41st Board Meeting

Recoveries Report for the period ended 31 December 2018

GF/B41/16 15-16 May 2019, Geneva

Board Information

Purpose of the paper: This report is provided to the Audit & Finance Committee for review pursuant to a decision of the Board at its Thirty-Second meeting (GF/B32/DP04) and contains background information and an updated table regarding the status of non-compliant expenditures identified by the Office of the Inspector General ("OIG") as of 31 December 2018, as well as recoverable amounts identified in the due course of grant management operations as of 31 December 2018. The OIG reports independently to the Board on the Secretariat's progress on matters related to recoveries.



Executive Summary

Context

During the second half of 2018, the total outstanding OIG recoverable balance, net of written commitments to repay, remained stable at US\$ 1.9 million. The US\$ 1.9 million total outstanding recoverable balance, net of written commitments, demonstrates resolution of 98% of the aggregate recoverable amount over time (unchanged from 30 June 2018). The 98% results from both an increase in resolution of recoveries case and a decreasing trend in new cases (both in terms of number of new cases and the amounts identified as non-compliant for each such case).

Turnaround times for new cases continue to improve compared to 'legacy' cases, i.e., pre-2014. Of the 10 open OIG cases, only 1 case dates back to pre-2014. The improvement with respect to legacy cases reflects the more rigorous approach to recoveries referred to in previous reports with the Global Fund seeing considerable benefits: recoverable funds are being returned more quickly than was the case pre-2015. In the last two quarters, the Secretariat had five new cases amounting to US\$ 1.87 million, with three of these cases having been closed before 31 December 2018. Of the outstanding recoverable amount related to these new cases, approximately US\$ 1.1 million relates to Zambia, for which the Secretariat has received a letter from the Ministry of Health indicating that they will reimburse the full amount to the Global Fund by no later than 31 October 2019.

The non-OIG aggregate outstanding balance amounted to US\$ 14.3 million. This amount is distributed amongst 55 grant implementers in 33 countries with a median recoverable balance of US\$ 58,653.

Good progress continued in early 2019, and by January 31st, the OIG aggregate outstanding balance amounted to US\$ 1.4 million, representing resolution of 99% of aggregate recoverable amounts; and the non-OIG aggregate outstanding balance amounted to US\$ 13.4 million.

There are no specific actions required for Secretariat, OIG, Board or Committees emanating from this report.

What is the topic of this update?

1. The Global Fund is fully committed to the principles of transparency and accountability. To fulfill this commitment, the Global Fund works, through its risk management and assurance processes, to expose irregularities and misuse of resources. Key measures are dedicated towards prevention but where irregularities or misuse have materialized, action is taken to address the underlying weaknesses and seek recoveries as appropriate.

2. The Global Fund maintains a zero-tolerance approach to fraud and corruption and aims to take swift and appropriate action when cases of misuse of funds are identified. The Global Fund will continue to ensure that all identified irregularities are communicated responsibly and in a timely manner to the Board and to other stakeholders.

3. Reports on amounts identified as compromised by various compliance issues and on the Secretariat's efforts to seek refunds from recipients should be read in full awareness of the context and broad environment within which the Global Fund operates. Specifically, the Global Fund works in countries where governance, programmatic and oversight capacities are often weak, which carries inherent financial and programmatic risks.

What is the current status?

OIG Recoverable Amounts

4. When the OIG publishes audit or investigation reports that include the identification of noncompliant expenditures, the Secretariat identifies an appropriate amount to recover, taking into account the Global Fund's legal right to recover, Global Fund policies and procedures, the financial loss to the program, relevant business and political implications, and the specific facts of the case, and engages in a process to seek recovery of such amount. All OIG recoverable amounts are approved by the Executive Director, upon the recommendation of the Recoveries Committee.

5. With respect to open OIG investigation reports, which are reflected in the amounts in Tables 1 - 2, the Secretariat uses as a starting point the proposed recoverable amount indicated by the OIG in the investigation reports rather than the total non-compliant amount, given that the total non-compliant amount includes amounts that may not be recoverable because, for example, the associated services or goods have been delivered to the grants. The historical difference between total non-compliant expenditures and the proposed recoverable amounts identified in OIG investigation reports from March 2009 through 31 December 2018 amounted to US\$ 43.4 million. Specifically, for the second half of 2018, the total non-compliant expenditures amounted to US\$ 1,872,476, of which there was a difference of US\$ 175,818 between the total non-compliant expenditures identified in OIG investigation reports and the proposed recoverable amounts. This difference of US\$ 175,818 is a result of the Global Fund having recovered the amount earlier on.

6. As OIG audit reports typically do not include a proposed recoverable amount, the Secretariat, with input from the OIG, determines the appropriate recoverable amount based on the content of the OIG audit report. This recoverable amount is then presented to Recoveries Committee's review and subsequent recommendation to the Executive Director for approval.

7. During the six-month period ended 31 December 2018, there were five new cases that were presented to Recoveries Committee with an aggregate recoverable amount of approximately US\$ 1.87 million. Of this amount, the Papua New Guinea case represented US\$ 175,818, the Zambia case represented US\$ 1,064,788, the Eswatini case represented US\$ 26,701, the Nigeria case represented US\$ 63,580 and the South Sudan case represented US\$ 541,589.

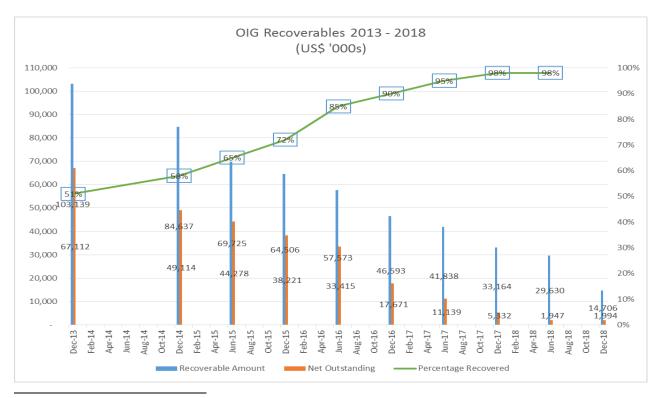
8. As of 31 December 2018, there are two OIG investigation reports pending presentation to the Recoveries Committee: Guinea for US\$ 114,366, and the Country Coordinating Mechanism Mozambique for US\$ 26,020 (of which US\$ 1,433 has already been reimbursed).

9. During the second half of 2018, further good progress was made: US\$ 3.1 million was recovered and credited to the Global Fund's bank accounts, relating to cases for which demand letters were sent as well as cases subject to Reimbursement Protocols. Of those cases with an aggregate recoverable amount of US\$ 18.3 million that were closed in the second half of 2018, it is important to note that US\$ 1.5 million in cash was actually received during the same period. Since the inception of the recoveries process, a total amount of US\$ 86.4 million has been recovered and written commitments for a further US\$ 6 million have been obtained.

10. The total outstanding recoverable balance, net of written commitments to repay, remained unchanged at US\$ 1.9 million¹.

11. The US\$ 1.9 million total outstanding recoverable balance, net of written commitments, demonstrates resolution of 98% of the aggregate recoverable amount over time (up from 95% as of 31 December 2017). The 98% results from both an increase in resolution of recoveries case and a decreasing trend in new cases.

12. Graph 1 below illustrates the evolution of the total amount deemed recoverable (all cases) and the net recoverable outstanding amounts for the previous five years.



¹ The Secretariat notes that in an OIG audit report: Limited scope review of the Secretariat's Recoveries Report for the period up to 31 December 2015, dated 30 August 2016, the OIG indicated that the total outstanding recoverable balance as of 31 December 2015, net of written commitments to repay, that the OIG was able to verify amounted to US\$ 39.1 million while the Secretariat-reported amount was US\$ 38.2 million. The discrepancy results from a difference of US\$ 1.0 million in the gross recoverable amount that the OIG was able to verify and a difference of US\$ 1.9 million in the oIG was able to verify as recovered. The Secretariat is working with the OIG to reconcile the figures but for the purpose of this report, the Secretariat is basing the figures on the Secretariat-reported amounts.

13. Turnaround times for new cases continue to improve compared to 'legacy' cases, i.e., pre-2014. The improvement with respect to legacy cases reflects the more rigorous approach to recoveries referred to in previous reports and the Global Fund is seeing considerable benefits: recoverable funds are being returned more quickly than was the case several years ago.

14. Recoverable amounts are recorded in the Global Fund's financial statements in accordance with International Financial Reporting Standards (IFRS). The net recoverable amounts in this report may be different from those presented in the financial statements due to the accounting method adopted to comply with the requirements of IFRS. For example, the OIG may release a report that is promptly reflected in this report but converting the findings into a demand letter (which is then booked in the financial statements) may not take place until after the reporting period and may also reflect adjustments based on recommendations by the Recoveries Committee and approval by the Executive Director. It should be noted that the financial statements reporting on losses and recoveries uses the exact same underlying data as that presented within the tables below, and that a formal reconciliation process is implemented and validated through the Recoveries Committee.

Non-OIG Recoverable Amounts

15. The Secretariat is in the process of finalizing the development and implementation of an automated process to centrally capture and report on confirmed non-compliant expenditures. During December 2018, the majority of the development of the automated process was completed and the Secretariat expects to be able to formally launch the automated process in the Grant Operating System (GOS) in the first quarter of 2019. Consequently, the data as of 30 June 2019 data to be included in the next Recoveries Report is expected to be sourced from this automated process.

16. It is expected that this will be the last Recoveries Report whereby the Secretariat implemented a manual process to centrally capture and report on confirmed non-compliant expenditures that arise in the ordinary course of grant management. Non-OIG recoverable amount data is collected each quarter from Country Teams and offers a snapshot of a rolling total. In the event that they are not resolved within specified timeframes these instances are reported to the Recoveries Committee for their review and recommendation in accordance with guidance provided to Country Teams.

As of 31 December 2018, the aggregate outstanding balance due amounted to US\$ 14.3 million and is distributed across 33 countries (55 Principal Recipients).

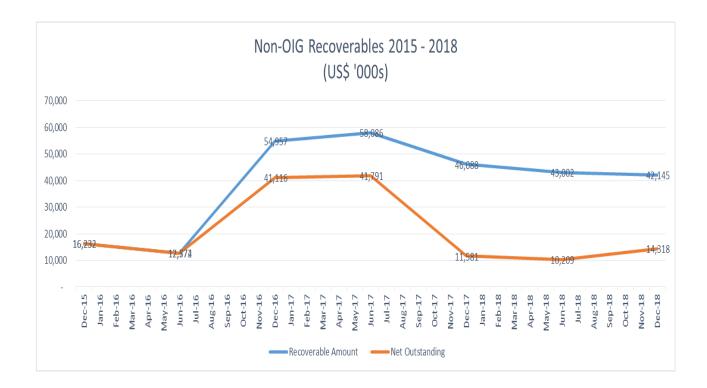
17. Of this US\$ 14.3 million, there are four Principal Recipients that account for approximately 52.1% of the total outstanding amount due, as follows:

Ministry of Health (Ghana): US\$ 2.3 million (16.4%) National Agency for the Control of AIDS (Nigeria): US\$ 1.9 million (13.3%) Ministry of Health (Mozambique): US\$ 1.8 million (12.3%)

Ministry of Health (DRC): US\$ 1.4 million (10.1%)

17. As of 31 December 2018, of grants that have outstanding non-OIG recoverable amounts, the average amount outstanding per grant is US\$ 238,870 but it should be noted that this figure is influenced by the aforementioned amounts listed in paragraph 20. As such, closer attention is warranted on the median amount, which is US\$ 58,653.

18. Graph 2 below illustrates the evolution of the total amount deemed recoverable (all cases) and the net recoverable outstanding amounts for the previous five years.



2:1 Allocation Reduction

19. The second half of 2018 has also seen three further applications of the so-called "2-for-1 allocation reduction" method to resolve particularly difficult cases, where all reasonable recovery approaches have failed to produce results. Allocation reductions represent a means available to the Secretariat of resolving exceptionally difficult cases where all means of recovery have been considered exhausted. Upon approval by the Executive Director the country's allocation is reduced by a factor of 2:1, being two units of allocation reduction for every one unit of recoverable amount.

20. There are a number of reasons why the allocation reduction approach is only applied as a last resort. For one, there is a negative impact on the country's available budget to fight the three diseases. Additionally, the misused funds with respect to which the reduction is applied are not actually recovered. As a result, there may be less accountability and 'consequence' for an implementer who misspent funds.

21. Accordingly, it is important that there is adequate visibility for the cases in which it was concluded that there was no better option but to apply the 2-for-1 allocation reduction approach, which is why the allocation reductions that occurred during the period ended 31 December 2018 are described in the following paragraphs.

22. During the period ended 31 December 2018, 2-for-1 allocation reductions were used to resolve US\$ 956,320 of outstanding recoverable amounts through three cases. In regard to these cases, the Recoveries Committee reached the conclusion that all other reasonable options for recovery and forms of leverage had been considered and exhausted, and deemed the programmatic impact of the allocation reduction to be limited. These allocation reduction recommendations were approved by the Executive Director.

Nepal (Non-OIG)

As originally noted in the Recoveries Report for the period ended 31 December 2017, Global Fund reviews initially uncovered US\$298,697 of non-compliant expenditures under three Nepal grants, all of which were implemented by national programs under Nepal's Ministry of Health and Population (MoHP), who no longer serve as Principal Recipients. The Global Fund determined it had exhausted all options for recovery of this amount, and therefore approved a 2:1 reduction to Nepal's 2017-2019 allocation in an amount of US\$597,394. Subsequently, the MoHP provided new information and documentation that included proof certain funds had been returned to the relevant program accounts and providing support for expenditures previously considered non-compliant, based on which the Global Fund approved a reduction of US\$233,593 to the recoverable amount outstanding, for a revised outstanding amount of US\$65,104. Given the continuing low likelihood of cash recovery, the Global Fund therefore approved the application of a revised allocation reduction of US\$130,208 to Nepal's 2017-2019 allocation, and this revised item is therefore being included.

Ghana (OIG)

An OIG investigation report released in 2014 found irregularities in the procurement process of condoms by the Principal Recipient Ministry of Health ("MoH"). The condoms at issue were also found to be defective. The total loss to the grant as a result of this procurement was found to be US\$3,840,003. In 2015, the MoH entered into an agreement to replace the condoms and to repay the recoverable amount in respect of any condoms not replaced. The agreement was partially implemented due to delays and poor coordination on the part of the MoH. Nevertheless, the Global Fund applied cash payments and in-kind contributions received from the MoH to this outstanding amount, reducing it to US\$826,494. After exploring all options for recovery and forms of possible leverage, as well as in consideration of the length of time elapsed and the need to prioritize other pending matters such as the progressive implementation of the supply chain-related milestones from the agreement covering losses due to a central medical store fire, the Global Fund decided to apply a 2:1 allocation reduction in an amount of US\$1,652,988 to Ghana's 2017-2019 allocation.

Sri Lanka (Non-OIG)

Non-compliant amounts totaling US\$64,722 relating to unbudgeted cost overruns for staff (US\$28,054) dating back to 2014 under HIV grant SRL-S11-G13-H and unsupported provident fund and trust fund contributions (US\$36,668) from the period between 2008 and 2010 under TB grant SRL-607-G07-T were identified by the Global Fund. Both grants were implemented by the Principal Recipient Ministry of Health, Nutrition and Indigenous Medicine ("MoHNIM"). Considering the Global Fund had exhausted all options for recovery and the low likelihood of any recovery from MoHNIM, it decided to apply a 2:1 allocation reduction in respect of Sri Lanka's 2017-2019 allocation, for a total reduction of US\$129,444. As noted in the Recoveries Report for the period ended 30 June 2016, the Global Fund had previously applied a reduction of US\$2,929,292 to Sri Lanka's 2014-2016 allocation, to address recoverable amounts outstanding from MoHNIM's predecessor agency (in addition to from two non-governmental former Principal Recipients).

Post Script (Significant events occurring or expected after 31 December 2018)

23. In November 2018, Population Services International transferred US\$ 7,482,908 to the Global Fund in relation to an OIG investigation report with respect to the Democratic Republic of the Congo that was sent to the AFC on 13 February 2019.

24. In November 2018, UNDP transferred USD 846,900 in relation to a UNDP OAI investigation.

25. In December 2018 the previous Government of the Democratic Republic of the Congo sent a letter signed by both the Minister of Health and the Minister of Finance to the Global Fund acknowledging that the Government would reimburse US\$ 1,436,344 in Non-OIG non-compliant expenditures over the course of 2019.

26. In January 2019, the Republic of Mali signed a Reimbursement Protocol with the Global Fund for an aggregate amount of EUR 1,536,705.

Annexes

The following items can be found in Annex:

- Table 1 provides an overview as of 31 December 2018.
- Table 2 presents the detailed country-by-country data for OIG-reported open cases as of 31 December 2018.
- Fully resolved OIG-reported cases feature in Table 3 as of 31 December 2018.
- Table 4 presents a summary of recoverable amounts identified in the due course of grant management as of 31 December 2018.

Table 1: Overview of OIG recoverable amounts considered by the Recoveries Committee as of 31 December 2018

Table 1: Overview as at 31 December 2018									
All amounts expressed in US\$									
				Recoveri	es and other Adjus	tments			
	OIG Reported Figures	Management Adjustments	Amount deemed Recoverable	Written off	Allocation Reduction	Received	Net Still to Recover	Committed to Repay	Net after Commitments
Balance as at 01 July 2018	33,013,263	(3,382,905)	29,630,358	0	(1,845,209)	(16,550,942)	11,234,207	(9,287,063)	1,947,144
Add/(Less): Recoveries and other Adjustments									
Cash recovery						(1,369,864)	(1,369,864)		(1,369,864)
New Commitments							0	1,597,093	1,597,093
Commitments recovered						(1,711,560)	(1,711,560)	1,711,560	0
Net management adjustments		(33,013)	(33,013)				(33,013)		(33,013)
Write offs				(777,486)			(777,486)		(777,486)
Allocation Reduction					(826,494)		(826,494)		(826,494)
	0	(33,013)	(33,013)	(777,486)	(826,494)	(3,081,424)	(4,718,417)	3,308,653	(1,409,764)
Add: New cases reported by the OIG during the period:	1,872,476	(239,818)	1,632,658	0	0	(175,818)	1,456,840	0	1,456,840
Less: Cases closed after full resolution	(18,301,011)	1,776,882	(16,524,129)	777,486	2,671,703	13,074,940	0	0	0
Balanœ as at 31 Deœmber 2018	16,584,728	(1,878,854)	14,705,874	0	0	(6,733,244)	7,972,630	(5,978,410)	1,994,220
Total dosed cases (n=82)	137,764,865	(37,430,101)	100,334,764	(5,292,023)	(15,382,178)	(79,660,563)	0	0	0
Total all reported cases (n=92)	154,349,593	(39,308,955)	115,040,638	(5,292,023)	(15,382,178)	(86,393,807)	7,972,630	(5,978,410)	1,994,220

Table 2: Recoveries Committee OIG cases with outstanding recoverable amounts as of 31 December 2018 - Dates provided below each country refer to the date the OIG report was published.

		01	G Reported	figures								
	Misappropriated	Unsupported	Ineligible	Other	Management Adjustments	Gross Recoverable		Allocation Reduction	Recovered	Net Amount still to	Committment to	
	(in USD)	(in USD)	(in USD)	(in USD)	(in USD)	Amount (in USD)	(in USD)	(in USD)	(in USD)	Recover (in USD)	Repay (in USD)	(in USD)
Burkina Faso	0	0	9,918,532	13,035	0	9,931,567	0	0	-5,240,697	4,690,870	-4,690,870	(
OIG - Audit												
30/10/2015												
PADS / Plan International	0	0	9,918,532	13,035	o	9,931,567	0	C	-5,240,697	4,690,870	-4,690,870	(
Central African Republic	198,334	718,106	219,908	70,119	-26,749	1,179,718	0	a	-70,119	1,109,599	-911,265	198,334
OIG - Audit												
06/02/2013												
CN/CNLS	0	718,106	219,908	70,119	-26,749	981,384	0	C	-70,119	911,265	-911,265	(
17/01/2018												
IFRC	198,334					198,334				198,334		198,334
Kenya		62,557				62,557			-11,932	50,625		50,625
OIG - Investigation												
09/02/2018												
NTLDP		62,557				62,557			-11,932	50,625		50,625
Mali	2,210,113	0	0	0	-1,586,977	623,136	0	a) a	623,136	0	623,136
OIG - Investigation												
06/10/2014												
Rep. of Mali	2,210,113	0	0	0	-1,586,977	623,136	0	0	, a	623,136	0	623,136
Niger	94,712	1,590,897	0	0	-168,569	1,517,040	0	a	-1,140,765	376,275	-376,275	c
OIG - Investigation												
01/12/2014												
UNDP	94,712	1,590,897	0	0	-168,569	1,517,040	0	0	-1,140,765	376,275	-376,275	c
Nigeria	54,472			9,108		63,580			-19,858	43,722		43,722
OIG - Investigation												
06/08/2018												
ARFH	36,196			9,108		45,304			-13,169	32,135		32,135
IHVN	18,276					18,276			-6,689	11,587		11,587
Timor-Leste	0	152,626	0	0	-96,559	56,067	0	0	-42,813	13,254	0	13,254
OIG - Audit												
09/10/2015												
мон	0	152,626	0	0	-96,559	56,067	0	C	-42,813	13,254	0	13,254
Uganda			207,421			207,421			-207,061	360		360
OIG - Audit												
26/02/2016												
MOFPED			207,421			207,421			-207,061	360		360
Zambia	1,064,788		,			1,064,788				1,064,788		1,064,788
OIG - Investigation												
26/04/2018												
мон	1,064,788					1,064,788				1,064,788		1,064,788
Grand Total	3,622,419	2.524.186	10,345,861	92.262	-1,878,854		0	0	-6,733,245		-5,978,410	1,994,219

			reported fi						
Row Labels	Mis appropriated	Unsupported (in USD)			Management Adjustments (in USD)	Gross Recoverable Amount			
Ang ola	i (in USD)	(in USD) 3,964,884	(in USD) 304,500	(in USD)	(IN USD) -72,688	(in USD) 4,196,696	(in USD)	(in USD)	(in USD) -4,196,690
19/10/2016		3,964,884	304,500		-72,688				-4,196,696
MOH		3,964,884	304,500		-72,688				-4,196,696
Bangladesh	2,008,276		1,267,887	325,396			-30,211	-2,101,588	
04/12/2015	3,571			325,396			-23,324	-2,101,588	
MoHFW, SCUSA	3,571			325,396			-23,324	-207,162	-
	-					-	-23,324	-	
27/04/2015	1,894,426		0	0 0		-)	0	-1,894,426	
PMUK	1,894,426	0		U	0	-))	-	-1,894,426	(
27/05/2016			0		-	-	0		
Ministry of Finance of Bangladesh			0		0	-	0		
23/10/2018	110,279					110,279	-6,887		-103,392
MOHFW / NTP	110,279					110,279	-6,887		-103,392
Burkina Faso			78,880		-5,600	,			-73,280
04/09/2018			78,880		-5,600	,			-73,280
NCS / SP / CNLS			78,880		-5,600				-73,280
Burundi	328,072	,	178,084	0		,	-2,272	-143,429	,
19/08/2015	144,021		139,047	0			0	0	,
SEP-CNLS	144,021		139,047	0	0	283,068	0	0	-283,068
24/10/2017	184,051		39,037	0		,	-2,272	-143,429	
RBP+	184,051	0	0	0	0	184,051	-2,272	-95,150	-86,629
SEP-CNLS PN LT RB P+ CED -CARITAS	0	11,920	39,037	0		50,957	0	-48,279	-2,678
Cam bodia	411,000	223,000	24,940	1,362,000	-157,000	1,863,940	0	0	-1,863,940
13/07/2015	411,000	223,000	21,000	1,362,000	-157,000	1,860,000	0	0	-1,860,000
CNM, NCHADS and MoH and NCHADS	411,000	0	21,000	0	41,000	473,000	0	0	-473,000
CNM, NCHADS, CENAT, and MOH	0	223,000	0	1,362,000	-198,000	1,387,000	0	0	-1,387,000
23/02/2018			3,940			3,940			-3,940
UNOPS			3,940			3,940			-3,940
Cameroon	33,455	2,199,530	3,631,924	0	-2,199,530	3,665,379	0	0	-3,665,379
26/02/2016	33,455	2,199,530	3,370,322	0	-2,199,530	3,403,777	0	0	-3,403,777
MoPH and Care international	33,455	2,199,530	3,370,322	0	-2,199,530	3,403,777	0	0	-3,403,777
16/05/2017			261,602			261,602			-261,602
Ministry of Public Health			261,602			261,602			-261,602
Congo	0	3,656,000	0	0	-1,241,000	2,415,000		0	-2,415,000
10/02/2015	0	3,656,000	0	0	-1,241,000	2,415,000		0	-2,415,000
MOHP, SEP/CNLS, Medecins d'Afrique	٥	3,656,000	0	0	-1,241,000			0	-2,415,000
Congo (Democratic Republic)	139,216		3,000	0			-208,105		-1,626,363
08/06/2017	139,216		3,000	0			, 0		-1,428,718
UNDP	139,216		3,000	0	0		0	0	
15/12/2017	0		0	0			-208,105	0	
UNDP	-		-	0			-208,105	0	

			reported fi					allowed as T. J. M.	
Row Labels	Misappropriated T (in USD)	Unsupported (in USD)		Other (In USD)	Management Adjustments (in USD)	Gross Recoverable Amount (in USD)	Written-Off (In USD)	Allocation Reduction (in USD)	Recovere (In USD)
Côte d'Ivoire		(11030)	155,605	(11/030)	-20,916		(11030)	(11030)	-134,64
19/04/2017			155,605		-20,916				-134,61
PNLT			155,605		-20,916				-134,68
Dilbouti	a	4 126 020	4,068,530	0			0	-1,845,209	
03/08/2018	0	4,136,029	4,068,530	0	_,,		0		
MoH (part I)	0		4,068,530	0			0		
MoH (part II)	0	-	4,008,000	0			0		
Dominican Republic	0		174,760	0			0		
18/09/2013	0	-	174,760	0			0	-	
COPRESIDA	0	-	174,760	0			0		
Egypt	a	0	668,877	0			-668,877		
29/09/2017	0	0	668,877	0		,	-668,877		
NAP / MOHP	0	•		0			-668,877		
Eswatini	26.701	0	668,877	0	, .	658,877 26,701	-006,677	0	-26,70
25/12/2018	26,701					26,701			-26,70
CANG 0	26,701					26,701			-26,70
Ethlopia	20,701		1,324,000	o			-245.000		-6.782.00
27/05/2014	0			0	-		-245,000		
MOH, HAPCO, EIFD DA, and NEP+	0			0	-		-245,000		-6,782,00
Georgia	877,947	5,705,000	1,524,000	0			-245,000		
11/11/2015	877,947	-	0	0			0		
MLH5A	877.947	0	0	0			0		
Ghana	3,840,003		1,974,876	555,474			0		
08/08/2017	3,840,003		1,974,876	555,474			0	,	-4,522,5
Ghana Health Service	0		1,974,876	555,474			0	-	-1,509,0
23/10/2018			-,				-	-	
Ghana Health Service	3,840,003 3,840,003		0	0			0	-	
Guatemala	3,840,005	0	272,032	0			0		-2,012,51
16/04/2015	0	0	272,032	0			0		
M0H	0	-	272,032	0			0		
							-		
Guinea	165,331		0	0		,	0		
25/03/2016	165,331	250,852	-	0			0	-	
PNPCS P Guyana	165,331	250,852	0 56,966	0		416,183 56,966	U	0	-416,13 - 56,9 (
09/12/2016			56,966			56,966			-56,9
MOH			56,966			56,966			-56,91
Halti	a	519,000		705,000	-661,000		-660,000	0	-1,157,00
31/12/2013	0	519,000		705,000			-660,000		-1,157,00
UNDP and Fondation Sogebank	0	519,000		705,000			-660,000		-1,157,00
UNDP and Fondation Sogebank	872,000		1,254,000	705,000			-660,000		-1,157,00
13/12/2013				0					
13/12/2013 INP+	872,000		1,140,000 0				-81,000		-1,296,00
	872,000	0		0			- 81,000		
NACO	0	0		0	-110,000	1,030,000	0	0	-1,030,0
24/05/2016			0						

Row Labels	Mis appropriated	OIG Unsupported (in USD)	reported fi Ineligible (in USD)	other (in USD)	Management Adjustments (in USD)	Gross Recoverable Amount (in USD)	Written-Off (in USD)	Allocation Reduction (in USD)	(in USD)
Kaz akhsta n	5,537,324	211,000	37,000	142,000	-385,000	5,542,324	-5,000	-5,432,097	
28/10/2014	105,227	211,000	37,000	142,000	-385,000		-5,000	0	
Republican Centre for Prophylactics and Control of ALDS	105,227		0	0	0		0	0	
Republican Centre for Prophylactics and Control of AIDS / National Centre of TB Problems of the MoH	0	211,000	37,000	142,000	-385,000	5,000	-5,000	0	
24/05/2016	5,432,097	0	0	0	0	5,432,097	0	-5,432,097	,
RCAIDS & NCTP	5,432,097	0	0	0	0	5,432,097	0	-5,432,097	7
Kenya	0	1,437,000	1,816,000	0	-2,059,000	1,194,000	0	0	-1,194,00
29/06/2015	0	1,437,000	1,816,000	0	-2,059,000	1,194,000	0	0	-1,194,00
Treasury CARE KNWA SANAA	0	1,437,000	1,816,000	0	-2,059,000	1,194,000	0	0	-1,194,00
Kyrgyzstan	0	38,617	136,577	4,262	-58,482		0	-120,974	
04/12/2013	0	0	58,482	0	-58,482	0	0	0)
SSED	0	0	58,482	0	-58,482	0	0	0	
20/10/2017	0	38,617	78,095	4,262	0	120,974	0	-120,974	•
NCP	0	28,354	46,729	4,262		79,345	0	-79,345	5
RAC	0		31,366	0	0	41,629	0	41,629	
Lao (Peoples Democratic Republic)	0		99,000	1,876,000	-1,070,000	946,000	0	0	-946,00
19/02/2015	0			1,876,000	-1,070,000	946,000	0	0	
мон	0				- 1,070,000		0	0	
Madagascar	0	0	693,933	64,038	-176,000		-9,699	0	
09/07/2015	0		410.933	64,038	0		-9,699	0	
UGP Pact SALAMA AIM	0		410,933	64,038	-	474,971	-9,699	0	
21/04/2015	0		283,000	0	-176,000		0	0	
PSI	-		283.000	0	- 176,000		0	0	
Malawi	0	-	435,566	0	-681,051	3,313,713	0	-	
07/12/2016	-		435,566	0	-681,051	3,313,713	-	0	
NAC	0		435,566	0	-681,051	3,313,713	0	0	
Mali	4,074,444		122,106	0	0		-770,599	0	
06/12/2018	4,074,444		122,106	0	0		-770,599	0	
PNLP & PNLT	4,074,444		122,106	0	0		-770,599	0	
Mauritania	4,173,671		0	0	0		0	0	
21/10/2011	1,737,966		0	0	0		0		
SENLS	1,737,966			0	0	· · · · · · · · · · · · · · · · · · ·	0	0	
30/06/2016	2,435,705		0	0	0	.,,	0	0	
SU/G9/2016 UNDP	2,435,705		0	0	0		0	0	
UNDF Mozambique	2,435,705		0	0	0		0	0	
Mozamoique 19/09/2013	0		0	0	0		0		
	0		0	0	0		0	0	
Ministry of Health Namibia	0		583,553	0	-1,368,532	5 00,000 869,091		0	
	0						0	0	
12/07/2016 MOHSS	0		583,553 583,553	0	-1,368,532		0	0	
	266.304			0	-1,368,532		0	0	
Niger			0	-	-4,254	524,353	-	-	
16/04/2015 (785	0		0	0	0	36,546	0	0	
LKS 05/09/2017	266,304		0	0		36,546 487,807	0	0	
			-	-	-4,254		-	-	
CSLS	266,304	225,757	0	0	-4,254 -11,508,235	487,807 10,000,355	0	0	
Nigeria	11,189		5,413,424				0	-2,635,898	
22/09/2015	0		1,596,658	0	-4,942,838		0	-2,635,898	
CHAN	0		511,590	0	-1,289,416		0	-887,933	
CISHAN CONTRACT			0	0	0		0	-360,026	
NACA	0		786,000	0	0		0	-444,617	
YGC	0		299,068	0	3,653,422		0	-943,322	
09/10/2017	11,189		0	0	-1,775,671		0	0	
CHAN - SRs	0		0	0	0		0	0	
NMCP	11,189		0	0	0		0	0	-
NMEP		2,395,722			1,775,671	620,051			-620,05
10/10/2017		2,965,516			-2,665,394	300,122			-300,12
NACA		2,965,516			-2,665,394	300,122			-300,12
11/10/2017		2,154,485			-2,124,332	30,153			-30,15
SFH		2,154,485			-2,124,332	30,153			-30,15
19/01/2018			3,816,766			3,816,766			-3,816,76
NACA			3,816,766			3,816,766			-3,816,76

			010	i reported fi	gures					
	_	Misappropriated	Unsupported		Other	Management Adjustments	Gross Recoverable Amount	Written-Off A	llocation Reduction	
Row Labels	1 T	(in USD)	(in USD)	(in USD)	(in USD)	(in USD)	(in USD)	(in USD)	(in USD)	(in USD)
Pakistan			41,921			-33,013	8,908			-8,90
08/10/2018			41,921			-33,013	8,908			-8,90
NTP			41,921			-33,013	8,908			-8,90
Panama				104,911		20,611	125,522	-48,839		-76,68
29/11/2017				104,911		20,611	125,522	-48,839		-76,683
CAI				104,911		20,611	125,522	-48,839		-76,68
Papua New Guinea		359,543	2,528,252	2,092,659	0	-653,449	4,327,005	-97,048	0	-4,229,95
10/06/2014		359,543	24,859	280,623	0	-298,386	366,639		0	-366,639
Rotary Against Malaria (RAM)		359,543	24,859	280,623	0	-298,386	366,639		0	-366,639
27/01/2016		0	0	1,352,696	c	-355,063	997,633	0	0	-997,63
NDOH		0	0	1,352,696	0	-355,063	997,633	0	0	-997,63
07/11/2017		0	2,327,575	459,340	0)	2,786,915	-97,048	0	-2,689,86
NDOH		0	2,327,575	459,340	C)	2,786,915	-97,048	0	-2,689,86
24/07/2018			175,818				175,818			-175,818
PSI			175,818				175,818			-175,818
Philippines		0	0	2,012,000	c	-1,757,000	255,000	0	0	-255,000
09/11/2012		0	0	2,012,000	C	-1,757,000	255,000	0	0	-255,000
TDF / PSF / Department of Health		0	0	2,012,000	0	-1,757,000	255,000	0	0	-255,000
Senegal		0	140,000	0	c	-87,000	53,000	0	0	-53,000
24/11/2016		0	140,000	0	0	-87,000	53,000	0	0	-53,000
MSH and PNLP		0	140,000	0	0	-87,000	53,000	0	0	53,000
Sierra Leone		70,510	0	0	c	0	70,510	0	0	-70,510
03/03/2016		70,510	0	0	0	0	70,510	0	0	
MOH		70,510	0	0	C	0	70,510	0	0	-70,51
South Sudan		0		265,100	c	-611,950		0	0	
24/02/2016		0	262,295	265,100	0	-372,132	155,263	0	0	-155,26
PSI		0	262,295	265,100	C	-372,132		0	0	
03/04/2017			127,131	,			127,131			-127,13
PSI			127,131				127,131			-127,13
04/05/2017			8,338				8,338			-8,33
UNDP			8,338				8,338			-8,331
07/11/2017			500,564				500,564			-500,564
PSI			500,564				500,564			-500,564
26/12/2018			541,589			-239,818				-301,77
UNDP			541,589			-239,818				-301,77
Sri Lanka		0		1,665,126	c			0	-693,292	
25/01/2016		0	982,030					0	-693,292	

			reported fi						
Row Labels	Misappropriated (In USD)	Unsupported (In USD)	Ineligible (in USD)	Other (In USD)	Management Adjustments (in USD)	Gross Recoverable Amount (In USD)	Written-Off (in USD)	Allocation Reduction (In USD)	Recovered (in USD)
Swaziland	(11050)			(11030)			-138.000		-1,133,00
30/05/2014				0			-138,000		-1,133,00
NERCHA				0			-138,000		-1,133,00
Tajikistan	13,985	-	1,041,000	109,541	-1,137,000		-138,000	0	
09/08/2013	6,800			0			0	0	
Project HOPE	6,800			0			0	0	
09/09/2016	7,185			109,541	0		0	0	
UNDP	7,185						0	0	
Tanzania (United Republic)	,103			819,000			0	0	
31/12/2014			0	819,000			0	0	
MOHSW / PMO-RALG / AMREF / TACAIDS / NACP / NTLP / NMCP			0	819,000			0	0	
29/05/2017		283,454	0	813,000	-615,000	283,454	0	0	-283,45
PSI / MOF		283,454				283,454			-283,45
Togo	a		736,361	o	-570,735		o	o	
							0	0	
16/09/2016 PSI		120,000	736,361 736,361	0 0			0	0	
	0	,	1,649,776	0			-485,000	-	
Uganda				-					-1,164,77
05/12/2014			1,600,000			_//	-485,000		-1,115,00
MoFPED	C	0	1,600,000		0	_,	-485,000	0	-1,115,00
09/07/2018			49,776			49,776			-49,77
TASO			49,776			49,776			-49,77
Ukraine	C		171,373	0			-5,373	0	
04/12/2015	C	-	5,373	0			-5,373	0	
International HIV/AIDs Alliance and the Network of People Living with HIV	C	0	5,373	0	C	5,373	-5,373	0	
31/12/2014	C	2,393,000	166,000	0	-2,559,000	0	0	0	
Alliance UK / Alliance Ukraine / All Ukrainian Network of People Living with HIV/AIDS	C	2,393,000	166,000	0	-2,559,000	0	0	0	
Yemen	15,712	0	0	0	0	15,712	0	0	-15,71
22/02/2016	15,712	0	0	0	C	15,712	0	0	-15,71
NTCP	15,712	0	0	0	C	15,712	0	0	-15,71
Zambla	13,000	5,760,000	4,998,000	0	-895,000	9,876,000	-1,701,000	0	-8,175,00
16/10/2015	13,000	5,760,000	4,998,000	0	-895,000	9,876,000	-1,701,000	0	-8,175,00
ZNAN	13,000	5,760,000	4,998,000	0	-895,000	9,876,000	-1,701,000	0	-8,175,00
Zanzibar	a	62,000	388,000	0	-36,000	414,000	-2,000	0	-412,00
10/03/2015	a	62,000	388,000	0	-36,000	414,000	-2,000	0	-412,00
Moh & ZGFCCM	c	62,000	388,000	0	-36,000	414,000	-2,000	0	-412,00
Zim babwe	C	297,952	289,000	0	-191,000	395,952	-134,000	0	-261,95
30/06/2015	c	0	134,000	0	0	134,000	-134,000	0	
Ministry of Health and Child Welfare / National Aids Council / Zimbabwe Association of Church Related Hospitals		0	134,000	0			-134,000	0	
20/06/2017		261,952				261,952			-261,95
UNDP / MOH CC		261,952				261,952			-261,95
30/06/2017		36,000	155,000		-191,000				202,33
MUTAMBARA FOUNDATION		36,000	155,000		-191,000				
MOTAMBARA FOUNDATION	73 777 607	66,635,146		5 967 711			-5 7 97 072	-15,382,178	-79 660 5 6

Table 4: Recoverable amounts identified and submitted to the Recoveries Committee in the ordinary course of grant management operations outstanding as of 31 December 2018

				(in USD) A	lanagement G djustments (in USD)	iross Recoverable Amount (in USD)	Written-Off All (in USD)	(in USD)	n Recovered C (in USD)	om mittment to Repay (in USD)	Net After Commitments (in USD)
Afghanistan	80,099				(11030)	80,099					80,099
AFG-708-G04-H	80,0 99					80,099					80,099
мон	80,099					80,099					80,099
Angola	1	50,392			-84,711	65,681					65,681
AGO-M-MOH		51,036				51,036					51,036
мон		51,036				51,036					51,036
AGO-M-WVI		99,356			-84,711	14,645					14,645
WORLD VISION		99,356			-84,711	14,645					14,645
Belarus		52,547			04,711	352,547					352,547
BLR-H-RSPCMT / BLR-T-RSPCMT		52,547				352,547					352,547
RSPCMT		52,547				352,547					352,547
Benin		15,949				115,949					115,949
BEN-304-G04-M											
		49,037				49,037					49,037
AFRICARE		49,037				49,037					49,037
BEN-M-PNLP		66,912				66,912					66,912
PNLP		66,912				66,912					66,912
Burundi	1:	10,859				110,859					110,859
BDI-C-CRB		358				358					358
CRB		358				358					358
BDI-H-PNLS	•	62,983				62,983					62,983
PNLS		62,983				62,983					62,983
BDI-M-PNILP	:	27,753				27,753					27,753
PNILP	:	27,753				27,753					27,753
BDI-T-PNILT	1	17,857				17,857					17,857
PNILT	1	17,857				17,857					17,857
BRN-809-G07-H		1,907				1,907					1,907
SEP/CNLS		1,907				1,907					1,907
Central African Republic	158,704					158,704					158,704
CAF-708-G05-H / CAF-810-G08-M / CAF-911-G09-T	158,704					158,704					158,704
NAC, NCLS, MOPHP	158,704					158,704					158,704
Chad		11,604	48,731			360,335					360,335
TCD -H-FOSAP		93,507				93,507					93,507
FOSAP		93,507				93,507					93,507
TCD-810-G04-H			31,610			208,443					208,443
AMASOT			31,610			208,443					208,443
TCD-810-G06-H			17,121			58,385					58,385
UNAD			17,121			58,385					58,385
Congo (Democratic Republic)		41,164				1,941,164			- 293,700		1,647,464
COD-H-MOH		1,958				1,958					1,958
MOH		1,958				1,958					1,958
ZAR-S-MOH / ZAR-911-G13-T		42,310				42,310			-33,450		8,860
MOH	4	42,310				42,310			-33,450		8,860
ZAR-S-MOH / ZAR-M-MOH / ZAR-911-G13-T / KPMG	90	69,641				969,641					969,641
MOH	90	69,641				969,641					969,641
COD-H-SANRU	44	60,252				460,252			-260,250		200,002
SANRU	44	60,252				460,252			-260,250		200,002
COD-M-SANRU / COD-H-CORD AID	44	67,003				467,003					467,003
MOH	44	67,003				467,003					467,003
Côte d'Ivoire	1	70,665				70,665			-64,240		6,425
CIV- 809-G09-M		70,665				70,665			-64,240		6,425
PNLP		70,665				70,665			-64,240		6,425
Dominican Republic		2,403				2,403					2,403
DOM-T-MSPAS		2,403				2,403					2,403

Table 4 (continued): Recoverable amounts identified and submitted to the Recoveries Committee in the ordinary course of grant management operations outstanding as of 31 December 2018

	Unsupported Ineligible (in USD) (in USD)	Other (in USD)	Misappropriated (in USD)	Management Gr Adjustments (in USD)	Amount (in USD)	Written-Off Allocatio (in USD) (in	n Reduction USD)	Recovered C (in USD)	ommittment to Repay No (in USD)	(in USD)
Gabon	11,458				11,458					11,458
GAB-T-MSPS MSPS	11,458 11,458				11,458 11,458					11,458 11,458
Ghana		27,400,000			29,741,037			-8,500,000	-18,900,000	2,341,037
GHA-M-MOH	2,341,037	27,400,000			2,341,037			-8,500,000	-18,900,000	2,341,037
мон	2,341,037				2,341,037					2,341,037
(blank)		27,400,000			27,400,000			-8,500,000	-18,900,000	0
GOVERNMENT OF GHANA		27,400,000			27,400,000			-8,500,000	-18,900,000	0
Guatemala	30,994				30,994					30,994
GUA-M-MSPAS	30,994				30,994					30,994
MSPAS	30,994				30,994					30,994
Guinea	11,302				11,302					11,302
GIN-T-MSHP	11,302				11,302					11,302
MS HP	11,302				11,302					11,302
Indonesia	40,508				40,508			-1,982		38,526
IDN-M-MOH	22,504				22,504					22,504
MOH IDN-H-MOH	22,504 16,053				22,504 16,053			-1,982		2 2,504 14,071
MOH	16,053				16,053			-1,982		14,071
IDN-T-MOH	16,053				16,053			-1,962		14,0/1 1,951
мон	1,951				1,951					1,951
Kenya	489,028				489,028					489,028
KEN-405-G06-M	360,042				360,042					360,042
MOF	360,042				360,042					360,042
KEN-M-TNT	7,260				7,260					7,260
NT	7,260				7,260					7,260
KEN-T-TNT	121,726				121,726					121,726
NT	121,726				121,726					121,726
Liberia	209,697		55,193		264,890			-24,975		239,915
LBR-M-MOH / LBR-C-MOH			55,193		55,193			-24,975		30,218
мон			55,193		55,193			-24,975		30,218
LBR-M-MOH / LBR-T-MOH / LBR-810-G07-H	209,697				209,697					209,697
MOH and SW	209,697				209,697					209,697
Macedonia (Former Yugoslav Republic) MKD-011-G04-T	28,490				28,490					28,490
MKD-011-G04-T MOH	19,880				19,880 19,880					19,880
MKD-H-MOH										8,610
MOH	8,610 8,610				8,610 8,610					8,610
Nalawi	160.839				160,839					160,839
MLW-H-NAC	160,839				160,839					160,839
NAC	160,839				160,839					160,839
Mali	1,072,322				1,072,322					1,072,322
MAL-405-G02-H	314,815				314,815					314,815
HCNLS	314,815				314,815					314,815
MAL-809-G08-H	757,507				757,507					757,507
HCNLS	757,507				757,507					757,507
Mauritania	14,053				14,053			-7,883	-6,170	0
MRT-CFUND-1305	14,053				14,053			-7,883	-6,170	0
CCM	14,053				14,053			-7,883	-6,170	0
Mozambique	547,341	1,220,654			1,767,995					1,767,995
M02-708-G07-T	21,391				21,391					21,391
мон	21,391				21,391					21,391
MOZ-H-MOH / MOZ-M-MOH / MOZ-911-G10-H / MOZ-809-G08-S	36,105				36,105					36,105
MOH	36,105				36,105					36,105
MOZ-H-MOH / MOZ-M-MOH / MOZ-T-MOH / MOZ-809-G08-S / MOZ-911-G10H / MOZ-911-G11M	489,845				489,845					489,845
MOH MOZ-H-MOH / MOZ-M-MOH / MOZ-T-MOH	489,845	1,220,654			489,845 1,220,654					489,845 1,220,654
мод-н-мон / мод-м-мон / мод-т-мон мон		1,220,654			1,220,654					1,220,654
Namibia	146,472	*,***,034		-121,619	24,854					24,854
NAMI Dia NMB-202-G07-H-00	146,472			-121,619	24,854					24,854
NAN-2027-1-00 NANASO	146,472			-121,619	24,854					24,854
Nepal	3,082	454,932			458,014					458,014
CCM Funding	3,082	58,233			61,315					61,315
CCM Nepal	3,082	58,233			61,315					61,315
NEP-T-NTC		62,720			62,720					62,720
NTC		62,720			62,720					62,720
		278,568			278,568					278,568
NEP-H-NCASC										
NEP-H-NCASC NCASC		278,568			278,568					278,568
		278,568 55,411			278,568 55,411					278,568 55,411

Table 4 (continued): Recoverable amounts identified and submitted to the Recoveries Committee in the ordinary course of grant management operations outstanding as of 31 December 2018

	Unsupported Ineligible (in USD) (in USD)	Other (in USD)	Misappropriated (in USD)	Management Adjustments	Gross Recoverable Amount	Written-Off (in USD)	Allocation Reduction (in USD)	Recovered ((in USD)	Committment to Repay (in USD)	v Net After Commitments (in USD)
	((((in USD)	(in USD)	(((((
Nigeria	2,112,933				2,112,933					2,112,933
NGA-H-NACA	1,907,105				1,907,105					1,907,105
NACA	1,907,105				1,907,105					1,907,105
NGA-M-NMEP	205,828				205,828					205,828
NMEP	205,828				205,828					205,828
Pakistan	533,500		7,239		540,739			-1,494		539,245
PAK-H-NACP	19,534				19,534					19,534
NACP	19,534				19,534					19,534
PAK-T-NTP	58,921				58,921					58,921
NTP	58,921				58,921					58,921
PAK-M-DOMC	6,994				6,994			-1,494		5,500
DOMC	6,994				6,994			-1,494		5,500
PAK-T-TIH	448,051				448,051					448,051
The Indus Hospital	448,051				448,051					448,051
PAK-H-NZT	,		7,239		7,239					7,239
NZT			7,239		7,239					7,239
Serbia		695,408	.,		695,408					695,408
SER-809-G05-H		695,408			695,408					695,408
Youth of Jazas		695,408			695,408					695,408
South Africa	23,267			-16,178	7,089					7,089
SAF-H-NRASD	23,267			-16,178	7,089					7,089
NRASD	23,267			-16,178	7,089					7,089
South Sudan	62,818		301,156	-168,485	195,489			-21,962		173,527
SSD-CFUND-13	,		18,615	,	18,615			-14,095		4,520
ACHI			18,615		18,615			-14,095		4,520
SSD-H-UNDP / SSD-T-UNDP / SSD-910-G13-UNDP			108,563	- 12,374	96,189			14,000		96,189
UNDP			108,563	-12,374	96,189					96,189
SSD-M-PSI	62,818		173,978	-156,111	80,685			-7,867		72,818
PSI	62,818		173,978	-156,111	80,685			-7,867		72,818
Tajikistan	48,328		1/3,5/8	-130,111	48,328			-4,250		44,078
TJK-T-RCTC	40,465				40,465			-4,250		36,215
RCTC	40,465				40,465			-4,250		36,215
TJK-H-UNDP	7,863				7,863			-4,250		7,863
UNDP										7,863
Tanzania (United Republic)	7,863		737,243		7,863 737,243					7,865
TZA-H-MOF / TZA-M-MOFP / TZA-T-MOF			737,243		737,243					737,243
MOF			737,243		737,243					737,243
Ukraine	179,567				179,567					179,567
UKR-C-AUA	179,567				179,567					179,567
APH	179,567				179,567					179,567
Uzbekistan	253,649				253,649					253,649
					252 640					253,649
UZB-H-RAC	253,649				253,649					
UZB-HI-RAC RAC Grand Total	253,649 253,649 238,803 11,376,268		1,100,831	-390,993	253,649 253,649 42,144,634			-8,920,486	-18,906,170	253,649

Notes to tables:

(1) Each OIG report leading to a recoverable amount is counted as a separate case, even if multiple reports apply to the same country.

(2) A written commitment is recognized as such once signed by a competent authority, in practice usually the Ministry of Health with co-signature by the Ministry of Finance.

(3) Adjustments by management include changes to the OIG-reported figures based on additional considerations, which may include review of additional supporting documentation, retroactive approval of expenditures reported by the OIG as non-compliant where sound rationales exist, an evaluation of the Global Fund's available legal rights and remedies, and amounts identified by the Secretariat as recoverable in addition to the amounts reported by the OIG. Such adjustments are made in consultation with the OIG.

(4) The amount deemed recoverable represents the maximum amount to be recovered based on the deliberations of the Recoveries Committee and the Executive Director and latest information available. The amounts include considerable sums which are subject to further analysis or explanation by the Secretariat and validation by the OIG. Part or all such amounts may be shifted to the management adjustments column following further deliberations of the Recoveries Committee and the Executive Director. For cases not yet fully resolved, the amounts in the 'written off', 'recovered' and 'commitment to repay' columns may not fully represent the amount ultimately recovered, as recovery work is still ongoing on a portion of the amount shown as 'net deemed recoverable'.

(5) Allocation reductions represent a means of resolving exceptionally difficult cases where all means of recovery have been exhausted. Upon approval by the Executive Director, a country's allocation may be reduced by a factor of 2:1, being two units of allocation reduction for every one unit of recoverable amount. The amounts in the table represent the recoverable amounts written off as a result of the application of allocation reductions.