

GUIDELINES

TOP-UP TRIGGERS

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INTRODUCTION

Applicability

This policy is applicable to countries with top-up triggers related to their system transformation grant (STG) allocation under GPE 2025 where triggers are not yet achieved.

Background and Introduction

The “top-up” is GPE’s incentive-based financing mechanism to encourage governments (with partner support) to take action towards resolving challenging bottlenecks in one or more of the four enabling factors for system transformation: (i) data and evidence, (ii) gender-responsive sector planning, policy and monitoring, (iii) sector coordination, and (iv) volume, equity and efficiency of domestic financing for education.

For applicable GPE partner countries, a portion of the system transformation grant allocation may be designated as a “top-up allocation.” The top-up allocation is only released by GPE if the top-up triggers are achieved, in part or in full depending on whether all triggers are achieved. The triggers measure successful implementation of agreed actions that have the potential to unlock bottlenecks in the enabling factors deemed high priority.

The top-up triggers are developed by the government and the local education group through inclusive dialogue. They are included in the partnership compact which sets out the country’s pathway for system transformation. Triggers are reviewed by the Secretariat as part of its Quality Assurance Reviews, and subsequently approved by the GPE Board along with, for each trigger: the funding amount, expected date of achievement and means of verification.

The life cycle of the top-up includes the following milestones:

- A. GPE Board approval of the top-up triggers.
- B. Programming of the top-up allocation as part of a grant application.¹
- C. Verification of trigger achievement and GPE decision on the release of top-up funds.

In exceptional cases, the life cycle may also include:

- D. Revision of the top-up

The steps leading up to Board approval of triggers (A.) are described in the [partnership compact guidelines](#), while the programming of the top-up allocation as part of a grant

¹ If a country has not programmed the top-up funding into its system transformation/multiplier grant: once the triggers are achieved or substantially achieved, as assessed by the Secretariat, the country has the option to program the top-up funds: (1) as additional financing or (2) as top-up funds to any 2030 system transformation grant allocation, submitting a single application.

application (B.) follows GPE's implementation grant application process, as described in the [guidelines for the system transformation grant](#).

GOVERNANCE

1. In case of discrepancy in the formulation of a top-up trigger across different documents, the version in the Board decision of the approval of the triggers prevails (English version of the Board decision).
2. Once GPE reaches a decision to release (or not) partially or in full the top-up financing, any non-released top-up financing is effectively revoked.²

VERIFICATION OF TRIGGERS & PROCESS FOR RELEASE OF TOP-UP ALLOCATION

Ahead of the mid-term review of the partnership compact, the government determines the extent to which the top-up triggers are met, on time, and whether there has been progress in resolving the corresponding enabling factor bottlenecks. The means of verification of trigger achievement as set out in the partnership compact should be followed in this process, which should culminate in a summary report on the results of the verification for review and endorsement by the local education group.

The local education group review and endorsement step should be well-documented, and the collected evidence (data sources) should be shared along with the summary report. In most cases, the summary report and evidence will next feed into the mid-term review discussions of the partnership compact. The mid-term review guidelines provide suggestions for how this discussion on top-up trigger achievement can be organized during the mid-term review.

Six months to a year prior to the achievement due date of the first trigger, the government and coordinating agency are encouraged to contact the Secretariat to confirm the specific steps for **verifying the top-up triggers**, agreed during the approval of the strategic parameters for GPE support to the partnership compact.

In some instances, the timing around the verification vis-à-vis the mid-term review may be challenging, in which case the Secretariat can advise on the appropriate steps to take ahead of the submission of the request to release the funds.

The process for release of the top-up allocation is as follows:

- The government should submit a request to release the top-up funding, signed by the minister of education or their delegate and endorsed by the local education group.

² When top-up financing is not fully released: Where the top-up funds have been approved by the GPE Board as part of the STG, the corresponding amount of the approved STG is canceled. Where top-up funds have not been approved by the GPE Board as part of the STG, the Secretariat will communicate to the country that the corresponding funds are no longer available.

The request should note the extent of trigger achievement and that the achievement has been verified in accordance with the methodology set out in the partnership compact. Where the top-up funding has not been programmed prior, the request should include how the country plans to use the funds, i.e., whether the funds will be added to the existing STG or whether the country intends to create a new program or add the funding to its GPE 2030 indicative allocation. Attachments need to include the data sources for the verification as noted in the partnership compact. Additional evidence may also be submitted.

- The Secretariat will assess the request. Where the trigger is assessed as achieved or substantially achieved, the CEO in their delegated authority from the Board will release the funds. The CEO may defer a decision to the Board. Where the trigger is assessed as not achieved, the Board will make a decision to cancel the linked funds.
- Following CEO or Board decision, as applicable, the Secretariat notifies the partner country, the coordinating agency (on behalf of the local education group), and the grant agent of the STG if the funds will be added to the grant, of the decision within 10 business days.

TOP-UP REVISION CRITERIA AND PROCESS

Triggers are intended to incentivize time-bound actions to resolve key bottlenecks to country systems transformation identified by the Independent Technical Advisory Panel (ITAP) over the short to medium-term – two or three years – and are expected to be well-crafted and realistic in the context. Therefore, revision of a top-up trigger is an extraordinary measure and is viewed with particular caution and scrutiny. There may from time to time be countries with a strong justification for a revision to the top-up and GPE agreement to a revision could be sought.

The following four criteria will be considered by the Secretariat as part of its quality assurance, before moving a revision request towards a decision:

- a. **Timing: The timing of the revision request will factor into the assessment**, for example:
 - i. Revision requests should generally be submitted a minimum of three months before the trigger is to be achieved to allow for GPE consideration of the revision before the trigger expires. The timing of the request should also consider any regular GPE approval processes underway so that the request for trigger revision does not unduly delay (become a bottleneck to) progress in reform implementation, including GPE program approval, conducting the mid-term review of the partnership compact, or releasing the top-up funding. The Secretariat can provide advice to facilitate these processes.
 - ii. A revision request received on or after the trigger achievement due date (not verification date) will be retroactive and will not be considered.

b. **Type of revision:** Permissible revisions would fall in one of two categories, with the first category being subject to more careful scrutiny and requiring stronger justification:

- i. a change in the top-up trigger (see non-permissible revisions in d. below), an extension to achieve the trigger.
- ii. a change to the means of verification.

The maximum extension to achieve a trigger is 12 months cumulatively.

c. **Strength of justification and adequacy of proposed change:** The proposed change should be appropriately justified and also meet the same expectations as the original trigger. Successful requests for revisions can include:

- i. The action incentivized by the trigger is no longer relevant in the context due to unforeseeable developments, and the country seeks to replace it with an equally effective trigger addressing the same enabling factor challenge.
- ii. Diligent progress is being made, but more time is needed.
- iii. A major crisis or major concern that warrant a revision, as assessed by the Secretariat.

d. **Illustrations of non-permissible revisions.** Given the careful design and selection process around the top-up, the following revisions will not be considered, unless there is a major crisis or major concern that warrant such a revision, as assessed by the Secretariat:

- i. A request to revise a trigger that has already been revised once.
- ii. A request to revise more than one trigger. Only one trigger can ever be revised. Here a trigger means an action (or actions) with a specific funding amount attached to it.
- iii. A request to revise the funding amount linked to a trigger.
- iv. A request to revise a trigger to address a different challenge.

These limitations do not apply to requests for extension of the trigger achievement due date and the means of verification.

Process for Top-Up Trigger Revisions:

The government in consultation with the local education group should discuss the need for a revision and submit a “trigger revision request” to the Secretariat. The submission should include:

- the reasons, content and timeline for the proposed revision, as well as how the revision will impact progress in reform implementation, and mid-term review of the partnership compact.
- a description of how the revision will affect the theory of change outlined in the compact, or the STG-funded program in situations where the top-up funding has already been programmed.

- evidence to support the revision request (for example, evidence that diligent progress has been made, evidence that the trigger is no longer relevant in the context due to unforeseeable developments).
- documentation verifying the local education group's support of the proposed revision (for example, meeting minutes or a letter from the coordinating agency confirming the support of the local education group).

The revision request should generally be submitted no later than three months before the trigger is to be achieved.

The Secretariat will assess the revision request and consider the particular facts and circumstances, as well as fairness.

The Secretariat forwards its recommendation, along with relevant documentation, to the CEO for decision under their delegated authority from the Board. The Secretariat notifies the partner country, the coordinating agency (on behalf of the local education group), and the grant agent, of the decision within 10 business days. In the event the CEO does not agree to a revision, the Secretariat may refer the matter back to the local education group for further discussion, along with the rationale for the objection. After discussion, a revised program revision request may be submitted, including endorsement by the local education group.

In the event a revision request is not approved by the CEO, any cancelation of the top-up funds linked to the trigger will require Board approval.

The CEO may defer a decision to the Board.

QUESTIONS AND ANSWERS

Revisions

- **Is there a restriction on the number of triggers that can be revised?** Yes. Only one trigger can ever be revised and only if the revision is appropriately justified and adequate.
- **If a trigger is changed, does it need to address the same high priority enabling factor area?** Yes. Moreover, the revised trigger needs to address the same challenge as identified in the ITAP report and referenced in the partnership compact.
- **In the event of a coup or the absence of a functioning government in a country, can the triggers be cancelled/revised?** Any consideration of such measure will depend on the actual facts and circumstances.
- **If a trigger is no longer relevant, could the revision request include to cancel the trigger and add the linked top-up funding to another existing trigger?** No.
- **Can we simultaneously request a revision to the top-up and a revision to the STG?**

Yes. In fact, this is preferred as combining requests reduces transaction cost.

- **If the top-up funding is already programmed into the STG, is it possible to revise an STG if the triggers are not met? If so, what is the procedure for this? Does GPE need to approve the revision?** It will be necessary to revise the STG if a trigger is not achieved as it means that the corresponding top-up amount that has been programmed and is necessary for implementation will not be released. Countries with top-up allocations are encouraged to build funding scenarios into their program in the event one or more triggers are not achieved.

Trigger Achievement

- **Should the achievement of triggers be validated by the country before or after the MTR?** As a rule, triggers should be validated before the mid-term review as per the compact. Where a trigger revision is approved, the target date for validation of that one trigger may be after the MTR, as per GPE approval of the revision.
- **Will payment for the achievement of triggers be disbursed before or after the MTR?** Payment of the triggers will take place once the country has confirmed that the triggers are achieved, concurred by the local education group – normally during the MTR of the partnership compact – and once the Secretariat concurs, for final decision by the CEO, that the trigger is achieved or substantially achieved.
- **Triggers must be achieved or substantially achieved in order to release the funds. What does ‘substantially achieved’ mean?** This depends on the trigger. For example:
 - if a trigger is to train 3,000 teachers but by the trigger due date, 2,990 teachers have been trained, the trigger would be considered substantially achieved as sufficiently close to the goal set.
 - If the trigger is to implement an updated school census covering all schools and the coverage is at 95%, then the trigger would be considered substantially achieved as sufficiently close to the goal set.
 - If the trigger is for 95% of primary education schools to receive the first of two tranches of direct school funding support and the actual coverage is 60%, then the trigger would NOT be considered substantially achieved as not close to the goal set.
- **If by the trigger due date, a trigger has been achieved at 60%, can a country receive a proportional payment on the trigger, i.e. 60% of the top-up amount linked to the trigger?** No. The trigger has to be either fully or substantially achieved (see previous question for illustrations of “substantially achieved”) and only in these two cases will it receive the top-up funding linked to the trigger.

- **Is it possible to request a partial payment on the trigger after each year of implementation, linked to the level of achievement at that time?** No. Scalability, or partial payment, is not possible with the top-up. The trigger must be either fully or substantially achieved for GPE to release top-up funds.

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