



Centre for Social Justice Newsletter, July 2026

In this Edition, CSJ conducted a two-day learning and reflection meeting with the cluster partner members of the project “Improving the Effectiveness of Anti-Corruption Processes and Reforms”. In an intervention targeting the 2027 election campaigns, CSJ prepared and validated a Governance and Political Agenda for the Economy. In collaboration with the Independent Corrupt Practices and Other Related Offences Commission, we finalized, published and publicly presented the review of implementation of corruption risk assessments and systems studies in three critical agencies namely the National Health Insurance Authority, National Primary Health Care Development Agency and the Universal Basic Education Commission. This Edition focuses on the NHIA report.

Cluster Learning and Reflection Meeting - Improving the Effectiveness of Anti- Corruption Processes and Reforms



Group Picture of Participants

The meeting held on 6th – 7th July, 2026 had the objective of documenting the cumulative impact, systemic outcomes, and sustainability pathways recorded by cluster partners under the improving the effectiveness of anti-corruption processes and reforms programme. The Programme is supported by the Rule of Law and Anti-Corruption Programme (RoLAC 2) of the European Union. The partners came from six focal states of Anambra (Social and Integral Development Centre [SIDECE]); Lagos (Community Life Project [CLP]); Plateau (Kaneng Rwang-Pam Foundation for Education and Migration Awareness [KRP FEMA]; Adamawa (Women and Youth Empowerment for Advancement and Health Initiative [WYEAHI]); Kano (Women in Media Communications Initiative [WIM]); and Edo (Africa Network for Environment and Economic Justice [ANEEJ]).

During the meeting, participants presented their comprehensive state-specific updates, detailing policy shifts, challenges, and structural progress over the last two years.

Political and Governance Agenda for the Economy

CSJ with the support of Friedrich Ebert Stiftung produced a Handbook on political and governance agenda for the economy. This is a contribution towards the 2027 elections, to focus the attention of candidates and political parties on the economy. Governance is about the allocation and management of public resources to satisfy the public good. The electoral process throws up candidates from different political parties who contest for power and present their world views of how they intend to address the myriad of challenges facing the society. These challenges and the response of contestants for power to solving them are usually problematised and become a national dialogue before and after the elections. Successful candidates become government officials charged with the management of resources in the economy.

The Handbook focused on critical economic issues - Budgeting, Capital Importation and Foreign Direct Investment, Constitutional Economic Objectives, Cost of Governance and Leakages in the System, Debts, Diaspora Remittances, Economic Growth, Electricity, Employment and Poverty Reduction. Other issues reviewed were Exchange Rate, Gender as a Cross Cutting Issue, Inflation, Interest Rate, Access to Credit, Petroleum Resources, Social Sector (Education and Health) and the Economy, Taxation and Trade.

The Handbook was presented at a meeting of candidates, political parties and civil societies.



Group Picture of Participants

Read The Details Here

Full Details

CSJ and ICPC Collaborate to Review the Implementation of Recommendations of Previous Corruption Risk Assessments and Systems Studies

INTRODUCTION

The Independent Corrupt Practices and Other Related Offences Commission (ICPC), in collaboration with the Centre for Social Justice (CSJ) conducted a System Review of the National Health Insurance Authority (NHIA). This is in line with ICPC's preventive mandate under Sections 6 (b – d) of the Corrupt Practices and Other Related Offences Act, 2000. This assessment builds upon the 2019 Systems Study and Corruption Risk Assessment, which examined the core operational, financial, and governance structures of the Authority.

The current review evaluates the extent of implementation of the 2019 recommendations, identifies gaps in compliance, and assesses the progress made in strengthening transparency, accountability, efficiency, and service delivery in line with the NHIA Act, 2022. It further identifies emerging risks, operational bottlenecks, and systemic vulnerabilities that may hinder the realisation of the Authority's mandate to provide accessible, affordable, and quality healthcare for Nigerians.

The review revealed mixed progress, with notable improvements in some areas, persistent gaps in others, and emerging service delivery concerns affecting enrollees

the assessment template.

FINDINGS

Governance, Policies, and Compliance

- a). Partial approval of the NHIA Conditions of Service (CoS) by the National Salaries, Income and Wages Commission (NSIWC) resulted in significant cost reductions; however, full harmonisation with the Office of the Head of Service of the Civil Service of the Federation (OHCSF) standards remains pending.
- b). Exit packages and fringe benefits are now paid strictly in line with NSIWC guidelines, correcting previous abuses.
- c). The Anti-Corruption and Transparency Unit (ACTU) is weak, improperly constituted, and lacks operational independence.

Financial Management and Fund Utilisation

- a). Internally Generated Revenue (IGR) remains insufficient to sustain personnel costs, resulting in heavy reliance on Contribution Funds. Administrative Charge from the Contribution Fund is intended to support operational expenses, including personnel costs and other recurrent expenditure.
- b). Persistent reconciliation challenges with the Central Bank of Nigeria (CBN) and REMITA have left several financial entries unresolved.
- c). Significant investments were made from the Information and Communication Technology (ICT) Fund in 2024 and 2025, marking a positive departure from previous periods when the Fund remained idle and unutilised.

Human Resources, Staffing, and Representation

- a). Persistent disparity in state representation of staff, with some states heavily overrepresented, and others barely represented. This is based on general recruitments conducted over the years.
- b). No recent general recruitment has been conducted beyond targeted medical professional engagements carried out in 2022.

Oversight of Health Maintenance Organisations (HMOs) and Health Care Facilities (HCFs)

b). Claims settlement delays by HMOs continue to demoralise HCFs and compromise service delivery.

ICT Systems and Operational Tools

a). Accreditation modules on the NHIA Quality Tool are functional, but the quality improvement module is still inactive.

b). There is no centralised portal for monitoring approval code issuance, causing delays and poor oversight of HMO performance.

Fieldwork and questionnaires revealed widespread dissatisfaction:

a). Frequent delays in approval code issuance, often exceeding NHIA's one-hour benchmark.

b). Persistent denial or partial provision of drugs across facilities

c). Long waiting times, poor customer service, and perceived discrimination against public enrollees

d). Lagos University Teaching Hospital (LUTH) presents a severe case, where public private partnership (PPP) commercialisation has made essential diagnostics unaffordable for NHIA enrollees.

e). At the University of Nigeria Nsukka (UNN) Medical Centre, enrollees continue to pay out-of-pocket for services despite the HMO's release of capitation funds. The new Vice-Chancellor acknowledged the issue and committed to resolve it, while the NHIA State Coordinator warned that capitation may be withheld if irregularities persist.

f). Widespread miscommunication and denials under Group, Individual and Family Social Health Insurance programme (GIFSHIP), including unresolved failed registrations.

g). Enrollee sensitisation remains grossly inadequate, with 38% of respondents reporting they have never been sensitised.

Although the 2025 budget was approved earlier than previous years, NHIA still fell short of meeting statutory expectations for annual budget readiness.

RECOMMENDATIONS FOR NHIA

Governance, Policy Alignment, and Compliance

a). Fast-track full harmonisation of the CoS with OHCSF and ensure strict adherence to NSIWC-approved compensation frameworks.

Financial Controls and Sustainability

- a). Develop a medium-term financial sustainability plan to reduce dependence on Contribution Funds.
- b). Strengthen reconciliation mechanisms with CBN, REMITA, and the Office of the Accountant-General of the Federation (OAGF) to resolve outstanding financial discrepancies.
- c). The NHIA should sustain the prudent investment of the ICT Fund.

Staffing and Representation

- a). Conduct merit-based general recruitment to address state representation imbalances and ensure compliance with federal character principles while achieving equitable state representation.

Oversight of HMOs and HCFs

- a). Enhance monitoring of HMOs through a centralised portal that tracks approval code issuance, turnaround time, and compliance indicators.
- b). Enforce timely settlement of claims to HCFs and sanction non-compliant HMOs.

Service Delivery and Enrollee Protection

- a). Strengthen enrollee sensitisation nationwide through sustained public engagement and targeted communication.
- b). Address drug denial and stock-out challenges through improved monitoring of HCFs and stricter enforcement of benefit packages.
- c). Intervene urgently in LUTH to ensure PPP arrangements do not undermine NHIA enrollees' rights.
- d). Conduct an immediate audit of capitation funds at the University of Nigeria Medical Centre and enforce corrective actions to ensure funds support enrollee care
- e). Resolve GIFSHIP-related miscommunications and refund outstanding failed registrations

ICT and Operational Systems

- a). Activate the Quality Improvement module of the NHIA Quality Tool

claims, and service delivery.

Budgeting and Strategic Planning

Institutionalise early budget preparation and timely submission in line with the NHIA Act, ensuring that annual budgets are approved early in the year.

KEY INITIATIVES BY THE NHIA IDENTIFIED DURING THE REVIEW

- 1). Operationalisation of the Vulnerable Group Fund (VGF) to subsidise health insurance premiums for vulnerable Nigerians.
- 2). NHIA Fistula Free Programme (NFFP) for comprehensive obstetric fistula care and post-treatment insurance enrolment.
- 3). Financing Access to Comprehensive Emergency Obstetric and Neonatal Care (CEmONC) for Maternal Complications, targeting emergency obstetric conditions.
- 4). Financing Access to CEmONC for Neonatal Emergencies, focusing on small and sick newborns.
- 5). Strategic Purchasing and Bundled/FFS Payment Mechanisms to improve quality and efficiency of care.
- 6). Integration of Health Insurance into Social Safety Nets, ensuring long-term financial protection for beneficiaries.
- 7). Identity Inclusion through National Identity Number (NIN) Requirement to enhance beneficiary verification and programme integrity

The System Review reveals that while the NHIA has taken commendable steps toward strengthening financial governance, improving operational frameworks, and aligning with regulatory standards, significant gaps continue to undermine the efficiency and integrity of the Scheme. Persistent weak oversight of HMOs and HCFs, and widespread service delivery challenges, particularly those affecting enrollees, pose serious risks to the attainment of universal health coverage.

Addressing these gaps requires sustained institutional commitment, stronger accountability mechanisms, and targeted reforms that prioritise transparency, financial discipline, and enrollee welfare. With deliberate action and strict implementation of the recommendations outlined in this report, NHIA can significantly enhance its performance and deliver on its mandate under the NHIA Act, 2022

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