GUIDELINES

TOP-UP TRIGGERS

March 2025

GPE Transforming Education

CONTENTS

INTRODUCTION

Applicability

This policy is applicable to countries with top-up triggers related to their system transformation grant allocation under GPE 2025.

Background and Introduction

The "top-up" is GPE's incentive-based financing mechanism to encourage governments (with partner support) to take action toward resolving challenging bottlenecks in one or more of the four enabling factors for system transformation: (a) data and evidence; (b) gender-responsive sector planning, policy and monitoring; (c) sector coordination; and (d) 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.

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, 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 the top-up allocation.[2]

In exceptional cases, the life cycle may also include the following:

D. Revision of the top-up.

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

[2] For countries that applied for the full system transformation grant allocation, release of the top-up allocation means that the allocation becomes available (in full or in part, depending on whether all triggers are achieved) for GPE to commit, then disburse to the grant agent under the usual policy whereby GPE disburses funding once per year, based on the implementation plan of the grant. Other countries will first need to submit an application for the outstanding allocation before these resources can be committed, and disbursed.

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 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.[3]

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

Ahead of the midterm review of the partnership compact, the government determines the extent to which the top-up triggers have been met and are 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.

> **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**, usually agreed during the approval of the strategic parameters for GPE support to the partnership compact.

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 midterm review discussions of the partnership compact. The midterm review guidelines provide suggestions for how this discussion on top-up trigger achievement can be organized during the midterm review.

In some instances, the timing around the verification vis-à-vis the midterm 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 allocation.

[3] When the top-up allocation is not fully released: where the top-up allocation has been applied for and approved as part of a grant application, the corresponding amount of the approved grant is canceled. Where the top-up allocation has not been approved by the GPE Board as part of a grant, the Secretariat will communicate to the country that the corresponding allocation is no longer available.

Countries where the top-up allocation is programmed as part of a grant may submit separate requests for the release of the top-up allocation if the trigger achievement due dates are more than six months apart.[4]

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

> To apply for (part of) the release of the top-up allocation, countries must submit a Request for Release of Top-Up Allocation form.

- The government must submit a request form to release the top-up allocation, signed by the minister of education or their delegate and endorsed by the local education group. 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 allocation has not been programmed prior, the request should include how the country plans to use the allocation—that is, whether the funds will be added to the existing system transformation grant 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 allocation. The CEO may defer a decision to the Board. Where the trigger is assessed as not achieved, the Board will decide whether to cancel the linked funds.

TOP-UP REVISION CRITERIA AND PROCESS

Following the 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 (if the funds have been approved as part of a grant) of the decision within 10 business days.

Triggers are intended to incentivize time-bound actions to resolve key bottlenecks to country systems transformation 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.

[4] This also applies to countries where the scheduled trigger achievement due dates are the same or less than six months apart but where a trigger is achieved ahead of time and results in the next trigger due date being more than six months later, and where the top-up funds are programmed a part of a grant.

The following four criteria will be considered by the Secretariat as part of its quality assurance before moving a revision request toward 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 midterm 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 the verification date) will be retroactive and will not be considered.
    iii. Some trigger revisions may be retroactive earlier than the achievement due date indicated in the partnership compact, if the trigger is tied to a specific year or date/event prior to the due date. (Example 1: if the trigger includes to increase the allocation for teachers in the approved 2024 education budget by 20 percent, an extension request submitted after the 2024 budget is approved by parliament is effectively retroactive. Example 2: if the trigger includes that 90 percent of teachers will receive their remuneration in fiscal year 24-25, a revision request will be retroactive once that year has ended.) A revision request received after the trigger has become retroactive will normally not be considered even if the formal achievement trigger due date has not yet passed.

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 itself (see impermissible revisions in (d) below), a change to the means of verification for trigger achievement
    ii. An extension to achieve the trigger.

    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 meet the same expectations as the original trigger. Successful requests for revisions can include the following reasons:
    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 warrants a revision, as assessed by the Secretariat.

d. **Illustrations of impermissible 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 warrants such a revision, as assessed by the Secretariat:

i. A request to change a trigger that has already been changed once.
ii. A request to change more than one trigger. Only one trigger can ever be changed/replaced. 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.

Exception: the above limitations do not apply to requests for extension of the trigger achievement due date and the means of verification. Each trigger can be extended multiple times (up to 12 months cumulatively) and the means of verification for each trigger can also be revised multiple times in principle.

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 top-up trigger revision request form to the Secretariat. The submission should include the following:

> To request a top-up trigger revision, countries must submit the Top-Up Trigger Revision Request form.

- The reasons, content and timeline for the proposed revision, as well as how the revision will impact progress in reform implementation, and the midterm review of the partnership compact
- A description of how the revision will affect the theory of change outlined in the compact, or the program in situations where the top-up funding has already been programmed as part of a grant
- 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 form 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 cancellation of the top-up amount 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 changed?** Yes. Only one trigger can ever be changed/replaced and only if appropriately justified and adequate. However, this restriction does not apply to revisions to the means of verification or to extensions of the trigger achievement due date: each trigger can be extended multiple times (up to 12 months cumulatively) and the means of verification for each trigger can also be revised multiple times in principle.
- **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 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 canceled or revised?** Any consideration of such measure will depend on the 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 system transformation grant?** Yes. In fact, this is preferred as combining requests reduces transaction costs.
- **If the top-up allocation is already programmed into the system transformation grant, is it possible to revise a system transformation grant if the triggers are not met? If so, what is the procedure for this? Does GPE need to approve the revision?** It might be necessary to revise the system transformation grant if a trigger is not achieved because 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

- **Does verification of the achievement of the trigger need to be completed before the trigger achievement due date?** No. Verification is different from achievement. Verification can happen after the trigger achievement date. There is flexibility on the length of the verification period, and subsequent endorsement by the local education group of the verification, and finally the submission of the request to the Secretariat to release the top-up allocation. In contrast, there is no flexibility on the trigger achievement due date, unless an extension has been granted.
- **Should the achievement of triggers be verified by the country before or after the midterm review of the partnership compact?** As a rule, triggers should be verified before the midterm review as per the compact. Where a trigger revision is approved, that trigger's achievement date followed by verification of that one trigger may be after the midterm review, as per GPE approval of the revision.
- **Will release of the top-up allocation happen before or after the midterm review?** Release of the allocation will take place once the country has confirmed that the triggers are achieved, they have been endorsed by the local education group—normally during the midterm review of the partnership compact—and once the Secretariat concurs, for final decision by the CEO, that triggers are achieved or substantially achieved.
- **Triggers must be fully 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 and by the trigger due date 2,990 teachers have been trained, then 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 percent, then the trigger would be considered substantially achieved as sufficiently close to the goal set.
  - If the trigger is for 95 percent of primary education schools to receive the first of two tranches of direct school funding support and the actual coverage is 60 percent, then the trigger would NOT be considered substantially achieved as it is not close to the goal set.
- **If by the trigger due date a trigger has been achieved at 60 percent, can a country receive a proportional payment on the trigger, that is, 60 percent of the top-up amount linked to the trigger?** No. The trigger must 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.
- **Can countries revise the use of the top-up allocation before the triggers are met and the (partial) allocation is released?** Yes, via a grant revision request.
- **Can countries submit a top-up release request before the mid-term review of the partnership compact?** There is some flexibility in the top-up guidelines in terms of when countries can request the release of top-up funds. In most cases, the summary report on the achievement of top-up trigger and evidence will next feed into the mid-term review discussions of the partnership compact. In some instances, the timing around the verification of top-up trigger achievement 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.

  This said, there is an expectation that grant performance is discussed at the mid-term review to "learn and adapt" as needed to accelerate progress on the priority reform. If countries request the (partial) release of the top-up allocation before the mid-term review, they miss out on the opportunity to consider if the agreed use of the top-up allocation in the program is still valid or whether a revision should be proposed, for example if the discussion reveals that the program is performing poorly, or is otherwise in need of a major restructuring to accelerate progress on the priority reform. Countries may also consider if there is a risk to smooth implementation of the grant if access to the (partial) top-up allocation is delayed until after the mid-term review.
- **Where the use of the top-up allocation has been approved by the GPE Board of Directors, may countries start implementing activities funded by the top-up allocation before the triggers are achieved and the CEO has approved the release of the top-up allocation?** No. Implementation of activities funded by the top-up allocation may not start until triggers are achieved and the GPE CEO has approved the release of the linked funding. However, the government/grant agent could submit a grant revision request that revises which grant activities (that have not started) will be canceled if triggers are not achieved (as with a budget reallocation revision). If the request is approved, then implementation may start.

CONTACT

information@globalpartnership.org

OFFICES

Washington
701 18th St NW
2nd Floor
Washington, DC 20006
USA

Paris
66 Avenue d'Iéna
75116 Paris
France

Brussels
Avenue Marnix 17, 2nd floor
B-1000, Brussels
Belgium

Chennai
Global Infocity Park, Block C
11th floor
40 MGR Salai, Perungudi
Chennai, Tamil Nadu 600096
India

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