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Nigeria COVID-19 Vaccination Plans: Ensuring Equitable Allocation and Distribution

<i>For: Senate Committees on Health, Anti-Corruption and Financial Crimes; Information, Media and Publicity.</i>	<i>For: House Committees on Health, Anti-Corruption; Information, National Orientation, Ethics and Values.</i>	<i>For: Ministries of Humanitarian Affairs, Health, Information and Culture; and National Centre for Diseases Control (NCDC).</i>
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Executive Summary

The morbidity and mortality rates of the coronavirus, otherwise called Severe Acute Respiratory Syndrome Coronavirus 2 (SARS-CoV-2) or COVID-19, ignited the urgency of developing and ensuring access to affordable, safe and efficacious vaccines with rapid and fair deployment in sight. Hopefully, Nigeria expects to take delivery of its first coronavirus vaccine doses in February 2021, with health workers, top government officials and vulnerable people to be given priority. National Assembly has approved that ₦10bn be set aside in the 2021 Appropriation Act. As huge as this money is, lack of supervision can hinder free, fair and equitable access to the vaccines. That's why it is important that the legislature as the true representatives of the people and symbol of democracy should set up a comprehensive auditing, accountability and reporting mechanisms to monitor the entire process and uphold the citizens' right to health and good living regardless of status, religion, ethnicity and race. Whilst the national response to the COVID-19 outbreak is led by the federal government through the Presidential Task Force (PTF), the National Assembly is constitutionally empowered to provide a legislative support to tackle the pandemic through the development and passage of relevant legislations to mitigate the effects of COVID-19 on citizens and the economy, and perform oversight on the executive response to the pandemic. Summarily, the challenges Nigeria COVID-19 Vaccination plans may face as identified in this Brief may come inform of:

- Lack of transparency and accountability in the process of procurement of the vaccines;
- Entry of substandard and counterfeit vaccine products into markets;
- Theft of vaccines within the allocation and distribution channels, diversion to the black market or kept for personal use. This risk is particularly pronounced when supplies are limited,
- Diversion of government funding designated for the administration of the vaccines;
- Nepotism and favouritism; and
- Administration of the vaccine by unqualified personnel, especially, at the local and community levels.

The following summarizes recommendations and better options for legislature to carry out oversight on the procurement, distribution and administration of COVID-19 vaccines:

- a) the legislature should adopt and use as its benchmark the overarching principles of the WHO's Fair Allocation Framework and Equitable Access to COVID-19 Health Product, such as *solidarity, accountability, transparency, responsiveness, equity and fairness, affordability, collaboration as well as regulatory and procurement efficiency;*
- b) The National and States Assemblies should set up a Specialized Joint Committee (SJC) to oversee the procurement and distribution of the vaccines in Nigeria. The proposed SJC should have mandate to

oversee the prioritization, distribution and monitoring of vaccine programmes across the federation. This could remain a critical oversight body during a public health emergency;

- c) National and States Assemblies' SJC should request the Federal Government to develop and submit vaccine distribution plans outlining how vaccine distribution will likely proceed in phases. Working with this plan, the proposed SJC functions should include monitoring the disbursements of funds, the purchase of vaccines, and the distribution of vaccines and related processes in 'real time' so that any red flags can be identified and addressed quickly;
- d) The legislature or its specialised committee should also monitor the government agency and its personnel towards ensuring that priority vaccine recipients are identified and vulnerable individuals and communities are protected, thus, guaranteeing the citizens right to health and good living regardless of status, religion, ethnicity and race;
- e) Lastly, comprehensive auditing, accountability and reporting mechanisms should be set up to monitor the disbursement process and verify appropriate distribution, delivery and receipts.

Introduction

With the second wave of the coronavirus SARS-CoV-2 (COVID-19) and the rising numbers of cases and fatalities, countries of the world are jostling for the vaccine. Since 11 March 2020 when the virus was declared a pandemic by the World Health Organization (WHO),¹ the world has been working tirelessly to procure a vaccine. The positive results announced by a number of vaccine manufacturers in November 2020 have led to vaccines being approved in different parts of the world for administration.² Ever since the announcement of the approval of the COVID-19 vaccines by the US Food and Drug Administration late 2020, the Nigerian federal government has been putting plans in place for procurement and distribution of these vaccines. In December, the National Assembly and the federal government set aside ₦10bn in the 2021 Appropriation Act for the procurement of Covid-19 vaccines. However, many have raised a lot of concerns on the scale and complexity of the allocation, distribution and prioritization of the vaccines.³ There is still doubt that the government has a coherent procurement plan;⁴ this is true as public officials have announced different plans just as some state governments are also planning to get their own supply.⁵

In the light of the foregoing, states and relevant government institutions need to identify and address any potential gaps and barriers in the distribution and allocation processes, to ensure that the populations in need have easy and equitable access to the vaccines. Unfortunately, Nigeria, with more than 206 million people⁶, is only expecting around 100,000 doses of the Pfizer Vaccines at the end of February, 2021,⁷ with health workers, top government officials and vulnerable people to be given

¹ Pharmaceutical Technology (2020). WHO declares COVID-19 outbreak a pandemic. Available on <https://www.pharmaceutical-technology.com/news/who-declares-covid-19-pandemic/>. Accessed 11th January, 2021.

² Ibid.

³ UNODC (2020). *COVID-19 Vaccines and Corruption Risks: Preventing Corruption in the Manufacture, Allocation and Distribution of Vaccines*. UNODC. Available on https://www.unodc.org/documents/corruption/COVID-19/Policy_paper_on_COVID-19_vaccines_and_corruption_risks.pdf. Accessed on 11th January, 2021)

⁴ Pasha 93: Nigeria doesn't have a coherent COVID-19 vaccine plan. What's needed. (<https://theconversation.com/pasha-93-nigeria-doesnt-have-a-coherent-covid-19-vaccine-plan-whats-needed-153655> Retrieved on 11 Jan. 2021)

⁵ Ibid

⁶ Varrella, S. (2020). Population of Nigeria 1950-2020. Retrieved from <https://www.Statista.com/Statistics/1122...>

⁷ Obiezu, T. (2021). COVID-19 Pandemic: Nigeria's Goal: Vaccinate 40% of Population Against COVID-19 This Year. Available on <https://www.voanews.com/covid-19-pandemic/nigerias-goal-vaccinate-40-population-against-covid-19-year>. Accessed on 11th January, 2021.

priority.⁸ Thus, there is need to identify possible challenges in the procurement, distribution and administration of the expected vaccines, and how to address them. Therefore, the main aim of this information brief is to articulate ways in which the National and States Assemblies can get involve and act as moderators and representatives of the people in this all-important activity.

Identifying some challenges Nigeria COVID-19 Vaccination plans may face

Nigeria has been faced with various scales and complexities of corruption before the advent of COVID-19. If the necessary strategies that consistently ensure accountability in the administration of the COVID-19 vaccines are not put in place, it may ignite another form of protest against the government. Summarily, the challenges Nigeria COVID-19 Vaccination plans may face may come inform of the following:

- Lack of transparency and accountability in the process of procurement of the vaccines;
- Entry of substandard and counterfeit vaccine products into markets;
- Theft of vaccines within the allocation and distribution channels, diversion to the black market or kept for personal use. This risk is particularly pronounced when supplies are limited,
- Diversion of funds designated for the administration of the vaccines;
- Nepotism and favouritism; and
- Administration of the vaccine by unqualified personnel, especially, at the local and community levels.

These and many more issues must receive a coordinated response, especially from the legislature. Critical response will be required by the legislature inform of oversight cardinal. These responses will help in advancing access to safe and effective COVID-19 vaccines by the Nigerian population, including the most vulnerable and marginalized groups. Meanwhile, there are useful documents and frameworks as guide to manufacturing, procurement, allocation and distribution of the vaccines.

Global and National Frameworks for Equitable Allocation of Covid-19 Vaccines

With Nigeria still in the midst of an escalating COVID-19 pandemic, attention to procure or develop a safe and effective COVID-19 vaccine has intensified. However, when the vaccines become available, ensuring fair, equitable and rapid distribution to the priority populations may present a serious challenge. This is the reason why the legislature should be involved in the procurement, allocation and distribution plans. So, for the purpose of reference and for the use of the legislators, we reproduce layers of global frameworks and documents developed by WHO.⁹ These documents from the World Health Organisation (WHO) include: (1) The Values Framework for the allocation and prioritization of COVID-19 vaccination; (2) The Roadmap for Prioritizing Population Groups for Vaccines against COVID-19; (3) A Fair Allocation Framework; and (4) Access to COVID-19 Tools (ACT) Accelerator. We will now describe the above global framework documents briefly one after another:

(1) *The Values Framework for the allocation and prioritization of COVID-19 vaccination* - The WHO Values Framework for the allocation and prioritization of COVID-19 vaccination was created by the SAGE Working Group on COVID-19 Vaccines. This document serves to underline the public health objectives and principles of vaccine prioritization necessary to provide guidance nationally to help

⁸ Clowes, W. & Olurounbi, R. (2021). Nigeria Now Expects First Covid-19 Vaccines in February.

(<https://www.bloomberg.com/news/articles/2021-01-21/nigeria-now-expects-first-covid-19-vaccine-doses-in-february>) Retrieved on 20th January, 2020).

⁹ WHO (2020). Coronavirus disease (COVID-19): Vaccine access and allocation. Retrieved on 20/1/2021 from [https://www.who.int/news-room/q-a-detail/coronavirus-disease-\(covid-19\)-vaccine-access-and-allocation](https://www.who.int/news-room/q-a-detail/coronavirus-disease-(covid-19)-vaccine-access-and-allocation)

focus on target populations during vaccine supply constraints.¹⁰ The Values Framework was created by SAGE and endorsed by the WHO Director-General and posted online on 14th September, 2020.¹¹ The Framework articulates the overall goal of COVID-19 vaccine deployment, providing six core principles that should guide prioritization decisions and twelve objectives that further specify the six principles. The Table 1 below gives details on this framework.

Table 1: World Health Organizations Values Framework at a Glance

Goal Statement	The overarching goal is for COVID-19 Vaccines to contribute significantly to the equitable protection and promotion of human well-being among all people of the world.
Principles	Objectives
Human Well Being	Reduce deaths and disease burden from the COVID-19 pandemic;
	Reduce societal and economic disruption by containing transmission, reducing severe disease and death, or a combination of these strategies;
	Protect the continuing functioning of essential services, including health services.
Equal Respect	Treat the interests of all individuals and groups with equal consideration as allocation and priority-setting decisions are being taken and implemented;
	Offer a meaningful opportunity to be vaccinated to all individuals and groups who qualify under prioritization criteria.
Global Equity	Ensure that vaccine allocation takes into account the special epidemic risks and needs of all countries; particularly low-and middle-income countries;
	Ensure that all countries commit to meeting the needs of people living in countries that cannot secure vaccine for their populations on their own, particularly low- and middle-income countries.
National Equity	Ensure that vaccine prioritization within countries takes into account the vulnerabilities, risks and needs of groups who, because of underlying societal, geographic or biomedical factors, are at risk of experiencing greater burdens from the COVID-19 pandemic;
	Develop the immunization delivery systems and infrastructure required to ensure COVID-19 vaccines access to priority populations and take proactive action to ensure equal access to everyone who qualifies under a priority group, particularly socially disadvantaged populations.
Reciprocity	Protect those who bear significant additional risks and burdens of COVID-19 to safeguard the welfare of others, including health and other essential workers.
Legitimacy	Engage all countries in a transparent consultation process for determining what scientific, public health, and values criteria should be used to make decisions about vaccine allocation between countries;
	Employ best available scientific evidence, expertise, and significant engagement with relevant stakeholders for vaccine prioritization between various groups within each country, using transparent, accountable, unbiased processes, to engender deserved trust in prioritization decisions.

Source: WHO (2020)

¹⁰ WHO (2020). Background paper on Covid-19 disease and vaccines. Prepared by the Strategic Advisory Group of Experts (SAGE) on Immunization Working Group on COVID-19 vaccines. Retrieved on 20/1/2021 from https://apps.who.int/iris/bitstream/handle/10665/338095/WHO-2019-nCoV-vaccines-SAGE_background-2020.1-eng.pdf?sequence=1&isAllowed=y

¹¹ Ibid

Appositely, the Values Framework document briefly described above is a very important framework from which Nigerian lawmakers can draw a lot of guidance for their oversight functions on the prioritization and equitable protection and promotion of human well-being among Nigerians. It would be discovered that the document outlines the general principles, objectives and related target groups for prioritization of COVID-19 vaccines; this would be aptly and relevantly useful as a guide for effective distribution of COVID 19 vaccines in Nigeria.

(2) *The Roadmap for Prioritizing Population Groups for Vaccines against COVID-19* - This document (the Roadmap) is produced to support countries in planning stage of the vaccination; the Roadmap suggests public health strategies and target priority groups for different levels of vaccine availability and epidemiologic settings.¹² The Roadmap is also intended to serve as guidance on preparing for vaccine prioritization decisions within countries. Although the Values Framework does include the principle of global equity, the Roadmap does not directly address global allocation decisions. Prioritization of population groups is categorized into four categories: ‘lower risk’ population (people doing administrative tasks that do not involve contact with patients), ‘medium risk’ population (people providing care in health facilities and in the community to the general public patients who are not known or suspected of having COVID-19), ‘high risk’ population (e.g clinical triage with in-person interviewing of patients with sign and symptoms of COVID-19) and ‘very high risk’ population (people working with COVID-19 patients in crowded, enclosed places without adequate ventilation).¹³

(3) *A Fair Allocation Framework and equitable access to COVID-19 health products* – This framework is about the overarching principles (solidarity, affordability, fairness, responsiveness, etc.) for equitable access and fair allocation of COVID-19 health products. Although universal, the principles allow for tailoring of the allocation mechanisms according to different contexts but with particular focus on reaching those populations at high-risk, living in conditions of vulnerability.¹⁴ Nigerian lawmakers need to be aware that a commitment to equity across all countries and for all populations in need remains the foundation of a global fair allocation framework. These principles are grounded in the right of every human being to the enjoyment of the highest attainable standard of health without distinction of race, religion, political belief, economic or any other social condition.¹⁵ To attain this right, lawmakers must ensure that COVID-19 vaccines and other health products for Coronavirus are affordable, available, appropriate, and of assured quality for all populations in need. Thus, lawmakers must know how to use their oversight power to promote access to and allocation of essential COVID-19 health products based on equity and fairness in Nigeria. As they have been identified by WHO (2020),¹⁶ these overarching principles are:

- i. *Solidarity*: The allocation of scarce resources must be done in a spirit of solidarity.
- ii. *Accountability*: Clearly defined roles and responsibilities are needed to ensure procedural justice.
- iii. *Transparency*: Trust needs to be built and maintained.
- iv. *Responsiveness* to public health needs.

¹² WHO (2020). Op. Cit.

¹³ WHO (2020). WHO SAGE Roadmap For Prioritizing Uses Of Covid-19 Vaccines In The Context Of Limited Supply: An approach to inform planning and subsequent recommendations based upon epidemiologic setting and vaccine supply scenarios, Version 1.1 (<https://www.who.int/publications/m/item/who-sage-roadmap-for-prioritizing-uses-of-covid-19-vaccines-in-the-context-of-limited-supply>, accessed 21 January, 2021).

¹⁴ Ibid

¹⁵ Constitution of the World Health Organization (https://www.who.int/governance/eb/who_constitution_en.pdf, accessed 21 January, 2021).

¹⁶ WHO (2020). WHO Concept for fair access and equitable allocation of COVID-19 health products. (<file:///F:/who-covid19-vaccine-allocation-final-working-version-9sept.pdf>, accessed 21 January, 2021).

- v. *Equity and fairness* in the allocation process is driven by public health needs and informed by these qualities.
- vi. *Affordability*: It is crucial for Legislature to ensure that costs do not pose a barrier to access.
- vii. *Collaboration*: Legislature can make policy to facilitate collaborative efforts among relevant global and national stakeholders to accelerate and scale-up the response.
- viii. *Regulatory and procurement efficiency*: Agile regulatory processes are needed to support efficient procurement process will ensure timely access to the available products.

The above eight principles are relevant for oversight and legislature may have to understand how to use them in order to ensure that allocation process enables equitable access and fair distribution of vaccines to the populations in need.

(4) *The Access to COVID-19 Tools (ACT) Accelerator*- It is said that “where you live shouldn’t determine whether you live.”¹⁷ In April 2020, WHO and partners launched the ACT-Accelerator partnership to serve as a global effort to develop tools to fight the Coronavirus disease.¹⁸ With significant advances in research and development by academia, private sector and government initiatives, the ACT-Accelerator is on the cusp of securing a way to end the acute phase of the pandemic by deploying the tests, treatments and vaccines the world needs.¹⁹ The ACT-Accelerator has ambitious targets and that is to provide 2 billion vaccine doses to the world by the end of 2021, 245 million courses of treatment and 500 million diagnostic tests to low- and middle-income countries in 2021.²⁰ The Global Fund is a co-convenor of both the Diagnostics and Health Systems Connector; the organization is also leading work on procurement and deployment in Therapeutics.²¹ Throughout the world, Donors commit to fund the scale up of the ACT-Accelerator but warn additional funding is critical to support its success. However, it’s said that a further 23.7 billion US\$ is required in 2021, if tools are to be deployed across the world as they become available.²²

Nigeria as a country, through its National Agency for Food & Drug Administration & Control (NAFDAC) has come up with a guideline on regulatory preparedness for licensing or promoting access to COVID-19 vaccines.²³ According to NAFDAC, a basic documentation according to the source of vaccine is required; that is, COVID-19 vaccines for programmatic use are expected to be from different sources, including a United Nations agency, a donation from a company or other source, or through national procurement. In general, lawmakers would need to and should familiarize themselves with the NAFDAC’s guideline on regulatory preparedness for licensing or accessing COVID-19 Vaccines. This will prepare them well for a good monitoring of the procurement and equitable allocation and distribution processes.

Conclusion and Recommendations

¹⁷ The Global Fund (2021). Tools Accelerator (ACT-A). (<https://www.theglobalfund.org/en/covid-19/act-a/>, accessed 21 January, 2021).

¹⁸ Ibid

¹⁹ Ibid

²⁰ Ibid

²¹ Ibid

²² The Access to COVID-19 Tools (ACT) Accelerator (<https://www.who.int/initiatives/act-accelerator>, accessed 21 January, 2021).

²³ NAFDAC (2020). Guidance on Regulatory Preparedness for Licensing or Access to COVID-19 Vaccines (https://www.nafdac.gov.ng/wp-content/uploads/Files/Resources/Guidelines/DRUG_GUIDELINES/Guidance-Documents-on-Covid-19-Vaccine-Preparedness-updated.pdf, accessed 21 January, 2021).

Nigeria expects to take delivery of its first coronavirus vaccine doses in February, with health workers, top government officials and vulnerable people to be given priority. National Assembly has approved that ₦10bn be set aside in the 2021 Appropriation Act. As huge as this money is, lack of adequate supervision can lead to waste of public fund which in turn is capable of hindering free, fair and equitable access to the vaccines. That's why it is important that the legislature as the true representatives of the people and symbol of democracy should set up a comprehensive auditing, oversight, accountability and reporting mechanisms to monitor the entire process as a way of upholding the citizens' right to health and good living regardless of status, religion, ethnicity and race. Whilst the national response to the COVID-19 outbreak is led by the federal government through the Presidential Task Force (PTF), the National Assembly is constitutionally empowered to provide a legislative support to tackle the pandemic through the development and passage of relevant legislations to mitigate the effects of COVID-19 on citizens and the economy; perform oversight on the executive response to the pandemic. The following summarizes recommendations and better options for legislature to carry out oversight on the procurement, distribution and administration of COVID-19 vaccines:

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- g) National and States Assemblies' SJC should request federal Government to develop and submit vaccine distribution plans; outlining how vaccine distribution will likely proceed in phases. Working with this plan, the proposed SJC's functions should include the capacity to monitor the emergency disbursements of funds, the purchase of vaccines, and the distribution of vaccines and related processes in 'real time' so that any red flags can be identified and addressed quickly;
- h) The legislature or its specialised committee should also monitor the government agency and its personnel towards ensuring that priority vaccine recipients are identified and vulnerable individuals and communities are protected, thus, guaranteeing the citizens right to health and good living regardless of status, religion, ethnicity and race;
- i) Lastly, comprehensive auditing, accountability and reporting mechanisms should be set up to monitor the disbursement process and verify distribution, delivery and receipts.