

Supplemental PEPFAR FY 2010 COP Guidance: streamlined COP submission and revised timeline

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Since the dissemination of the FY 2010 COP Guidance, a number of factors have come into play that result in the need to modify the Guidance:

- The recently articulated heightened emphasis on country ownership and sustainability should be incorporated into Partnership Frameworks (PFs), Partnership Framework Implementation Plans (PFIPs) and COPs
- For many country teams, the simultaneous development of PFs, PFIPs and COPs represents a large burden
- Ongoing delays in the development of the COPRS II reporting system have complicated COP submission

1. Streamlined COP submission

Ambassador Goosby has decided that a streamlined COP should be implemented this year, with the understanding that this approach will also help to inform dialogue around how to implement a “two-year COP” for future years.

To summarize the proposed changes, the streamlined COP submission for FY 2010 will require new information only in areas with substantial new investments and/or changes. Since COPRS II will not yet be deployed, countries submitting their COPs in October will use blank templates for the implementing mechanisms and technical areas; revised templates will be provided shortly that will allow for printing and include other modifications and corrections. Additional templates will be provided for collection of Global Fund, Management & Operations, Indicator and Public-Private Partnership (PPP) data.

Countries that have completed full COPs in the past will submit streamlined COPs in FY 2010. Implementing mechanism and budget code narratives will be required only for implementing mechanisms and budget codes that:

- a) Are a new mechanism, or are an ongoing mechanism that has added funding in a new budget code,
- b) Have an increase in budget that exceeds 20%, or have a substantially changed scope of work, or
- c) Contain new construction costs.

For ongoing implementing mechanism activities that do not meet these criteria, no implementing mechanism or budget code narratives will be required; review teams at HQ will use the FY 2009 COP narratives for any questions about ongoing implementing mechanisms.

Countries that are completing full COPs for the first time for FY 2010 have the option to complete full implementing mechanism and budget code narratives for all implementing mechanisms and budget codes, as outlined in the COP Guidance. This is because there are no existing descriptions of these mechanisms. Cognizant, however, of the burden this may present, countries may choose not to complete the entire description but rather provide no more than 2-3 sentences briefly summarizing each implementing mechanism or budget code.

For all countries, technical area narratives will still be required, as will summary technical area targets and implementing mechanism cross-cutting budget codes and key issues. As in the past, an executive summary will be required; this year, in light of the reductions to other COP narratives, it should include a brief summary of any new program directions that respond to the new PEPFAR vision of promoting country ownership and sustainability, including increased focus on support to governments and technical assistance.

Countries will submit the same level of COP information whether they submit in October or January, although the formats might be different depending on CORPS II deployment. Countries submitting in October will need to submit implementing mechanisms and technical area narratives using COPRS II blank templates and will have more supplemental documents required for submission. If COPRS II is ready, the countries submitting in January will use the new system for direct data entry and submission.

The following provides detailed changes to the FY 2010 COP guidance, which only affect Section 6, starting on p. 40¹:

- Key demographic, socio-economic, health and HIV statistics (p. 40) will not be entered at headquarters but will need to be included in the Executive Summary, as discussed above.

¹ Provided page numbers are from the *FY 2010 COP Guidance: Programmatic Considerations* posted at: <https://www.pepfar.net/C8/FY2010%20COP%20Planning/default.aspx>

- Global Fund data entry (pp. 41-43) will be collected in a supplemental document, as in previous years. The only information requested is an update. A revised template for FY 2010 will be circulated shortly along with guidance.
- PPPs (pp. 44-45) will be captured in the supplementary document that was used in FY 2009, with minimal information changes.
- Countries will set national level targets per the existing guidance (pp. 49-50); guidance is forthcoming as to how those targets will be collected.
- Countries will submit technical area narratives as described in the guidance on p. 50. Countries should include narrative noting USG staffing with the technical area narrative, as the Management and Operations narratives have been streamlined.
- Technical area summary targets will be collected as described in the guidance on pp. 54-55. The template for collecting indicator data will be forthcoming.
- DUNS numbers (p. 55) for the FY 2010 COP will be handled by HQ once COPRS II is deployed.
- Other managing partner guidance remains the same (pp. 55-63).
Implementing mechanism information described in the guidance (pp. 63-85) will be collected for all mechanisms, including cross-cutting budget codes and key issues. As noted above, however, for countries that have completed COPS in the past, the inclusion of implementing mechanism and budget code narratives is only needed for only the three categories described on page 1 of this Supplemental Guidance. Additional information on which narratives should be completed follows:
 - For any new mechanism all applicable narratives should be completed; for an ongoing mechanism that has added funding in a new budget code, the overall narrative and relevant budget code narrative(s) should be completed.
 - For any ongoing mechanism where budget code funding has increased by 20% or more or where the scope of work has substantially changed, all applicable narratives should be completed.
 - For any new construction in any activity, narratives are needed. Please note that where funds are used for USG renovation of staff space, this should be described in the M&O narratives.
- Countries that are completing full COPs for the first time for FY 2010 have the option to complete full implementing mechanism and budget code narratives for all implementing mechanisms and budget codes, as outlined in the COP Guidance. Cognizant, however, of the burden this may present, countries may choose not to complete the entire description but rather are asked to provide no more than 2-3 sentences briefly summarizing each implementing mechanism or budget code.

- Early funding will take place outside of the COPRS system for FY 2010; guidance will be issued separately for this.
- Implementing mechanism-level indicators and targets will no longer be collected in the system for FY 2010. Agencies requiring this information for HQ reviews will collect this information outside of the COP.
- Management & Operations data has been revised (pp. 86-94). A template will be provided for narratives which will:
 - No longer include Narrative 1 (p. 88)
 - Still require Narratives 2, 3, and 4 (p. 88-90)
- Agency Information (p. 87-88) and staffing data will be collected in a supplemental database, as in previous years, with minimal information changes (i.e. Narrative 5 - justify new staff p. 90).
- All supporting documents (p. 94) will remain with the following exceptions and previously mentioned additions for a total of eight documents:
 - Executive Summary – in addition to the existing content, guidance would be provided to request that operating units discuss how their program will be moving to align with the new PEPFAR vision.
 - PF and PFIP upload will be optional based on whether this information is available/approved or not.

When country teams have completed their templates, all templates should be posted to their country team sites on www.pepfar.net and an email should be sent to the Country Support Team Leader (CSTL) stating that all FY 2010 COP documents have been posted to the website. Direct links to the country team web pages will be shared individually with country teams.

2. Revised timeline

To allow country teams that are working on PFs and PFIPs to focus on these critical five-year strategic documents, which will then inform the FY 2010 COP, the COP submission timeline is being revised. The general rule is that countries completing a PF/PFIP in CY 2009 will submit their COPs on January 29, while countries not submitting a PF/PFIP in CY 2009 will submit their COPs on October 16. (Please see table below.) An early funding opportunity, with requests due September 18, will allow countries submitting on January 29 to request funds through June 30, 2010.

The driving factors for this division of submission dates include:

- Allowing countries not completing PF/PFIPs to submit in October will enable funding for those countries to move more rapidly.

- Countries completing a PF/PFIP will have more opportunity to substantively focus on completion of a robust five-year strategic document (PFIP) that incorporates the new PEPFAR vision, and HQ will be more able to support the PFIP development process.
- This division reflects most countries' current planning timelines.
- This division enables HQ to better respond to the needs of the field by making the reviews more manageable, thus increasing HQ ability to meet timelines for Congressional Notifications and move money to the field

We recognize that the major disadvantage of this approach is that it makes it difficult for countries submitting in October to fully adjust programs to the new strategic direction. Thus, while this group of countries will undoubtedly do what they can to respond in the FY 2010 COPs, we understand that adjusting to the new program emphasis will, to some extent, be deferred to the FY 2011 COPs (and to PFs and PFIPs for countries submitting them in FY 2010). Further, it may mean that countries submitting in January may not be able to reprogram any FY 2010 funding until August (or within the current fiscal year) due to the timing of CN process and reprogramming request due dates.

Timeline for October 16 COP Submission	
<i>Date</i>	<i>Action</i>
September 18	Early Funding request due
October 16	FY 2010 COPs due (any countries with PF funding must also submit their final PFIP and proposed PF budget allocations for prior years at this time)
October 19 – November 4	COP cleaning and reading
November 5-13	COP reviews (9 teams conducting programmatic reviews only with TWG input, as needed)
November 13	FY 2009 APR due
December 15	CN ready for clearance
February 1, 2010	CN clears
February	Funding moves to agencies

Timeline for January 29 COP Submission	
<i>Date</i>	<i>Action</i>
September 18	Early Funding request due
September	Iterative review and approval of submitted PFs
October 1	All PFs approved
October/November	HQ technical assistance to field for PFIP

	preparation
November/December/January	Iterative, interactive reviews of <i>draft</i> PFIP
November 13	FY 2009 APR due
December 1	PFIPs and proposed funding allocations for prior year PF funding due for final review
January 29, 2010	FY 2010 COPs due
February 1-13	COP cleaning and reading
February 16-26	COP reviews (9 teams conducting programmatic reviews only with TWG input, as needed)
March 30	CN ready for clearance
May 1	CN clears
May	Funding moves to agencies

Anticipated Country Submission Dates	
<i>October 16 Submission</i>	<i>January 29 Submission</i>
Cambodia	Angola
China	Botswana
Ethiopia	Caribbean
Ghana	Central America
Guyana	Cote d'Ivoire
India	DRC
Indonesia	Dominican Republic
Malawi	Haiti
Russia	Kenya
Sudan	Lesotho
Swaziland	Mozambique
Thailand	Namibia
Uganda	Nigeria
Vietnam	Rwanda
Zambia	South Africa
Zimbabwe	Tanzania
	Ukraine

Please quickly confirm with your CSTL that you plan to submit on the date noted; if you have questions about the date provided above, we will work with you to determine the best option. Because of the unique circumstances of Central Asia, we will also work with the teams in that region to identify the best approach there.

There are additional policy decisions have been made with respect to the COP dual submission dates:

- COPs submitted in January cannot contain any unallocated funds.
- Countries not submitting a PF in CY 2009 may only program their FY 2010 COP to their approved FY 2010 planned base levels. Countries planning to complete PFs in FY 2010 will need to defer programming above their base until their PFs and PFIPs are approved. This is anticipated to be later in the third quarter of FY 2010.

Under this simplified version of the FY 2010 COP submission, HQ seeks to maximize the utility of COPRS II by 1) providing valid templates based on the system to reduce burden later in transferring data from the templates to the deployed system, 2) continuing to prepare written responses to COP guidance clarification questions and 3) continuing to host COP Calls for real-time answers to questions. HQ is also working on a solution for the October submission countries to be able to see reports and analyses of the data provided in the templates in order to review and finalize budget and program decisions. Country teams should also take this opportunity to re-evaluate their technical assistance needs and work with their CSTL and agency backstops to adjust any current requests as appropriate.

If you have any questions or comments, please contact your CSTL.