

Comments on the NPFE Approach Paper

Comment by	Comments	GEF EO Response
Background		
GEF Sec (William Ehlers)	In the background section there is a missing part that we believe is critical: NPFE started as a direct access activity (<i>recipient executed trust fund</i> , according to the technical terms managed by the World Bank’s trust funds procedures). However, the process was so complicated for countries that after some few months, the direct access was not used anymore. Instead, it was changed to a <i>bank executed trust fund</i> . We believe that there should be a mention about this in the background section because it is the only way to understand how the procedural side evolved.	The revised approach paper has elaborated more on this section to clearly reflect this change in administrative procedure of the NPFEs.
GEF Sec (William Ehlers)	In page 4 – paragraph 2, it is stated that “ <i>a toolkit issued by the GEF Secretariat in September 2012 provided templates and guidance on accessing resources under the reformed CSP</i> ”. This statement is inaccurate. Countries received detailed guidance on how to access the NPFE funds through the application form that was issued by the GEF Secretariat in July 2010 and posted on the GEF website in August 2010 (two months after the NPFE was approved by the Council). The toolkit the paper refers to and that provided templates and guidance on accessing resources under the reformed CSP program, of which NPFE is a component, was issued in April 2011. The one of September 2012 was an updated version.	The approach paper has been changed to clarify that the toolkit was issued in April 2011 – with an update in September 2012.
Evaluation Objective /Scope		
GEF Sec (William Ehlers)	According to the section “Evaluation Objectives and scope” (page 5), the evaluation “ <i>will provide an assessment of the NPFE activities undertaken, and in turn, determine the overall relevance and effectiveness of the initiative</i> ”. We are not sure if by answering the proposed questions of interest it would be possible to reach the expected objective. Particularly, we have the following observations: The second paragraph of this section states that the evaluation will also look “ <i>at countries undertaking country portfolio planning without funding from the GEF and the countries that have not conducted the NPFEs – the experiences across these different groups of countries would be compared with the purpose of ascertain the added value of the GEF funding</i> ”. While we understand that it would be possible to compare countries that undertook their NPFE with GEF funding vs. those that undertook their planning exercises without GEF funding based on both, their internal processes and their respective NPFs, we believe there should be a clearer explanation of the basis on which the comparison would be done with those countries that neither undertook a NPFE nor produced a NPF.	With regards to comparing with countries that did not do a NPFE we would be looking into the underlying reasons why, e.g. alternative means of programming resources etc. (Also see section under comparisons below).
GEF Sec (William Ehlers)	Under Evaluation Objectives and Scope, the document refers to the fact that it will not look at Direct Access but will be limited to the assessment of the NPFE Initiative. While we understand this, it is nonetheless important to look into the Direct Access – and its procedures as they had a direct bearing on the impact – duration, efficiency and ultimately the effectiveness of the NPFE. This follows what we mention in para 1 above	The evaluation will include “direct access” as far as it pertains to the administrative procedures in the NPFE (see objective 1) , but will not look at the wider concept of “direct access” per se.

<p>GEF Sec (William Ehlers)</p>	<p>In <i>Evaluation Objective 1: Assessment of NPFE process</i> (page 6), there should be some questions that would allow an assessment of the administrative process applied while NPFE applications were processed as “<i>recipient executed trust fund</i>” as compared to the one where they were processed as “<i>bank executed trust fund</i>” (see comment 1 above).</p>	<p>The evaluation includes an assessment of the administrative process (see objective 1). This assessment will include the shift from “recipient executed trust fund” to the “ancillary expense agreement”.</p>
<p>GEF Sec (William Ehlers)</p>	<p>In <i>Evaluation Objective 2: Assessment of NPFE effects</i> (page 6), it says that the evaluation will assess “<i>the effects of the NPFE with a focus on the extent to which the NPFEs lead to transparency and predictability in programming of available resources at the national level, and strengthen country ownership</i>”. We doubt this could be estimated by assessing the “<i>perceptions of the relevant stakeholders</i>”, as well as “<i>perceptions of enhanced synergies between focal areas</i>”. This is of great concern as there is no reference on how these perceptions will be evaluated, and perceptions are difficult to assess. By the same token, it is not clear what type of “results” will be looked at: would they be the list of projects? Or would they be the process by which the list of projects was done? Or both? We believe it would be good to clarify this.</p>	<p>The assessment of NPFE effects (objective 2) will partly be looked at through the gathering of perceptions of GEF stakeholders (complementing the other evaluation methods). As this is a formative evaluation with a focus on learning, these perceptions will not necessarily lead to evaluative judgment, but rather to elicit the usefulness of the NPFE by its stakeholder, which is an important perspective. The approach paper has been revised to further clarify its emphasis on learning and formative focus.</p>
<p>GEF Sec (William Ehlers)</p>	<p>In <i>Evaluation Objective 3: Assessment of the extent NPFE reports reflect the actual process, priorities identified and decisions taken during NPFEs, and the actual use of these reports by the GEF stakeholders</i> (page 6), it is stated that the evaluation would also assess “<i>how these documents are used by different stakeholders, especially the GEF agencies that are expected to organize their support to the countries for preparation and implementation of GEF projects and programs based on the priorities identified in the NPFEs</i>”. Although it is true that GEF agencies are one of the main stakeholders, we believe that NPFDs were not designed for them to organize their support to the countries. Indeed, GEF agencies have their own programming documents that guide their action / support to countries. As stated in page 3 – paragraph 1 of the document, NPFEs “<i>are meant to serve as tools for enhancing country ownership in determining programming priorities in a given GEF replenishment period</i>”. We believe that NPFDs’ main users are the countries, which would be in a position to select the most appropriate GEF agency based on their comparative advantage to manage the project. Therefore, we think that it would be more useful to assess how these documents have been used mainly (not exclusively) by countries and then / also to which extent GEF agencies have used them.</p>	<p>Agree. The approach paper has been revised accordingly.</p>
<p>GEF Sec (William Ehlers)</p>	<p>Regarding the same <i>Evaluation Objective 3</i>, we consider that the usefulness of NPFDs goes beyond those project ideas that are finally materialized. The</p>	<p>This will be taken into account in the portfolio</p>

Ehlers)	GEF Secretariat technical teams commented on all the NPFs that were submitted. Many times those comments suggested not continuing developing a determined project idea for specific technical reasons. In that context, NPFs have been useful because with those comments, both – counties and agencies— avoided investing scarce resources in potential project ideas that would never be accepted. How will this be taken into account?	analysis of the NPFEs. This analysis will include the process (see objective 1 and 3), the NPFE usefulness and also the comparison study.
UNEP (Maryam Fuller)	Among the objectives of this MTE, we suggest that another fundamental question be asked : did the NPFEs promote a “portfolio approach” as OPS-4 recommended ? Did the NPFEs conduct a stocktaking of the existing portfolio in a reasonable manner that led to lessons learnt for programming in GEF-5? How can a portfolio approach be further encouraged?	Agree. Objective 2 addresses this issue, however the approach paper has been revised to more explicitly reflect the portfolio approach.
UNEP (Maryam Fuller)	Another question that would important to ask is whether the NPFEs contributed to “improving effectiveness and efficiency of <u>the GEF Partnership</u> ” (GEF/R.5/31), especially in the context of two key partners : <ul style="list-style-type: none"> • Countries relations with GEFSec and Agencies • Agencies relations amongst themselves, including the thorny issue of “competition” and alignment with “comparative advantages” • Relations between GEFSec and Agencies (especially in cases where Agencies were not invited to meetings which occurred early on). 	Agree. This is addressed under objective 2, however the approach paper has been revised to more explicitly reflect the GEF partnership angle.
UNEP (Maryam Fuller)	We also suggest that the NPFE be seen in the context of the entire project cycle. In other words, did the NPFEs facilitate the “pre-PIF” stage and reduce our transaction costs in the early stages of the project cycle as was expected? (the NPFEs were supposed to have “one page concept notes” attached to them, from which the Agencies would then quickly develop PIFs).	This is included in the approach paper under objective 2.
UNEP (Maryam Fuller)	In this context, it is also important to understand whether there is value to conduct more NPFEs during the second half of a GEF cycle? Or is it “too late” in the sense that most of the GEF funds have been programmed and countries that did not conduct an NPFE up to now would be delayed if they were to undertake them now.	The evaluation will include the issue of the timing of the NPFEs.
AfDB (Ignacio Soto)	Evaluation Objective 1: Assessment of the NPFE process: <i>Relevance consideration</i> : Under the process assessment the evaluation assesses effectiveness and efficiency. The question is why “relevance” is not considered. For instance relevance on the timeline (2010 cohort versus 2011 cohort; small (< 7mUS\$) vs big allocations, etc, the relevance on the approval process (GEF clearance, Agencies comments -if consulted) etc.	The overall relevance of the NPFE initiative will be assessed (page 5) in the approach paper. This is not specified again under the three evaluation objectives.
AfDB (Ignacio Soto)	Evaluation Objective 2: Assessment of the NPFE effects: Under this Evaluation objective: transparency, predictability of resources and country ownership will be assessed. Those aspects, at least, transparency and ownership should also be integrated under the processes (Eval Objective 1):	The issue of transparency is addressed specifically under objective 2 – as the guidance to the NPFEs lists

	How transparent are the processes in place, difference in transparency between existing NPFEs.	this as one of the main objectives of the NPFE initiative.
AfDB (Ignacio Soto)	Evaluation Objective 3: Assessment of the extent NPFE reports reflect the actual process, priorities identified and decisions taken during NPFEs, and the actual use of these reports by the GEF stakeholders: <i>Inter-linkages</i> : We fully agree with the scope and objectives under this objective. Nevertheless, as for the evaluation objective 2, the difficulty is the linter-linkages between the three evaluation objectives. How these documents are used by the stakeholders, will also be a “ownership” assessment, already assessed under evaluation objective 2, which should also be appraised in the processes (evaluation objective 1).	The three objectives in this evaluation are indeed closely interlinked and overlap somewhat. However we do not believe this will present a difficulty in the evaluation.
Comparison Issues / No standard followed / NPFE funding / no funding		
GEF Sec (J-M Sinnassamy)	Some countries hold NPFE without GEF financing. You should have a look to these NFPD. It is interesting that countries were able to find other resources. It may also reflect the difficulties at the beginning of the process to obtain GEF resources. However, there were potential conflicts of interest for GEF agencies to finance NPFE and be, at the end of the day, the unique agency to implement all the country portfolio (let's say it is a theoretical case of course).	Agree. We are looking at countries that did the NPFEs without GEF funding and will analyze their sources of funding (in the portfolio analysis / comparison) and potential conflict of interest.
GEF Sec (William Ehlers)	In the section “ <i>Limitations and challenges</i> ”, we believe it will be useful to highlight that there was no standard approach, that each country followed its own methodology and therefore comparing them is very difficult: for example, while some did it in one workshop, others dedicated more than one workshop for each focal area; some had an existing committee, others designated an adhoc group, while others followed a different route and all these groups of varied compositions.	Agree. The approach paper has been revised to reflect the wide differences in the NPFE processes and methodology between the countries.
GEF Sec (William Ehlers)	Another challenge is that the resulting NFPDs were all very different in nature ranging from general statements of priorities to specific project ideas presented as simple titles or with greater descriptions.	Agree. The differences will be mapped out and analyzed in the evaluation.
GEEF Sec (William Ehlers)	Finally, another challenge is that between the preparation of the NFPD and the actual sending of PIFs to the GEF, circumstances, OFPs, and even Governments changed adding a level of revision that is also difficult to capture, compare and assess. (One country recently sought advice because they had an NPFE decision and a year later the President decided that his priority was something else.) While we understand that it would be possible to compare countries that undertook their NPFE with GEF funding vs. those that undertook their planning exercises without GEF funding based on both, their internal processes and their respective NFPDs, we believe there should be a clearer explanation of the basis on which the comparison would be done with those countries that neither undertook a NPFE nor produced a NFPD (comments also above under objectives).	Agree. This will present a challenge for the evaluation. We have attempted to capture the changes in NPFEs under objective 3 which reads “The evaluation would also document and assess the process followed to accommodate changes in priorities”. With regards to comparing with countries that did not do a NPFE we would be looking into the underlying reasons why, e.g. alternative means of programming resources etc.

AfDB (Ignacio Soto)	And comments on Limitations and Challenges: The evaluation proposes to rely on comparisons between results in countries that opted for the program with those that did not and look at the underlying reasons. We propose that the Evaluation should also compare between them the countries that opted and provide lessons learned in a formative way.	Agree. This evaluation has a strong formative focus and aims to provide lessons that may help to improve the NPFE initiative.
Project fragmentation / low amounts		
GEF Sec (J-M Sinnassamy)	Concerns with many NPFs (too many projects with low amounts, some problems of eligibility, no GEF reasoning, no co financing, no justification of the agency, etc.) and we prepared responses. In some cases, the NPFs have evolved, not always. Our responses were not available on the website for agencies and partners. It was a source of confusion, when agencies referred to a NPF we did not agree with.	These are interesting aspects that the evaluation will look into as it proceeds.
UNEP (Maryam Fuller)	Many small projects averaging \$1-2 million in GEF grants – and there seems to be a correlation with those countries having done the NPFE process. In such countries, a call for proposals has resulted in a much larger pool of proposals being considered, and it has been difficult for the OFP or the national committees to combine the proposals or to prioritize one or two. Has the average size of projects increased or decreased in GEF-5 vs GEF-4 ? We therefore suggest that this issue be verified jointly through both the STAR and NPFE MTEs.	These are interesting aspects that the evaluation will look into as it proceeds.
Country Ownership		
UNEP (Maryam Fuller)	Another issue that could best be verified jointly between the STAR and NPFE MTEs is that of ownership. The STAR is expected to promote transparency and country driven approaches, including clear responsibilities between GEF Sec and the countries. However, the process of quite a few NPFs did not fully abide by these principles. Furthermore, there is the issue of civil society engagement that in our view should be part of any discourse on country ownership. It would be instructive to explore these issues in more depth in a sample of NPFs, and we would be happy to provide a list of suitable countries to do so.	Agree. The issues of ownership and civil society engagement are explicitly included under objective 2 and will be of key interest to the evaluation.
Agency Issues / Costs for Agencies		
UNEP (Maryam Fuller)	One of the key concerns of the Agencies, when the NPFE was first being designed, was the additional transaction costs that the Agencies would incur. It was expected that Agencies would pay this through their IA fees. Many agencies, including non-resident ones, have had difficulties in engaging closely with the NPFE process, and therefore the question needs to be asked whether this was an efficient way of doing NPFs (especially in the context of discussions on streamlining the project cycle).	The administrative processes of the NPFE (before and after the administrative change) will be looked into in detail. Objective 1 addresses efficiency and effectiveness of the process.
AfDB (Ignacio Soto)	As far as AfDB is concerned, we are most of the time not informed about NPFs. Our contribution to this exercise is therefore limited while we would welcome a better engagement along all other GEF agencies as this would provide the countries to discuss the programming in respect to each agencies comparative advantage.	The evaluation will examine the GEF partnership under objective 2 and elaborate on issues such as this one.

Other		
GEF Sec (J-M Sinnassamy)	How are the NPFDS internally used in the GEFSEC? Checking if projects fit with NPFE is included in our review for instance.	The evaluation will examine how the NPFES are used by the stakeholder including GEF Sec. This is addressed under objective 3.
GEF Sec (William Ehlers)	Online survey: we cannot offer comments because we do not know what the online survey will contain.	The contents of the online survey have not been finalized yet. We welcome the Secretariat to share any concerns or issues that it wants the evaluation team to take note of. Where feasible these concerns and issues will be accommodated in the questionnaire.
UNEP (Maryam Fuller)	Please clarify whether the final paper will go to the GEF Council in FY 2014 or calendar year 2014 ? In either case, we would encourage a much faster time frame, because if the NPFES were to be rolled out also in GEF-6, then one of the lessons we have already learnt is to start the NPFES well in advance (i.e. even as early as the last few months of GEF-5 as soon as the STAR allocation has been set).	The Evaluation would be an input to the OPS-5 report so its contents will be available for assimilation in the programming for GEF-6.
GEF Sec (J-M Sinnassamy)	In the next greenline, I proposed to include some lessons we took in participating in the Congo NPFE. These lessons are also based on the lessons we took after providing comments to a bunch of NPFD and because we have been involved actively or remotely in other NPFE (Cameroon, DRC). I will be pleased to elaborate more if you want to discuss at one moment of the process	We are interested to learn about your experience with the NPFES in Africa. The evaluation team will be in contact with you.