

Dear Colleagues,

PATH is highly supportive of the FIF and its intention to bring new resources to an overlooked area of global health. These investments will ensure that countries can better prevent, prepare for, and respond to pandemics, to keep us all safe.

We appreciate the opportunity to provide feedback on the questions presented in the World Bank Group's May 2022 whitepaper on "**A Proposed Financial Intermediary Fund (FIF) for Pandemic Prevention, Preparedness and Response Hosted by the World Bank.**"

Question	Feedback
Focus of FIF financing	
<p>Given the substantial financing needs identified by various independent reports at country, regional and global levels, while also recognizing that the FIF's financing priorities could change over time, and that it would ultimately be the prerogative of the FIF's governing board to set the priorities, what would be the optimal balance between priorities at these three levels in the initial phase of the FIF's operationalization?</p>	<p>Regional entities (e.g., groups such as Africa CDC) could receive the bulk of funding, then country, then global. This is for efficiency at start-up, but also because of the need to look at cross-border challenges that come into play in pandemics. Country-level funding is also critical, especially in countries where risk of pandemic emergence is high and surveillance, diagnostic, and other key capacities are low. There is a great opportunity to strengthen the capacity, leadership, and decision-making roles of regional and national entities, to help negotiate those challenges.</p> <p>Ensure the FIF meaningfully supports country- and regionally-led initiatives to build stronger systems, which are the key to preventing, preparing, and responding to pandemics. We need to leverage investment by all member states, but in offering those funds, prioritize the needs of the LMICs, which need it most and are often left behind. LMIC partners should inform the FIF's priorities.</p> <p>Funding sources need to be new, diverse, sustainable, and commensurate with the needs, reaching beyond overseas development assistance (ODA) and health budgets and leveraging both public and private sources of finance. It is important to vet private sources for conflicts of interest and adherence to global agreements and codes of conduct, in research, manufacturing, marketing, and other actions which may benefit a particular organization.</p> <p>We understand that specifics about *what* to fund are still being specified, but—if regional and country actors agree that these are priorities—we recommend providing funding to build and enhance:</p> <ul style="list-style-type: none">• Core systems and capacities that constitute global public goods for preparedness.• Integrated, multisectoral approaches (including human and animal health, climate, and other areas) that address causes of pandemic emergence and spread.• Reliable, coordinated disease surveillance, epidemiology, data, and laboratory networks for early detection and sequencing of emerging pathogens with pandemic potential.

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	<ul style="list-style-type: none"> • Robust and effective biosafety, biosecurity, and research oversight and governance capacity. • A well-trained, well-equipped frontline health workforce and infrastructure capable of timely, agile, and effective infection prevention and control while ensuring continued delivery of essential health services. • Stress-tested multi-level systems (emergency operations centers, national public health institutes, communications networks, simulations, and pre-agreed response protocols) to stop outbreaks from spreading. • Platforms to accelerate and coordinate equitable development, manufacturing, and delivery of countermeasures to control pandemics. <p>We would envision that the agencies putting forth in calls for proposals, would express interest in applications that address one or more pieces of the ecosystem for Pandemic Prevention, Preparedness and Response; are multisectoral partnerships; and are disease and technology agnostic versus specific investments in a particular solution. That ecosystem includes infrastructure, workforce, coordination, regulation, global goods, supply chain, tax/trade/incentives, procurement and pricing, and equitable access amongst other critical elements.</p>
Governance	
<p>Based on the alternative arrangements that different FIFs following terms of the structure and composition of their governing boards, as presented above, we would welcome views on the composition of the governing board for the proposed FIF and on how best to incorporate the representation of recipient countries in a manner that balances inclusivity with the need for efficient decision-making and implementation. To facilitate efficient governance, the majority of FIFs group recipients into constituencies. How should recipients be grouped? For example, one seat per region? Or should limitations be set</p>	<p>In terms of the independent governing board making decisions about the FIF’s work program, we recommend that the FIF be governed in such a way as to avoid outsized influence from powerful actors. Ensure diverse leadership and governance to drive equity, transparency, and accountability through high-level representation from a cross-section of governments at all income levels, multilaterals, foundations, civil society, academia, and private sector. Regional entities such as African Development Bank, Africa CDC, AUDA-NEPAD, and other Africa-based entities should be considered. Africa, Asia, and Latin America/ Caribbean should have more seats than does the global north (especially US, Europe, Canada). LMICs should be preferred, and small island nations should be included. And the people serving as representatives of those groups should include meaningful numbers of women, marginalized tribal groups, people with disabilities, people of color, people who experience poverty, and other groups who are disproportionately impacted by pandemics.</p> <p>Given that the WB is already listed as Secretariat and—of course—Trustee, someone other than the WB should be lead, if leadership falls to one entity. To bring a level of equity at the highest level of the FIF, LMIC participants should be heading up the governance. Any of GFATM, Gavi, and CEPI could serve as the entity leading the independent governing board, but in any case, all three of those should be explicitly listed in</p>

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<p>on the number of countries in any one constituency to facilitate coordination within the constituency, which would result in a different number of seats per region?</p>	<p>the governance structure, and the staff people in the lead should be from LMICs. Moreover, if the FIF is meant to strengthen the whole ecosystem and add value, an alliance model like Gavi might be appropriate with defined roles for Gavi, GFATM, CEPI, and of course WHO.</p> <p>Furthermore, we recommend considering engagement of multisectoral partners at two levels: in the FIF's overall governance structure, and at the country level. We strongly endorse the GFATM Country Coordinating Mechanisms model and ask that you examine the Global Financing Facility multisectoral country platforms being stood up now because of a lack of engagement of local stakeholders to strengthen decision-making and funds disbursement.</p> <p>The FIF should complement existing work and structures and avoid further fragmentation of the global health architecture, filling strategic PPR gaps that are not currently covered by existing organizations and initiatives. It should work closely with leading global institutions to align efforts.</p> <p>We have concerns over who would determine who should use the funds and for what—and provide technical assistance to ensure PPR happens effectively and equitably. If the secretariat is small and focused on providing administrative support and helping the trustee disburse and oversee funds, and the technical advisory committee is focused on informing the independent governing board, then it is important to consider who would take this role of ensuring the funds are funding the right things and doing so effectively and equitably. We recommend a technical review board assists in assessing and ranking applications.</p>
<p>How could representation from CSO observers be best reflected on the FIF's governing board? Would a constituency-based approach work?</p>	<p>As per feedback you have already received, we would strongly recommend CSOs be elevated beyond observers. They should be involved in the design and the FIF should be accountable to civil society, rather than having their voice and influence in decision-making be limited. CSOs should be on the governing board, with a predominance of regional and national CSO not as observers but as core members of the governing board. CSOs themselves should be given the opportunity to select their representatives—as seen in GFF, Gavi, UHC2030 and GFATM—with a strong preference for LMIC representation.</p>
<p>How could the FIF's governing board best leverage scientific/technical advice from WHO and other expert organizations/individuals? (e.g., through a technical advisory body and/or as</p>	<p>Scientific technical organizations/individuals should be advisors rather than observers, and they should go beyond WHO. CSOs should be represented amongst them. WHO should be a full member of the governing board to bring technical expertise. A scientific/technical advisory committee as a permanent committee of the governing board should be set up with members drawn from WHO, technical organizations, CSOs with expertise, LIC, and LMIC experts. The CSOs should not be only self-selected, but purposively sought for participation on the scientific/technical advisory</p>

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observers to the governing body?)	<p>committee. The advice from this committee should be considered in the governing board's decisions, and the chair of this committee should be members of that governing board.</p> <p>It would also be worth considering including private sector scientific/technical experts without conflicts of interest/challenges adhering to global norms and agreements regarding code of conduct, provided there is proper vetting.</p> <p>Organizing a technical advisory board with broad participation from technical organizations, academia, NGOs, and LIC/LMIC experts should be included. This could be done through a solicitation/application model to allow for broader participation.</p>
What would be the best way to establish linkages between the proposed FIF and the G20 JFHTF and/or any other G20 finance and health coordination platform established in the future?	<p>Link measurable progress toward global preparedness indicators and support technical collaboration to implement capacity-building and monitor and evaluate effectiveness, leveraging leading existing tools such as the JEEs, the IHR Monitoring and Evaluation Framework, and the Global Health Security Index.</p> <p>As well it will be important to link the various financing mechanisms together so that there is transparency, avoidance of duplicate funding, etc.</p>
Operating modalities, funding allocation, funds flow and resource mobilization	
How can the FIF's operating modalities be best structured to incentivize/catalyse country investments in PPR?	<p>The FIF could arrange to match at an accelerated level (e.g., 2x matching, or an indicative amount, at least at the start) what LMIC country governments commit and deliver through their own budgets, per line items of supplies and ecosystem activities considered "PPR". This could help establish systems and structures that include planning for financing increases over time and more sustainably ensure longer term management at country level.</p> <p>Alternately, or in tandem, there could be a performance-based checklist applying a number of indicators on pandemic preparedness. A score of certain percentage would then qualify a country a certain range of resources.</p> <p>In any case, the FIF should catalyse domestic planning and budgeting for preparedness without forcing prioritization between pandemics and other health and domestic needs, and without contributing to further indebtedness, both of which are demotivating and contribute to debt crisis for already struggling countries.</p> <p>As well, to incentivize country investments, the FIF should include country governments and country and regional entities in decision-making, as mentioned above, and ensure resources to support PPR actually reach countries, including their frontline health workers and contribute to health systems strengthening.</p>

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	Country and regional partners should be prioritized as implementers, in order to enable country leadership and targeted resource allocation. We are concerned that if the funds flow through UN agencies, to offer technical assistance and provide funding to governments, this will create a delayed and indirect funding flow, limiting funds available to countries. Other partners beyond the UN agencies should certainly be included among implementing partners.
Should the FIF include eligibility for financing private sector activities and if so, which implementing entities should be engaged for this purpose (FIFs primarily fund such activities through the private-sector arms of MDB groups)?	Private sector entities should be focused on those (including markets and manufacturers) in LMICs, especially for activities around building the ecosystem for PPR, e.g., researchers/firms building global goods, collaborating equitably, sustainably, and meaningfully with others. But conflicts of interest, adherence to global agreements and code of conduct should be carefully vetted. Critically, support to private sector should ensure that outputs are for public benefit and investments are short term in nature.
Based on the relative merits and disadvantages of alternative replenishment approaches described above, should the proposed FIF aim for regular replenishments (e.g., every three or five years) or ad hoc replenishments?	Replenishments can be scheduled to happen every five years. Such a period gives adequate time for planning, execution and learning, though a longer window would be required to see impact. Replenishments should target different stakeholders including government of all member states, bilateral and multilaterals including opportunities for crowd funding and for the private sector as a financier.