



**Public Comment | PEPFAR Scientific Advisory Board (SAB) | April 5 2024**  
**Naïké Ledan | Director of International Policy and Advocacy | [pepfarwatch.org](http://pepfarwatch.org)**

These remarks are delivered on behalf of the [PEPFAR Watch Coalition](http://pepfarwatch.org). We are an independent coalition of African and global civil society organizations, activists, and data analysts. We work together to ensure greater accountability of PEPFAR to the communities it serves. We advocate for a PEPFAR that is responsive to evidence generated by people living with HIV, key populations (KP), and other communities most affected by HIV through community systems and responses, such as Community-Led Monitoring.

We appreciate the work of SAB members and we thank you for your deliberations today over priority, cutting-edge topics concerning the science of HIV.

While we would like to comment on many of the issues you have discussed today, we are focusing instead on one priority: PEPFAR's Sustainability Agenda, in particular Sustainability and Key Population programming for HIV.

We believe the responsiveness of the sustainability agenda to the science regarding HIV in Key Populations is of the utmost importance. The SAB has a unique role to play in ensuring PEPFAR is much more clearly emphasizing and prioritizing this theme as one of the most important features of evidence-based sustainability programming.

As you know, in sub-Saharan Africa, new HIV infections among key populations make up 25% of total new HIV infections; in the rest of the world, key populations make up 80% of all new infections. Currently there is no country in the program portfolio where PEPFAR is achieving 95-95-95 for Key Populations. Across PEPFAR supported countries, there are governments embracing retrogressive policies and laws or a rising tide of anti-gender rhetoric and attacks including in Uganda, Ghana, Kenya, Malawi, Zambia, Tanzania, Burundi and beyond.

As the SAB is well aware, these concerning developments create major barriers to reaching communities with appropriate, accessible and inclusive services, provided with dignity and respect. PEPFAR's sustainability agenda must be rooted in the reality that most PEPFAR supported countries lack the political will to take on comprehensive, quality service delivery for Key Populations.

**In fact, a preliminary analysis that we have recently shared with PEPFAR indicates that FY25 budgets for Key Population programs in many priority countries are being**

**cut, and any increases are only between 1-5%.** Across the program, KP budgets are already extremely small, representing only 5.5% of overall program budgets on average. Passing on portfolio-wide program cuts wholesale to what are relatively small and challenging programs is cause for serious concern.

Given the more difficult operating environment, communities are concerned that these program cuts are inconsistent with high impact strategy Key Populations require. There is nothing sustainable about cuts to Key Population program budget programs year after year, while criminalized communities face rising threats.

PEPFAR's work around sustainability must first and foremost be guided by science and evidence—too often sustainability is framed as a political matter. Sufficient and sustained HIV treatment and prevention is what will lead to a defeat of HIV, and until AIDS is over, PEPFAR is needed. We would therefore make the following requests to the SAB:

- 1) The cuts proposed for KP program budgets for FY25 are inequitable given how off-track the response is for KPs across PEPFAR's portfolio, as well as the deteriorating legal, policy and service delivery environment communities are facing. These inequities fuel unsustainability because they worsen existing vulnerabilities to infection and high risk of poor clinical outcomes from HIV disease.
- 2) PEPFAR should prioritize more clearly a portfolio-wide plan highlighting the need to scale up investments in Key Populations, and to safeguard quality service delivery in the context of increasing criminalization and anti-gender threats. This will mean, by definition, that sustainability looks and feels different for Key Populations—including expanding stand alone, relatively costlier platforms for service delivery that are not government owned, for the foreseeable future. When countries advocate for the criminalization, harm, or elimination of our communities, we cannot integrate into those systems. Addressing this is not just a minor issue; it should be central to sustainability work. It is worrying that this crucial aspect is not being mentioned in the high-level efforts planned for Part A between now and December 1st.
- 3) As experts in the high impact interventions that work in responding to HIV among Key Populations, the SAB should query the highly concerning PEPFAR FY25 Key Population budget reductions, which in our assessment are unjustifiable according to the science and program evidence. Furthermore, the SAB should work with PEPFAR to explore a new multi-year initiative focused on expanding funding for Key Population interventions and that is paired with a genuine strategy for overcoming the highly differential and unique political, social, legal, stigma, and other barriers that each of these populations face independent of each other that we believe have been deprioritized within PEPFAR since the close out of the two-year Key Population Investment Fund.

- 4) Finally, we appreciate the work of the Sustainability Advisory Group but would like for it to ensure direct representation of most affected communities, including Key Populations from countries where these agendas are going to be implemented. Community experts have been contributing important work in this area about the reality of politics around sustainability—not wishful thinking, but the reality—can contribute valuable evidence and perspectives, in line with the Denver Principles.