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ANALYSIS REPORT

AGAINST THE GRAIN:

How Ukraine and Myanmar UNOCHA Pooled Funds Kept Money Flowing to Local Actors Under the US Fast-Track Allocation

Prepared by George Kamau,
Courtenay Cabot Venton and Sarah Rose

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Executive Summary

Introduction

In December 2025, the United States announced an initial $2 billion commitment to the UN Office for the Coordination of Humanitarian Affairs (UNOCHA), with roughly 90 percent to be channeled through Country-Based Pooled Funds (CBPFs) and disbursed through fast-track reserve allocations. Funds also had to be implemented in just six months UNOCHA; this timeline pushed most CBPFs to work with established partners that could absorb a lot of money quickly and constrained their efforts to expand partnerships with local organizations. Across the entire allocation, only 12 percent of funding reached local partners (and only 4 percent of direct funding)—a stark decline from 2025 when local organizations received 55 percent of total CBPF funding (and 46 percent of direct funding). However, two CBPFs stand out as clear outliers: the Myanmar Humanitarian Fund (MHF) and the Ukraine Humanitarian Fund (UHF) each directed over 40 percent of the US-funded fast track reserve allocation to local and national actors. The share of direct funding to local organizations was substantially higher in Ukraine than in Myanmar, where channeling funds through international partners was often a deliberate choice to protect local organizations in a highly insecure context.

This report analyses why these two funds were able to allocate significant funding to local organizations, even under intense time pressure. The analysis is based on 11 key informant interviews (KIIs) collected between August and September 2026 with pooled fund managers, Advisory Board members, donor representatives, local and national NGO leaders, among others. With a second US$1.8 billion allocation now under way, understanding how Myanmar and Ukraine went against this trend can shape how that funding—and potential future allocations—are designed and managed.

Key Findings

- **Committed international leadership that held its position under institutional pressure** was named by almost every respondent as a key enabler. Humanitarian Coordinators, UNOCHA leadership, pooled fund managers and advisory bodies kept a sustained focus on localization and resisted pressure to route a larger share of the allocation through international intermediaries.

- **Vocal and organized local leadership.** Local actors in both countries had coordinated platforms for sustained advocacy, a feature often missing elsewhere even where there are strong local actors. Respondents saw the pairing of international and local leadership as what ultimately moved more resources to local actors.

- **Large national intermediaries are able to absorb funding at scale.** Both countries had national NGOs large enough to manage sizeable grants, lead consortia, and channel funding to downstream partners. This capacity was built first and foremost by civil society in Ukraine and Myanmar, but also through years of intentional international investment and through the funding surges that followed the 2021 coup in Myanmar and the 2022 full-scale invasion of Ukraine.

- **Solidarity and collaboration among local organizations.** In Myanmar, a previously fragmented civil society became far more coordinated in the years after the coup. In Ukraine, relationships built among local organizations over the past decade facilitated quick creation of joint partnerships.

- **Application processes that reduced burden and encouraged local organizations' participation.** The MHF used one-page concept notes as the entry point for applications, rather than requiring full proposals upfront, easing the burden on both applicants and UNOCHA reviewers under tight deadlines; only shortlisted applicants were then asked for full proposals. Because the funding went directly to international NGOs and UN agencies, with national NGOs as their partners, this did not in itself lower barriers for local organizations in this allocation. The UHF encouraged local organizations to form consortia and ultimately funded seven of them.

- **Programmatic approaches aligned with local comparative advantages.** Direct commodity procurement was a major component of the US-funded allocation, accounting for three quarters of the funding to some countries like Sudan. On the other hand, commodities were a smaller share of spending in Myanmar (43%) and Ukraine (50%), creating space for local actors to lead on delivery of services.

Risks

The approach was not without costs. For local partners funded under this allocation, the six-month, non-extendable window created a lot of pressure on these organizations. Large sums also arrived without matching increases in staffing, stretching both local partners and UNOCHA teams. In addition, funding clustered among a small group of proven organizations. While this was a rational response to the timeline, it also both concentrated risk within those partners and left smaller, newer, or less visible organizations struggling to access funding.

Recommendations

- **Assess enabling conditions in each country where UNOCHA CBPFs operate to understand more about opportunities for direct local funding under time pressure.** This report points to the presence of large national intermediaries, organized local networks, and established

consortia among conditions that enabled significant funding to flow locally in a short timeframe**.** Mapping these joined up structures could support faster targeting of local groups that could potentially manage larger scale funding and distribute it to a broader group of local organizations.

- **Invest in platforms that facilitate local leadership and advocacy.** Donors should provide funding and support for the creation and strengthening of local platforms; local actors need to invest the time and commitment to participate in local platforms and work collectively, actively moving from competition to collaboration; and international actors and funders should give organized local platforms a formal role in shaping allocations.

- **Invest in consortia that allow ecosystems of local actors to be actively engaged in program delivery – and not just in crisis times.** Donors can fund research to understand how best to structure equitable consortia that shift power and funding to local actors; donors and organizations can engage in complementarity assessments, to identify the complementary roles that are best suited to local and international partners in any consortia; local and international actors should prepare consortium arrangements *before* funding surges, with pooled funds supporting consortia through regular standard allocations; and donors should invest in the local intermediaries and networks that are part of consortia in between crises, not only during them. In Ukraine, sustained investment in the institutional strengthening of local and national actors, including their core costs and capacity, was central to what made a high local share possible.

- **Make light-touch applications the default for all allocations.** Building on the MHF's experience with one-page concept notes, use a short first-stage submission for accelerated allocations and request full documentation only from shortlisted applicants. Any second-stage requirements should remain proportionate to grant size and risk, so that the time saved at the first stage is not lost later in the process.

- **Resource pooled fund teams to match the scale of funding.** UNOCHA headquarters should provide CBPFs with staffing and management resources proportionate to the funding they are asked to manage. In both countries, large sums arrived without a matching increase in staff, and localizing funding takes more staff time, not less.

1 Background and Context

1.1 The Localization Gap

The 2016 Grand Bargain committed donors and aid organizations to channel 25% of global humanitarian funding to local and national actors "as directly as possible" (IASC, n.d.). A decade on, the sector remains far short of that target. Direct funding to local and national actors was just 0.5% of Grand Bargain signatory funding in 2024 (ALNAP, 2025) and 4.3% of all reported humanitarian funding in 2025, with total direct and indirect funding to local and national actors at 8.7% (ALNAP, 2026).

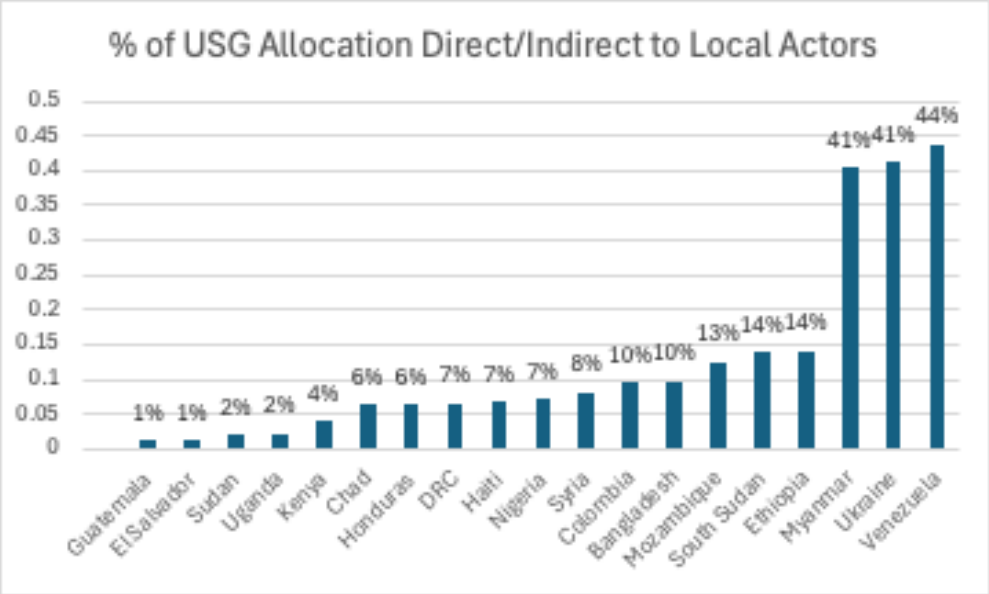
Country-Based Pooled Funds (CBPFs) are widely regarded as one of the sector's strongest localization mechanisms. This is by design: UNOCHA's global guidelines give CBPFs two mutually reinforcing purposes—financing life-saving humanitarian action and contributing to system change and localization (UNOCHA, n.d.-b; Refugees International, 2026). In 2026 local NGOs directly received 46 percent of CBPFs' collective funding—and 55 percent of direct and indirect funding, though there was considerable variation across funds.

1.2 The December 2025 US Allocation and the "Humanitarian Reset"

On 29 December 2025, the United States and UNOCHA signed the first "Humanitarian Reset" framework agreement, anchored by a US pledge of $2 billion—a sum up to two times larger than UNOCHA's allocations in a typical year. This commitment was welcomed as the first significant outlay of US humanitarian funding since the dismantling of USAID earlier that year. Roughly 90 percent of the $2 billion would go through 18 UNOCHA managed pooled funds, with the remainder allocated to the Central Emergency Response Fund (CERF) (CALP Network, 2026; CALP Network, 2026a).

The allocation, however, carried an unusually compressed timeline: UNOCHA funds were to be delivered within six months UNOCHA; by four months UNOCHA had disbursed 88% of available resources. To move this considerable volume of money in such a compressed timeline, CBPFs had to focus largely on well-known partners that could absorb large sums within weeks and implement it within months; most local partners did not meet those criteria. As a result, an estimated 12% of US-funded CBPF allocations reached national organizations both directly and indirectly, compared to 55% of all CBPF funding in 2025 (CALP Network, 2026b).

Across the 18 country funds that received this funding, three countries are notable outliers: Myanmar Ukraine and Venezuela all directed over 40 percent of the US-funded fast track reserve allocation to local actors (directly and indirectly).



This report investigates the conditions that made this significant difference possible in Myanmar and Ukraine.[1] These lessons will be important to bear in mind for the current US contribution to UNOCHA—a pledge of $1.8 billion made in May 2026—this one with a 12-month timeline (U.S. Mission to the UN, 2026)—as well as any future contributions.[2] The findings also offer broader lessons for UNOCHA management and donors eager to supporting local organizations and systems in countries with UNOCHA pooled funds.

[1] When The Share Trust began this study, data for Venezuela was not available, so their status as an outlier was unknown.

[2] The US State Department indicated in May that funding UNOCHA would be a part of its humanitarian funding strategy going forward (https://usun.usmission.gov/joint-press-conference-on-funding-to-the-humanitarian-aid-UNOCHA/), though uncertainty remains about what that might look like.

Fund Overview

The Myanmar Humanitarian Fund (MHF), established in 2007, is one of UNOCHA's longest-running CBPFs, using an area-based model to fund national and international NGOs and UN agencies in Myanmar's most insecure and least accessible areas (UNOCHA, n.d.-a)[3]. With large parts of the country controlled by non-state ethnic and military actors, most aid can only be delivered through local and national actors already embedded there. The MHF's 2026 Localization Strategy targets 75 percent of funding (excluding the US award) directly to these actors, and the fund was on track to meet it at the time of writing. Under the US award, however, the MHF deliberately funded local and national NGOs indirectly, as partners of international NGOs and UN agencies, to protect them from the risks of receiving such funding directly.[4]

The **Ukraine Humanitarian Fund (**UHF) has been one of the largest funds globally. It has grown steadily since the 2022 full-scale invasion and has made publicized commitments to localization. By its 2025 First Standard Allocation of $88.6 million, the UHF reported channeling nearly 70% of funding through national organizations, as direct recipients or sub-implementing partners (UNOCHA, 2025b).

[3] The 2026 Humanitarian Needs and Response Plan appealed for $890 million to reach 4.9 million people, a reduced target reflecting both a narrower geographic scope and diminished response capacity foreseen for the year (UNOCHA, 2025a).

[4] These risks, discussed with the MHF's national NGO partners, included inflexible and highly targeted timelines and allocation approaches (by activity and location), heavier reporting and coordination expectations, and increased scrutiny from the authorities over implementation and banking at such scale. Given the pilot nature of this first tranche, they were considerable. The MHF subsequently launched a $20 million allocation directly to 23 local and national NGOs (plus 48 sub-partners) through 26 projects, with more flexible timelines and targeting criteria and greater MHF support so that partners could implement in line with contextual realities.

2 Methodology

This report follows a comparative, qualitative case-study design oriented around key informant interviews (KIIs) with UN leadership, donors, local and national NGOs, and other key stakeholders structured around a common interview guide and analyzed thematically.

2.1 Key Informant Interviews

This analysis draws on 11 KIIs (4 Myanmar, 7 Ukraine) conducted between August and September 2026. The following research questions were used to guide the interviews:

1. What conditions and fund design features made a high local allocation possible?

2. Who made it happen?

3. What tools and mechanics facilitated the high percentage?

4. Why not elsewhere?

5. What are the tradeoffs or risks to the approaches that enabled local funding?

3 Findings

3.1 Context

The interviews revealed common factors that enabled significant local funding under the first US fast-track allocation, along with shared risks and consequences of channeling funds to local actors under intense time pressure. Contextual differences, however, should not be understated. Nor do these findings tell the whole story; complex dynamics influence funding patterns and there may be specific examples that are not well captured here. However, the consistency of the findings across both countries point to important lessons—as well as a set of recommendations to inform future funding.

3.2 Enabling Factors

Sustained and committed international leadership willing to resist institutional pressure. Across both countries, almost every respondent pointed to committed leadership as one of the most important enabling factors. Fund managers, humanitarian coordinators, and advisory boards were all credited with a sustained and deeply committed focus on localization. Importantly, these leaders resisted institutional pressure to target a higher percentage of funding to international intermediaries.

- Pressure to use these funds to support UN agencies or other international actors was somewhat mitigated in Ukraine since these intermediaries had more sources of funding outside of UNUNOCHA compared to other countries (even within UNUNOCHA, for example, USG allocations represented 55% of total funding to the UHF in 2026, compared to 90-100% in almost all of the other funds), and this was identified as a key factor that reduced some of the pressure from the UN system to take a larger share of USG funding channeled to the pooled fund. The UHF had also, through a deliberate policy over several years, largely shifted away from funding UN agencies (close to zero by 2025) .

Vocal and organized local leadership willing to push the international humanitarian system. Alongside strong leadership within the UN and UNOCHA country teams, respondents also highlighted that vocal, organized and consistent leadership from local actors was consequential for maintaining their participation in decision-making. The presence of a coordinating body seemed to be key for sustained local advocacy in both Ukraine and Myanmar. In Ukraine, for example, the Alliance of Ukrainian Civil Society Organizations mobilized local organizations and worked with aligned donors and UN counterparts to press for greater direct funding. Importantly, it seemed to be the combination of committed international leadership with vocal and organized local leadership that ultimately allowed the system to target significantly more resources to local actors.

For example, in Myanmar, the Network Advisory Group (NAG), a national NGO member of the MHF Advisory Board in 2026, was a strong advocate for national NGO inclusion in the US award and a valuable interlocutor for UNOCHA while the allocation was being developed, in discussions on including

national NGOs in MHF processes—and as recipients of funding—under both the US award and regular MHF allocations. Respondents noted that local actors had not been fully involved at the outset, and that, with a very large sum arriving and most of it initially expected to flow through INGOs, the NAG's leadership advocated persistently and vocally for local organizations to receive a meaningful share rather than being bypassed.

One respondent observed that, without the NAG at the table, this shift would not have happened. Local actors in Myanmar also have a formal seat in senior decision-making: five local organizations sit on the Humanitarian Country Team (HCT), the main strategic coordination forum for the humanitarian response, where they represent the wider community of national partners. This gives local civil society a direct channel to raise concerns and influence response priorities, including how pooled funding is used. Respondents described a shift from a previously fragmented local civil society to one that is more coordinated and visible, with stronger collective mechanisms that give local organizations a shared voice. At the same time, one respondent cautioned that this can create an over-reliance on the small number of local actors that are active in the HCT.

The existence of large local intermediaries that have grown in strength and capacity over a number of years. Respondents were explicit that capacity investments long preceded the US allocation – with funding surges at the onset of the 2021 coup in Myanmar and the 2022 full scale invasion in Ukraine. Investments in local organizations over the past four to five years (and before) contributed to an ecosystem of large national NGOs that could metabolize large amounts of donor funding. This capacity was built first and foremost by local civil society itself, supported by international investment.

Collaboration among local and national NGOs that allowed for joint action. In Myanmar, the local ecosystem was fragmented but had become highly coordinated as a result of growing solidarity following the coup. For example, 14 national NGOs formed a network that could receive and distribute larger scale donor funding and act as an intermediary for local partners. In Ukraine, relationships between local organizations built over the last decade allowed organizations to quickly create collaborative models of response. In both cases, consortia models meant that large number of local actors could be integrated into the response, by working in partnership with an international prime.

The UNUNOCHA pooled funds in each country used specific proposal and design features to facilitate greater funding flows to local actors.

- In Myanmar, the use of one-page concept notes as the entry point for applications, rather than requiring full proposals upfront, was repeatedly described as a "game changer" that reduced burden on both UNOCHA and applicants under compressed deadlines. This was a deliberate departure from standard pooled-fund application procedures, and 23 concept notes were ultimately received. The aim was to keep the application as light and low burden as possible under compressed deadlines, for applicants and UNOCHA reviewers alike, with only shortlisted applicants then asked to submit full proposals. Because the applicants funded directly under the US award were international NGOs and UN agencies, with national NGOs participating as their partners, the concept-note approach did not in itself lower barriers for local organizations in this

allocation.

- In Ukraine, the UHF encouraged complementary local organizations to group themselves into consortia, which allowed more local actors to be included. The UHF ultimately funded seven consortia under the US fast track allocation. The ability of organizations to quickly coalesce into consortia was attributed to pre-existing working relationships among national NGOs, and to large national organizations that could already operate at a scale similar to INGOs and bring smaller partners in with them.

Both Ukraine and Myanmar responses had a relatively low share of direct commodity procurement, which appeared to open space for greater delivery of programming by local actors. Out of the 18 countries receiving USG support, Sudan had the highest level of commodity procurement at 74%, delivered through a direct and large scale delivery model run almost entirely by UN and INGO actors. Passthrough to downstream partners was almost non-existent. In sharp contrast, 50% of Ukraine's funding and 43% of Myanmar's funding were used for supplies delivered to beneficiaries, with a much greater share of resources flowing through partners rather than directly procured.[2]

In Ukraine, a digitally sophisticated operating environment allowed local actors to lead on cash delivery. In Ukraine, cash made up a large share of the UHF's US-funded response (one respondent estimated roughly two-thirds)—well above its share of the wider response, where cash was estimated at around 20 percent in 2025–2026 and accounts for 39 percent of planned 2026 HNRP requirements (UNOCHA, 2026b)—, This delivery in cash was well set up for local leadership. Ukraine's well-developed cash working groups, strong social protection system, and government digital infrastructure — including a pension-fund registry used as a primary beneficiary list — allowed national NGOs to run sophisticated cash and registration systems. Having a strong digital platform helped to provide coordination on cash that facilitated participation by many local organizations rather than needing one centralized international organization.

3.3 Risks and Consequences

The Share Trust asked about the risks or potential unintended consequences of targeting such a large amount of funding to local actors under compressed timelines. Again, many of the risks cited were common across the two countries:

Compressed timelines with no flexibility:

- Partners had to be able to deliver within a 6 month window, with no possibility for extension in contexts characterized by implementation delays, placing continuous pressure on local partners to deliver on time. Channeling the funding through fast-track reserve allocations, rather than standard allocations, compounded this: it limited open competition and left little time for prioritization, outreach, or onboarding new partners. Heavy reliance on reserve allocations for large-scale

funding also risks stretching an instrument designed for unforeseen needs.

Concentration of risk:

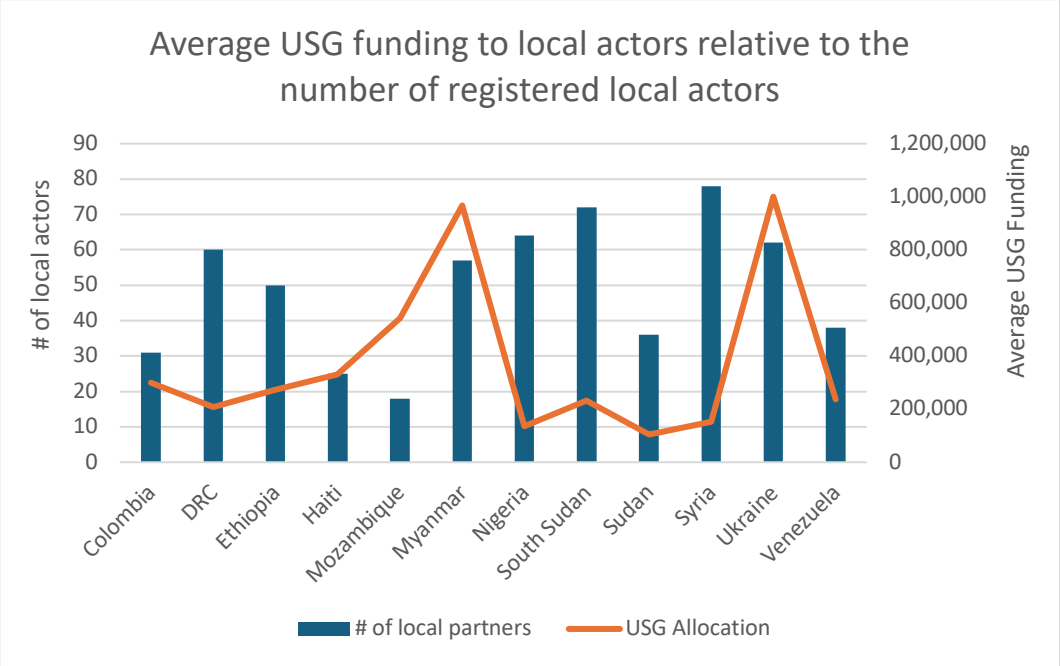
- Both funds hit high local funding shares partly by concentrating large, fast disbursements on a small set of already-trusted partners (while the partner base was expanded through consortia, as highlighted above, this still relied on a small handful of prime recipients). This was a rational response to compressed timelines, but one that can produce risk to organizations from having significant new sums of funding.

- In addition, in both countries, local actors received numerous grants through multiple channels. For example, in Myanmar, one local NGO appeared in 9 of 23 concept notes and was funded through 8 of them; another organization appeared 8 times independently. As a result, where a local partner was not a prime, they were often still receiving large amounts of funding through multiple grants which can concentrate risk. In Myanmar, centralizing the allocation of $136 million under the leadership of the Humanitarian Coordinator gave the MHF an unusual overview of complex UN–INGO–national NGO partnership chains, where overlapping relationships (for example, multiple donors working with the same NGOs in the same areas) are widespread and compounded by limited information sharing. Once the MHF had mapped all concept notes and identified overlapping national NGO sub-partners, it convened the actors concerned to build a common understanding of potential geographic overlap and of the implications for national partners, including reporting burden, additional risk, and capacity. INGOs and UN agencies then adjusted locations, removed some sub-partners, and followed up to confirm partner capacity and risk. In some cases a national NGO still partnered across many grants after this review; this was possible because the partnerships spanned different parts of the country and reflected the scale of that organization's national network.

- In Myanmar specifically, this was compounded: the US award was paid 100% up front by direct banking to direct recipients, which respondents described as putting local actors at extremely high risk with the DFA; prime recipients could, however, transfer funds to national NGO sub-partners in tranches, as they judged appropriate given the risks and operational needs.

Notably, in both Myanmar and Ukraine, the average amount of funding to local actors relative to the number of registered local actors is significantly more than other funds, including Venezuela. Figure 2 maps the number of registered local actors by CBPF/country (for those countries where data is available) against average USG funding. Of note, when the total funding going to local actors is calculated, for the 10 countries where data is available, the average funding relative to number of

registered local partners is $251k. By sharp contrast, in both Myanmar and Ukraine, the average funding relative to number of registered local partners is $966k and $1m respectively.



- **Uneven benefits:** this same focus on channeling funding via a few well-established organizations meant that smaller, newer, or less visible organizations struggled to access funding for smaller projects via this particular allocation.

- **Staff fatigue and unchanged capacity:** Multiple respondents flagged that large lump-sum funding arrived without a matching increase in staffing to manage the grant (an issue raised at both the local partner, and international partner/UNOCHA level).

4 Recommendations

Assess status of enabling conditions across UNOCHA CBPFs to ensure readiness for future funding flows. Each fund could map which of the enabling conditions identified in this report are already in place, such as large national intermediaries, organized local networks, established consortiums and partner-based delivery models, and design its allocation to build on them rather than defaulting to the fastest/easiest international route.

Invest in platforms that facilitate local leadership and advocacy. Vocal, organized and consistent leadership from local actors was consequential, and the presence of a coordinating body was key. In both countries, these coordinating bodies were very intentionally invested in by donors, and local actors actively led on designing platforms with active participation across a range of organizations with clear organizing principles. Importantly, these platforms had active and committed international counterparts.

- Donors should provide funding and support for the creation and strengthening of local platforms. This should be multi-year and flexible funding - platforms that maintain momentum between funding surges are better placed to influence allocations when they come.
- Local actors need to invest the time and commitment to participate in local platforms and work collectively. Actively moving from competition to collaboration is key and needs to be intentional and structured.

International actors and funders should give organized local platforms a formal role in shaping allocations. Bring representatives of local networks into allocation discussions before envelopes and modalities are set, so that local voices do not depend on ad hoc advocacy to be heard.

Invest in consortia that allow ecosystems of local actors to be actively engaged in program delivery – and not just in crisis times. Consortia can facilitate a range of positive outcomes – they can enhance complementarity between local and international partners, support peer to peer learning, and bring a range of both larger local intermediaries as well as much smaller local organizations into program delivery. Their success can depend on strong structures that share funding and power across partners, a focus on collaboration rather than competition, and preparation ahead of a crisis.

- Donors can fund research to understand what type of consortia structure works best, what the principles of good consortia are (particularly from the perspective of local partners), how equitable principles are best embedded in consortia to ensure that all partners have a share of funding and design. Consortia can work really well when they are highly collaborative but can also result in top down structures that limit the power and voice of local actors – hence understanding principles for good design, and how those might play out in different contexts, is key.

- Engage in complementarity assessments, to identify the complementary roles that are best suited to local and international partners in any consortia, leaning into the comparative advantages of UN agencies, INGOs and LNGOs.
- Local and international actors should prepare consortium arrangements *before* funding surges. Pooled funds can build consortia through regular standard allocations so that groups of national NGOs are already formed and able to submit joint proposals within a short time period. Building effective consortia takes time, often years rather than months, and typical CBPF project durations of up to 12 months may not allow a new consortium to mature; pooled funds should consider longer or multi-phase funding for consortia so that consortia are ready to absorb time-bound surge funding.
- Donors should invest in the local intermediaries and networks that are part of consortia in between crises, not only during them. The capacity that let Myanmar and Ukraine absorb large sums was built over years. Multi-year, intentional support to national NGOs and networks, including in contexts not yet facing a funding surge, is what makes a high local share possible when one arrives. In Ukraine, for example, a substantial share of some UHF allocations went to core costs and capacity strengthening for local and national actors, building a pool of partners able to absorb large sums at speed.

Make light-touch applications the default for all allocations. Building on the MHF's experience with one-page concept notes, use a short first-stage submission for accelerated allocations and request full documentation only from shortlisted applicants. Any second-stage requirements should remain proportionate to grant size and risk, so that the time saved at the first stage is not lost later in the process.

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