

Special EU Programmes Body Foras Um Chláir Speisialta An AE Boord O Owre Ocht UE Projecks

# Implementation Evaluation Year 3

# Implementation Evaluation of the PEACE IV Programme and INTERREG VA Programme

# **Executive Summary**



# I EXECUTIVE SUMMARY

# Introduction

The Special EU Programmes Body (SEUPB) commissioned SJC Consultancy to undertake a longitudinal Implementation Evaluation of the PEACE IV Programme and INTERREG VA Programme (2014-2020). This is the last of three reports produced i.e. first interim report (October 2017), second interim report (August 2018) and final report (May 2020). The link to the Executive Summary of the Year 1 and Year 2 reports can be found on SEUPB's website: <a href="https://www.seupb.eu/piv-evaluation-plan">https://www.seupb.eu/piv-evaluation-plan</a>

#### **Financial Performance**

#### Programme Budgets and Commitment (March 2020)

The budget for PIV is €269.61m and for IVA is €282.76m, totalling a substantial investment of €552.37m (ERDF and Government Department match funding) across the eligible area for the period 2014-2020. Overall, 102% has been committed of the combined budget for PIV and IVA – an over commitment will address a possible attrition rate.

|             | Total Grant<br>Budget Allocation<br>(ERDF + 15% Gov<br>Match) | Commitment to<br>date (ERDF +<br>match) | %<br>Committed | No. of<br>Projects<br>Approved | No. of<br>Lead<br>Partners | No. of<br>Project<br>Partners | Total no.<br>of<br>Project<br>Partners |
|-------------|---|---|----------------|--------------------------------|----------------------------|-------------------------------|--|
| PEACE IV    | € 269,610,965   | € 277,933,996                           | 103%           | 96                             | 96                         | 159                           | 255                                    |
| INTERREG VA | € 282,761,995   | € 286,139,784                           | 101%           | 33                             | 33                         | 160                           | 193                                    |
| TOTAL       | € 552,372,960   | € 564,073,780                           | 102%           | 129                            | 129                        | 319                           | 448                                    |

Based on the Performance Framework, both financial and output targets have largely been met, and in most cases exceeded. This progress will contribute towards meeting final 2023 targets. For targets that were at risk of being met, there is evidence that SEUPB has taken timely corrective action to mitigate any risk.

SEUPB's Communications Team has been active in promoting the success of the Programmes, for example, a total of 95 case studies<sup>1</sup> have been developed (against a performance framework target of 120 by 2023). These case studies provide learning for current projects and help inform future projects under PEACE PLUS. Dissemination of communication and learning is also evident via press releases issued to the media to engage a wider audience (74 press releases as of March 2020, against a final Programme target of 85).

#### Expenditure and N+3 target

Of the €187,077,189 expenditure declared by projects (as of March 2020), 69% has been certified and paid (€128.69m). A further 29% is pending i.e. in processing pipeline. 2% has been disallowed and the remaining classified as 'sitting ducks' i.e. awaiting further clarification in subsequent reporting period.

Considerable efforts have been made by SEUPB to achieve expenditure levels aligned with targets, with N+3 targets exceeded for both Programmes (€128.69m against target of €103.8m for the year 2020).

#### **External Factors**

The unprecedented outbreak of COVID-19 has resulted in an extremely challenging period. The fall out of this pandemic is still unknown, as is the effect on PIV and IVA funded projects. Some projects may find it difficult to meet outputs and SEUPB will be met with an increasing administration burden to provide tailored support and related modification requests going forward.

<sup>&</sup>lt;sup>1</sup> Combination of 1-2 page overviews as standalone case studies <u>https://www.seupb.eu/case-studies</u>, along with snapshot project overviews contained within YourEU magazines <u>https://www.seupb.eu/media/your-eu-magazines</u>

Mitigating factors will reduce this risk as Case Officers are working closely with Project Partners to manage the implications and seek new ways of working. A Guidance Document and FAQ has also been developed and circulated (April 2020) as a reference for projects. Furthermore, to help ease financial burden, SEUPB has issued guidance on accessing emergency payments as part of the claims submission process. This demonstrates SEUPB's ability to react quickly and provide timely support and reassurance to Project Partners in these uncertain times.

It is acknowledged that the MA has experience in manging these funds and previous Programme records indicate that any potential risk will be minimised to avoid de-commitment at the end of the programming period. The MA's regular communication with the EC will continue and the outworking of mitigating measures, to support projects during the COVID-19 pandemic, will be monitored closely.

Key changes from the current PIV and IVA Programmes:

- N+2: For the new PEACE PLUS Programme, a N+2 target will be re-introduced a feature of previous Programmes. This based on the assumption that increased use of simplification measures will help to reduce delays, promote sound financial management as well as aid timely implementation. Although, it is likely that this change will significantly increase the pressure to record expenditure early in the programming period.
- Designation: For post-2020, the Designation procedure (i.e. sign-off from the EC on management and control systems) will be discontinued, as systems would largely be rolled over to the next programming period, without requirement for Programmes to undergo a new designation process. Assurance would still be obtained by early systems audits. The assumption is that rollover of systems will contribute to a speedier start of the next programming period.
- Audit: The MA worked extensively with both Internal Audit and the Audit Authority to complete the Audit of Operations and the Audit of Management and Controls. Going forward, the EC's simplification measures for 2021 - 2027 outline a more proportionate approach to audits i.e. simpler audit requirements and fewer burdens for Programmes with good track record and proper functioning of the management and control systems.

# **Application Process**

For both PIV and IVA, SEUPB facilitated extensive communication of funding calls, along with thematic workshops, to generate interest among stakeholders and prospective applicants. As of January 2020, a total of 216 applications have been received, to include 149 applications for the PIV Programme (41% success rate) and 67 applications for the IVA Programme (49% success rate), as per the breakdown below.

|  | Total no. of<br>applications | LoO issued/<br>contracted | Rejected | Withdrawn | Approved<br>pending funding |  |  |
|--|------------------------------|---------------------------|----------|-----------|-----------------------------|--|--|
| PEACE IV   | 149                          | 61*                       | 83       | 4         | 1                           |  |  |
| INTERREG VA  | 67                           | 33                        | 31       | 3         | 0                           |  |  |
| TOTAL  | 216                          | 94                        | 114      | 7         | 1                           |  |  |
| *Local Authorities counted once in terms of Letters of Offer issued (noted that LAs are responsible for delivering three |                              |                           |          |           |                             |  |  |

separate projects/themes each, bringing total number of PIV projects to 96 projects (including Technical Assistance). 129 projects overall for PIV and IVA (129 projects/216 applications - 60% award success rate).

#### Funding Call

- SEUPB met the CP requirements by publishing a rolling funding call, to include detailed descriptions of the processes, outputs and funding allocation under each theme. The funding calls are based on the outputs and results within the CP.
- Based on SEUPB's own observations, it is acknowledged that on reflection some funding calls had overly
  specific indicators, which proved to limit the pool of applicants and potentially reduced the development of
  innovative solutions to address priority areas. Key learning is the need to be less prescriptive about the types
  of projects to achieve Programme outcomes, thus embracing a more 'bottom-up' approach.
- **Recommendation:** For PEACE PLUS, the greater use of Accountable Departments and technical expertise (where relevant) is recommended, to help support the definition and development of funding calls.
- SEUPB commissioned research to identify organisations that, whilst eligible, have not previously availed of PIV funding and to identify any barriers to uptake. The results of the research will help inform SEUPB's approach and promotional activities and potentially the creation of a more targeted funding call in the future.
   Recommendation: Organisations/groups identified as 'hard to reach' should be provided with additional support in terms of skills and capacity building to develop projects and avail of funding.

#### **Application Process**

- The PIV and IVA application process evolved from a two-stage process to a shorter one-stage process. Based on weaknesses evident, a combination of both is recommended as a further evolution in the application process.
- The suggested approach provides a combination of sufficient pre-application support, whilst giving applicants an opportunity to present their initial concept/proposal to SEUPB using a pro forma approach - so as to not spend excessive time/resources on development until SEUPB feedback is provided as to the project's suitability and viability. This is followed by a suggested development phase of 10-12 weeks (currently 6 weeks) to devise a robust Business Plan as part of a one-stage process.

Recommendation: Therefore, the recommended application approach is as follows:

- **Pre-application support:** thematic workshops and provision of 1.5-2 consultancy days support. These should be made mandatory (rather than the current voluntary process).
- Outline Proposal: Submission of a short pro-forma response, outlining the proposed project and how it will contribute to the priorities of the new PEACE Plus Programme, with a timely decision made (within 8-10 weeks). The pro-forma aims are two-fold, firstly to nurture and develop meaningful projects from a wider applicant pool, who are able to meet the outcomes of PEACE Plus; and secondly to identify and reject weak applications at an early stage to avoid applicants investing significant time and resources on the development of detailed project proposals that are not feasible and/or do not align to overall outcomes (as well as minimising the admin burden for Joint Secretariat (JS) assessors).
- Depending on available resources, SEUPB could consider extending the scope/days of the consultancy support to review the outline proposals i.e. an individual with the required expertise per programme strand (particularly important for IVA type projects, requiring specific expertise). The results of this review will be provided to prospective applicants, who will then decide if they wish to apply for funding.
- **Stage 1: Submission of application**: The timeframe between the Outline Proposal and Stage 1 should be extended to 10-12 weeks to allow sufficient time for the development of a robust Business Plan. This provides a clear demarcation between the Outline Proposal and Stage 1. NB. This single stage approach

should include an admissibility check and applications that do not have the required information/documents in place will be recorded as ineligible and not assessed.

- Key issues:
  - The suggested approach relies heavily on the quality of external consultants engaged to provide support to prospective applicants. This poses a risk to SEUPB, as it somewhat outside their control. To mitigate this risk, it is suggested that SEUPB devise a competitive Framework of preferred suppliers; and a guide provided to the successful pool of consultants to ensure consistency and fairness of approach/support package provided.
  - SEUPB should also exercise some caution, providing too much 'hand-holding' may mask potential issues (weak Project Partners) and ensure that Lead Partners not only have the capacity and competencies to devise a good project application but also be able to deliver in the implementation phase. There is a risk that applicants lean too heavily on training resources and use this in their respective applications, meaning that applications may become similar and difficult to assess for individuality. To mitigate this, differentiation should be provided through applicants' proposed governance arrangements and delivery mechanisms and scoring of same.

# **Assessment Process**

The Joint Secretariat (JS) has the primary responsibility for conducting project assessment against pre-defined selection criteria. This involves a single assessment process leading to the tabling of recommendations to the Steering Committee for final approval. In some funding calls, the assessment is supplemented with an Economic Appraisal, carried out by a third-party assessor, to support the decision-making process of the JS.

- Throughout the programming period, SEUPB, DoF and DPER have worked in close consultation with the
  relevant government departments to expedite the assessment of projects. More recently, further efforts are
  being made to streamline the NI Guidance for Economic Appraisal and Evaluation (NIGEAE) standards in
  terms of simplifying the process of gaining approval for expenditure decisions by moving towards 'The Five
  CASE Model' approach<sup>2</sup> (i.e. Strategic, Economic, Commercial, Financial, Management) for major
  expenditure decisions. It is expected that the role of economist will be reduced to focus on two of the five
  areas i.e. strategic and economic case.
- DoF supply approval limits are also expected to be raised [not known to what level yet perhaps in the range £15m to £10m] where agreement can be gained with departments as to which projects require economic appraisal/business case and to complete this at an earlier phase or in parallel with the application/assessment process.
- Proformas will be used for smaller, less complex projects, with no/limited input from departmental economists; instead it is proposed that low value expenditure is approved via delegation arrangements supported by appropriate training and guidance.
- **Recommendation:** For PEACE PLUS it is important that applicants are aware of the 'The Five CASE Model' approach and have the skills and capacity to develop projects requiring an economic appraisal/business case.
- In terms of external expertise, SEUPB liaises closely with economic assessors to discuss conclusions and resolve any points of clarity emanating from economic appraisals prior to finalising the internal assessment report before issuing to the Steering Committee.

<sup>&</sup>lt;sup>2</sup> Department of Finance (DoF)'s report 'Review of the Expenditure Approval and Business Case Processes (July 2019)

- **Recommendation:** SEUPB commissioned an independent moderation of all economic appraisals and subsequent JS assessments were carried out under the PIV Shared Spaces second funding call. This moderation proved to be a worthwhile benchmarking exercise and helped add further due diligence to the process and should be conducted for any future funding calls.
- This moderation highlighted weaknesses in some applications in terms of evidencing need and demand. Going forward, considering should be given to providing case studies/worked examples on what is accepted research (and a template for letters of support). This is particularly important for larger scale capital projects requiring an economic appraisal.
- The moderation also identified a common issue where value for money (VfM) is not adequately concluded in the independent economic appraisals nor JS assessment reports. **Recommendation:** A 'Value for Money Matrix' to include benchmarks should be devised to inform future PEACE PLUS Programme costs (cost per participant/capital build costs) for all approved projects against each other. It is considered that there will be similarities in the various offerings of Programmes to allow for comparisons to aid the VfM assessment.
- Recommendation: For PEACE PLUS efforts should be made to limit clarifications to a single round. SEUPB and Accountable Departments should endeavour to integrate clarifications to minimise the same/similar requests for information from applicants resulting from the parallel review process. We acknowledge that SEUPB is aware of this issue and will seek continual improvements and create better synergies between processes and reduce the potential for duplication.

#### Scoring

- Recommendation: To aid any future assessment and moderation process and to minimise subjectivity, a 'Scoring Matrix' should be developed to include clear guidance/sub criteria on what constitutes a 'satisfactory' (score 3); 'very good' (score 4) and 'excellent' (score 5) project. PIV and IVA approved projects with scores of 5 (or high 4) should aid the development of the Scoring Matrix.
- **Recommendation:** Extracts from approved projects with scores of 5 (or high 4) could also be used as case study examples to demonstrate the expected standard for funding. For approved projects if a score of 3 'satisfactory' is given, it is important that a plan is put in place to raise the standard to best contribute to the results and outputs of the Programme.
- The response to and assessment of Horizontal themes (Sustainable Development and Equality) is an area of weakness. Due to the smaller weighting of this criterion, it appears to be given less attention by applicants and has not been consistently addressed by the appraiser or assessor. **Recommendation:** Consideration should be given to addressing the Horizontal themes via a Pro-Forma response as part of the application to aid consistency of approach and to streamline the assessment of these areas.

#### **Processing Times**

The Cooperation Programme states that Stage 1 should not exceed 12 weeks from call closure and Stage 2, including the issue of the Letter of Offer, should not exceed 36 weeks from call closure. The CP target for Stage 1 was met (100%), however for Stage 2 the target was only met by 30% of PIV projects.

- PIV Processing times:
  - 100% applicants met Stage 1 target (12 weeks).
  - 65% applicants met Stage 2 target (36 weeks).
  - 30% applicants met LoO target (36 weeks).
- IVA Processing times:
  - 100% applicants met Stage 1 target (12 weeks).
  - 56% applicants met Stage 2 target (36 weeks).
  - 0% applicants met LoO target (36 weeks).

The adoption of eMS appears to be one of the key barriers to meeting processing time targets. Discussions are taking place as to the future of eMS and indeed what format this will be in the next programming period, which will consider the impact of processing times and the issue of timely Letters of Offer.

In the meantime, as part of the current Programme SEUPB revised the process (mid 2018) to issue Letters of Offer following Steering Committee decisions with obligations that must be fulfilled upon acceptance. This negates the need for pre commencement conditionalities and shortens the associated time frames for issuing of Letters of Offer. The new process proved to work in the second PIV Shared Spaces call, with Letters of Offer issued within 37 weeks (compared to 57 weeks in the first funding call).

# **Claims Process**

- Effective management and control of funds is demonstrated by a low error rate of the Programme (i.e. below the 2% EC threshold).
- Based on a review of the Guidance for Member States on management verifications it is evident that SEUPB has structures and processes following this guidance to meet Programme rules and regulations.
- Of the €187,077,189 expenditure declared by projects, 29% (€54,4m) is pending i.e. in processing pipeline. The largest proportion of expenditure pending is 'on hand' with FCU (58%), which is expected given their role in the processing of same.
- The average number of days from claim receipt to FLC issued (from the period mid-June 2017 until July 2019) is, on average, 59-64 days. FCU aims to issue a FLC within 28 days, however this timeframe is dependent on FCU being in receipt of an accurate claim with supporting documentation from Project Partners. i.e. that satisfactorily meets requirement to evidence sample to processing payment.
- Timeframes are impacted by resourcing, limit of sampling of two periods at any one time, review of supporting documentation and awaiting further supporting documentation from Project Partners in response to queries on expenditure.
- **Recommendation:** Shorter processing times are reflective of the use of Simplified Cost Option, highlighting the potential of the wider, more extensive adoption of SCOs for the future programming period to reduce the admin burden.
- Overall, it is evident that the staff within FCU staff are highly committed to the success of the Programme implementation and supporting Lead/Project Partners in the claims process.

#### **Verification Process**

- **Recommendation:** SEUPB to consider creating tailored templates and/or checklists for Project Partners to complete when submitting their supporting documentation for the sampled lines. This would guide Project Partners on what information is needed and reduce excessive volumes of unnecessary documentation.
- To verify outputs achieved, JS Case Officers often undertake a manual exercise, for example, reviewing and tallying attendance sheets, feedback forms etc. (which can sometimes be scanned hard copy versions).
   Recommendation: There should be a requirement for Lead/Project Partners to collate raw data and analyse before issuing to JS in electronic form to be sample and/or spot-checked.
- There are cases where FCU has verified large claims, yet this may be disallowed by JS. Recommendation: There should be opportunities for FCU and JS staff to come together at an earlier stage to review claims in parallel. In cases where outputs are not being met then sampling and administration verification should not take place until resolved, to create efficiencies.
- The multi-layered approval process from FCU, JS, MA and CA requires a 4-month processing time, which is a long process. **Recommendation:** For future Programmes (post 2020), consideration should be given to merging processes, for example, merging FCU and JS roles to allow verification of outputs and expenditure to occur simultaneously rather than as subsequent stages.
- **Recommendation:** Consideration to be given to merging MA and CA responsibilities, as per one of the simplification measures provided by the EC regulatory framework. Although, there is need for more EC guidance on legal requirements under this simplification option.

#### Reporting

• **Recommendation:** For future Programmes (post 2020), there needs to be a more balanced approach to reporting on eMS. For example: The retention of data in eMS (or future system) is recommended from the previous report to the current report to greatly improve efficiency and user satisfaction levels. This would allow users to update information, rather than starting from a blank report each quarter. *This issue was raised in the Year 2 Implementation Evaluation and raised by SEUPB to INTERACT – who have agreed to put this request on their enhancement wish list to be developed within the core system*. This should be followed-up and actioned within the current Programmes.

#### **Role of Lead Partner**

- In the current process the Lead Partner can only view Progress Reports once a FLC certificate is received per Project Partner, before they can compile a consolidated Project Report. Recommendation: As Lead Partners are responsible for ensuring eligibility of expenditure, then it is recommended that the Lead Partner should have first sight of Partner Reports prior to submission to FCU. This may help to reduce errors prior to being sent to FCU for review.
- **Recommendations:** There is duplication/repetition with having individual Partner Reports and an overall Project Report. Going forward it is recommended that the role of the Lead Partner is extended i.e.
  - SEUPB should consider the option of all claims being submitted through the Lead Partner to the FCU; one consolidated Project Report submitted to FCU (rather than individual Partner Reports); one FLC issued per project per reporting period (rather than a Project Partner basis). Although, this would represent a move away from establishing an error rating on a Project Partner basis to an overall Project.
  - The Lead Partner should be resourced to monitor the Project Partners' claims prior to submission to SEUPB, (to ensure supporting documentation to evidence claim is sufficient) and to allow the Lead Partner

to liaise with Project Partners to develop a joint consolidated Project Report to FCU. This is likely to reduce the workload for FCU as Lead Partners will assume more verification responsibility. This recommendation is dependent on system re-configuration and additional resources, the merits of which should be considered as part of the development of PEACE PLUS.

- An alternative processes could also be considered such as: instead of Project Partners reporting individually, suggest that Project Partners report on a Work Package basis (to include an 'approve' button for Lead Partner to sign-off data provided). This would create a more streamlined approach to reporting. Although, this would require reconfiguration of eMS (or future monitoring system post 2020).

#### **Effective Partnerships**

- Payments are only made upon a FLC being issued to each Project Partner and the receipt of the consolidated Lead Partner project report. This effectively means that Project Partners who are compliant and timely with their claim submissions are subject to waiting for payment until all Project Partners are approved – this issue becomes more apparent in larger partnerships.
- Recommendation: It is important that SEUPB re-emphasises the roles of Lead and Project Partners and their respective responsibilities and the impact of potential partnership breakdown on the verification and payment of claims. 'Leadership and Capacity Building' training was provided to all themes in 2019. This will help ensure partnerships are working at an optimum level.
- Recommendation: FCU staff respond to claims on a first come first served basis and do not take an
  overarching view of the project/partnership, however it is recommended that FCU should identify partnerships
  where only Project Partner claim is outstanding and alert relevant JS Case Officer to contact to encourage
  timely submission. Focusing on completing verification on a partnership level may create improved workflows
  to allow progression to the consolidated Project Report stage and subsequent payment.

# **Simplification Measures**

A study commissioned by the EC (2017)<sup>3</sup> indicated that overall, the efforts to reduce administrative costs and burden are paying off. For ERDF/CF Programmes, the simplification measures imply a reduction of administrative costs of 4 to 8% and a reduction of administrative burden of 9 to 14%. The most important simplification measures are SCOs and e-Cohesion followed by simpler rules for revenue-generating projects and the harmonisation of rules. The EC advises that simplification should also address gold-plating and unnecessary administrative requirements, adding that there is a significant potential for savings through better use of modern technologies.

#### e-Cohesion

The principles of e-Cohesion have been achieved by SEUPB adopting the INTERACT Electronic Monitoring System (eMS).

SEUPB has worked with the system developers (CPB) throughout the programming period to agree amendments to improve functionality and have received system upgrades to address most of the issues identified. SEUPB will continue to liaise with CPB to meet the needs of the PIV and IVA Programmes, and importantly to help inform the development of any future system changes for PEACE PLUS.

<sup>&</sup>lt;sup>3</sup>Sweco, t33 and Spatial Foresight 'Use of new provisions on simplification during the early implementation phase of ESIF (June 2017) [Online] Available at <a href="http://ec.europa.eu/regional\_policy/en/information/publications/studies/2017/use-of-new-provisions-on-simplification-during-the-early-implementation-phase-of-esif">http://ec.europa.eu/regional\_policy/en/information/publications/studies/2017/use-of-new-provisions-on-simplification-during-the-early-implementation-phase-of-esif</a>

For the future Programme, SEUPB has considered four system options:

- Option 1 SEUPB procures/develops a new system (via open tender).
- Option 2 INTERACT customises current eMS core system for post 2020 ETC Programme requirements.
- Option 3 SEUPB adapts current eMS for PEACE PLUS Programme.
- Option 4 INTERACT implements a new monitoring system (using experience from the eMS project).

After careful consideration of the pros/cons of each of the above options, SEUPB has opted for Option 4, as there is confidence that Programme specific and EC regulatory requirements can be fully met and in a way that is efficient, provides value for money, and is delivered in time for the start of the new Programme Period in 2021.

- Recommendations: Consideration for future monitoring system:
  - Provide induction training for all Project Partners. In the PIV and IVA Programmes, no formal training on eMS was provided for Project Partners on the basis that it is an intuitive system and the fact that SEUPB provided comprehensive user guidance. This was a missed opportunity, as Project Partners became increasingly anxious and frustrated with the perceived inflexibility of the system, coupled with technical glitches.
  - Convene SEUPB/Project Partner user-group workshop(s), focused on functionality (to be facilitated by CPB) to help each party understand system needs, issues and/or limitations. By communicating this commitment to users, it will enhance confidence that issues raised by individuals have been considered, and where possible, changes made to improve future iterations of the current eMS and the future system design for PEACE PLUS.
  - For the future programming period, the standalone 'Data Dashboard' monitoring tool and ZoHO system (used by Case Officers during site visits) should be integrated within the existing/new eMS to streamline monitoring processes and thereby have a holistic view about projects in a central system.
- INTERACT recently confirmed (December 2019) the future eMS with financial resources allocated to commence working on the new improved system with the aim to have the application form module ready in the first half of 2021.

#### Simplified Costs Options (SCOs)

SEUPB proactively promoted the use of SCOs for example calls for applications identified opportunities for SCOs and provided practical application, as well as information via thematic workshops (held prior to Stage 2 applications being submitted) to include a dedicated session on the adoption of SCOs. Furthermore, the Financial Controller provided an additional level of support to assist applicants in determining appropriate SCOs and calculating such costs for their applications. The MA also introduced some mandatory unit costs and flat rates tailored to each theme.

- SCOs can have a positive impact on the verification and audit phase, to reduce financial management costs for beneficiaries and MA. The EC's study (2017) notes that SCOs are currently the simplification measure whose help is most effective in reducing the administrative burden on beneficiaries. The use of SCOs could reduce the total administrative costs by some 25%.
- Recommendations: For future Programmes (post 2020):
  - For the PIV and IVA, at the time of application many Project Partners did not have the three years of evidence required by the EC to prove specific unit costs. Going forward for any future Programmes (post 2020), Project Partners will now be able to use the evidence gained from this Programming period, therefore the use of SCOs will be extended.

- SEUPB is considering SCOs for 'Travel and Subsistence', based on empirical evidence a flat rate will be agreed for all projects, therefore removing the administration association with direct costs.
- Further training support and advice to Project Partners at the pre-application phase on how to apply SCOs within their application/business plan.
- Using case study examples to promote wider uptake of SCOs in terms of what has worked well in PIV and IVA to help reduce error rates and the administration burden.
- The wider adoption and application of SCOs would not only reduce administration to enable Project Partners to focus on quality outputs, but also act as an incentive to meet and exceed targets as eligible costs are based on the real output.

#### Recording of Outputs/Programme Design

The PIV and IVA Programmes aim to achieve specific objectives and related measures (output indicators and one or two result indicators). Focusing on core common indicators aims to ease monitoring and reporting requirements and has facilitated aggregation of data and reporting on achievements at EU level.

**Recommendations:** Due to the COVID-19 pandemic, adjustments to outputs and results may have to be made to take account of the unprecedented circumstances.

SEUPB has commissioned various independent evaluators to carry out separate Impact Evaluations for each of the PIV and IVA Programme Priorities, which will consider the achievement of output and result-outcome indicators and will make recommendations as to the suitability of indicators. However, we have noted a few overarching observations:

- The terminology used for result indicators is more akin to activities and outputs and not the impact to be achieved. For example there is reference to numbers achieved and less on how this will create transformational change i.e. the intervention logic needs to be more clearly defined.
- It is unclear how some of the result indicators will be measured, for example 'local action plans that result in meaningful, purposeful and sustained contact between persons from different communities'; or 'movement from 'a little' to 'a lot' of collaboration; 'good' to 'high quality' – it is not clear how these parameters are defined nor how they can be measured.
- There are instances where targets have been set at an unrealistic level (IVA Environment) without
  acknowledging how external factors can affect achievement. There are other instances were targets were
  set too low (IVA Research and Innovation), and where targets have been greatly exceeded, which raises the
  question as to the suitability of the original target.
- Recommendations: It is imperative that outputs/targets follow the SMART rule i.e. specific, measurable, realistic and timebound. The Output Indicator Guidance (OIG) document, issued by SEUPB to applicants, also states that result indicators should be responsive to policy; robust, reliable and statically validated; and timely.
- Throughout SEUPB's guidance material and communications it is evident that extensive references are made to the importance of meeting the output and results that the Programme sets out to achieve. SEUPB should consider consolidating 'The Guide for Applicants' and OIG into one document, for ease of reference for applicants.

- **Recommendations:** The OIG is not easily found on SEUPB's website. There should be a central repository for applicant/project information. Project Partners should be provided with more support on how to effectively evidence the achievement of outputs and results.
- As Impact Evaluations become available, there is a requirement for a central repository or projects and a
  wider audience to access and appreciate the outputs and results of PIV and IVA funding. NB. In terms of the
  PEACE Programme, SEUPB is currently developing a learning 'Peace Platform', which will create a fully
  interactive repository and digital library, a space for continuous learning, sharing best practice,
  communication and understanding of activity funded.
- SEUPB is committed to increase the result orientation of the Programmes by making projects more focused on results. **Recommendation:** For the PEACE PLUS Programme, it is important that expertise is gained in the early development of funding calls and results/output indicators specific to each call, particularly technical expertise for INTERREG related projects.

# **Delivery Structures and Training**

#### **Delivery/Staffing**

- SEUPB has significant experience, spanning over 21 years, of managing large-scale EU funded Programmes. There are 57 full-time equivalent members of staff in SEUPB. In terms of PIV and IVA, SEUPB is responsible for managing 129 projects involving 448 Project Partners.
- Based on the evaluators' interaction with staff members, it is evident that they are highly committed to the successful implementation of the Programme and supporting project beneficiaries.
- SEUPB has taken a lead role in promoting PIV and IVA across the EU community. There has been an increased level of communication and advocacy work to promote the outcomes of the funding.
- At peak times, SEUPB has commissioned additional support e.g. 100 days of Managed Services to support FCU claims process, therefore indicating the need for an increased staff complement.
- As part of its wider Development and Innovation Plan, SEUPB is undertaking an Organisational/Corporate Review to include a process mapping exercise to determine potential efficiencies and opportunities for streamlining process. Subsequently, staffing allocation can be aligned to the required processes to best deliver current and future Programmes.
- SEUPB has endeavoured to encourage cross-functional working and communication across departments, for example by facilitating internal co-operative events/sessions to ensure consistency of approach and to avoid mixed messages going to projects.
- **Recommendations:** Cross-functional teams should be set up on a theme basis to promote consistency of approach and sharing good practice.

#### Training

- The MA has developed a comprehensive support and training programme, which is in line with the stage of implementation. There is evidence of good attendance and positive feedback from participants.
- In response to our Year 2 Implementation Evaluation (2018) it is also noted that SEUPB commissioned an independent Customer Training Needs Analysis (CTNA) to identify gaps in support.

- A range of short online training videos have been created by SEUPB to assist with the various administrative, claims and reporting operations. These are concise and easy to understand, making good use of eMS visuals and Q&A session with Case Officers.
- The MA and Communications team have actioned a review of all guidance material, as well as data presentation and support for projects to be based on theme/priority to promote ease of information access.

Recommendations: For the future PEACE PLUS Programme, there should be a greater focus on:

- Pre-application Support
  - Development of a robust pre-development support package tailored per Programme theme, to prepare potential applicants. This support should include the introduction of expertise at an earlier stage to help develop feasible projects and quickly mobilise successful projects. This will increase the quality of applications and reduce the level of administration surrounding the clarification process.

#### • Implementation Support

- Continuation of blended training approach to include a mix of online educational materials and opportunities for interaction offline with traditional place-based workshop methods.
- Creating online training content requires SEUPB staff to enhance skills and become competent in developing creative content for webinars and screencasts.
- Due to the current pandemic, there has been a greater focus on virtual contact (to abide by social distancing rules). In these circumstances, some Project Partners may need to be upskilled in the use of technology; as well as support to seek innovative ways to diversify projects to meet targets.
- Enhanced support to prepare Project Partners to administer project, for examples claims to reduce the number of errors and project modifications. A one-day training on how to submit claims and supporting documentation/evidence should be made mandatory.
- Project Partners must be proactive and use resources and to ask for assistance, where required. It is
  expected that individuals will avail of the training provided and the MA is committed to meeting/reacting
  to demand.
- Consider the potential of a dedicated Quality Impact Body per priority, where necessary, with specific expertise to aid project mobilisation and implementation i.e. reviewing outputs and impact achieved as well as supporting timely corrective action to ensure performance framework targets are met.

#### • Partnership Working:

- Focus on partnership building increasing capacity of Lead Partners to effectively lead and support Project Partners. Leadership and Capacity Building training was provided to all themes in 2019; and should form part of any future training portfolio.
- Consideration should be given to the potential impact of Brexit where Project Partners may be working in different jurisdictions with varying legislation which could influence project delivery. Therefore, training on developing partnership working is fundamental to the creating strong, effective partnerships.
- Increased use of information exchange platforms and networking opportunities to share learning and develop a portfolio of good practice. The new PEACE Platform should support this activity also permitting the real time sharing of information between projects across all objectives.

#### • Simplification Measures

- Any potential future eMS should include induction training and the increasing use of webinars to support the claims and reporting process.
- Focus on supporting Project Leads to report on outcomes/results achieved.
- The adoption of SCOs presents a training need to ensure that Case Officers are fully aware and confident in their application, particularly for the future programming period which will likely include the wider use of SCOs.