.org/sites/default/files/resources/cerf\\_handbook\\_2018\\_en.pdf](https://cerf.un.org/sites/default/files/resources/cerf_handbook_2018_en.pdf)

## 2.2 Effectiveness

### Summary

#### What worked well

- The extent of the funding gap for NGOs has not been established, but anecdotally, the view at country-level was that UN agencies and governments had received funding, but NGOs were indeed struggling to mobilise funds and the CERF allocation was in most cases the first or the first significant funding NGO partners received.
- The allocation targeted funds in complementarity to established COVID-19 preparedness and response priorities and against geographic priorities determined with reference to assessments of severity and risk, and under-funding. Overall, therefore, the allocation strengthened the effectiveness of the response by ensuring coverage of key priorities and gaps.
- The allocation enabled the initiation of activities which would not otherwise have been possible, particularly isolation and treatment centres, and in CAR psychological services.
- There is some evidence to confirm that the allocation played a role in prioritising vulnerable groups, particularly at the proposal review stage, where feedback from gender and protection advisors was well received, and the thematic emphasis on sexual and gender-based violence (SGBV) was reflected in the activities developed in some countries.

#### Areas for reflection and improvement

- Evidence on whether grant sizes and the number of partners selected were appropriate is mixed. On one hand, the relatively large grants enabled activities to be delivered on a significant scale and provided a strategic comparative advantage. On the other hand, there is some evidence that the grants were too large, deterring some partners from applying, particularly national NGOs, and some contracted partners struggled to spend their allocated funds.
- The overall effectiveness of the allocation is difficult to assess at this stage, before final reports have been received. The fact that COVID-19 cases were lower than anticipated at the proposal development stage and the resulting difficulty of assessing needs meant, however, that results are expected to be lower than initial targets set at the proposal stage. Recalling that the allocation was made on a “no regrets” basis and potentially framing investments in terms of response readiness in the context of high levels of uncertainty, and considering how partners, IOM and CERF adapted to changing circumstances, may prove useful when reflecting on overall effectiveness.

- How did the allocation make a difference at country level? Has the allocation improved the response?
  - Did the NGO allocation address a particular gap in the availability of funding at country level?
  - What did the allocation allow NGOs to do that they could not have otherwise done?
  - What were the major outputs reported by partners?
- Did the allocation of funds to NGOs lead to a more effective response?

57. The CERF NGO allocation responded to perceptions of a significant funding gap for NGOs in the COVID-19 response. The funding situation for the COVID-19 response varied across the six different countries and the presence or extent of a “funding gap” is difficult to determine. Many KII respondents at country level noted their perception that funding was available for UN agencies, who had received bilateral funds and CERF funds, and for governments in some cases, who had received funding from the World Bank, but very little was available for NGOs. Most of the NGOs interviewed indicated that they either did not have any dedicated funding for COVID-19 activities prior to the CERF allocation, or they had limited funds from internal sources, or pre-negotiated emergency response funding, including framework agreements. However, it is also worth noting that in the three countries with CBPFs, COVID-19 allocations had taken place in Sudan and CAR, and a non-COVID-related standard allocation in South Sudan, with NGOs the primary recipients of these funds (see Table 1).

*Table 1: CERF COVID-19 allocation and CBPF COVID-19 funding allocations in 2020<sup>42</sup>*

<b>Country</b>	<b>CERF NGO allocation (USD million)</b>	<b>CBPF funding (USD million)</b>
CAR	USD 5	USD 8.6
South Sudan	USD 4.9	USD 10.4
Sudan	USD 3	USD 12.6

58. Rates of implementation progress varied significantly across the different countries and partners, however, in a number of cases, implementation was well behind expected timelines at the time of the interim reports in mid-November 2020. There were a variety of reasons for this. In CAR, insecurity at the start of the implementation period meant that activities had to be conducted remotely in some cases for the first couple of months. In situations where NGOs were standing up new activities and moving into new locations, in contrast to UN partners, NGOs were unable to commit expenditure – crucially on recruitment and procurement - until they had contacts in hand and cash in the bank. Hiring new staff, negotiating permissions with local authorities and launching procurement for new activities all took time. However, once partners had established their activities, implementation rates quickly picked up and the majority of partners were expected to complete their planned activities.

59. IOM’s regular monitoring of partners played a positive role in identifying challenges and encouraging partners to accelerate implementation. IOM was also able to provide technical support to WASH projects, notably in Libya and Sudan, which was noted as well received and beneficial by partners delivering WASH activities. Where budget burn rates were below the threshold to trigger the next tranche of the budget from IOM, this was also noted as playing a useful role in helping to accelerate rates of implementation.

60. What the allocation achieved overall in terms of results will not be assessed until final reports are received. However, it is likely that achievements will be below targets in some areas, and particularly in health facility-based interventions where targets are based on patient numbers. This is in large part simply because COVID-19 cases were lower than anticipated during the implementation period.

61. Actors at country level often remarked that although case numbers had not reached the expected crisis levels during the implementation period, investments in upgrading WASH infrastructure were in any case much needed and in each country, health facilities and communities are now better prepared for the second wave

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<sup>42</sup> Based on data from OCHA’s internal NGO allocation tracker and funding data for CERF and CBPF allocations to the COVID-19 response available at: <https://pfb.unocha.org/COVID19/> Accessed 23<sup>rd</sup> February 2021.

of COVID-19 thanks to the allocation's investments in public health information and communication, supply of protective materials, and investments in upgrading WASH infrastructure.

- Did the allocation enable types of programming and/or coverage of geographic areas not otherwise funded?

62. The allocations prioritised geographic areas that were not already covered and which were considered to be high risk. For example, in South Sudan, transit corridors from Uganda and Kenya (Yei, Nimule and Torit) were prioritised, as well as Juba, which although there were activities underway, had by far the largest number of cases, and finally Bentiu, where a large internally displaced population is concentrated. Sudan prioritised four states which had not received funding under the earlier SHF allocation, and two which received a relatively small amount. The decision to prioritise four particular states (Sennar, Gazira, Gedaraf and North Kordofan) built on the strategic objective of an earlier CBPF COVID-19 allocation which funded organisations who were willing to expand their operational presence into areas with limited humanitarian presence.<sup>43</sup> In this case the CERF allocation reinforced the strategic objective to extend humanitarian presence into underserved areas. In CAR, the allocation prioritised areas within the 20 areas considered high risk by the government, with reference to the HRP crisis severity ranking, and prioritised areas which had not received funding under the earlier CBPF allocation.<sup>44</sup>

63. In most cases, partners were selected because they already had an operational footprint in the prioritised areas, and this enabled them to scale up or establish new COVID-19 related activities, from an existing base. Where partners were moving into new areas, project start-up times were considerably longer, as partners worked through negotiating permissions with local authorities, hiring staff and setting up new bases.

64. As projects reach their conclusion, where there is no continuation funding, partners expressed concerns about the loss of investments that will be incurred if facilities and bases are now closed down, as well as concerns for the reputational impacts this is likely to have with staff, communities and local authorities. In retrospect, the continuity of investments in new areas could have been considered at the allocation stage and strategies to mitigate these risks considered.

65. The allocation allowed the establishment of a variety of new types of programming, including allowing integrated programming. For example, ten of the 26 projects are listed as covering more than one sector (see Annex 4). These integrated programmes comprised 45% of the total funds allocated (\$10.3 million). Most notably, the allocation enabled the setting up of isolation and treatment facilities. And in CAR the establishment of psychological services was noted as uniquely enabled by the CERF allocation.

- Were the parameters used for the allocation the right measures to better meet humanitarian needs?
  - Did the sectors selected correspond with priority funding gaps?
  - Were the organisations selected those best placed to deliver?
  - Were the right number of partners selected?
  - Were project sizes appropriate?

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<sup>43</sup> Grant Management Overview: [Sudan], CERF NGO Allocation (20-RR-IOM-019), Interim Report (15 November 2020)

<sup>44</sup> Approved Chapeau CAR.

66. CERF was clear in their guidance that the sectoral priorities were health (including mental health and psychosocial support) and WASH and within these broad parameters, the WASH and Health cluster/sector coordinators should identify priorities (including geographic areas, affected people and types of activities), which would then be shared with the selection committee who, under the leadership of the RC/HC would determine the joint priorities for the allocation.
67. Each of the recipient countries had already developed strategies to guide COVID-19 responses and they were able therefore, to use these to guide the identification of strategic priorities at the country level. For example, Libya had undertaken a re-prioritisation of its HRP in late April to identify relevant existing and new requirements to respond to COVID-19.<sup>45</sup> In Sudan, the Humanitarian Country Team (HCT) and UN Country Team (UNCT) had developed a costed COVID-19 Country Preparedness and Response Plan, aligned with the Federal Ministry of Health COVID-19 plan.<sup>46</sup> In Bangladesh, a COVID-19 Response Plan was added as an Addendum to the 2020 Joint Response Plan for the Rohingya Humanitarian Crisis, requesting an additional US\$181 million for the COVID-19 preparedness and response.<sup>47</sup> South Sudan also added a COVID-19 addendum to their Humanitarian Response Plan in 2020.<sup>48</sup> In CAR, the HCT developed a multi-sectoral response strategy in support of the government's strategy, which prioritised 20 areas across the country.<sup>49</sup> In Haiti, the government published a multi-sectoral plan for preparedness and response in March 2020, with the UN and partners developing a supporting plan and strategic framework with funding requirements of US\$176 million.
68. Cluster/sector coordinators identified particular gaps within these priority sectors to further refine the strategy for the allocation and focus on areas which were not well supported. For example, in Libya, the health sector was relatively well funded, therefore \$2.7 million of the \$3 million allocated to Libya was prioritised for the WASH sector. And within the WASH pillar of the response, infection prevention and control were prioritised. In Sudan, funds were divided by state, with roughly \$700,000 per state, with amounts adjusted to take into account the size of the state and the disease burden. In Bangladesh, sector coordinators prioritised closely against the priorities identified in the supplemental COVID-19 response plan, focussing on the establishment of intensive care and isolation facilities, WASH support to district health facilities and in the community targeted towards particular sections of the camps.<sup>50</sup>
69. CERF provided guidance on the number of suggested NGO partners per country allocation<sup>51</sup>, in order to "ensure efficiency and scale".<sup>52</sup> CERF's assessment of optimal project sizes was between \$ 0.9 and \$ 1.1 million, which was comparable with average UN CERF grants in 2019 of \$1.2 million.<sup>53</sup> CERF added additional guidance that local NGOs could be selected, and in this case, up to one additional NGO could be selected, but with a maximum ceiling of four NGOs per country.<sup>54</sup> Bangladesh and Haiti exceeded the recommended number, including one additional NGO, while other countries stuck to the upper limits of the recommended numbers of partners (see Table 2).

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<sup>45</sup> Approved Libya Chapeau

<sup>46</sup> Approved Chapeau Sudan

<sup>47</sup> Approved Chapeau Bangladesh.

<sup>48</sup> Approved Chapeau South Sudan.

<sup>49</sup> Approved Chapeau CAR.

<sup>50</sup> Approved Chapeau Bangladesh.

<sup>51</sup> These were specified in the email sent from the ERC to RC/HCs announcing the allocation on 17<sup>th</sup> June 2020.

<sup>52</sup> OCHA (2020) CERF COVID-19 NGO allocation – Country Envelopes (internal document dated 10<sup>th</sup> June 2020).

<sup>53</sup> Ibid.

<sup>54</sup> Ibid.

Table 2: Recommended and actual numbers of NGO partners selected

Country	CERF NGO allocation (US\$ million)	CERF suggested number of NGO recipients	Actual NGO recipients selected
Bangladesh	\$ 3	Up to 3 or 4 if includes NNGO	5 (2 x INGO; 3 x NNGO)
CAR	\$ 5	Up to 4	4 (x INGO)
Haiti	\$ 4	Up to 4	5 (3 x INGO; 2 x NNGO)
Libya	\$ 3	Up to 3 or 4 if includes NNGO	4 (3 x INGO; 1 x NNGO)
South Sudan	\$ 4.9	Up to 4	4 (3 x INGO; 1 x NNGO)
Sudan	\$ 3	Up to 3 or 4 if includes NNGO	4 (3 x INGO; 1 x NNGO)

70. CERF did not provide any specific recommendation that local and national NGOs should be prioritised. They were noted as eligible, should they meet the criteria established in the guidance.<sup>55</sup> Some country teams were clear in their intention to include local and national NGOs in the allocation, notably in Haiti and Bangladesh, where additional efforts were made to ensure that more than one national NGO received funding.

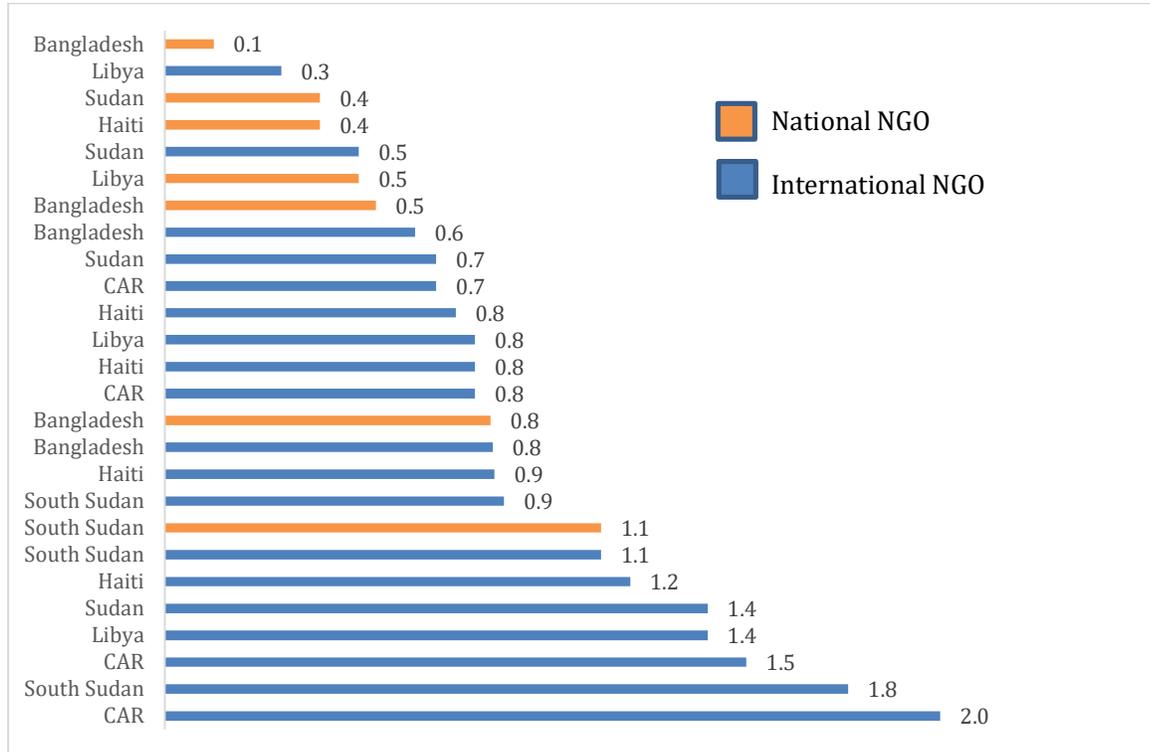
71. There are some indications that there should have been greater flexibility to increase the number of partners and reduce grant sizes depending on local circumstances. In fact, this was the case in Bangladesh, where due to the open call for concepts, partners suggested their own budget sizes and one local NGO requested just \$126,200, while the largest grant in Bangladesh was for \$845,000. The grant sizes were felt to be relatively large and potentially difficult to spend within the nine-month implementation period by a number of actors consulted. In Libya, some NGOs indicated that they would not have the capacity to programme funds within the available timeframe and therefore declined the invitation to develop a proposal. There does not seem to have been a strong appetite for larger grants among the NGOs consulted, although there were several cases where international NGOs felt it was a struggle to programme contracted funds, and they would rather have received less. Conversely, the relative size of the CERF allocation grants was also felt to be a strategic comparative advantage in allowing the initiation and scale up of activities on a substantial scale.

72. In practice, the size of grants spanned a considerable range, from \$2 million to \$130,000 (see Figure 7), with an average grant size of \$1.01 million for international NGOs and \$ 0.59 million for national NGOs. However, the size of the grants and assessments of the capacity to absorb and programme funds proved to be a barrier to access for national NGOs. In Haiti for example, despite an intention to have an equal number of national and international NGO partners, only two national NGOs were ultimately considered eligible following the selection process. The relative capacity of local and national NGOs also varies widely across the six countries. BRAC, for example, is head-quartered in and originates from Bangladesh, but is in fact a very large international organisation, which approved a budget of \$ 1.4 billion for 2020.<sup>56</sup> Meanwhile, national NGOs in CAR typically receive grants of around \$50,000.

<sup>55</sup> CERF IOM NGO COVID-19 allocation – Q and A, 15 June 2020.

<sup>56</sup> BRAC Annual Report 2019. <http://www.brac.net/downloads/BRAC-AR-2019e.pdf>

Figure 6: CERF NGO COVID-19 allocation NGO grant sizes<sup>57</sup>



73. It is difficult to determine objectively whether the organisations selected were the best placed to deliver. Final reports have not yet been compiled, however, anecdotally OCHA and IOM reported that in most cases the organisations selected will have broadly met their targets and delivered to expected standards.
74. There were some areas of concern expressed however around whether the selection processes facilitated selection of the best placed organisations to deliver. The principal concern noted is around how the capacity or organisations to deliver can be assessed objectively where there is no HFU or equivalent to advise on past partner performance and to provide a robust verification in the form of capacity assessments, and where the clusters or sectors might have limited knowledge of potential partners or their past performance.
75. National NGOs faced additional challenges in meeting eligibility criteria and navigating the proposal development process. They were noted for example to have potentially less in-house capacity to rapidly develop proposals, and to have been disadvantaged by the need to demonstrate attention to priorities such as gender and protection and by the requirement to submit documents in English or French.
76. It is also worth noting that although larger organisations were selected in many cases on the basis that they would have the required capacity to absorb funds and scale up, size did not necessarily correspond with effective performance. In one case, it was a large international NGO which was the furthest behind in implementation for example. Smaller national NGOs unaccustomed to receiving such large grants also reportedly struggled to utilise funds. Rather than size, the capacity to absorb and scale was correlated more closely with situations where organisations already had staff in place, had established relationships with authorities and communities, and similar ongoing activities and logistics capabilities. Notably, in Haiti both

<sup>57</sup> Based on data from OCHA's internal NGO allocation tracker.

national and international organisations struggled to pivot from more developmental activities to quickly undertaking international procurement and concerns were raised that the selection process had not adequately assessed the capacity of partners to undertake essential emergency response actions.

- Have NGOs used CERF funding to focus on vulnerable groups (including women and girls, children, and people with disabilities) that would otherwise not be reached?
- Did NGOs integrate aspects of effective programming, including with regard to gender, GBV, people with disabilities, protection (i.e., the ERC's strategic steers) and accountability to affected people?

77. NGO proposals demonstrated a focus on vulnerable groups, and the inclusion of gender and protection experts in the selection and proposal review processes provided practical feedback to partners to strengthen their attention to these groups. Whether these groups would not otherwise have been reached is not feasible to determine and partners were keen in some cases to add some practical nuance to assumptions around vulnerability targeting. Some NGO partners noted for example that their responses are targeted at community of health facility level and therefore targeting individuals or sub-sets of the population is somewhat outside of their control. Partners in Libya noted that vulnerable groups in Libya were not synonymous with women, girls, children, and people with disabilities, since young men make up a large proportion of the migrant population. One NGO noted that they did not modify their activities based on feedback from the selection committee, rather they framed them more explicitly in the proposal.

78. Beyond paying attention to vulnerable groups at the proposal development stage, it was not determined however whether reporting and monitoring scrutinised the implementation of the intention to target vulnerable groups.

79. In some cases, partners included dedicated activities addressing the ERC's priority areas<sup>58</sup>. In Bangladesh for example, World Vision included several protection and SGBV activities and provided for example GBV awareness training alongside hygiene and COVID-19 awareness training.<sup>59</sup> In CAR, the overall strategy included a strong emphasis on addressing heightened risks of GBV. Mental health messages were included in health messaging, a hotline established, and psychological services provided in supported health facilities.<sup>60</sup> In Haiti, the strategy specifically priorities and selected partners on the basis of their experience in SGBV programming and in supporting people with disabilities. For example, Humanity and Inclusion's project in Haiti targeted vulnerable categories of persons and provided respiratory physiotherapy as well as, psychological and psychosocial support, for COVID-19 patients with a focus on people with disabilities.<sup>61</sup>

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<sup>58</sup> The ERC communicated four priority areas to RC/HCs to be given increased focus in future CERF funding requests on 29<sup>th</sup> January 2019. These priorities are areas often considered under-funded and under-prioritised in funding allocations and include (a) support for women and girls, including tackling gender-based violence, reproductive health and empowerment; (b) programmes targeting disabled people; (c) education in protracted crises; and (d) other aspects of protection. OCHA (2019) Q&A on the Emergency Relief Coordinator's Four Priority Areas for CERF, Advisory Group Meeting, 19-20 June 2019.

[https://cerf.un.org/sites/default/files/resources/Q%26A%20on%20the%20ERCs%20Four%20Priority%20Areas%20for%20CERF\\_0.pdf](https://cerf.un.org/sites/default/files/resources/Q%26A%20on%20the%20ERCs%20Four%20Priority%20Areas%20for%20CERF_0.pdf)

<sup>59</sup> Approved Chapeau Bangladesh.

<sup>60</sup> Approved Chapeau CAR.

<sup>61</sup> Approved Chapeau Haiti.

## 2.3 Impact and Relevance

### Summary

#### What worked well

- The allocation overall met its objectives of moving funding to the frontlines of the response, relatively quickly and on similar terms to UN agencies, in what was understood to be an acute crisis.
- The size of the allocations was noted to have allowed NGOs to deliver programmes of meaningful impact and scale. Perhaps most importantly, the allocation was felt to have delivered real and clearly demonstrated impact at health facility and community level.

#### Areas for reflection and improvement

- Improving leadership and coordination of the response were not among the stated objectives of the allocation, and no evidence of attributable effects on improving these areas was identified. Rather, the allocation benefitted from prior investments in humanitarian coordination, leadership, tools and analysis. Given that the allocation was relatively small in relation to the overall requirements and size of operations and was made on a “one off” basis, this finding is as expected. There could be opportunities to include specific requirements and incentives to strengthen leadership and coordination in future however, particularly in encouraging reporting and operational coordination at sector/cluster level.
- Relationships were strengthened in some cases, but on a relatively ad hoc basis. Relationships between OCHA and IOM seem to have been strengthened most.
- Given its focus on speed and scale, the allocation was not well suited to supporting localisation goals and proved controversial among local and national NGOs in Bangladesh.
- Although difficult to measure, there is no clear evidence to indicate that the allocation had a catalytic effect on funding for the response.
- The grant manager model had trade-offs that meant that some partnership benefits of funding via UN agencies - notably sector specific technical expertise and coordination - was inevitably lost or reduced.

- Did the allocation help to strengthen humanitarian leadership, coordination, and a strategic, life-saving response to humanitarian needs?
- How has the allocation shaped relationships at country level, including between the UN and NGO community?

80. The role of the RC/HC in leading the country-level processes to identify strategic priorities and suitable NGO partners is clearly stated in OCHA’s country and global guidance. It is important to note however that strengthening humanitarian leadership and coordination was not an explicit stated objective of the allocation. Interview respondents at country level were candid and relatively consistent (only in CAR did views diverge) in their assessment that the allocation did not materially strengthen leadership or coordination, rather, it benefitted from investments in coordination, leadership, analysis and relationships that pre-date the allocation.

81. Sector/cluster coordinators noted in several instances that the allocation in fact missed an opportunity to strengthen coordination by not encouraging or requiring partners to report their results to the sector/cluster. In countries where NGOs already participated actively in clusters, partners reported regularly on their

activities in any case. The allocation did not change this. But in other countries, sector/cluster coordinators noted with some disappointment that they had heard little or nothing from either the partners or IOM (who were regularly monitoring projects) regarding the status of implementation, or any challenges encountered. Although IOM was not required to report to the clusters/sectors, and in some cases did reportedly provide updates, this was noted as a missed opportunity to strengthen coordination.

82. The allocation did not have a significant effect on strengthening relationships between UN agencies and NGOs overall, since the number of NGOs contracted were in any case small, and relationships were limited to NGOs and IOM and OCHA after the NGO selection process. However, a range of anecdotal and unexpected spin off benefits were noted. In a number of cases, UN staff (OCHA, RCO and to a lesser extent IOM, who often have very operational interaction with NGO partners in any case) noted their appreciation of the NGOs contracted that arose from their increased interaction with them and greater understanding of the details of their work.

83. In contrast, the allocation posed a potential risk to relationships between local and international actors. Perceptions of a pre-cooked process that largely benefitted international NGOs emerged as a significant reputational risk in Bangladesh, despite the fact that Bangladesh took by far the greatest efforts to ensure a more inclusive process. This required careful management by the RC and serves as a cautionary tale for OCHA. Greater transparency in the allocation process could help to manage such risks, though in practice, this did not help much in the case of Bangladesh.

- Has the allocation led to co-benefits such as improved access, better relations with partners or as a catalyst to raise more funding (for the overall response or individual NGOs)?

84. No evidence was found to indicate that the allocation served as a catalyst to raise more funding, though some discussions were ongoing for a number of organisations with IOM and bilateral donors on potential continuation funding in several cases. At the time of interviews, the projects were either completed, or entering their final stages. Very few had secured continuation funding and NGOs were facing the difficult task of withdrawing and handing over. For some activities, notably rehabilitation of WASH facilities, and to an extent, provision of supplies and health education messaging and training, which do not require continued support. Ceasing support to health facilities, however, is far more problematic, particularly given that in several countries, case numbers are now rising and they are anticipating a significant second-wave. Closure of isolation facilities was noted as particularly difficult and risks significant loss of investment and preparedness, as well as strained relationships with local authorities. In retrospect, the exit strategy for activities at the proposal stage warranted greater consideration. Planning for exit could include efforts to support coordination of the donor funding response. In CAR for example, the HC and OCHA actively engaged with bilateral donors to advocate for complementary and continuation funding.

- What specific benefits could an NGO allocation add to CERF's toolbox?
  - What are the advantages of an NGO allocation compared with channelling funds through UN agencies in a regular CERF allocation?
  - What are the potential downsides or risks of an NGO allocation?
  - What factors in the wider funding landscape influence the relevance of an NGO allocation?

85. NGOs and UN agencies have different comparative advantages at an operational level. UN agencies, notably WHO and UNICEF, had received funding to enable procurement and capacity strengthening. However, most of the front-line delivery by partners, particularly at health facility level, is conducted by NGOs, who were

struggling to mobilise funding. In this respect, the CERF allocation addressed a critical gap in enabling direct support to health facilities as well as upgrades to WASH facilities at facility and community level and other very concrete activities, including providing cash and hygiene supplies to isolating families and access to mental health services. It is worth noting, that this point was emphasised by a number of health sector/cluster coordinators.

86. The grant manager model had trade-offs that meant that some benefits of funding via UN agencies in CERF's traditional funding model was inevitably lost or reduced. Notably, the impartial role of the grant manager limited their ability to contribute to decision-making and reduced opportunities for coordination and technical oversight. IOM in fact has considerable operational experience with many of the partners in question and in direct implementation, particularly in WASH. They were only able to use these to a limited extent, however. Meanwhile, the sectoral technical contributions and coordination role of specialised agencies, which under a regular CERF allocation would be used to provide technical oversight and support to implementing partners during project implementation, was only engaged during the selection process through cluster involvement in proposal review and partner selection. Precedent for a sector specific grant manager function of CERF funds however, already exists through ad hoc country level initiatives. IOM has in two instances served as grant manager for NGO projects in the shelter cluster, working in close coordination with the cluster coordinator, who provided technical support, oversight, and monitoring, while IOM identified partners, disbursed funds and provided oversight and reporting.<sup>62</sup>
87. The grant manager model however, in principle allows greater flexibility to target multi-sectoral programmes than channelling funds through a single sectorally focussed agency. It was noted for example that channelling funds through WHO alone would have limited the potential to target WASH activities.
88. One of the primary advantages of the allocation was the size of the grants NGOs received, which allowed relatively large-scale projects, with meaningful impact at scale. This allowed setting up of critical services such as isolation and treatment centres.
89. The results achieved by NGOs under this allocation are far more readily determined than those achieved through a CERF grant to a UN agency which then sub-contracts to NGOs for front-line delivery. Donors and the CERF therefore have far clearer line of sight between funding inputs and project results.
90. The allocation was not well suited to supporting localisation goals and the process designed included a range of thresholds that ultimately made it difficult for local and national NGOs to access funds. Of the 26 grants awarded, eight were to national NGOs. A further two national NGOs received funding as implementing partners of CERF NGO allocation recipients.<sup>63</sup> Without concerted efforts at country level within the selection process, it is likely very few national NGOs would have been able to meet the required criteria. There are a range of practical lessons CERF can draw from this experience which could help to increase accessibility, including greater flexibility in grant sizes and providing more coaching and support through the application process. However, ultimately there are trade-offs between access, scale and speed, which are the key comparative advantages of a CERF allocation. Other financing tools, notably those with a permanent presence at country level, such as CBPFs and the START Fund Bangladesh, are far better tools to ensure that funds reach front-line local and national NGOs.
91. It is also worth noting that in some countries, COVID-19 was one among many concurrent crises. Sudan, for example, experienced major flooding, a large new refugee influx from Ethiopia in East Sudan, and new

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<sup>62</sup> CERF (2017) Direct NGO Access to CERF – Discussion Paper. 11 May 2017. [https://cerf.un.org/sites/default/files/resources/cerf\\_ngo-access-cerf\\_20170511\\_en.pdf](https://cerf.un.org/sites/default/files/resources/cerf_ngo-access-cerf_20170511_en.pdf)

<sup>63</sup> Note that this figure is based on information provided in partner in interim reports and figures in final reports may vary.

conflict induced displacement in West Darfur. It is also notable that in South Sudan, the CBPF allocation undertaken in March, did not prioritise COVID-19. While the sectors/clusters and selection committees undertook well-reasoned prioritisations of COVID-19 responses, in context with these other crises, and in light of continued low case numbers in most cases, COVID-19 was not necessarily felt to have been the primary humanitarian priority. Several respondents noted that while additional funding was welcome, they were unsure as to why and on what basis their country had been chosen for this allocation and questioned whether RC/HCs had been consulted, they would have proposed other funding priorities.

- Do you think that the impact of the NGO allocation was ultimately worth the investment?

92. CERF noted early in the process that the allocation did not constitute a new window, rather it was prompted by the “unprecedented specific challenges” posed by the pandemic and that it was “experimental in nature”.<sup>64</sup> Considerable hopes have been built among actors at country level who participated in and benefited from the COVID-19 NGO allocation that this model will be continued. There is very strong support for the CERF NGO allocation at country-level, not only among NGOs, but also among actors involved in coordination of the response, including among RC/HCs and sectors/clusters.

93. The impact of the allocation in programming terms has not been determined by this review. Concerns have been raised around the transaction costs associated with the model chosen. However, the allocation overall met its objectives of moving funding to the frontlines of the response, relatively quickly and on similar terms to UN agencies, in what was understood to be an acute crisis.

94. In addition to programmatic results achieved, the allocation has generated lessons, tools and experience which will prove valuable in streamlining processes should CERF replicate an NGO allocation in future.

### 3. Conclusions and recommendations

95. The 2020 COVID-19 NGO CERF allocation was a pragmatic response to an exceptional set of challenges. It was a laudable effort to use the tools that OCHA had at its disposal to fashion a solution to an obvious problem in resource allocation across the humanitarian system.

96. The over-riding objective of the allocation was simply to move money to front-line responding NGOs to enable them to deliver life-saving activities. In this respect, the allocation met its objective.

97. The allocation has demonstrated that CERF *can* fund front-line organisations, without following the typical UN agency-partner model, and can add real value in situations where a significant additional and rapid injection of funds for NGOs is required.

98. The allocation has also generated many lessons which will help to inform potential future decisions on when and how the CERF can support movement of funding to front-line responders. One of the key lessons for CERF has been the fundamental differences in the way NGOs and UN agencies function. While the principle of treating NGOs on similar terms is sound, in practice, they require more tailored tools and rules to suit their funding and operating models. The different operational comparative advantages of UN agencies and NGOs

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<sup>64</sup> CERF IOM NGO COVID-19 allocation – Q and A, 15 June 2020.

could also be engaged with greater complementarity across CERF funding allocations, particularly with respect to international procurement, which a number of NGOs struggled with under the NGO allocation.

99. While the CERF NGO allocation performed well in a number of key areas, this model cannot address all of the problems that exist in the international funding architecture that pose barriers to ensuring funding reaches the right organisations at the right time. Notably, CERF is well suited to provide funding quickly, flexibly, and at scale. And it relies on existing established coordination infrastructure and experience. That is not necessarily a good fit with supporting smaller organisations, notably smaller local and national NGOs, nor for situations where there is limited humanitarian coordination capacity. The allocation therefore raises a number of strategic questions for OCHA to consider.
100. Firstly, it is worth restating here the observation that where the CERF allocation worked best, it was where a CBPF was already present. This raises questions about the efficiency of dual OCHA-led funding processes. Logically, funds would simply be channelled via CBPFs where they are present. The reason why they were not in this instance, is because of CERF's established rules and not because CERF was considered to have a particular comparative advantage over the CBPFs in directing funding to front-line NGOs. It may be worth considering at the corporate level, how OCHA could build greater contingent capacity at the global level to support surge funding through the existing network of country CBPFs and through regionally hosted CBPFs, the first pilot of which was launched covering Central and West Africa in February 2021.<sup>65</sup> This includes considering strategies to mobilise resources centrally for the network of established funds, particularly for crises affecting many countries simultaneously.
101. Secondly, in situations where humanitarian coordination is less streamlined, and where there is no reliable means of objectively assessing partner capacity through an established CBPF, it is far more difficult for CERF or a managing agent to be sure that funds are reaching the right priorities and the right actors. This is where the clearest gap in the humanitarian funding architecture lies, and an area where OCHA could develop a comparative advantage, although the risks and challenges are considerable. OCHA could explore options to build institutional capabilities to extend surge funding to front-line responders in more developmental settings<sup>66</sup>, including through regionally hosted CBPFs which in principle have the capacity to open country funding envelopes in settings without existing CBPFs, and which would benefit from established management and administrative functions at the regional level.<sup>67</sup>
102. Thirdly, the CERF allocation through the grant manager model was challenging for local and national NGOs to access and there is limited scope for the model to be substantially improved without losing the advantages of speed and scale. Replicating and formalising a model which benefits larger and familiar organisations is potentially a reputationally risky move for OCHA, as demonstrated by the poor publicity the allocation received in Bangladesh from some local and national NGOs. Moreover, it does not address the structural gaps in the financing architecture to move funds to front-line actors based on their comparative advantage. OCHA could consider therefore what an optimal route for surge funding accessible to local and national NGOs would look like, and where OCHA can add value to this, noting that a variety of models and instruments may be required.
103. Finally, if OCHA were to replicate an NGO allocation, the purpose and justification should be very clearly articulated. It was clear in this case that overall, there were systemic problems preventing funding reaching

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<sup>65</sup> OCHA (2021) Launch of a Regionally-hosted Pooled Fund for Central and West Africa, February 2021.

<sup>66</sup> This could build on previous research on the topic: Poole, L. (2015) *Improving Funding for Front-Line Responders: Opportunities and Options for Pooled Humanitarian Funds*. <https://reliefweb.int/sites/reliefweb.int/files/resources/Improving%20Funding%20For%20Front-Line%20Responders%20-%20Opportunities%20and%20Options%20for%20Pooled%20Humanitarian%20Funds.pdf>

<sup>67</sup> OCHA (2021) Regionally-hosted Pooled Funds: Questions and Answers

front-line responders. CERF provided a practical contribution to this problem. However, there are significant questions around the cost-efficiency of the model. On an exceptional basis, and where learning is part of the return on the investment, the decision to use the CERF was justifiable. However, if CERF were to make NGO allocations on a more regular basis, strategic and value for money considerations would need to be much more clearly justified. In particular, the real costs of providing the grant management service, which was offered on an exceptional reduced basis by IOM in this instance, and the additional workload taken on by country staff, should be realistically assessed to inform decisions on future NGO allocations.

104. Expectations have inevitably been built. A recipient country level there is enthusiasm for further iterations of such an experiment and NGOs more broadly will be interested in signals from CERF as to future NGO allocations. CERF will now need to manage communication around what role CERF might play in future in funding NGOs more directly, with openness and candidness.

## **Recommendations**

### **Strategic considerations for CERF**

- In order to manage expectations that have built as a result of the allocation, the lessons from this review should be summarised and communicated clearly by OCHA to the CERF Advisory Group, actors at country level who participated in the 2020 NGO allocation, NGO consortia and interested NGOs.
- In order to guide decisions on potential future replication of an NGO allocation, and based on lessons learned through the 2020 COVID-19 allocation, CERF should summarise the respective comparative advantages of the grant-manager model (e.g. speed, scale, transparency, multi-sectoral scope) versus the traditional UN partnership model (e.g. technical oversight, coordination, enhanced risk assurance).
- Value for money considerations would need to be much more clearly defined to ensure that the right tool is selected for the particular financing challenge faced. In particular, the real costs of providing the grant management service, which was offered on an exceptional reduced basis by IOM in this instance, and the additional workload taken on by country staff, should be realistically assessed to inform decisions on future NGO allocations.
- The fact that COVID-19 cases were lower than anticipated at the proposal development stage means that results are expected to be lower than initial targets set at the proposal stage. Recalling that the allocation was made on a “no regrets” basis and potentially framing investments in terms of response readiness in the context of high levels of uncertainty, and considering how partners, IOM and CERF adapted to changing circumstances, may prove useful when reflecting on overall effectiveness.

### **Strategic considerations for OCHA**

- OCHA should consider how it builds greater contingent capacity at the global level to support surge funding to NGOs through the existing network of CBPFs and Regionally-hosted Pooled Funds (RhPFs), the first of which is now being piloted. This could include reflection on resource mobilisation for the CBPFs and RhPFs at a central level as part of a system or network of surge financing capacity.
- OCHA could consider what an optimal route for surge funding accessible to local and national NGOs would look like, and where OCHA can add value to this, including through, but not limited to CBPFs and RhPFs, noting that a variety of models and instruments may be required.
- The clearest gap in the humanitarian funding architecture lies in situations where humanitarian coordination is less streamlined, and where there is no reliable means of objectively assessing partner capacity through an established CBPF. It is far more difficult for the CERF or a managing agent to be sure that funds are reaching the right priorities and the right actors in these settings. Noting that while the risks and challenges are considerable, OCHA could explore options to build institutional capabilities to extend surge funding to front-line responders in in settings with less established humanitarian response and financing capacities, including through RhPFs.

## Technical recommendations for future potential NGO allocations

- Develop a realistic theoretical timeline for future potential allocations stating recommended numbers of days for each stage in the process, which includes increased time for proposal development and review, and a more competitive and transparent NGO selection process.
- Consider adapting the NGO selection process to allow a longer and more competitive process that invites concept notes or proposals to broaden the potential pool of partners and manage concerns around bias in the selection process.
- Allow greater flexibility at country level to tailor grant sizes and numbers of partners to local circumstances.
- Prepare a stock of standard reporting and guidance templates, including orientation/training tools, that can be quickly adapted and circulated early to enable partners to plan their reporting.
- RC/HCs leading country level selection processes should circulate priorities and eligibility criteria in advance and communicate the outcome of the selection process to help manage perceptions of a “pre-cooked” process.
- Develop score-card templates for partner and proposal assessment that include a mixture of objectively verifiable criteria and judgement-based assessments, that can be adapted at country-level, and used to record the decision-making process.
- Consider developing a list of possible additional criteria to assess the emergency response capacity of partners alongside core criteria, that can be adapted to context. Based on experiences from the 2020 NGO allocation, these could include checks on international procurement experience.
- Develop guidance for review committees to consider exit and transition strategies with particular scrutiny of projects which propose incurring longer-term costs such as setting up new project bases, with rental, service and staffing contracts, or which are likely to create expectations among authorities, partners and communities of continued support.
- Clarify in guidance to prospective NGOs that CERF funding is of limited duration and continuation funding should be sought from alternative sources.
- Consider options to streamline dual reporting to the managing agent and CERF.
- Include a requirement for NGOs to brief clusters on implementation progress to support coordination.
- In order to reduce the number of formal modifications, consider allowing greater delegated authority to grant managers to permit changes to activities within a clear range of parameters on the basis of “notes for the record”, particularly where the grant manager is providing frequent and good quality monitoring, as was the case for IOM under this allocation.
- Consider whether a greater degree of budget variance can be tolerated without triggering a formal budget modification, particularly for smaller grants.

## Annex 1 Acronyms

CAR	Central African Republic
CBPF	Country-Based Pooled Fund
CERF	Central Emergency Response Fund
ERC	Emergency Relief Coordinator
FTS	Financial Tracking Service
HCT	Humanitarian Country Team
HFU	Humanitarian Financing Unit
HRP	Humanitarian Response Plan
IASC	Inter-Agency Standing Committee
KII	Key Informant Interview
LoA	Letter of Agreement
MoU	Memorandum of Understanding
RC/HC	Resident Coordinator/Humanitarian Coordinator
RCO	Resident Coordinator's Office
RR	Rapid Response (window of the CERF)
SGBV	Sexual and gender-based violence
SHF	Sudan Humanitarian Fund
ToR	Terms of Reference
UNCT	UN Country Team

## Annex 2 Terms of Reference

### Background

**CERF seeks to hire a consultant to conduct a review of its first-ever allocation to NGOs.**

**In June 2020, CERF made its first-ever NGO allocation, channelling \$25 million in funding via IOM to 24 frontline NGOs for COVID-19 response.** As the ERC has noted, “NGOs are at the heart of our global effort to contain the pandemic” and this unprecedented allocation was a way to pilot an approach to providing NGOs with more direct access to CERF funding. The allocation was successful in supporting localization, with one third of the recipient NGOs being national NGOs. Building on IOM’s flexible and tailored approach, the CERF was able to also pass on to NGOs light contractual arrangements and conditions for funding similar to those typically offered to UN agencies.

**The funds supported NGO COVID-19 programming in six countries:** Bangladesh, the Central African Republic, Haiti, Libya, South Sudan and Sudan. The allocation focused on the water, sanitation and hygiene and health sectors, including mental health, sexual and reproductive health and gender-based violence response and protection. In each country, the best placed frontline responders were identified by an expert committee under the leadership of the RC/HC. The allocation prioritized a limited number of interventions at scale, to ensure the greatest impact for those in need. The average project sizes were \$1 million for international NGOs and \$600,000 for national NGOs. The projects targeted 1.38 million beneficiaries across the six countries, including 388,000 women, 332,000 girls, 348,000 men, and 313,000 boys.

**Given the uniqueness of the NGO allocation, a dedicated learning process has been implemented.** CERF is collating lessons from various stakeholders and has conducted a survey among all recipient NGOs and other stakeholders involved in the process (cluster coordinators, representatives of NGO consortia, and protection and gender specialists who participated in committees to select the NGO projects). In the survey, NGOs expressed high levels of satisfaction with the process. In general, 85 per cent of NGOs and 76 per cent of other stakeholders were satisfied or very satisfied with the allocation.

**The CERF secretariat is commissioning an independent review of the \$25 million NGO allocation.** Every year, CERF commissions independent reviews, linked to its Performance and Accountability Framework (PAF). These reviews either focus on allocations to specific countries or regions, or on thematic areas.

### Objectives, Users and Scope

**The main objective of the review is to generate learning from the NGO allocation.** Since the allocation was the first of its kind and required setting up new processes and tools, identifying best practices, lessons learned and areas for improvement will help organizing possible future NGO allocations more effectively and efficiently.

**The intended users of the review are the CERF secretariat, its Advisory Group and other donors, and OCHA offices, country teams and Resident and Humanitarian Coordinators, especially in the 6 selected countries.** The CERF secretariat will use the lessons generated by the review to improve processes and tools for possible future allocations of a similar type. Other stakeholders will benefit from an independent review of this innovative allocation, providing them with a level of accountability. The final report will be published on the CERF website.

**The review will focus specifically on CERF’s first-ever NGO allocation,** starting from the first conceptualization of the allocation to its implementation (the review will not cover the final stages of implementation or the final reports). The review may examine other CERF allocations, e.g. to UN agencies for Covid-19 programming, for comparison.

### Criteria and questions

**The review will help answer the following questions (the questions may be adjusted and/or prioritised during the inception phase of the review):**

- **Relevance**
  - How did the allocation make a difference at the country level? Were the parameters used for the allocation the right measures to better meet humanitarian needs?
  - Has the allocation strengthened NGO response capacity at country level? Did the allocation sustain critical NGO programming?
  - Are NGO allocations a relevant modality to be added to CERF's 'toolbox'?
  
- **Efficiency**
  - Was the allocation process, both at headquarters and country level – by both OCHA and IOM - conducted efficiently? Were there any delays that could have been avoided?
  - Was clear guidance provided and were roles and responsibilities clearly assigned?
  - Was complementarity with CBPF allocations ensured in the relevant countries?
  
- **Coverage**
  - Has the provision of funds to NGOs more directly led to more precise targeting of particularly vulnerable people, including women and girls, children, and people with disabilities?
  - Have NGOs used CERF funding to focus on vulnerable groups that would otherwise not be reached?
  
- **Effectiveness**
  - Did the allocation of funds to NGOs lead to a more effective response?
  - Did NGOs integrate aspects of effective programming, including with regard to gender, GBV, people with disabilities, protection (i.e., the ERC's strategic steers) and accountability to affected people?
  
- **Impact**
  - Did the allocation help to strengthen humanitarian leadership, coordination, and a strategic, life-saving response to humanitarian needs?
  - Has the allocation led to co-benefits such as improved access, better relations with partners or as a catalyst to raise more funding (for the overall response or individual NGOs)?
  - How has the allocation shaped relationships at country level, including between the UN and NGO community?

## **Methodology**

**The review will be conducted remotely and will include a desk review, interviews at headquarters level and a small number of case studies, the number of which will be determined during the inception phase.** At the end of each virtual country visit, the reviewer should offer the country team a debrief meeting, to present, discuss and validate the main findings, conclusions and recommendations from each case study country. Stakeholders to be interviewed include: OCHA (including CERF), IOM and NGO staff involved in the allocation at headquarters and in country offices; RC/HCs; cluster coordinators, protection and gender advisors and others involved in the selection committees for this allocation; and others. The reviewer will have access to all documents related to the allocation including the anonymized raw data of the survey.

## **Governance**

**The review is commissioned by the CERF secretariat which also manages the review and will sign off on any final deliverables.**

## Deliverables

**The reviewer will be responsible for the following deliverables.**

- Inception report
  - A short (5 to 10-page) inception report will present the review framework, including changes to the review questions or additional questions and the methodology to answer them, and a proposed workplan including a list of planned interviewees.
- Review report
  - The main deliverable, the review report (20 pages) provides answers to the review questions and a small number (around 5) of concrete, realistic recommendations for a possible future NGO allocation. Recommendations must logically follow from the findings and conclusions of the review
- Presentation
  - A presentation (both a slide deck and a meeting) to present the main findings and recommendations of the review
- Summary
  - A 1 or 2-page summary of the review report to present the main findings and recommendations at the strategic level senior management decision-making. The summary should be visually appealing so that it can be shared with any stakeholders interested in the review

## Required Skills

- Proven ability to conduct in-depth research on humanitarian action.
- Ability to formulate advice and guidance on humanitarian programming.
- Strong writing skills, including ability to communicate technical information to non-expert audience.

## Qualifications & Experience Required

- Academic Qualifications: Advanced university degree (Master's degree or equivalent) in international affairs, international development, development economic, public policy or related field. A first-level university degree in combination with qualifying experience may be accepted in lieu of the advanced university degree.
- Work experience: A minimum of seven years of progressively responsible experience in gender in humanitarian action and/or international development is required. Experience drafting evaluation report and/or guidance is required. Knowledge of humanitarian pooled funds is desirable.
- Language: Fluency in English is a requirement. Knowledge of other official UN languages is considered a significant advantage.

## Duration

Up to 40 working days over a four-month period.

## Selection criteria

- Extent and relevance of work experience
- Extent and relevance of experience in evaluation and guidance development
- Demonstrated understanding of the role of UN agencies and NGOs in humanitarian programming
- Experience in humanitarian financing

## Annex 3. Review matrix

Primary question	Sub-questions	Sources of evidence
<b>Relevance</b> ( <i>Fragmentation and reduced strategic impact</i> )		
How did the allocation make a difference at country level?	<ul style="list-style-type: none"> <li>○ Did the NGO allocation address a particular gap in the availability of funding at country level?</li> <li>○ What did the allocation allow NGOs to do that they could not have otherwise done?</li> <li>○ What were the major outputs reported by partners?</li> </ul>	<ul style="list-style-type: none"> <li>○ Analysis of priorities and funding requirements within funding appeals</li> <li>○ Analysis of funding against appeal requirements, CERF and CBPF allocations</li> <li>○ KIIs</li> <li>○ Review of NGO proposals and interim reports</li> </ul>
Were the parameters used for the allocation the right measures to better meet humanitarian needs?	<ul style="list-style-type: none"> <li>○ Did the sectors selected correspond with priority funding gaps?</li> <li>○ Were the organisations selected those best placed to deliver?</li> <li>○ Were the right number of partners selected?</li> <li>○ Were project sizes appropriate?</li> </ul>	<ul style="list-style-type: none"> <li>○ KIIs</li> <li>○ Review of NGO proposals and interim reports</li> <li>○ Review of HNOs / appeal documents</li> </ul>
What specific benefits could an NGO allocation add to CERF's toolbox?	<ul style="list-style-type: none"> <li>○ What are the advantages of an NGO allocation compared with channelling funds through UN agencies in a regular CERF allocation?</li> <li>○ What are the potential downsides or risks of an NGO allocation?</li> <li>○ What factors in the wider funding landscape influence the relevance of an NGO allocation?</li> </ul>	<ul style="list-style-type: none"> <li>○ KIIs</li> <li>○ Analysis of and comparison with CERF reporting on pass-through funding to NGOs</li> <li>○ Analysis of FTS and appeal funding data, CERF and CBPF allocations</li> </ul>
Has the allocation improved the response?		<ul style="list-style-type: none"> <li>○ KIIs</li> </ul>
<b>Efficiency</b> ( <i>Partner engagement and disbursement speed; oversight processes; increased process related transaction costs</i> )		

Was the allocation process, both at headquarters and country level – by both OCHA and IOM - conducted efficiently?	<ul style="list-style-type: none"> <li>○ Were there any delays that could have been avoided?</li> <li>○ Was the workload associated with the allocation process considered reasonable?</li> </ul>	<ul style="list-style-type: none"> <li>○ KIIs</li> <li>○ Survey findings</li> <li>○ Analysis and comparison with RR and UFE allocation timeline data</li> </ul>
Was clear guidance provided by CERF and IOM and were roles and responsibilities clearly assigned?	<ul style="list-style-type: none"> <li>○ Was the issuance of guidance sufficiently timely to allow NGOs to develop their responses?</li> </ul>	<ul style="list-style-type: none"> <li>○ KIIs</li> <li>○ Survey findings</li> <li>○ Review of allocation guidance documents</li> <li>○ Review of minutes of allocation process meetings</li> <li>○ Compilation of lessons</li> </ul>
Was the selection of NGOs appropriate and transparent?	<ul style="list-style-type: none"> <li>○ How were the criteria to select NGOs developed and what factors were taken into account?</li> <li>○ Were these criteria shared transparently?</li> <li>○ Was the selection process efficient and transparent?</li> </ul>	<ul style="list-style-type: none"> <li>○ KIIs</li> <li>○ Review of minutes of NGO selection processes</li> <li>○ Survey findings</li> </ul>
Was complementarity with CBPF allocations ensured in the relevant countries?	<ul style="list-style-type: none"> <li>○ At what stages was the CBPF consulted?</li> <li>○ How were CBPF allocations taken into account?</li> <li>○ What potential synergies or duplications were there?</li> </ul>	<ul style="list-style-type: none"> <li>○ KIIs</li> <li>○ Survey findings</li> <li>○ Compilation of lessons</li> <li>○ Analysis of funding against appeal requirements</li> </ul>
Did the agreements with NGOs meet timeliness and flexibility requirements?	<ul style="list-style-type: none"> <li>○ Were the contracting and disbursement processes sufficiently timely?</li> <li>○ Were contractual and reporting requirements sufficiently flexible?</li> </ul>	<ul style="list-style-type: none"> <li>○ KIIs</li> <li>○ Survey findings</li> </ul>
<b>Effectiveness</b>		
Did the allocation of funds to NGOs lead to a more effective response?		<ul style="list-style-type: none"> <li>○ Review of NGO proposals and interim reports</li> <li>○ KIIs at country level</li> </ul>

Did the allocation enable types of programming and/or coverage of geographic areas not otherwise funded?		<ul style="list-style-type: none"> <li>○ Review of allocation guidance documents</li> <li>○ Review of minutes of allocation process meetings</li> <li>○ Review of NGO proposals and interim reports</li> <li>○ KIIs</li> </ul>
Have NGOs used CERF funding to focus on vulnerable groups (including women and girls, children, and people with disabilities) that would otherwise not be reached?		<ul style="list-style-type: none"> <li>○ Review of NGO proposals and interim reports</li> <li>○ KIIs at country level</li> <li>○ Analysis of funding against appeal requirements</li> <li>○ Review of minutes of allocation process meetings</li> </ul>
Did NGOs integrate aspects of effective programming, including with regard to gender, GBV, people with disabilities, protection (i.e., the ERC's strategic steers) and accountability to affected people?		<ul style="list-style-type: none"> <li>○ Funding recipient proposals and interim reports</li> <li>○ Review of guidance documents</li> <li>○ KIIs</li> </ul>
<b>Impact</b> ( <i>fragmentation and reduced strategic impact</i> )		
Did the allocation help to strengthen humanitarian leadership, coordination, and a strategic, life-saving response to humanitarian needs?		<ul style="list-style-type: none"> <li>○ KIIs at country level</li> </ul>
Has the allocation led to co-benefits such as improved access, better relations with partners or as a catalyst to raise more funding (for the overall response or individual NGOs)?		<ul style="list-style-type: none"> <li>○ KIIs at country level</li> </ul>

How has the allocation shaped relationships at country level, including between the UN and NGO community?		○ KIIs at country level
Do you think that the impact of the NGO allocation was ultimately worth the investment?		○ KIIs at global and country level

## Annex 4. Allocation summary

Country	NGO	NGO Type	Sector(s)	Amount
<b>Bangladesh</b>	Friendship	NNGO	Health	\$ 840,128
<b>Bangladesh</b>	Save the Children	INGO	Health, WASH	\$ 845,000
<b>Bangladesh</b>	BRAC	NNGO	WASH	\$ 544,027
<b>Bangladesh</b>	World Vision	INGO	WASH	\$ 645,000
<b>Bangladesh</b>	Reaching People in Need (RPN)	NNGO	WASH	\$ 126,200
<b>CAR</b>	The Alliance for International Medical Action (ALIMA)	INGO	Health	\$ 700,000
<b>CAR</b>	International Medical Corps UK (IMC)	INGO	Health	\$ 2,000,000
<b>CAR</b>	International Rescue Committee (IRC)	INGO	Health, WASH, SGBV, Child Protection	\$ 1,499,999
<b>CAR</b>	Medecins d'Afrique (MDA)	INGO	Health	\$ 800,001
<b>Haiti</b>	Humanity and Inclusion	INGO	Health, WASH	\$ 800,000
<b>Haiti</b>	Solidarités International	INGO	Health, WASH	\$ 1,200,000
<b>Haiti</b>	Habitat for Humanity	INGO	Health, WASH	\$ 850,001
<b>Haiti</b>	Centres de développement et la Santé	NNGO	Health, WASH	\$ 400,000
<b>Haiti</b>	PROFAMIL	NNGO	Health, WASH	\$ 750,284
<b>Libya</b>	Danish Refugee Council	INGO	Health	\$ 1,400,000
<b>Libya</b>	Grupo di Volontariato Civile (GVC)	INGO	Health	\$ 800,000
<b>Libya</b>	Emdad	NNGO	Health	\$ 500,000
<b>Libya</b>	Terres des Hommes (TdH)	INGO	WASH	\$ 300,000
<b>South Sudan</b>	Medair	INGO	Health, WASH	\$ 1,762,583
<b>South Sudan</b>	International Rescue Committee (IRC)	INGO	Health, WASH	\$ 874,999
<b>South Sudan</b>	United Networks for Health (UNH)	NNGO	Health, WASH	\$ 1,125,000
<b>South Sudan</b>	Norwegian Refugee Council	INGO	WASH	\$ 1,124,949
<b>Sudan</b>	Mercy Corps	INGO	Health, WASH	\$ 700,000

<b>Sudan</b>	Plan International	INGO	Health, WASH	\$	500,000
<b>Sudan</b>	GAH	NNGO	Health, WASH	\$	400,000
<b>Sudan</b>	Save the Children	INGO	Health, WASH	\$	1,400,000