

## Evaluation of Programmatic Approaches in the GEF

### AUDIT TRAIL

#### Stakeholder comments on the draft approach paper circulated in January 2016

11 March, 2016

From	Comment	Response and Action Taken
UNEP Evaluation Office	The Approach Paper clearly describes the history of GEF programmatic approach but for clarity, it could be good to also specify what the programmatic approach is, list the programmes and describe how the programmatic approach differs from other GEF funding modalities.	The history section describes the various GEF interpretations and definition of the programmatic approach and how these changed over time. Annex 3 provides the full list of programs. The evaluation report will discuss it more in depth, including how it differs from other modalities of GEF support.  No changes made.
	We were also wondering if the GEF Independent Evaluation Office will develop an Inception Report, providing a more detailed plan to the evaluation, such as describing how projects for the meta-analysis will be selected and providing a ToC for the programmes? We believe this Inception Report would be informative and helpful in terms of getting a clearer view of the scope of the evaluation and methods used to evaluate the programmes.	We do not prepare inception reports in our evaluations. The final version of the approach paper incorporates a fully developed ToC and a complete evaluation matrix.  Annex 1 has been updated with a ToC and a complete evaluation matrix.
World Bank	We consider this an important and timely exercise and welcome an evaluation of how well programs have worked. However, we found that the breadth of the purpose, objectives, scope, issues and questions can cause confusion, and do not present a sharp enough focus. The focus of this evaluation could be narrowed and strengthened.	Considering how long the GEF has been experiencing with programmatic approaches we have to look both at results and performance issues.  No changes made.
	It would be of value to explain what does the evaluation intends to measure in terms of "broader scale and longer term global environmental benefits". In some cases, the clustering of projects within a program does not necessarily ensure greater delivery of global environmental benefits, but reduced transaction costs, increased visibility and therefore, increased appetite to engage in the GEF.	We are aware of that. However, broader scale and longer term results has been the aim of GEF programs since their introduction. As stated in para 5 of the approach paper: "...The GEF Programmatic Approach: Current Understandings (GEF/C.17.Inf.11) – an Information Document submitted to Council in May 2001 – clarified that the overall aim of GEF programs is "to secure larger and sustained impact on the global environment through integrating and mainstreaming global environmental objectives into a country's national strategies and plans through partnership with the country."

		<p>This overall aim has consistently been used in most if not all the major Council documents that came afterwards. The planned cost effectiveness analysis will cover the transaction costs and related issues.</p> <p>No changes made.</p>
	<p>It would be useful to clarify what “enhanced accountability and oversight” means, and to whom this is applied – the GEF Secretariat, the IAs or EAs.</p>	<p>We took this language from Council Working Paper “Streamlining the Project Cycle &amp; Refining the Programmatic Approach (GEF/C.38/05/Rev/1), July 1, 2010, p. 6.</p> <p>That paper refers to disbursing to countries and regions with enhanced accountability and oversight. It further states that: “... In order to assure full accountability, an RBM strategy would form part of each program document. The strategy would include a results framework for the program, a baseline, would show how each project would contribute to the program goal and objectives, detail how monitoring of results and of effectiveness and efficiency indicators would achieve coverage of all projects, and would include a detailed budget to adequately support the monitoring...”.</p> <p>As all the parties are involved in disbursing large scale financing through programs it applies to GEFSEC, IAs and EAs.</p> <p>No changes made.</p>
	<p>The focus of cost-effectiveness as a key purpose of programs raised disagreement on the part of many parties, including the Bank, and that subsequent reviews on programs, including one commissioned by the GEF Secretariat in 2011, concluded that costs on programs are higher, not lower.</p>	<p>Noted. We are aware of that review. Programs should not be pursued purely for cost-effectiveness purposes.</p> <p>No changes made.</p>
	<p>Why regional/global programs are only being introduced for the purpose of assessment of cost-effectiveness? We also note that this is the only mention made of cost-effectiveness in the approach paper.</p>	<p>We refer to regional and global UMBRELLA programs, not to all regional/global programs.</p> <p>We will check which umbrella programs we have, except for the already excluded enabling activities ones, and check definition of umbrella programs.</p> <p>We will conduct cost effectiveness analysis only on umbrella programs to keep the evaluation scope manageable.</p>

		No changes made.
	It would be interesting to understand what members of the GEF Partnership view as the principal efficiency gains with respect to program transaction costs, and where might changes need to be introduced to enhance efficiency?	Indeed. We could organize a short online survey to investigate this issue, if a complete list of stakeholders with emails is made available to us. We are going to ask GEF Agencies to provide us with such a list.  A footnote (36) contemplating the possibility to conduct the online survey, has been inserted.
	Under efficiency question c), how is this different than simply asking how M&E plays a role in any project? The question should be more specific with respect to what programs are expected to do differently.	Not necessarily. The compounding difficulty for program level M&E is that it has to be designed adhering to the program hierarchy of objectives, showing how each project would contribute to the program goal and objectives, detailing how monitoring of results and of effectiveness and efficiency indicators would achieve coverage of all projects.  No change made.
	It would be of value to examine the nature of the types of finance leveraged under programmatic approaches, and the different IAs to whom such leveraging is attributed.	The nature and type of finance leveraged has been introduced as an indicator in the evaluation matrix.  See the evaluation matrix in Annex 1
	It is not clear whether the evaluation is about impact or about the mechanics of doing programs.	Both, as clearly captured in the three overarching objectives of the evaluation.  No changes made.
	We would also seek clarification with regard to the evaluation design (para 38 and Annex I).	Annex 1 has been updated with a ToC and a complete evaluation matrix.
GEF Secretariat	The approach paper does not adequately address the new programmatic approaches, including thematic and geographic. As a result, a very large share of the PFD programs that will be captured in the evaluation remain in the early stages of implementation. In contrast, very few of the programs have reached a stage where all child projects would be closed and evaluated. As a result, we see a risk that the evaluation – at least with respect to objectives (i) and (ii) (para 31) – will rely heavily on few early programs.	We are aware of the programs “immaturity”. The evaluation intends to be summative of past programs (including pre-2008) and formative towards new programs (including the IAPs). The IAPs will be subject of a Mid-term Review and as such will not be included in this evaluation. However, the other GEF-6 programs (there are 4 of them) have been now included in the scope of this evaluation  The portfolio has been updated (both in the text and in the annex) to include the 4 additional GEF-6 programs.
	The present approach applies emphasis on “drivers” to GEF-4 and GEF-5 programs retroactively and without justification. The focus on	As clearly stated in paragraph 32 of the Approach Paper, we won’t hold the GEF programs accountable to standards they were not

<p>drivers is very much a GEF-6 and GEF2020 construct and it would be unfair to apply it retroactively.</p>	<p>expected to meet. However, the concept on drivers of environmental change has always been there in GEF documents and projects, although expressed in a different way. The assessment of drivers is one of the areas where the evaluation will be formative.</p> <p>No changes made.</p>
<p>It is unclear whether the evaluation is designed as an evaluation of the programmatic approach <i>modality</i>, or whether it is a synthesis of evaluations of individual programs. If the former is attempted, which we believe would be interesting and useful.</p>	<p>The evaluation design focuses on the program modality.</p> <p>Language has been added where appropriate to clarify the focus of the evaluation design on programs as a modality of GEF support.</p>
<p>Consider the following as overarching objectives of the evaluation: assess the performance of the GEF in delivering outcomes/impacts related to global environmental benefits; assess the extent to which GEF programs have facilitated knowledge sharing, including lessons learned.</p>	<p>Knowledge sharing will be one of the aspects that will certainly need to be looked at. However, in GEF official documents on programmatic approaches KM is defined as a value added to do programs, not as the main objective.</p> <p>No changes made to the main text. Added two indicators in the evaluation matrix.</p>
<p>The background section refers to “program approaches”, “programs”, “program-based approaches” and “programmatic approaches” almost interchangeably – would it be possible harmonize the terminology?</p>	<p>We refer to programs. However, we often quote citations from the documents we reviewed and there programs are called differently.</p> <p>No changes made.</p>
<p>The present approach paper does not include nor address the Integrated Approach Pilots (IAPs). Will they be the object of separate evaluations?</p>	<p>Yes, IAPs are subject an MTR that will be launched later this year.</p> <p>No changes made.</p>
<p>It might be useful to have an analysis (maybe a case study) on comparison on the effectiveness and efficiency between: 1) Programmatic Approach (PA) and Projects; and 2) Programmatic Approach (PFD and child projects) versus large Project (a project that takes programmatic approach with multiple components).</p>	<p>We will consider the opportunity and feasibility to conduct such comparisons during the evaluation.</p> <p>No changes made.</p>
<p>For the proposed cost-effectiveness analysis of umbrella programs, it is necessary to compare the costs and time taken at the child project level, not only at the umbrella program level.</p>	<p>Indeed, that’s what’s implicitly meant here.</p> <p>Added: “...and related child projects” on the cost-effectiveness bullet point in paragraph 39.</p>
<p>The OECD definition in paragraph 1 does not seem to align with the rest of the opening paragraph.</p>	<p>Para 1 is just a concise introduction on what is the general definition of programs. The OECD is the most general definition.</p> <p>No changes made.</p>

<p>In paragraph 3, it mentions: “GEF’s strategic move towards multi focal and integrated solutions to environmental problems proposed in the GEF 2020 Strategy. “ This sentence seems to equate MFA with our integrated strategy. There is no direct reference in the 2020 strategy to an emphasis on MFA. Instead, our document focuses on achieving scale, systemic approaches, etc. While there is an obvious relationship between the MFA concept (which we are in fact defining as we speak) and the concept of integration, these two are somewhat distinct in the GEF workings. It would be good to ensure that there is clarity as well in how these will figure (IAPs and MFAs) in the evaluation.</p>	<p>We are aware of the issue raised in this comment. We will take it into account during the evaluation.</p> <p>No changes made.</p>
<p>Para 6: In addition to the RAF and STAR, the increased number of GEF Agencies (and their competition) as well as drive towards MFA programs/projects were also key factors that influenced the way programs were designed and financed.</p>	<p>We will verify this during the course of the evaluation.</p> <p>No changes made.</p>
<p>Para 7: Increase in programmatic approaches have not only increased due to clarifying procedures, but intentional strategy/approach/communication by the GEFSEC and partners</p>	<p>We will verify this during the course of the evaluation.</p> <p>No changes made.</p>
<p>Para 7. Footnote 8 is misaligned with the text it is meant to support. The reader expects to see a citation on the increase in submission of PA since May 2008, but the October 2008 paper says that PAs began increasing by April 2008. I think the IEO may be citing the Oct. 2008 report on face value, but the report appears to be an exaggeration (see paragraph 35). If a Paper published in May 2008 was preceded by 10 new PAs for the April 2008 work program, it cannot be that the paper induced the increase in PAs. The IEO should search for a more clear causation for a purported increase in PAs.</p>	<p>The sentence in the approach paper is quoting the October 2008 paper, which mentioned that: “Among other things, the paper (C33.6) provided guidelines for the preparation of PAs, which has eased past confusion about the submission of PAs for GEFSEC clearance. Since its introduction, the GEFSEC has seen an increasing trend in the submission of PAs.” The evaluation will look into whether the increase in PA submission came as a consequence of the May 2008 Council paper.</p> <p>No changes made.</p>
<p>Para 10: On point (ii), the new policy stated same procedures between the UN and IFIs (i.e. it is not a “perceived” difference but there were “actual” difference in procedures)</p>	<p>We are aware that there were actual differences between the procedures applied to UN agencies and IFIs. We refer here to the “perceived complexity of processing modalities by the UN agencies”, not to a “perceived difference in processing modalities”.</p> <p>No changes made.</p>
<p>Para 11 introduces the IAPs without noting that they are implemented as programs. This may be “assumed” by those of us in the know, but another reader may wonder.....?</p>	<p>Agreed.</p>

		A specific reference to IAPs as programs has been made in the second sentence of the paragraph.
	Para 16. A hypothesis that programmatic approaches will enhance “country’s national strategies” or “country ownership” should no longer be used as a criterion for all programs. With the new programmatic approach modalities that have thematic and geographic focus, the emphasis by design is not single country focus. Of course, efforts and child projects are still aligned with country strategies and have strong country ownership. But statements like “Furthermore, country ownership for regional and global programs was found to be relatively weak” need to be much more precisely articulated.	The Approach Paper does not hypothesize that programs enhance country’s national strategies or ownership. All the contrary, ownership is weak, especially in global and regional programs. This paragraph reports OPS4 finding, which is instrumental to identify ownership as a key question for the evaluation.  No changes made.
	Para 17 on Mesoamerican BD Corridor Program: The description focuses on what did not work, while this program has provided very useful experience on what worked from a technical perspective. The para requires balance in summarizing the evaluation.	The purpose of reporting on the available evaluative evidence is not to identify findings on successes and weaknesses, but to identify issues worth exploring in this evaluation.  No changes made.
	Para 23-25 and Table 2: ... the GEF-5 Public Private Partnership (PPPs) programs used the PFD as an organizing/financial modality in order to enhance delegation of authority for investment decisions and streamline GEFSEC concurrence for each investment. We “borrowed” the PFD/Programmatic Approach, but did not follow it. For example, each PFD under the GEF-5 PPP has zero child projects. Strangely, the PMIS records only two of the 5 as “Parent” using the PFD. If one subtracts the 2 PPP from the total for GEF-5 in Table 2, it puts the decline in “real” programmatic approaches more starkly. Further, it shows even more strongly that CCM had only 1 program in GEF-5 and CCA had 2. The short reference in para 25 to the GEF’s categorization should be expanded on, and the document should probably clarify the real PMIS data and drop the 5 PPPs from the analysis. The 5 PPPs are 4929, 4959, 5143, 5388, and 5744. Also, in GEF-4, the Earth Fund project 3357 is listed. This should be dropped in our opinion.	Accepted.  The Earth Fund and the 5 PPPs have been excluded from the scope.
	Para 26 and Figure 1. The proposed typology is not clearly “straightforward” and may miss some of the critical elements related to the IAPs and the new thematic and geographic typologies. The distinction between “global” and “regional” programs does not appear to be useful.	Our classification refers to our scope. IAPs are outside our scope. It comes from the data that are available in PMIS and in the PFD documents. We do not know whether a program is thematic, geographic or integrated when we look into PMIS and in the PFDs. If

		<p>another typology would be more useful, please tell us where to find the data for it.</p> <p>No changes made.</p>
	<p>In Para 27, the dismissive nature of excluding two umbrella programs hardly makes sense, when in fact the GEF programmatic approach was designed to accommodate these types of programs. Further, does the analysis also intend to exclude other umbrella programs for enabling activities?</p>	<p>Umbrella programs of enabling activities are excluded as they are not designed to achieve broader scale and longer term programmatic results, but rather to achieve cost efficiencies. After further review of the available documentation and discussions with the Secretariat, we acknowledge that the two specific programs referred to in this comment show programmatic aspects that go beyond the mere cost-efficiency argument. Other umbrella programs will be subject of cost-effectiveness analysis.</p> <p>The two programs (3654, 3994) have been included in the scope.</p>
	<p>Para 29: PFDs are now required for all programs and hence the term “post-PFD programs” is confusing -- the para refers to programs that were introduced after the <i>introduction</i> of PFDs.</p>	<p>Accepted.</p> <p>Added “Post-PFD introduction”</p>
	<p>Para 29 and Table 4. Could be misleading and/or less informative unless CCM and CCA are explained. SFM is not mentioned in the chart and probably should be identified.</p>	<p>Accepted.</p> <p>Para 29 and Table 4 changed accordingly.</p>
	<p>Para 31: as above, it would seem important to ensure that the objectives are appropriate for programs that were conceived under different replenishment cycles, and – for the first objective – it is not clear what reference point is used to assess whether “broader scale” and “longer-term” benefits were achieved.</p>	<p>The reference point is 2008. However, strategic, longer term and larger scale objectives have always been the main objectives of GEF programs. Please refer to para 10 of GEF/C.33/6 of May 2008.</p> <p>No changes made.</p>
	<p>Para 37, Relevance: question (a) seems slightly convoluted, why not use the standard question on whether programs have been relevant for countries’ needs and priorities? and why is relevance not considered vis-à-vis convention mandates?</p>	<p>We are looking at ownership here, from a relevance point of view.</p> <p>No changes made.</p>
	<p>Relevance Question b: “to what extent have child project level objectives been coherent with and integrated in the program level one?” It is more relevant to determine to what extent child project level outcomes contributed to achieve the program level outcomes (instead of objectives).</p>	<p>This is a relevance question, not an effectiveness one. This will be looked at in the quality at entry study.</p> <p>No changes made.</p>
	<p>Para 37, Efficiency: the questions on efficiency are not clear – to what extent will the evaluation consider the (a) cost-effectiveness of programs in terms of GEF financing vs. achieved GEBs, GEF financing</p>	<p>All those aspects will be analyzed. We included them as indicators in the evaluation matrix.</p>

<p>vs. actual co-financing and program management costs as a share of program financing; and (b) project cycle management in terms of the time elapsed between submission, approval, endorsement, start of implementation and completion?</p>	<p>See the evaluation matrix in Annex 1</p>
<p>Efficiency Question c, we suggest that this one question be split into two. What role did monitoring play – and what role did evaluation play? These are very different functions with monitoring lead by GEFSEC and evaluation by the IEO.</p>	<p>We always cover both M and E in evaluations.  No changes made.</p>
<p>Para 39. If indeed these questions in some cases will be based on terminal evaluations (TEs) then the evaluation premise must make explicitly clear the very weak linkage between completed GEF-4 programs and the modernized, evolving, and integrated GEF-6 programs. The proposed methods do not explicate if all the methods will be applied to all the programs. For example, will each and all programs get a “quality at entry study”? A Rapid Impact Evaluation? A Progress to Impact? If not all, then what selection criteria will be used and how will the results be appropriately nuanced if the sample sizes are small?</p>	<p>Not all the methods will be applied to all the programs. This is already partly explained in para 39, and will be fully explained in a methodological annex to the final report.  No changes made.</p>
<p>Methods – Paragraph 39 (i): “A documentation review of GEF policy and strategy documents, and program/child projects related documents, as well as additional literature on programs. These include: PFDs and related child Project Identification Forms (PIFs), Project Preparation Grants (PPGs) and/or other design documents; Project Implementation Reports (PIRs) and Mid-Term Reviews (MTRs); and Terminal Evaluations (TEs).” In GEF-5 and GEF-6 Programmatic Approaches, several child projects lacked PIFs. Instead, they were directly submitted for CEO Endorsement. Suggest to explicitly include these documents as part of the documentation review.</p>	<p>We will include these documents in our documentation review.  No changes made.</p>
<p>Annex 3: while these are recent programs and will not be evaluated across all the criteria, it is worth noting that 5037 and 5228 are single trust fund, LDCF programs that are not expected to achieve GEBs and could not be evaluated based on the current questions on effectiveness and results;</p>	<p>Even though LDCF and SCCF programs are not expected to achieve GEBs, this does not mean that they don’t actually achieve them. It will be important to observe if there are cases where GEBs are achieved in adaptation programs for the learning that can potentially be drawn.  No changes made.</p>
<p>Annex 3 needs to be updated to include GEF=6 programs and multi-trust fund indicators.</p>	<p>Agreed.</p>



		GEF-6 programs have been included in Annex 3
STAP	<p>The Approach Paper could acknowledge, preferably at the beginning, the major difference between GEF’s approach to programs (that was unsystematic and uneven, also after the introduction of PFDs) compared to more “traditional” interpretation of donor-based programs defined by OECD and potentially other funding organizations (including WB trust funds and etc.). OECD/DAC defined “programme-based approaches (PBAs) as a way of engaging in development co-operation based on the principles of co-ordinated support for a locally-owned programme of development, such as a national development strategy, a sector programme, a thematic programme or a programme of a specific organisation. Programme-based approaches share the following features: i) leadership by the host country or organisation; ii) a single comprehensive programme and budget framework; iii) a formalised process for donor co-ordination and harmonisation of donor procedures for reporting, budgeting, financial management and procurement; iv) efforts to increase the use of local systems for programme design and implementation, financial management, monitoring and evaluation” (OECD, DCD/DAC(2007)39/FINAL/CORR2). GEF’s experience with PAs is very different from this type of programmes.</p>	<p>We are aware of the differences between the traditional definition used by the donor community and the way it has been interpreted by the GEF over time. We do not think it is necessary to modify the approach paper at this point, but we will certainly discuss the issue in the evaluation report, based on a literature review aiming at highlighting similarities and differences between GEF programs and more “traditional” donor-based programs as defined by OECD (including WB trust funds and etc.).</p> <p>No changes made.</p>
	<p>para 19: Reference to OPS5 is somehow misrepresented. OPS5 text reads “OPS5 recommends reorienting the GEF decision points. The move toward programming and programmatic approaches should continue. In time, the work program, currently consisting mostly of project concepts, should consist mainly of approvals of programming proposals of recipient countries and programmatic approaches of regional and global environmental problems.” Therefore, it is not about shifting formulation of GEF-6 strategies away from focal area strategies, but on shifting project-based approval culture towards program-based approvals.</p>	<p>We refer to the first OPS5 report, not the final one. However, the point is valid.</p> <p>The language in paragraph 19 has been changed accordingly.</p>
	<p>para 30: The main purpose of the evaluation is to assess whether and how GEF programs delivered the expected results in terms of global environmental benefits while addressing main drivers of global environmental change. This would be the right focus of the evaluation, but the stated purpose misses an important potential opportunity regarding counterfactual evidence, i.e., distinguishing the</p>	<p>Accepted.</p> <p>Added “...compared to stand alone projects” to the first key question under effectiveness and results.</p>

<p>impact of programs vis-à-vis the cumulative impact from individual projects. In addition to assessing GEF program impacts in terms of global environmental benefits delivery, it would be useful to understand to what extent and under what conditions programs could be a preferential financial modality as compared to individual projects. Therefore, para 31 (i) could be revised as follows: “Evaluate the extent, mechanisms, and conditions by which GEF programs have delivered broader scale and longer term GEBs compared to stand-alone projects”.</p>	
<p>para 35: the Evaluation will not cover SGP and will provide only limited (for cost-effectiveness reasons) assessment of global/regional umbrella programs. Such exclusion is difficult to understand and would require further elaboration, particularly because regional and global programs represent 63.2% and 15.2% of the total GEF finance, respectively (para 28). In the context of programmatic approaches, assessing the utility of this modality for regional and global programs would be particularly important taking into account existing STAR-associated barriers. Furthermore, it is not clear from the Approach Paper if IAPs will also be assessed in the evaluation. It would be desirable to do so to start collecting lessons, at least for IAPs design elements. The approach paper could also show the evolution in GEF funding to programs from GEF-3 to GEF-5.</p>	<p>We don’t mean to exclude the regional and global programs. But we do intend to exclude the umbrella programs done only for cost efficiency reasons. The enabling activities ones are among them. We refer to regional and global UMBRELLA programs, not to all regional/global programs. IAPs are not covered by this evaluation.</p> <p>No changes made.</p>
<p>Para 37: Evaluative Questions. a) Suggest revising as “To what extent have the different typologies of GEF programs delivered the intended results in terms of broader scale and longer term environmental outcomes and impacts compared to stand-alone projects (in similar settings and contexts)? This assessment should preferably be coordinated with the other ongoing OPS6 studies. Suggest adding a new question: To what extent have GEF programs addressed the needs of multiple MEAs/multiple focal areas?</p> <p>Relevance: adding a new or revising the existing questions by including the information about to what extent programs improved GEF agency and donor coordination and harmonization of donor procedures (e.g., in program M&amp;E reporting and co-financing)?</p>	<p>The reformulation of the first key question is accepted.</p> <p>Multiple benefits are not among the objectives of doing programs in the GEF, so we don’t think this issue merits to be raised at the level of a key question. However, we will have opportunities to look into it during case studies of single and multifocal programs.</p> <p>We agree that GEF programs are very different from the traditional interpretation of donor based programs defined by OECD.</p> <p>Added “to stand-alone projects” to the first question.</p>

	<p>It would be desirable if this evaluation would look at the knowledge management and learning approach in programs and compare with the evidence coming up from stand-alone projects. This could be a sub-question or additional question to be addressed by the evaluation.</p>	<p>We will look into KM as this is one of the major areas of GEF contribution as described in the generic GEF ToC. However, KM is a value added, not the main objective of doing programs, so we don't think it should be raised at the level of key question. We added two indicators on KM in the evaluation matrix.</p> <p>No changes made to the main text. Added two indicators in the evaluation matrix.</p>
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