

**GREEN
CLIMATE
FUND**

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Programmatic policy approach

Summary

This document provides guidance on the programmatic approach of the Green Climate Fund to funding proposals, including the definition and principles of a programme, the requirements for preparing a programmatic funding proposal and its sub-projects, and process-related aspects for submission review and approval of appropriate programmatic proposals

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I. Introduction

1. The Governing Instrument of the Green Climate Fund (GCF or the Fund) makes explicit mention of the programmatic approach: “The Fund will support developing countries in pursuing project-based and programmatic approaches in accordance with climate change strategies and plans, such as low-emission development strategies or plans, nationally appropriate mitigation actions (NAMAs), national adaptation plans of action (NAPAs), national adaptation plans (NAPs) and other related activities.”¹
2. This paper proceeds from an understanding that programmes are widely used in the delivery of effective international cooperation, and that in appropriate circumstances, countries, funding organizations as well as national and international agencies have often found it beneficial to use programmatic approaches to address complex issues, cover multiple countries in a region and/or correlated interventions within a country, to better align the approval and project cycles between the GCF, AE and country, to provide some certainty of funding in particular in private sector fund structures, and ultimately to build a stronger narrative to thereby bringing about transformational change.
3. Given these factors, this paper and the related proposed guidelines in annex II are developed with a view to supporting programmatic approaches and funds structures, which strengthen operational delivery as well as promote innovation in the development of programmatic proposals.
4. This document takes into account the GCF’s initial proposal approval process, the lessons learned from the programmatic proposals previously approved by the Board, the practices of other climate funds with regard to programmatic funding proposals and the relevant inputs received during the consultation process.

II. Discussions and decisions by the Board

5. The following table summarizes the discussions undertaken by the Board in relation to developing guidelines for a programmatic approach to funding proposals:

Board meeting	Discussion
Seventh meeting of the Board	<p>In decision B.07/03, paragraph (e), the Board noted convergence on the need to consider, among other items, the initial proposal approval process for regional programmes and projects.</p> <p>Furthermore, in the context of its approval of the initial strategic plan for GCF, the Board stated: “Strengthening the Fund’s proactive and strategic approach to programming is key to delivering country-driven and country-owned, high impact public and private sector proposals at scale on a meeting-by-meeting basis. In order to be able to do so, the Board and the Secretariat must gain a better understanding of the objectives of and funding requests from developing countries, the project and ‘programme’ pipelines that NDAs/FPs and AEs are planning on submitting to the Fund, and remaining gaps that the Fund needs to address pro-actively.”</p>
Thirteenth meeting of the Board	<p>There were extensive discussions during the informal and formal sessions of the Board meeting; however, there was no consensus among the Board members.</p> <p>The main issues regarding the approach were ensuring country ownership; ensuring access by direct access entities; avoiding any potential precedence</p>

¹ Governing Instrument for the Green Climate Fund, paragraph 36.

Board meeting	Discussion
	<p>setting relation to new allocation parameters for programmatic approaches; devolved authority for decision-making on funding allocation; level of detail required for designing programmatic approaches; and difference in interpretation and understanding of what a programmatic approach is.</p> <p>The Board took note of document GCF/B.13/18 titled “Programmatic approach to funding proposals”, but no decision was taken.</p>
Fourteenth meeting of the Board	<p>In decision B.14/07(k), the Board took note of the views expressed on programmatic proposals, including those related to the need to seek a balance of national, regional and international programmes.</p> <p>The Board also requested the Co-Chairs to continue to consult on the programmatic approach with a view to conclude the policy guidelines for programmatic approach for consideration at the fifteenth meeting of the Board, noting that approvals on programme proposals at the fourteenth meeting of the Board do not prejudice the Board’s consideration of these policy decisions.</p>
Fifteenth meeting of the Board	The programmatic approach for funding proposal was not included in the agenda.
Twentieth meeting of the Board	The programmatic approach for funding proposals was included in the agenda. However, the agenda item was not opened.

III. Review of approved programmes

6. Up to and including the 19th Meeting of the Board, there have been thirteen (13) approved programmes that were implemented either in a single country or across multiple countries.

Board Meeting	FP	Programme Name	AE
B.11	FP006	Energy Efficiency Green Bond Programme in Latin America and the Caribbean	IDB
B.14	FP025	GCF-EBRD Sustainable Energy Financing Facilities	EBRD
B.14	FP027	Universal Green Energy Access Programme (UGEAP)	Deutsche Bank
B.15	FP028	MSME Business Loan Program for GHG Emission Reduction	XacBank
B.16	FP039	GCF-EBRD Egypt Renewable Energy Financing Framework	EBRD
B.18	FP046	Renewable Energy Program #1 - Solar	XacBank
B.18	FP047	GCF-EBRD Kazakhstan Renewables Framework	EBRD
B.18	FP048	Low Emissions and Climate Resilient Agriculture Risk Sharing Facility	IDB
B.19	FP080	Zambia Renewable Energy Financing Framework	AfDB

Board Meeting	FP	Programme Name	AE
B.19	FP081	Line of Credit for Solar rooftop segment for commercial, industrial and residential housing sectors	NABARD

7. However, GCF has not provided specific guidelines for the programmatic approach to funding proposals and the Board approved programmes on a case-by-case basis. The disbursements for these programmes are based on eligibility criteria provided by the AE when the programme was approved by the Board.

8. In order to strengthen and deliver country-driven and country-owned funding proposals, there is a need for clearly defined guidelines for the AEs to submit programme proposals, the Board to approve and the Secretariat to disburse approved funding.

9. The need to address all factors relevant to programme proposals highlights the importance and value of establishing robust governance, monitoring and evaluation structures that will ensure significant country ownership and stakeholder input into the development of programme proposals, as well as to their phased implementation and monitoring and evaluation. Such structures and input will help ensure shared ownership in the programme and enhance the likelihood of programmatic success.

IV. Current status of consultations

10. Prior to the twenty-first meeting of the Board, an early draft of the initial guidelines for a programmatic approach was shared with Board members and alternate members of the Board for review and comment in August 2018. Comments were received from Board members as well as accredited entities, and further discussions were held between the Co-Chairs.

11. Following the consultation process, the secretariat will organize a couple of webinars prior to B,21 in order to provide further explanation of the proposed programmatic policy approach to funding proposals, answer questions and receive feedback from Board members and advisors. Subject to availability of time, additional webinars could be offered to NDAs and AEs too.

12. Throughout the consultations and discussions at previous Board meetings, a number of issues have been put forward by the Board, the Secretariat and other GCF stakeholders. An elaboration of some of these issues are provided in the subsequent paragraphs.

4.1 Definition and scope

13. Any programme developed and submitted for GCF consideration, including the individual projects within that programme (referred to hereafter as “sub-projects”), should contribute to GCF’s ultimate objectives as defined in the Governing Instrument including, inter alia, the promotion of a paradigm shift towards low-emission and climate-resilient development pathways in a cost-effective manner. A programme should achieve climate outcomes and/or efficiencies beyond what its sub-projects would have achieved if they were developed and implemented as stand-alone projects.

14. Building on the experience from similar funds, the strategic goals of a programme may be oriented around a particular theme or geography, though these approaches are not mutually exclusive. For instance, the Global Environment Facility frames geographic programmes as being within “a particular geography (landscape, ecosystem, district, province(s), country, etc.) and may focus on particular sectors in this broader context”. Similarly, the Climate Investment Funds (CIFs) prioritized a programmatic national investment planning process for their

thematic programmes. This national investment planning process requires the CIF to involve multiple stakeholders in the development and implementation of policy reforms and investments aligned with countries' climate strategies.

15. "Thematic" or "Sectoral" programmes can enhance coordination and strategic alignment of sub-projects in a manner that can increase the prospects of transformational change and provide operational efficiencies and accelerate implementation. In addition, the clarity that comes from the creation of an overarching vision and the delineation of a clear stepwise approach can facilitate broader consideration of co-financing.

16. "Geographic" or "regional" programmes can provide added value in terms of efficiency and/or helping to facilitate the harmonization of policies and regulations within a country and across a region in addressing resources or issues that extend beyond provincial or national boundaries. They will also accelerate implementation on the ground by removing a decision-cycle.

17. To illustrate the above, a geographic programme could address an emerging transboundary climate-related issue, such as an emerging cycle of flooding and drought in a basin across multiple countries. The programme, developed holistically, could be structured to address specific adaptation needs across the entire basin, rather than a single country in this example. Regional programmes that address the specific climate finance needs of a region could notably fall into this category of programmes.

18. As another example at a country level, a programme may be developed to implement a country's Nationally Determined Contribution (NDC) that identifies forestry and land use as a priority sector for addressing mitigation and adaptation needs. In this example, a country may have already identified forest conservation as one of its top climate priorities, and the programme would then contribute to the execution of this vision by designing the sub-projects in defined geographical areas (e.g. according to forest types) within the country.

19. In other cases, programmes have been established to enhance synergies and/or to facilitate the replicated implementation of a project type that has been demonstrated to be effective in supporting transformative change. Such programmes can be technical in focus, and/or developed in part to facilitate administrative efficiencies. The creation of financing facility programmes (e.g. framework programmes, revolving facilities, warehousing lines, grant facilities, etc) could be seen to fall within this programme type for serving the wide-spread MSME (Micro-, Small- and Medium-sized Enterprises) sectors in a country or a region. When appropriately circumscribed, programmes of this type can result in enhanced quality and efficiency, speed of implementation, lower transaction costs, and enhanced opportunities for leveraged co-funding.

20. Given the GCF mandate and the desire to enable broad Board consideration of a range of programmatic approaches, this paper proposes the following definition of programme: "a set of interlinked individual sub-projects, unified by an overarching vision, common objectives and contribution to strategic goals, which will deliver sustained climate results and impact in the GCF result areas efficiently, effectively and at scale."

4.2 Centrality of country role in programming

21. Beyond programme proposals, there also exists broader interpretations of the programmatic approach. For example, developing a country programme or investment plan may also be considered a programmatic approach by some stakeholders. From this document's perspective, there is a clear distinction between country programming and a programmatic approach to funding proposals. Country programming in the GCF context involves country coordination and stakeholder engagement, which may lead to a country programme that identifies priority investments. These priority investment opportunities can then be turned into

concrete concepts or funding proposals, on the basis of projects, of programmes, or a mixture of the two, as appropriate if they subsequently prove viable.

22. While a programme can provide increased benefits and add to the prospects for achieving paradigm shift at scale at a lower transaction cost to GCF, the oversight and coordination required to ensure effective implementation can add complexity. It is fundamental to the GCF that the projects and programmes it considers and approves be consistent with countries' NDCs and national climate strategies, and where these have been developed, the country programmes.

23. Programmatic proposals should include provisions describing the close participation and thought leadership of countries in the development of the programme and the fully developed sub-projects that are being submitted for Board approval, and related provisions should include, but not be limited to, a no objection letter for each country participating in the programme.

24. These factors highlight the importance of ensuring coordination and country ownership through the coordination by NDAs/FPs and participation of country partners in a programme's development, and through the early development of robust, transparent and inclusive governance structures that include country partners in all phases of the programme cycle. Therefore, programmes, like projects should employ consultative approaches with participation of country partners and other donors under the overall coordination of NDAs/FPs, implemented and evaluated in partnership with the relevant country.

25. Programme governance systems should be tailored to fit the unique circumstances of each programme and related sub-projects with a high degree of country ownership. This ownership could be manifested in several ways. First and foremost, good practice for a country driven process should allow all relevant stakeholders to actively participate in all stages of the programme cycle, from the design, development, submission and implementation.

Annex I: Draft decision of the Board

The Board having considered document GCF/B.21/31/Rev.01 titled “Programmatic policy approach”:

- (a) Adopts the initial guidelines for the programmatic approach set out in annex II;
- (b) Recommends that the Secretariat work closely with accredited entities in the pilot implementation of the initial guidelines with a view to develop lessons learned and improvements to the guidelines and propose revisions to the Board one year after adoption or at least three programmes have been approved by the Board pursuant to the initial guidelines set out in annex II; and
- (c) Requests the Secretariat to coordinate an independent evaluation of the implementation of the initial guidelines for the programmatic policy approach by the Independent Evaluation Unit of the GCF three years after its adoption by the Board; and
- (d) Also requests the Secretariat to update the templates for concept notes and funding proposals to reflect the programmatic approach and other matters to address policy gaps adopted at the twenty-first meeting of the Board with a view to making these publicly available by the twenty-second meeting of the Board.

Annex II: Initial guidelines for the programmatic approach

I. Definition of a programme

1. A programme is defined as a set of interlinked individual sub-projects or phases, unified by an overarching vision, common objectives and contribution to strategic goals, which will deliver sustained climate results and impact in the GCF result areas efficiently, effectively and at scale.
2. The scope of the programmes could be “thematic” or “sectoral” as well as “geographic” or “regional”.
3. “Thematic” or “sectoral” programmes can be defined following the GCF result areas as well as according to economic sectors as defined by a country(ies) or region(s). “Geographic” or “regional” programmes can involve coverage within a country and/or across a region in addressing resources or issues that extend beyond provincial or national boundaries.
4. In addition to categorizing programmes based on substantive or geographic factors, programmes may also be categorised in terms of the mode of their funding. For example, substantive or global/regional programmes can be funded using a variety of approaches including “tranching/phased” or “performance based” approaches. In concept, such funding modalities would approve programmes with approval of a first tranche of funding from the GCF to allow establishment and initial implementation to proceed. In such cases, further tranches of additional funding may be approved subsequently by the Board based on e.g. performance against clearly defined milestones, and/or evaluations of how well the programme has met the targets agreed in the original programme submission as well as development of pipeline of sub-projects.
5. The following principles would apply to all programmes and their respective sub-projects or phases:
 - (a) *Common and specific objective.* A programme addresses a specific issue or opportunity in the climate mitigation and adaptation context. Programmes that have broad coverage and spread across multiple sectors and/or countries should have a clear rationale in response to a specific issue or opportunity. There must be clearly defined measurable outcomes that unite all the sub-projects or phases.
 - (b) *Coherence among sub-projects or phases.* A programme has a clear linkage, synergy and interdependence among its sub-projects or phases, and each sub-project should contribute to the common and specific objective of the programme. Sub-projects complement and/or reinforce each other to achieve outcomes beyond those which could be achieved by GCF support for standalone one-off projects. Sub-projects also maintain coherence in their implementation; for global and regional programmes, the accredited entity and / or its executing entity should actively lead and manage the implementation of sub-projects to ensure coherence among activities in different countries. A programme may be structured so that initial sub-projects can be piloted for replication or scaling up through future sub-projects.
 - (c) *Value of a programme versus a project (or series of projects).* A programme should add significant value relative to a series of one-off projects, and the benefit(s) of taking the programmatic approach should be evident. There should be a strong rationale that a programmatic approach will enhance outcomes of the GCF investments relative to the project-based approach. The programme thereby takes on value greater than the sum of its parts (sub-projects). The programme’s added value could be in the form of increased cost efficiency, higher implementation effectiveness, greater impact, deeper integration across sectors or countries, or other outcomes. The programmatic approach should thus

demonstrate a greater likelihood to promote a paradigm shift, compared to single projects. It should also have additional benefits in terms of learning and knowledge generation, which can be captured in the programme’s monitoring, reporting and evaluation arrangements.

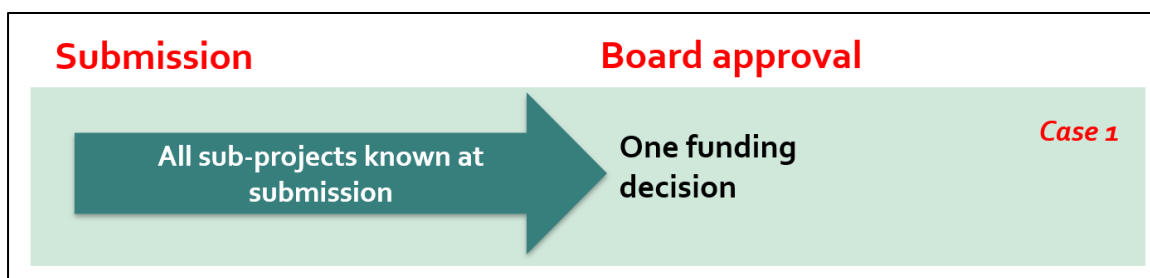
- (d) *Country driven.* A programme being considered by the GCF for funding should be aligned with the stated policies of the country(ies) and should address the needs of the recipient, based on the eligibility criteria defined in the programme proposal. While the mechanism for country participation is likely to be tailored to meet the needs of each programme proposal, actual country participation in the programme design and implementation should extend beyond the execution of a no-objection letter. Following the existing requirements for funding proposals, the accredited entity would be expected to comply with the no-objection procedure at programme level. In no case would a sub-project be funded in a country that has not provided a no-objection letter. In addition, the programme should demonstrate an inclusive governance structure that includes strong support from key stakeholders and all participating governments for taking a programmatic approach.
- (e) *Alignment with GCF's policies.* A programme, as well as its sub-projects, aligns with GCF’s policies and requirements, including the policies for environmental and social safeguards, gender, and others. The programme and sub-projects demonstrate alignment with GCF’s initial investment framework, including the investment criteria, sub-criteria and indicative assessment factors along with GCF’s information disclosure policy.

II. Submission of a programme and its sub-projects

6. These guidelines are prepared considering three possible cases of submissions of programmes:

7. For **Case 1**, all sub-projects are fully developed upon submission, with a one-time funding decision taken on all sub-projects under the programme. In this case, the funding decision is taken only once as the sub-projects were fully appraised before board approval.

Figure 1: Case 1 of submission of programmes and board approval

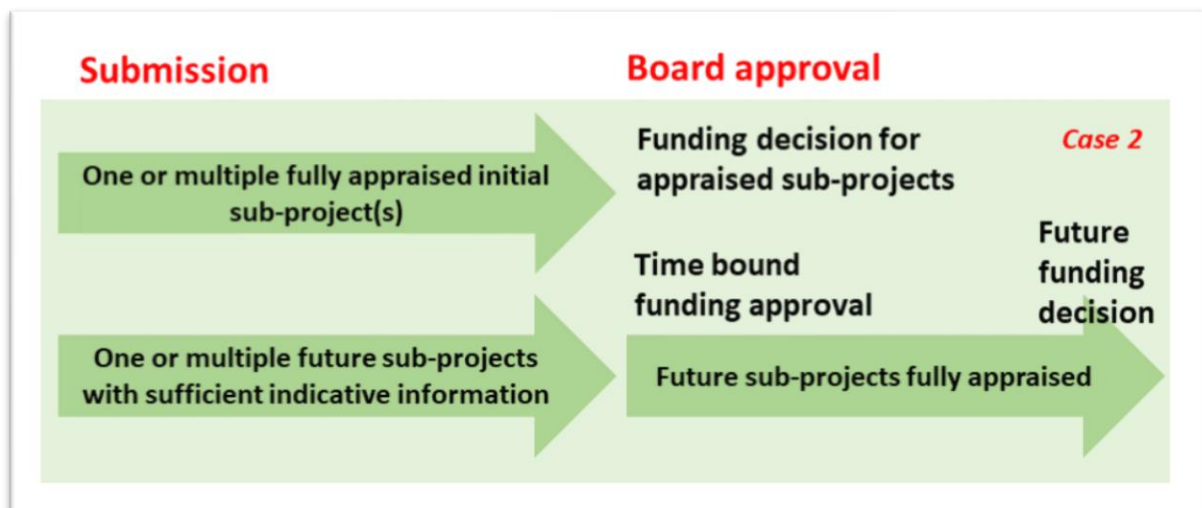


8. For **Case 2**, one or multiple sub-projects may be ready for Board consideration at the time of programme submission while additional sub-projects or phases may be fully developed and submitted in the future, as appropriate. In the second case, the following guidelines will apply:

- (a) A programme proposal should be submitted with one or multiple initial sub-project(s) that are fully developed and appraised. These sub-projects should comply with all relevant GCF policies.
- (b) When a programme proposal is submitted with one or multiple fully appraised initial sub-project(s), it can request approval of funding based on the one or multiple fully appraised initial sub-project(s).

- (c) A programme proposal may also request funding for the future sub-projects provided that sufficient indicative information is made available by the accredited entity in the programme proposal. The requested amount should be based on a list of future sub-projects being developed or to be developed.
- (d) The full amount would be approved at the outset by the Board, but further disbursements would be subject (in addition to the usual conditions precedent that can be cleared by the Secretariat) to approval by the Board of the particular sub-projects to be funded through the programme.
- (e) The funding approval will be time-bound based on programme specifics considering the timeframe and complexity of developing the future sub-projects or phases. The specific timeframe for funding approval should be proposed by the accredited entity in the programme, along with the rationale for such timeframe, and will be considered by the Board on a case-by-case basis. Upon the expiration of the pre-defined timeframe, the approval will no longer be effective.
- (f) Once a programme has been approved and fully appraised and developed subsequent sub-projects, these may be candidates for between-meeting decisions as the overall programme goals have already been defined.

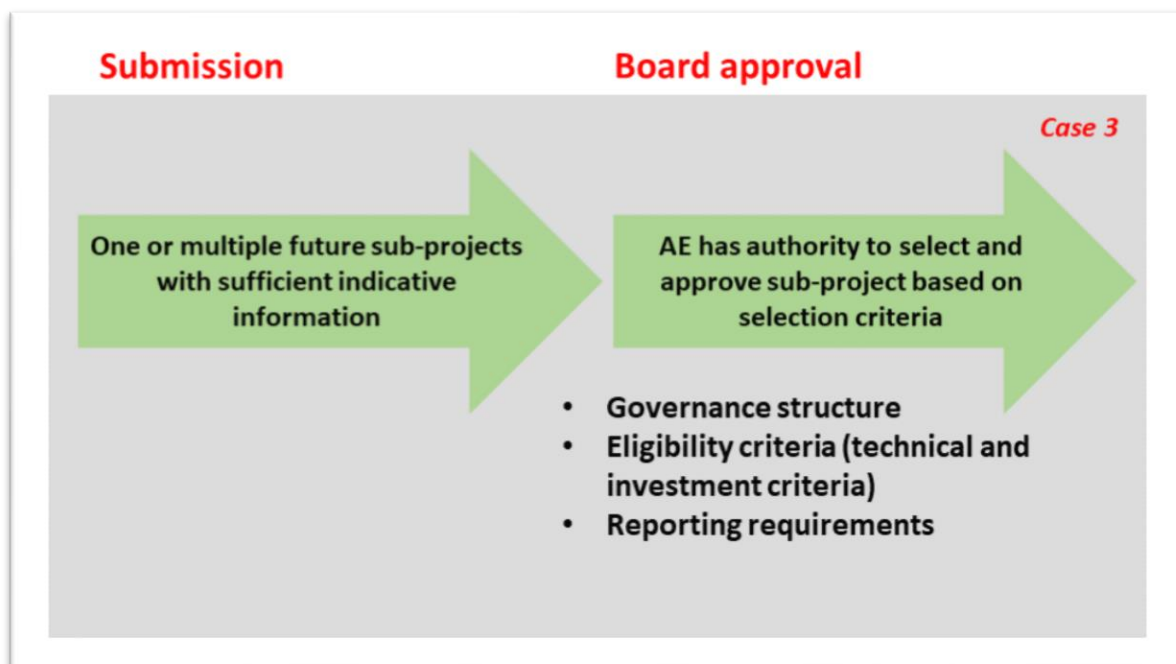
Figure 2: Case 2 of submission of programmes and board approval



9. For **Case 3**, the programme includes one or multiple sub-projects with sufficient indicative information on compliance with GCF policies, but a full appraisal is to be done in the future. The AE has authority to undertake detailed due diligence on proposed sub-projects and based on the outcome of such due diligence approve funding for such sub-projects that meet GCF Board-approved eligibility criteria. In addition, the following guidelines will apply:
- (a) Strong rationale describing the circumstances that justify the case of programme submission should be provided.
 - (b) A programme proposal should include a clearly defined Governance structure for decision making and ensuring country ownership.
 - (c) A defined set of eligibility criteria and means to ensure criteria on both technical and investment aspects that cannot be amended without Board approval.
 - (d) The reporting requirements should provide information on the mechanisms to ensure that the eligibility criteria and governance structure are viable and functional through the duration of the programme.

- (e) Similar to the previous case, the requested funding amount should be based on a list of future sub-projects being developed or to be developed.
- (f) The funding approval will be time-bound based on programme specifics considering the timeframe and complexity of developing the future sub-projects or phases. The specific timeframe for funding approval should be proposed by the accredited entity in the programme, along with the rationale for such timeframe, and will be considered by the Board on a case-by-case basis. Upon the expiration of the pre-defined timeframe, the approval will no longer be effective.
10. In some circumstances, a programme's features may require a more tailored approach for the submission and approval process. For instance, programmes in the form of financing facilities (e.g. revolving facilities including loans to financial institutions, warehousing lines, grant facilities, guarantee facilities, etc.) have key features that distinguish them from other types of programmes.
11. Key features of these include the homogeneity of sub-projects, high number and/or small size of sub-projects, and/or the time-sensitivity of sub-project approvals.
12. The following process and requirements would then apply for these types of programmes:
- (a) The accredited entity would set up a governance structure (typically an investment committee) at the programme level to ensure: the imposition of the accredited entity's obligations under the accreditation master agreement (AMA), funded activity agreement and Board's approval on the programme; and, the impartial, free and fair decision making on the selection of sub-projects;
- (b) The funding proposal would define a set of clear eligibility criteria, agreed with the Secretariat, covering the technical aspects of each programme (i.e. environmental and social safeguards (ESS), gender, indigenous people, monitoring and evaluation, risk, fiduciary, financial structuring, and legal) and GCF's investment criteria, with the objective of setting a standard level of quality for the sub-projects. Examples of indicative eligibility criteria could be as follows:
- (i) Impact potential: minimum expected impact per sub-project;
 - (ii) Sustainable development potential: minimum expected socio-economic benefits of each sub-project;
 - (iii) Efficiency & effectiveness: minimum expected ratio of CO₂/USD invested for each sub-project, minimum co-financing ratio of each sub-project.
 - (iv) ESS: type of ESS category of the sub-projects to be financed;
 - (v) Gender: minimum gender target for each sub-project to be financed;
 - (vi) Risk: indicative pipeline of sub-projects, credit category of the direct recipient of GCF's financing, portfolio concentration limits;
 - (vii) Legal: type of legal structure of an eligible investee;
 - (viii) Financial: appropriateness of instrument, financial parameters such as capitalisation, leverage, coverage or other ratios, conditions precedent, negative conditions, as may be appropriate

Figure 3: Case 3 of submission of programmes and board approval for programmes with sufficient indicative information but pending full appraisal



13. In all three cases, under exceptional circumstances where the sub-projects cannot be completed as set out in the initial proposal, the AE may apply to the Board for an extension in implementation period.

14. In all three cases, for Category A and Category B subprojects, the ESS Information Disclosure Policy will apply. It requires the accredited entities to disclose to the public and, via the Secretariat, to the Board and active observers, the necessary documentation relevant to the environmental and social safeguards of the activities and meeting the required disclosure period. The required disclosure will also apply to Category A and Category B subprojects of GCF-funded programmes and investments through medium- to high-level of intermediation.

15. The approach of GCF is to provide for grievance and redress at GCF, accredited entity, and activity levels. GCF requires that accredited entities inform the communities affected, or likely to be affected, by the GCF-financed activities about the grievance and redress mechanisms at all three levels, at the earliest opportunity of the stakeholder engagement process and in an understandable format and in all relevant languages. The details for sending complaints containing the contact information and the appropriate modes by which these will be received will be provided by the accredited entities to the communities and disseminated with other involved institutions.

16. If the accredited entities are acting in an intermediary function, the accredited entities will require the executing entities to fulfil the activity-level grievance mechanism requirements discussed in this section while maintaining responsibility for its own grievance redress mechanism and will conduct the necessary due diligence and oversight to confirm that these requirements are fulfilled.

III. Approval of a programme and its sub-projects

17. In **Case 1**, when a programme proposal is submitted with all sub-project(s) fully defined, a funding decision will be made by the Board for the programme proposal based on the sub-projects.

18. In **Case 2**, future sub-projects or phases beyond the initial, fully defined, individual or multiple sub-projects will be submitted to the Board for a funding decision when they are fully developed and ready for Board consideration.
19. In **Case 3**, approval of sub-projects is undertaken by the AE on the basis of applying agreed eligibility criteria. Sub-projects are held to the same standard GCF requirements whether they are submitted to the AE prior to the initial programme proposal or after programme approval. For the accredited entity to request delegated authority, the programme will specify clear and transparent eligibility criteria for the approval of sub-projects. The programme will also, in cooperation with the GCF Secretariat, define periodic reporting requirements (quarterly/semi-annually) that accredited entities will follow to report back to the Secretariat, and that the Secretariat will use to continuously assess the compliance of the AE with the eligibility criteria, and where appropriate to take remedial measures. Such further reporting would be additional to the annual performance reports that are the principal periodic mode of reporting and evaluation described in the monitoring and accountability framework for accredited entities adopted by the Board in decision B.11/10. The Secretariat and the Board will consider the appropriate reporting and assessment as well as other requirements that might be required to ensure implementation of a programme within GCF policies on a case-by-case basis.
20. Following GCF Board approval, the accredited entity would approve the sub-projects eligible to receive financing from the programme based on the eligibility criteria approved by GCF's Board (as part of the funding proposal package);
21. The Board may, at the request of the AEs and the recommendation of the Secretariat decide to approve a programme in multiple tranches. The Board may do so by deciding that the AE may seek approval of each tranche separately. Prior to any such approval by the Board, the commitment authority of the GCF shall not be reduced with respect to such further tranches.
22. Any material deviation from the eligibility criteria would require prior Board approval.

IV. Management, monitoring and evaluation

23. In order for the funding of other and/or subsequent sub-projects within the programme to be approved by the Board, management, monitoring and evaluation process also needs to be in place.
 24. Beyond the standard reporting requirements for a standalone project, a programme should also include additional programme-level reporting. For example, the accredited entity may report on experience gained and lessons learned from the design and implementation of the programme and how well the programme is achieving added value beyond what a collection of standalone projects would have achieved.
 25. The accredited entity would regularly report on the progress of the programme implementation and the pre-defined reporting requirements in addition to the requirements set out in the AMA.
-