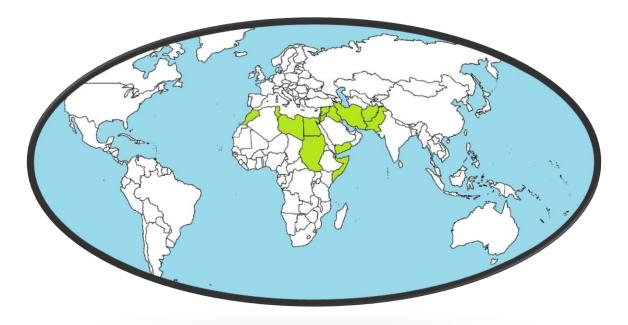
RESEARCH SYNTHESIS OF OIG FINDINGS AND GLOBAL FUND EVALUATIONS IN

Eastern Mediterranean Region Constituency of the Global Fund

FINAL REPORT

Dr. Seyed Ramin Radfar May 24, 2016



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Contractee:

UNDP, Iran on behalf of EMRC Board Member Office

Individual Contractor:

Dr.Seyed Ramin Radfar , MD,MPH, NIDA-ANRS Drug Abuse and HIV Research Fellowship

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Executive Summary

Eastern Mediterranean Region Constituency of The Global Fund (EMRC) are countries located in both Middle East and North Africa including 15 countries.

Afghanistan, Djibouti, Morocco, Iran, Iraq, Libya (Benghazi and Tripoli), Pakistan, Somalia, Sudan, Syria, Tunisia, Palestine, Egypt, Jordan and Yemen are the members of EMRC.

The purpose of this consultancy was to do a desk review of available OIG's audit reports for THE GLOBAL FUND projects in the Eastern Mediterranean Region and compiling recommendations to CCMs and other partners for preventing fraud and corruption in health programs.

Available reports firstly read without coding and for the second time reports has been reviewed and coded by thematic approaches using Atlas.ti.6 software, the codes in first review extracted freely by "Code in Vivo" method that use the same selected words in the text exactly as code, then these codes has been reviewed again and categorized by open coding method and merged to each other.

Based on the analysis of the OIG reports from the EMRC countries plus Panama, Bangladesh and Guyana, the main problems found by OIG during audit or investigation can be categorized in six main domains, including Contract issues, Service quality, Staff recruiting issues, Payment issues and Warehousing and maintenance issues.

Recommendations for EMRC countries without considering their importance are:

- 1. It is very important to know that the GF has zero tolerance for fraud, so CCMs and other GLOBAL FUND bodies in country should have in mind the possibility of fraud and mismanagement and wasting resources and inform the OIG office as soon as possible, there are many ways to anonymously inform allegedly fraud and misspending cases to OIG that are shown in the Global Fund website. 1
- 2. All of the contracts in domain of GF activities must be prepared based on precise and transparent TOR, competitive bidding and completely fare selection process, have nested a clear monitoring and evaluation process within the contract, and, it is recommended that possible outcome evaluation indexes calculate for all of the contracts.
- 3. The countries have to use certain limitation for outsourcing the projects to an institute/company/person and must be sure that all of the materials needed for GF projects will be purchased at the lowest fare price.
- 4. Projects including services for patients (i.e. Opioid Substitution Therapy, VCT) must be provided based on the last updated version of WHO/UNAIDS/UNODC manuals and with

¹ http://www.theglobalfund.org/en/oig/reportfraudabuse/ FINAL REPORT of SY OIG FINDINGS IN THE EMRC

- complete commitment to confidentiality and privacy rules according to the declaration of Helsinki ethics committee and other internationally accepted ethical codes.
- 5. To reduce overhead costs, the countries have to try to recruit minimum staff that is needed for GF projects, moreover, these staffs must be selected by a competitive and transparent process and have to be in maximum competence and efficacy, on the other hand, capacity building activities for service providers should be emphasized, it is also recommended that CCM and other GF bodies should try to provide integrated services for TB and HIV patients to increase access and use of the services.
- 6. All of the payments in GF projects must have clear supporting documents, paid after finalizing the project or based on deliverable outputs according to the TOR, and, via bank transactions except of the amounts below the agreed threshold or in necessary situation with reasonable causes, it is very important that supporting documents for payments must be completely and clearly traceable with valid address, phone number, etc.
- 7. Drugs and the other goods prepared by GF projects must have common logistic and transportation and maintenance mechanisms, must keep in acceptable standard condition in all of the stages starting from preparing and shipping phase till delivering to the final target group, entering and giving out drugs and goods to and from the warehouses should be conduct with accurate and documented process with appropriated and up to dated software.
- 8. Correspondence with OIG/GFATM secretariat must be on time and accurate.

ملخص تنفيذي

إقليم شرق المتوسط الدائرة من الصندوق العالمي (EMRC) هي دولة تقع في كل من الشرق الأوسط وشمال أفريقيا ما في ذلك ١٥ بلدا.

أفغانستان، جيبوتي، المغرب، إيران، العراق، ليبيا (بنغازي وطرابلس(، باكستان، الصومال، السودان، سوريا، تونس، فلسطين، مصر، الأردن واليمن هم أعضاء EMRC وكان الغرض من هذه الاستشارة إلى القيام بمراجعة مكتب التقارير المتاحة مكتب المفتش العام التدقيق للمشاريع الصندوق العالمي في إقليم شرق المتوسط وتجميع التوصيات إلى آليات التنسيق والشركاء الآخرين لمنع الغش والفساد في البرامج الصحية. وقد استعرضت التقارير المتاحة قراءة أولا دون الترميز وللتقارير زمنية ثانية وترميز بنهج الموضوعية باستخدام برامج Atlas.ti.6 ، رموز في أول استعراض استخراج بحرية "مدونة في فيفو" الطريقة التي تستخدم الكلمات المحددة نفسها في النص تماما كما الرمز، ثم تم استعراض هذه الرموز مرة أخرى وتصنيفها من قبل فتح طريقة الترميز واندمجت مع بعضها البعض.

وبناء على تحليل التقارير مكتب المفتش العام من الدول EMRC بالاضافة الى بنما وبنغلاديش وغيانا، والمشاكل الرئيسية التي صادفها مكتب المفتش العام خلال التدقيق أو التحقيق يمكن تصنيفها في ستة مجالات رئيسية، بما في ذلك قضايا العقود، جودة الخدمة، موظفين قضايا التوظيف وقضايا الدفع وقضايا التخزين والصانة.

توصيات للبلدان EMRC دون النظر أهميتها هي:

- ١. من المهم جدا أن نعرف أن الصندوق العالمي له عدم التسامح مطلقا بتهمة الاحتيال، لذلك آليات التنسيق وغيرها من الهيئات الصندوق العالمي في البلاد يجب أن يكون في الاعتبار إمكانية الاحتيال وسوء الإدارة وهدر الموارد وإبلاغ مكتب مكتب المفتش العام في أقرب وقت ممكن، هناك العديد من الطرق لإبلاغ مجهول يزعم الاحتيال والتبديد القضايا إلى مكتب المفتش العام التي يتم عرضها في الموقع الإلكتروني للصندوق العالمي.
- ٢. كل من العقود في مجال أنشطة الصندوق العالمي يجب أن يكون مستعدا على أساس الأجل دقيقا وشفافا من المنشأ، عطاءات تنافسية وعملية اختيار الأجرة تماما، فقد عشش رصدا واضحا وعملية التقييم في العقد، و، فمن المستحسن أن مؤشرات تقييم النتائج المحتملة حساب لجميع العقود.
- ٣. لها البلدان إلى استخدام بعض القيود عن الاستعانة مصادر خارجية لمشاريع لمعهد / شركة / شخص ويجب أن تكون على يقين من أن جميع المواد اللازمة للمشاريع الصندوق العالمي سيتم شراؤها في أدنى سعر أجرة.

- ع. يجب توفير المشاريع بما في ذلك خدمات للمرضى (OST, VCT,...)استنادا إلى إصدار آخر تحديث أدلة منظمة الصحة العالمية /برنامج الأمم المتحدة المشترك /المكتب ومع الالتزام الكامل بالسرية والخصوصية قواعد وفقا لإعلان لجنة الأخلاق هلسنكي وغيرها المقبولة دوليا رموز الأخلاقية.
- ٥. للحد من التكاليف العامة، يتعين على البلدان في محاولة لتجنيد الحد الأدنى من الموظفين أن هناك حاجة لمشاريع الصندوق العالمي، علاوة على ذلك، يجب أن يتم اختيار هؤلاء الموظفين من خلال عملية تنافسية وشفافة، ويجب أن تكون في أقصى كفاءة وفعالية، من ناحية أخرى، وينبغي التأكيد على أنشطة بناء القدرات لمقدمي الخدمة، فمن المستحسن أيضا أن CCM والهيئات الصندوق العالمي أخرى يجب أن تحاول توفير الخدمات المتكاملة لمكافحة السل وفيروس نقص المناعة البشرية المرضى لزيادة الوصول واستخدام الخدمات.
- آ. يجب أن يكون كل من الدفعات في مشاريع الصندوق العالمي الوثائق الداعمة واضحة، تدفع بعد وضع اللمسات الأخيرة على المشروع أو على أساس مخرجات إنجازها وفقا للشروط المرجعية، و، عن طريق المعاملات المصرفية باستثناء المبالغ تحت عتبة متفق عليه أو في حالة الضرورة مع أسباب معقولة، من المهم جدا أن المستندات المؤيدة للمدفوعات يجب أن يكون تماما ويمكن عزوها بوضوح مع عنوان صالح، رقم الهاتف، الخ.
- ٧. المخدرات وغيرها من السلع مشاريع الصندوق العالمي أعد يجب أن يكون لوجستية مشتركة وآليات النقل والصيانة، يجب أن تبقي في حالة القياسية مقبولة في جميع المراحل بدءا من إعداد والشحن المرحلة حتى تسليم إلى المجموعة المستهدفة النهائية، والدخول وإعطاء الأدوية والبضائع من وإلى المخازن يجب أن يكون السلوك مع عملية دقيقة وموثقة مع خصصت وحتى البرامج مؤرخة.
 - يجب أن تكون المراسلات مع مكتب المفتش العام أمانة / الصندوق العالمي في الوقت المناسب ودقيقة. $^{\wedge}$

Introduction:

Eastern Mediterranean Region Constituency of The Global Fund (EMRC) are countries located in both Middle East and North Africa including 15 countries, who are current or potential recipients of GF grants

Afghanistan, Djibouti, Egypt, Iran, Iraq, Jordan, Libya (Benghazi and Tripoli), Morocco, Pakistan, Palestine, Somalia, Sudan, Syria, Tunisia, and Yemen are the members of EMRC.

The Office of the Inspector General (OIG) safeguards the assets, investments, reputation and sustainability of the Global Fund by ensuring that it takes the right action to accelerate the end of AIDS, tuberculosis and malaria.

The purpose of this consultancy is to do a desk review of available OIG's audit reports for THE GLOBAL FUND projects in the Eastern Mediterranean Region and compiling recommendations to CCMs and other partners for preventing fraud and corruption in health programs.

According to the OIG website there are reports of OIG available for some of these countries, including Republic of Yemen, Republic of Djibouti, Arab Republic of Egypt, Republic of Sudan and Islamic Republic of Pakistan. Table 1 shows that countries and numbers of OIG reports that are available for each country in the EMRC region. OIG reports in different countries prepared differently, in some countries focuses were on special disease programs such as tuberculosis and AIDS grants, and in some other countries had wider scope as whole mechanisms of processes in the whole programs.

Figures 1 & 2 shows the countries that are member of EMRC and the countries that OIG reports for them are available.

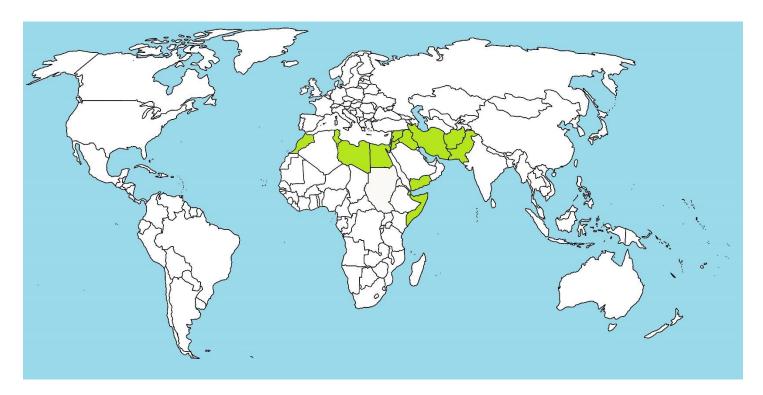


Figure 1: EMRC countries highlighted with green

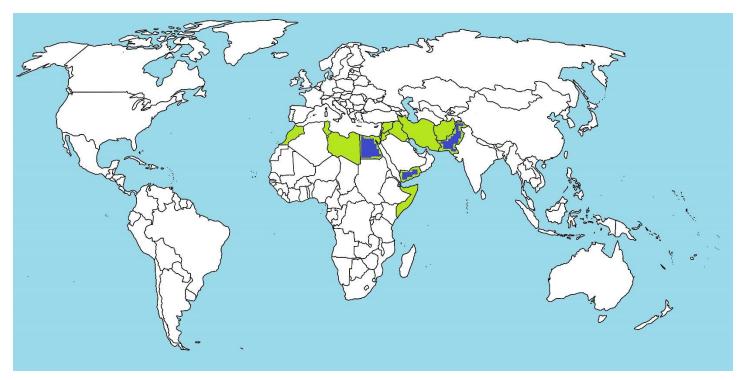


Figure 2:EMRC countries with available OIG reports highlighted with blue color

Considering the facts that central governance, cultural issues, average income and epidemic status in these countries are very different and OIG reports are not available for all of these countries, finding effective and to the point recommendations for promotion of the activities in these contents could be a little problematic but the consultant do his best to categorize the problems and prepare practical recommendations.

Table 1: OIG reports details in brief					
No	Country	Date Publis hed	Report No	Categories	
1.	Afghanis tan				
2.	Djibouti	2012	GF-OIG-10-015-I	 Ineligible Expenditures Identified by OIG , Ineligible SR Expenditures (External Audit) Ineligible Expenditures (LFA Special Verification Reviews and PUDRs) Budget overspend (LFA Special Verification Review) Overdraft charges 	HIV Round 4 HIV Round 6 Malaria Round 6 TB Round 6 CCM Funding
3.	Djibouti	2012	GF-OIG-10-015-A		
4.	Egypt	2015	GF-15-015	Collusion /Fraud Non-compliance with Grant agreements	National AIDS program
5.	Iran				
6.	Iraq				
7.	Jordan				
8.	Libya				
9.	Morocco				
10.	Pakistan	2015	GF-15-014		
11.	Palestine				
12.	Somalia				
13.	Republic of Sudan	2015	GF-OIG-15-009		
14.	Syria				
15.	Tunisia				
16.	Yemen	2015	GF-OIG-15-001	Corruption/ Inappropriate gratuities, Fraud/Misrepresentation of Information collusion, Mismanagement issues/Waste and abuse, Non-compliance with law/Grant agreements	National tuberculosis program

Methodology

The available reports that has been reviewed for preparing this report are listed in table 1, the reports were firstly read without coding and for the second time reports have been reviewed and coded by thematic approaches using Atlas.ti.6 software, the codes in first review extracted freely by "Code in Vivo" method that use the same selected words in the text exactly as code, then these codes has been reviewed again and categorized by open coding method and merged to each other.

Extra to the reports of OIG for the countries in EMRC region the following reports also has been reviewed by consultant:

- Charter of the Office of the Inspector General (Amended 07 March 2014)
- Office of the Inspector General 2015 Annual Opinion on Governance, Risk Management and Internal Controls of the Global Fund (published April 2016)
- 2015 Progress Update on Status of Agreed Management Actions
- Preventing and detecting possible misuse of funds available at:
 <u>http://www.theqlobalfund.org/documents/corporate/risk_management/Corporate_ActionsTakenToPreventAndDetectMisuseOfFunds_Report_en/</u>
- Investigation Report The Global Fund Grants to Panama Supplier fraud in HIV grant
- Investigation Report The Global Fund Grants to Bangladesh National Tuberculosis Control Program
- Investigation Report The Global Fund Grants to Guyana Ministry of Health

The executive summaries for OIG reports for countries Panama, Bangladesh and Guyana has been reviewed and different codes and issue than EMRC countries (if there were) extracted, on the other hands OIG general reports have been read but not coded and only recommendations were adapted.

In the next step based on the main problems that were noted by OIG in different countries a Likert questionnaire with 28 propositions was designed and circulated between delegates of the EMRC's countries in both English and Arabic language to obtain their opinions regarding the extracted problems. Unfortunately after two times of sending emails and links of the questionnaires ,we did not get even one filled online questionnaire from neither the delegates that were direct recipients of the Email and nor CCM members which delegates were asked to circulate the email among.

Findings

There is an estimation that 1.9% of the GLOBAL FUND budget spent for the costs that were subject to farud and misspending, nevertheless the GLOBAL FUND has a zero tolerance to misuse of the funds in any size in anywhere. The OIG analyzed possible operational risks for THE GLOBAL FUND funds in four main domains and 19 subdomains that were shown in Figure 3.

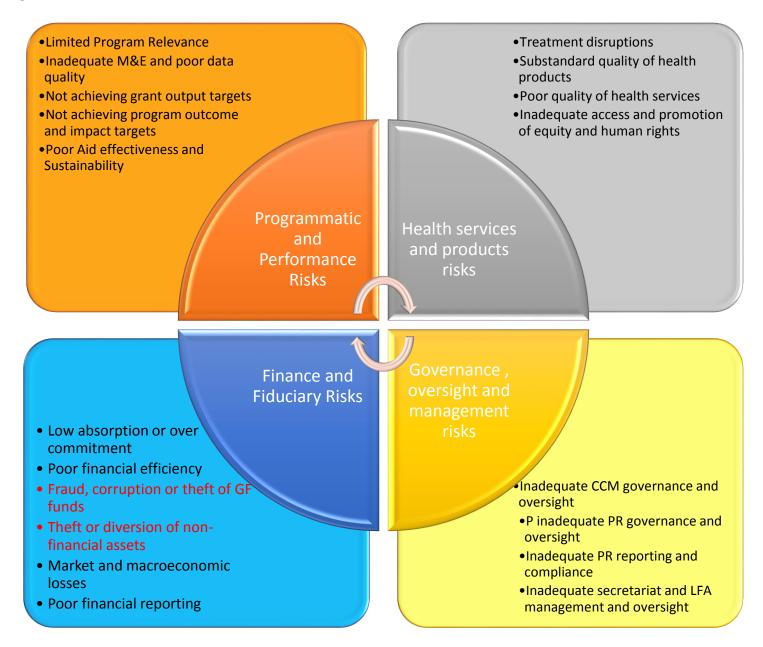


Figure 3: Operational Risks (contents of the figure has been adapted from Prevention and detecting possible misuse of funds

Among these subdomains, two of them in the domain of finance and fiduciary risks are directly subjects of fraud, these are:

• Fraud, corruption or theft of THE GLOBAL FUND funds

Theft or diversion of non-financial assets

Other risks also routinely will be checked by OIG during inspection.

OIG also designed a measure to evaluate External Risk Index (ERI) for countries receiving fund from THE GLOBAL FUND, figure 4 shows EMRC countries situation based on the ERI.

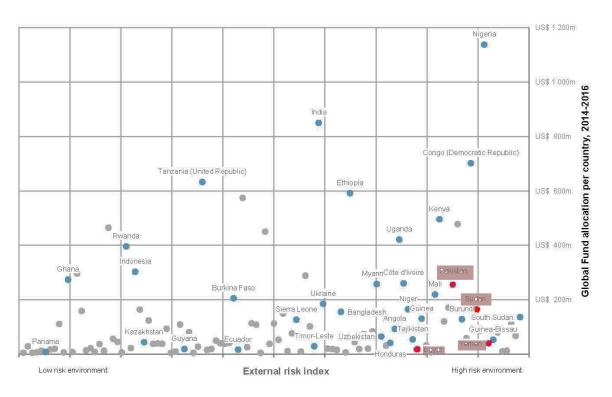


Figure 4: Countries position based on ERI and received fund Opinion on Governance, EMRC countries highlighted by red, Risk Management and Internal Controls of the Global Fund (figure modified from office of the Inspector General 2015 Annual, page 4)

ERI score categorize countries to four groups from as very high risk, high risk, medium risk and lower risk, table 2 shows situation of the EMRC countries according to the calculated ERI("Applying Risk Differentiation," 2014).

Table 2: Classification of EMRC countries as per the External Risk Index in 2014		
Very high	Afghanistan, Iraq, Libya, Palestine/Gaza, Somalia, Sudan, Syria, Yemen	
High	Iran, Pakistan, Egypt	
Medium	Djibouti	
Low	Jordan, Morocco, Tunisia	

It is very important for the GF authorities in EMRC countries that considering their situation based on ERI index, supervise the GF activities precisely.

Based on the analysis of the OIG reports from the EMRC countries plus Panama, Bangladesh, and Guyana, the main problems found by OIG during audit or investigation can be categorized in six main domains, including:

1. Contract issues:

The contract process had problems and increased probability for further misspending, the issues were:

- 1.1.Obscure and not clear TOR that resulted confusion in deliverable materials /output, or even the contract had no clear implementation plan and the implementation of the activities under the contracts was not monitored.
- 1.2.Serious issues in process of bidding and winner selection such as false competitors, leak of information in favor of some certain contractors, etc., have been identified in some countries in EMRC region.
- 1.3.Lack in designing and prevision feasible and accurate monitoring and evaluation mechanism for the activities was another problem that were found in contracts and outsourcing of the GLOBAL FUND projects.
- 1.4. Recruiting services and /or buying the needed material with prices higher than usual in some countries were identified.

2. Service quality:

Obviously, THE GLOBAL FUND secretariat want best service quality for patients/target group undergoing THE GLOBAL FUND services in different countries, according to the analysis the quality of service were compromised due to different reasons:

2.1.Disregarding confidentiality / privacy and ethical codes for the patients taking services from THE GLOBAL FUND projects was an issue that found in at least one of the EMRC countries:

"The OIG audit noted that services provided to HIV positive potential patients or patients including counseling, routine checkups, Follow-up and data storage at 5 out of the 6 ART centers visited were done in one room, compromising the confidentiality of the People Living with HIV/AIDS and their families. This practice may discourage HIV positive potential patients or patients from accessing services at the ART centers. ("Audit of Global Fund Grants to the Islamic Republic of Pakistan," 2015)"

2.2. Using out of dated or not up to dated manuals and guidelines for delivering services were another issue that affect quality of services. The issue especially were noted about OST and VCT services.

2.3. Providing services in a manner that reduce coverage of the services were another problem. Integrated services for clients is one of the strategies that can increase both availability and use of services for the target group, unfortunately this integration of the services even for TB/HIV patients that have many common issues and overlapped needs in services were not seen in some locations.

3. Staff recruiting issues;

The GLOBAL FUND projects need local and/or international staffs to deliver services in all level, there were issues regarding staffs such as:

- 3.1.recruiting staff much more than really needed,
- 3.2. avoiding competitive and transparent process for staff recruitments and /or
- 3.3. hiring staffs with not qualified skills, knowledge and abilities
- 3.4. Rapid staff turnover was another issue that were noted

4. Payment issues:

- 4.1. Absence or deficiency in supporting documents in the payment process were one of the most common issues:
 - "USD 5.4 million of expenditures did not have sufficient or any documentation to support the expenditures.("Investigation of Global Fund grants to the Republic of Djibouti," 2012)"
- 4.2.Advance payment and cash payment were other issues that were noted by OIG inspectors.
 - "....A further USD 1.7 million of unsupported transactions was identified in the form of unreconciled cash advances....("Audit of Global Fund Grants to the Islamic Republic of Pakistan," 2015)"
- 4.3.Untraceable/fake and factious invoices were the other issues that were reported, in many documents different factors from different companies had same contact number or false and non-reachable addresses.

5. Warehousing and maintenance issues:

Drugs and goods that prepared by THE GLOBAL FUND projects, especially drugs are expensive and sensitive to the conditions of maintenance, unfortunately many issues were found during inspections, the most important were:

5.1. Keeping drugs in non-standard situation and warehouses with high temperature without acceptable temperature:

"Temperatures at four of the warehouses visited were not properly monitored. In certain instances, the temperature monitoring sheet showed temperature reaching close to 30 degrees Celsius during the summer months even though the commodities should be stored in a temperature not exceeding 25 degree Celsius("Audit of Global Fund Grants to the Islamic Republic of Pakistan," 2015)"

"Despite the notable progress made by ******** in the development of a Quality Assurance policy, the implementation of this policy in terms of drug quality risk management was not effective. Despite being delayed at the customs warehouse for around six months (June to November 2014) in poor storage conditions, the most recent consignment of commodities of HIV and malaria drugs (valued at USD 1.98 million) were not treated as "suspect products" and were distributed without performing quality testing ("Audit of Global Fund Grants to the Republic of the Sudan," 2015)"

- 5.2. Warehouses have to an accurate system and software to register and document any entry and exit to and from the ware house, in some occasions even the expiry date of the drugs were not registered and US\$ hundreds thousands of drugs had been destroyed.
- 5.3. Maintenance, transportation and logistics costs can be easily reduced by merging similar parties such as drug for HIV and drugs for Malaria and or TB, The OIG noted that there are different and parallel mechanisms for maintenance and transportation of drugs for different diseases that increase the costs.

6. Other issues

6.1. During inspection in some countries the OIG noted that basic or minimum capacities such as internal financial control framework, comprehensive policies and procedures, adequate budget monitoring mechanisms (for example budget-variance analysis,

forecasting of expenditures) and ability for monitoring of sub recipients, an electronic financial information system, including financial accounting software in some countries are not available and needed that capacity building activities shall be implemented effectively, immediately.

6.2. Lack in planning with SMART objectives were another issues that in some countries observed and assigned as subject of promotion.

Although, all of the countries have to try to reduce international budget and make the activities sustainable with their own national budget and also the GF budgets in EMRC countries compared to the national budgets might not be high, but obviously this support for some important activities is very crucial and critical.

Fraud, miss pending and corruption in any form can be a serious problem for country in gathering international funds, so it is very important that governmental authorities as well as the GF bodies in each country make their full attention and efforts to detect possible issues, investigate and design systems to prevent illegal /unaccepted costs.

Moreover according to the Transparency International, situation of the EMRC countries regarding corruption is not a desired situation as most of the countries in EMRC group², so that importance of a mechanism to prevent such issues is more prominent.

² According to the Transparency International in 2015, in 167 country ranked from very clean (started from 1st as the most clean economy) to highly corrupt economy, unfortunately 8 of 15 countries in EMRC are in 151st -167th, two between 101st and 150th, and 4 are between 75th and 100th, only one country is in ranking below 5o.(more information available at: http://www.transparency.org/cpi2015)

Recommendations:

There are some recommendations for EMRC countries that without considering their importance are:

- 1. It is very important to know that the GF has zero tolerance for fraud, so CCMs and other GLOBAL FUND bodies in country should have possibility of fraud and mismanagement and wasting resources in their mind and inform the OIG office as soon as possible, there are many ways to anonymously inform allegedly fraud and misspending cases to OIG that are shown in the Global Fund website. ³
- 2. All of the contracts in domain of GF activities must be prepared based on precise and transparent TOR
- 3. All of the contracts in domain of GF activities must be processed by transparent and competitive bidding process and selection of the winners should be completely fare.
- 4. All of the contracts in domain of GF activities must have a clear monitoring and evaluation process with them, meaning the M&E process should be parallel to the implementation of the projects.
- 5. To have a better and clear M&E process, it is recommended that possible outcome evaluation indexes calculate for all of the contracts.
- 6. Outsourcing the services should be in a competitive basis and transparent process.
- 7. The countries has to use certain limitation for outsourcing the projects to an institute/company/person
- 8. The CCM, PR, SR and SSR must be sure that all of the materials needed for GF projects will be purchased at the lowest and fare price.
- 9. CCM and other GF bodies should try to provide integrated services for TB and HIV patients to increase access and use of the services
- 10. Confidentiality and privacy of the patients must be respected in all of the GF projects in all level of the services.
- 11. Projects including services for patients (i.e. Opioid Substitution Therapy, VCT) must be provided based on the last updated version of WHO/UNAIDS/UNODC manuals
- 12. Countries have to try to recruit minimum staff that is needed for GF projects.
- 13.Staffs recruited for GFAM projects in level of PR, SR and SSR must be selected by a competitive and transparent process.
- 14.Staffs recruited for GFAM projects in all level must be in maximum competence and efficacy
- 15. Correspondence with OIG/GFATM secretariat must be on time and accurate.

³ http://www.theglobalfund.org/en/oig/reportfraudabuse/ FINAL REPORT of SY OIG FINDINGS IN THE EMRC

- 16. The research /intervention projects funded by GFATM must follow known and internationally accepted ethical codes such as declaration of Helsinki ethics committee
- 17. All of the payments in GF projects must have clear supporting documents.
- 18.All of the payments in GF projects must be after finalizing the project or based on deliverable outputs according to the TOR.
- 19.All of the payments in GF projects must be via bank transactions except of the amounts below the agreed threshold or in necessary situation with reasonable causes.
- 20. Supporting documents for payments must be completely and clearly traceable with valid address, phone number, etc.
- 21.Drugs and the other goods prepared by GF projects must be keep in acceptable standard condition in all of the stages starting from preparing and shipping phase till delivering to the final target group.
- 22.A transparent and accurate process for entering and giving out drugs and goods to and from the ware houses should be in place in all level.
- 23. Similar materials prepare by the GF projects (i.e. drugs for TB, Malaria and HIV) should have common logistic and transportation and maintenance mechanisms to reduce maintenance costs.
- 24. Appropriated and up to dated software must be available and in use for maintenance process in ware houses
- 25. Capacity building for service providers in domain of the GF activities should be emphasized.

Abbreviations:

CCM	Country Coordination Mechanism
EMRC	Eastern Mediterranean Region Constituency of The Global Fund
ERI	External Risk Index
GF	Global Fund
LFA	Local Fund Agent
OIG	Office of Inspector General
OST	Opioid Substitution Therapy
PR	Principal Recipient
PUDR	Progress Update and Disbursement Request
SR	Sub Recipient
SSR	Sub-Sub Recipient
TOR	Term Of Reference
VCT	Voluntary Counseling and Testing