

STUDY

Requested by the REGI committee



The Role of Evaluation in Cohesion Policy



Policy Department for Structural and Cohesion Policies
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The Role of Evaluation in Cohesion Policy

Abstract

This study analyses the role of evaluation in Cohesion Policy, with a focus on the 2014–2020 programming period. It presents and assesses those EU rules which shape evaluations and their implementation at both the EU and Member State levels. Based on this evidence, it discusses possible options for the post–2020 period.

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LIST OF ABBREVIATIONS

AIR	Annual Implementation Reports
AMIF	Asylum Migration and Integration Fund
BMVI	Border Management and Visa
CBA	Cost-Benefit Analysis
CF	Cohesion Fund
CP	Cohesion Policy
CPR	Common Provisions Regulation (2014-2020 regulation)
CRIE	Centre for Research on Impact Evaluation
DG EMPL	Directorate-General for Employment, Social Affairs and Inclusion
DG REGIO	Directorate-General for Regional and Urban Policy
DG RTD	Directorate-General for Research and Innovation
EC	European Commission
ECA	European Court of Auditors
EFSD	European Fund for Strategic Investments
EIB	European Investment Bank
EP	European Parliament
ERDF	European Regional Development Fund
ESF	European Social Fund
ESI(F)	European Structural and Investment Funds
EU	European Union
EUR	Euro (currency)
EV	EValuation of Operations (EIB)
GDPR	General Data Protection Regulation

GPR	General Provisions Regulation (2007-2013 regulation)
IB	Intermediate Bodies
H2020	Horizon 2020
ICT	Information and Communication Technologies
ISF	Internal Security Fund
JRC	Joint Research Centre
MA	Managing Authority
MC	Monitoring Committee
MS	Member State
OECD	Organisation for Economic Co-operation and Development
OP	Operational Programme
R&D	Research and Development
ROP	Regional OP
SME	Small and Medium Enterprises
TB(I)E	Theory-Based (Impact) Evaluation
TEN	Trans-European Network
YEI	Youth Employment Initiative

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EXECUTIVE SUMMARY

Objectives and background

This study provides members of the Committee on Regional Development (REGI) with an in-depth analysis on **the role of evaluation in Cohesion Policy**. This takes place at a critical juncture when the Cohesion Policy's post-2020 budget is likely to be reduced, and the regulations defining the basis of the policy are still being negotiated.

The specific objective of this study is to assess the effectiveness and efficiency of the framework providing for the evaluation of Cohesion Policy at the level of the European Union (EU) and Member States. For the 2014-2020 programming period, this framework comprises rules and procedures enshrined in the Common Provision Regulation (CPR)¹ and fund-specific regulations, as well as a series of soft support instruments and guidance documents. This framework is expected to fulfil different functions and objectives, including the consolidation of a result-oriented approach to Cohesion Policy, the development of evidence-based policy learning, and the provision of relevant evidence on the impact of Cohesion Policy for reasons of accountability (i.e. justifying the spending of taxpayers' money).

To address these issues, this study relies on a methodological approach combining different tools, including a literature review, interviews with relevant stakeholders, and case studies conducted in six Member States (France, Ireland, Italy, Lithuania, Poland and Romania).

Key findings

Over the years the European Commission (EC) has made considerable effort to deploy an ambitious evaluation framework for Cohesion Policy (CP), the most evaluated EU policy. Its building blocks are the definition of three types of evaluations (ex-ante and ongoing evaluation under the responsibility of Member States, and ex-post evaluations mostly realised by the EC) and institutional arrangements in the Member States structured around a Managing Authority (MA) and Monitoring Committee.

During the 2014-2020 programming period, all three types of evaluations have been mandatory to ensure their completion at different stages of the policy process, across Member States. Mandatory Evaluation Plans encourage MAs to adopt a long-term strategic approach to CP evaluations. Monitoring indicators are closely linked to the programme's intervention logic and reinforce result orientation. Specific indicators are expected to give evidence on implementation progress necessary for MAs to introduce adjustments, and common indicators show CP achievements at the EU level. Substantial efforts have been made by the EC to support Member States and MAs by providing guidance documents and soft support (e.g. promoting impact evaluation approaches).

How this framework is actually implemented in practice at the EU and Member State levels shows a **mixed picture**. The CP evaluation framework facilitates an increasingly accurate analysis of CP achievements at the EU level, with improved indicators and steady progress in the realisation of ex-post evaluations by the EC. Some limitations remain concerning the possibility to aggregate indicators at EU level while mainstreaming evaluation findings in policy making needs further consolidation at EU level.

The Member State level presents more difficulties. Despite progress, and evidence that an evaluation-based learning process is taking root in some Member States, the quality of these evaluations remains mediocre and it is difficult for evaluation findings to feed into policy process at this level. The reasons for this include some requirements, which are too-strict (e.g. in terms of timing or coverage of

¹ Regulation No. 1303/2013.

evaluations), a lack of MA resource and capacity, and a weak 'evaluation culture' in some Member States. As a result, CP evaluations are sometimes seen as an exercise generating more 'administrative burden' than benefit and arrangements are often set formally to merely comply with requirements.

In this context, the Commission's post-2020 proposals aim at simplifying rules by reducing mandatory provisions in the CPR and fund-specific regulations, and limiting written guidance. For example, ex-ante evaluations are no longer required, programme-specific indicators are not mandatory and the dedicated approval procedures for major projects is removed. Also, the legislative proposals do not refer to the obligation for MAs to ensure evaluation capacity and for the EC to provide guidance. Some new obligations are introduced, such as the need for MAs to use evaluation criteria as defined by the Better Regulations framework, and more frequent data reporting instead of compiling Annual Implementation Reports.

The rationale underlying the Commission's proposal to simplify the evaluation framework is to grant more flexibility to Member States in order to improve their 'ownership' and commitment. However, as shown by past programming periods, the risk is that without a legal basis, some Member States and regions (especially those most behind) will not autonomously implement arrangements at the core of the evaluation practices that the EC has contributed to consolidate over the years. At best, a fragmented system of country-specific practices and approaches would emerge. This could undermine the considerable effort made so far in raising quality standards and harmonising practices and approaches.

It is therefore necessary to strike a balance between simple, effective regulatory provisions that show what needs to be done, and giving MAs the flexibility to organise and implement requirements in accordance with local specificities. This should form the basis for a sound partnership between the EC and Member States. **The European Parliament has an important role.** It should adopt a proactive approach to law-making as this is an important pre-requisite for effective evaluation. It should take stock of evaluation findings on Cohesion Policy, among other evidence, to raise the political dimension of the latter, and it should contribute to an evaluation culture in Member States and regions.

Recommendations

Based on the findings from the study, two types of recommendations are envisaged. First, **strategic recommendations** focusing on structural and longer-term issues suggest to:

-)] **Make explicit the purpose of CP evaluations at the Member State level regarding both accountability and policy-learning objectives.** This has implications for how evaluations should be conducted, by whom and when – overall, for their conditions of effectiveness.
-)] Promote a **more participatory approach** to overcome the lack of commitment of Member States. The EC, Member States and regions could co-design the evaluation framework.
-)] **Engage the European Parliament** along the lines in the paragraph above and detailed below.

Second, a series of **operational recommendations can be addressed to the main stakeholders.**

1) Co-legislators (the European Parliament and the Council) should consider revising some provisions of the future CPR and fund-specific regulations during the ongoing negotiations. For example:

-)] **Ex-ante evaluations should be mandatory** and could be done by authorities other than MAs to challenge the mainstream vision and make them more relevant.
-)] Managing Authorities should have **flexibility in deciding the coverage (programme or axis level, thematic) of impact evaluations.**

-
-)
 The **timelines** proposed should be indicative, or dependent on the absorption of funds.
 -)
Requirements concerning indicators should be included, such as the need to design programme-specific indicators and to ensure that common indicators can be aggregated at EU level for comparison purposes.
 -)
 It should be clarified that the five evaluation criteria of the Better Regulations framework are a basis for **defining specific evaluation questions** adapted to the programme being evaluated.
 -)
 The dedicated **selection and assessment procedure for major projects should be reintroduced** to preserve a harmonised approach to infrastructure appraisal at the EU level.
 -)
Building capacity in Member States and the obligation for the EC to provide support should be enshrined in the regulation to help align requirements with Member States' ability to fulfil them.
- 2) At the **Member State level**, the improvement of evaluation capacity and culture should be pursued and supported by adequate resources. Professionalism of evaluation teams should be an explicit objective. Discussions of evaluation findings should be promoted, including in political debates. The possibility of substituting or flanking the MA with a competent alternative body when the MA cannot guarantee a sufficient level of capacity should be considered.
 - 3) The **European Commission** should build upon its progress so far and continue consolidating evaluation capability in Member States and regions. It should strive to strike a balance between prescription and flexibility and continue supporting the regions most in need, in the most effective way.
 - 4) Evaluations of the **long-term impacts of Cohesion Policy** could be carried out in the framework of programmes like ESPON, Horizon Europe or other relevant EC funded programmes to allow other perspectives.

INTRODUCTION

Study background

Cohesion Policy accounts for about a third of the total EU budget, with EUR 366 billion for the 2014–2020 programming period (European Commission, 2014a), delivered through three central funds: the European Regional Development Fund (ERDF), the Cohesion Fund (CF), and the European Social Fund (ESF)/Youth Employment Initiative (YEI). An essential distinctive element of the policy is its shared management, with the design, implementation and evaluation of the policy mobilising stakeholders at different levels: the European Commission, the Member States and regional authorities across Europe. Its main aims are to tackle socio-economic disparities between the different EU territories and to bring investments to support the delivery of EU-wide strategic objectives. However, Cohesion Policy has also faced substantial challenges, including a projected decline in funding for the 2021–2027 period, which has generated significant controversy (European Parliament, 2020a).

A major trend shaping Cohesion Policy in recent years has been a **focus on results** (Perrin, 2011; Polverari, 2016a) – i.e., an approach to orient all aspects of planning and management towards outcomes instead of processes. In particular, in the aftermath of the economic and public financial crises of 2008–2011, more attention has been dedicated to the efficiency and effectiveness of the policy. In that context, **evaluation can be a valuable tool** for assessing the extent to which the policy is indeed effective and efficient. Moreover, evaluation has other potential benefits, including helping stakeholders to implement funds.

Evaluation can be defined as the collection of evidence to formulate a judgement on the merits of an intervention, programme or policy (Kubera, 2017). Cohesion Policy is one of the most evaluated EU policies (Darvas et al., 2019), involving hundreds of stakeholders across Europe. It is framed by a series of common EU rules. For the 2014–2020 period, evaluation requirements included in EU regulations were strengthened (Official Journal of the EU, 2013a), particularly in terms of the types of evaluations but also in monitoring and reporting. However, few studies have investigated how evaluation of Cohesion Policy has been implemented and used in practice in 2014–2020. It is a critical topic, as evaluation is one of the main ways to collect useful evidence for policymaking.

Objectives of the study

In order to address this gap in the available literature, the **aim of this study** is thus to provide an in-depth analysis with up-to-date information on the **role of evaluation in Cohesion Policy**. In particular, it will highlight the practical aspects of evaluation, including the different types of evaluations and methodologies used, the EU rules and procedures governing evaluations, as well as their actual implementation by different stakeholders at the EU, national and regional levels.

The **detailed objectives of this study** include:

-)] Assessing the effectiveness and efficiency of **current rules and procedures** governing evaluations in the field of Cohesion Policy (2014–2020) – i.e., whether they reach their objectives, and do so within reasonable costs and constraints;
-)] Assessing the extent to which **evaluation findings have been used** in the policymaking process at different levels, both in design and implementation;
-)] Providing **recommendations** on the future design of the policy framework for evaluations in the field of Cohesion Policy.

To operationalise the objectives of this study, a series of research questions has been followed (see Methodological Annexes).

Methodological approach and outline of the report

To collect and analyse the relevant evidence, this study **employs a variety of complementary methods**: literature review, semi-structured interviews, small-scale online survey, case studies at the Member State level and scenario-building. **Triangulation of evidence** has then been performed to consolidate the elements retrieved with each method. Further details are included in the Methodological Annexes.

The report is structured as follows. Chapter 1 clarifies the key definitions and concepts used to analyse the evaluation of Cohesion Policy. Chapter 2 presents the applicable EU rules (regulations) framing evaluation, and their changes across time. Chapters 3 and 4 examine how evaluations are carried out and used in practice, at the EU and Member State level, respectively. Chapter 5 reviews all the evidence used to critically assess the current framework of Cohesion Policy evaluation and the possible options (scenarios) for the post-2020 programming period. Chapter 6 concludes the report and proposes adequate recommendations based on the collected evidence. In the **Annexes**, section Case studies includes the six case study reports.

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1. DEFINITIONS AND CONCEPTUAL FRAMEWORK OF THE REPORT

KEY FINDINGS

-] Evaluation is an applied inquiry process that makes a judgement on the merits of an intervention, programme or policy. Evaluations have a variety of operational goals – namely, to measure an effect, to understand mechanisms at play or to learn. Similarly, evaluations can be used for different purposes, including accountability, advocacy, policy-learning and engagement.
-] Cohesion Policy sets out formal rules on evaluations, which are laid down in EU regulations. The fact that this policy operates in a multilevel governance context with multiple stakeholders has important implications for evaluation.
-] Evaluation of Cohesion Policy can be analysed by using a framework distinguishing different components or basic questions – e.g., who, what, how and why?

This first chapter provides critical definitions and develops a framework that is adapted to the specificities of Cohesion Policy to analyse the role of evaluation.

1.1. Defining evaluation: key theoretical and practical aspects

This section proposes a definition of the main notions that will be used in the report. Indeed, there are misconceptions to be addressed, including what evaluation is and what it is not. Challenges in defining the very notion of evaluation stem from **the important diversity covered by the term**, both in terms of **theoretical underpinnings** (see, e.g., Bachtler and Wren, 2006) and **practical aspects** (Stern, 2009).

A **broad definition** of evaluation, encapsulating most of this variety, can be retrieved from the 2004 *Encyclopaedia of Evaluation*. It defines evaluation as “an applied inquiry process for collecting and synthesising evidence that culminates in conclusions about the state of affairs, value, merit, worth, significance, or quality of a programme, product, person, policy or plan”. The notion of evaluation covers both an empirical dimension (retrieving and processing information about any object or subject of reality) and a normative perspective (formulating a motivated judgement) (Kubera, 2017). The normative component is what distinguishes evaluations from other forms of inquiry, such as academic research, and allows it to contribute to the development of specific policies. However, there are linkages between evaluations and academic research, in particular in the context of Cohesion Policy (e.g., Bachtler and Wren, 2006; Hagen and Mohl, 2009). This definition highlights that evaluation is a process, through which useful knowledge on a specific issue can be retrieved, and competencies can be accumulated for other purposes. Evaluation is also a body of results – i.e., the sum of knowledge produced from the previously mentioned process. It can thus take different forms, such as evaluation reports or presentations.

As evaluations include the collection of evidence and the formulation of a judgement, **different theories of evaluation (paradigms)** have emerged by which to conduct them. These cover discussions regarding the nature of reality and what can be considered knowledge (ontology and epistemology), how such knowledge can be derived (methodology), and the goals (operational objectives) and potential uses of evaluations. These theories are deeply rooted in academic and philosophical debates, but they have decisive impacts on which types of evaluations are conducted, and how (methods).

The competing paradigms of evaluations include **positivism, realism and constructivism** (Bachtler and Wren, 2006; Hoerner and Stephenson, 2012; Authors, based on interviews and case studies, 2019–2020).

-) **Positivism** considers that objective knowledge can be obtained through empirical observation. It is strongly linked with the operational goal to **measure the effects or impacts of an intervention**, which can serve the purposes of **accountability** (evaluations as proof that funds are used as intended to deliver effects) and **advocacy** (evaluations as arguments for debates or negotiations). Consequently, this paradigm tends to give birth to so-called **impact/result-oriented evaluations**, which are explicitly designed to estimate the consequences of an intervention. Positivism is also related to **monitoring/progress-oriented evaluations**, which track the progress of an intervention towards set targets, without necessarily distinguishing the contribution of the intervention from other factors. This paradigm is usually operationalised through predominantly quantitative methods (statistical analysis, econometrics, etc.).
-) **Realism** has an intermediate position regarding how knowledge can be derived – i.e., as an interplay between objective reality and its social construction by stakeholders. Its operational goals typically involve **understanding the mechanisms** of an intervention and **learning** during design and implementation. Its primary purpose is thus to promote **policy-learning** (i.e., improvement of an intervention or policy; but also building the skills and capacity of policymakers, which can be transferred to other tasks and policies). Realism can be applied to all types of evaluations, but especially to **process/implementation-oriented ones**, which examine how funds are managed and interventions are implemented. It rests on a combination of qualitative and quantitative methods.
-) **Constructivism** rejects objective knowledge and involves several stakeholders in evaluations to understand their different views and interdependence. It emphasises the development of participation and ownership, with a **clear operational goal of understanding and learning from evaluations**. Its purpose is mainly to **build participation and engagement among stakeholders**. It is less common in the context of Cohesion Policy and is mostly associated with **monitoring/progress-oriented and process/implementation-oriented evaluations**. It focuses on the use of qualitative methods.

Of course, these linkages between paradigms, operational goals, types and potential uses of evaluations are not absolute, but they tend to cluster together. They are synthesised in Figure 1 below. Traditionally in Cohesion Policy, evaluation has been more strongly associated with the positivist and realist paradigms (Bachtler and Wren, 2006), with implications in terms of operational goals, methods and potential uses.

Beyond these theoretical perspectives, there are also **practical aspects** affecting evaluation, which include the work of evaluators but also the broader organisational context. For instance, evaluations are strongly dependent on the division of responsibilities between stakeholders. Indeed, as evaluations include a normative judgement, deciding who conducts an evaluation and who benefits from its results can be challenging. The timing of an evaluation is also critical in facilitating the opportunity for it to inform the decision-making process. Delays in evaluations can represent an important problem in the process of taking stock of the generated knowledge. A simple distinction for sorting out evaluations is to identify when they are conducted compared to the investigated intervention: ex-ante (before the implementation of a policy/intervention), ongoing (during) or ex-post (after).

Figure 1 Overview of different paradigms of evaluation

	PARADIGM	OPERATIONAL GOALS, POTENTIAL USES	TYPES OF EVALUATION	METHODS
	POSITIVISM (objective knowledge, empirical observation)	To measure an impact/effect Accountability, advocacy	Monitoring-oriented, Impact/result-oriented	Typically quantitative
	REALISM (Interplay objective reality and society, social inquiry)	To understand (mechanisms at play), to learn Policy-learning	Impact/result-oriented, Monitoring-oriented, Implementation-oriented	Mix qualitative and quantitative
	CONSTRUCTIVISM (rejection of objective reality, participation and ownership)	To understand (mechanisms at play), to learn Engagement and participation	Monitoring-oriented, Implementation-oriented	Typically qualitative

Source: Authors, based on Bachtler and Wren, 2006; European Commission, 2019a, and interviews/case studies. Template from 24slides.com.

It is also useful to explicitly state **what evaluation is not**. An important **distinction should be made between evaluations and two other activities: monitoring and audit**. Indeed, there is sometimes confusion among stakeholders regarding these notions in the context of Cohesion Policy, as they are somewhat interrelated (Authors, based on interviews, 2019–2020). Misunderstandings of the specificities of these different activities can undermine their respective contributions (Evaluation Unit DEVECO, 2015). Figure 2 below briefly presents the content and main operational goals of these activities:

Figure 2 Distinction between evaluation, monitoring and audit

EVALUATION	MONITORING	AUDIT
Empirical inquiry with a normative judgment on a policy or intervention, mainly on its design and implementation	Continuous generation of data tracking the progress of implementation or results of a policy or intervention	Examination of the budgetary management (compliance with legal rules, irregularities) and/or the performance of a policy or intervention
Operational goals: to measure (attribution to the policy/intervention), to understand (mechanisms at play), to learn (improve skills, policy/intervention...)	Operational goals: to observe (collect data without attribution requirements) and retrieve rapid feedback	Operational goals: to check (detect and prevent irregularities)

Source: Authors, based on Berriet-Sollicet et al., 2014; Damen and Groenendijk, 2012; European Commission, 2018a; Evaluation Unit DEVECO, 2015; Kubera, 2017. Template from 24slides.com.

There are **strong linkages between these activities**, particularly in the context of Cohesion Policy. Indeed, explicit rules structure these activities at the EU level (Official Journal of the EU, 2013a). For instance, evaluations can rely on data produced by the monitoring system (Kubera, 2017), especially if the monitoring system is explicitly designed for that end, through “result-oriented monitoring” (European Commission, 2020a). In particular, monitoring/progress-oriented evaluations aim to track progress towards realisation of the targets of a policy/intervention and to provide a critical analysis of

this progress. This type of evaluation can thus bridge evaluation and monitoring, though their content is often more ascribable to monitoring (Authors, based on interviews, 2019–2020).

Similarly, performance auditing, which explores the effectiveness and efficiency of spending, tends to blur the distinction between audit and evaluation (Authors, based on interviews, 2019–2020).

1.2. Analytical framework adapted to Cohesion Policy specificities

For this study, **the scope of analysis is centred on evaluations conducted within the framework of Cohesion Policy** (i.e., as defined by its own EU-level rules), though references to external work by academics or other stakeholders are used where relevant.

Cohesion Policy has **two important particularities** when it comes to its evaluation. First, the practice is **highly institutionalised** (Naldini, 2018), meaning that evaluations are conducted within the framework of a formal set of rules designed and applied at the EU level (Official Journal of the EU, 2013a). It notably takes the form of regulations. Second, the evaluation of Cohesion Policy occurs in a **multilevel governance system**, with a **division of responsibilities of evaluations** and interactions between **the European Commission and Managing Authorities** (i.e., Member States and regional authorities). It mirrors the management of the policy itself, with Managing Authorities designing and implementing it through documents called Operational Programmes, in relationship with the European Commission. In particular, each level of governance is composed of different stakeholders (e.g., administrators, policymakers, evaluators) that might have different visions and goals for evaluations (Bachtler, 2019). The flexibility given to the Member States to organise the management and evaluation of Cohesion Policy according to their own institutional systems further complicates governance, e.g., depending on the level of centralisation of the Member States (see Chapter 4).

Moreover, as mentioned in the previous section, evaluation is a complex topic, with deeply intertwined theoretical and practical aspects. The institutionalisation and multilevel governance of Cohesion Policy adds further complexity. A **conceptual framework breaking down the different aspects of evaluation** is thus useful to systematically uncover how they apply in the context of Cohesion Policy. These different aspects refer to “any rule or principle that a group or organisation uses to guide its decision and actions when doing evaluation” (Trochim, 2009). Based on this perspective, different **analytical blocks of rules and practices** governing evaluation in Cohesion Policy can be defined.² These blocks form the basis of the conceptual framework applicable to the different funds of Cohesion Policy (ERDF, CF, ESF) (Authors, based on Trochim, 2009):

-)] **Number, types and content of evaluation (what?):** This aspect encapsulates the overall direction taken by the evaluation activity – i.e., what is evaluated. It thus refers to the number of evaluations carried out, their types (in terms of operational goals but also timing compared to the intervention), their topics and their level of analysis (e.g., focus on individual projects, parts of Operational Programmes, or entire Operational Programmes). These different aspects are intertwined and are both defined by legal rules (e.g., in terms of requirements to conduct certain types of evaluations) and by the practices and interests of involved stakeholders.
-)] **Organisation of evaluation (who and how?):** This refers to the organisational aspects of Cohesion Policy evaluation – i.e., primarily, the roles of the different stakeholders and how they operate to design, carry out and use evaluations (division of responsibilities, institutions, implementation arrangements, etc.). This organisation (roles of stakeholders in particular) is

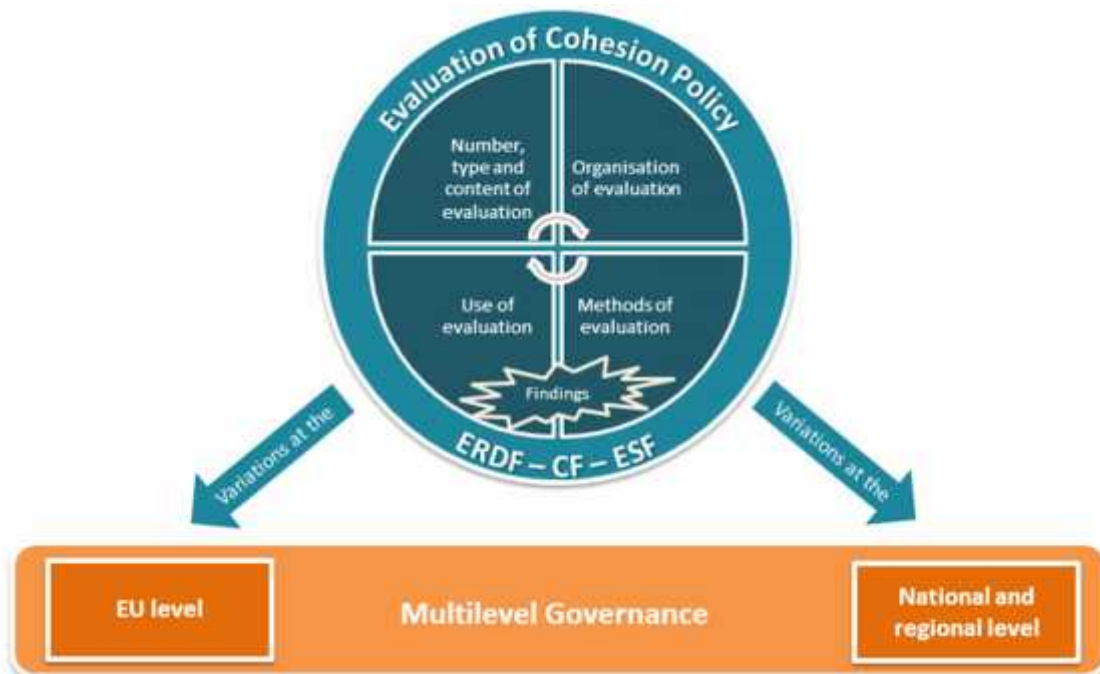
² These analytical blocks are not explicitly identified in the EU rules organising evaluation of Cohesion Policy. However, they are present in the scientific literature and allow a critical assessment of different issues at play.

mostly set within the formalised legal rules of the policy at different levels (EU, national, regional), but are also shaped by practices.

-)] **Methods of evaluations (how?):** The techniques promoted and used to carry out evaluations, in relation to their number, types, content and organisation. The methods and their perceived legitimacy can also influence the actual use of evaluations.
-)] **Findings of evaluations:** These are the main insights derived from the inquiry process in the context of Cohesion Policy. They can contribute to policymaking decisions, among other factors.
-)] **Use of evaluations (why?):** The intended use of evaluations include a distinction between different functions: accountability (evaluations as proof that funds are used as intended to deliver effects), advocacy (evaluations as arguments for debates or negotiations), policy-learning (evaluations as feedback to improve an intervention or policy, but also to build the skills and capacity of policymakers, which can be transferred to other tasks and policies) and participation/engagement (evaluations as a tool for community-building). It also includes insights into the actual influence of evaluations in decision-making processes (discussion of findings during meetings, implementation of recommendations on the ground, etc.).

Schematically, the conceptual framework for the analysis of the evaluation of Cohesion Policy can thus be **summarised as follows** (see Figure 3): there are rules and practices of Cohesion Policy regarding the number, types, content, organisation and methods of evaluation, which yield specific findings that might be used by the different stakeholders. Moreover, each of these steps is subject to potential variations, and they can depend on the level of government or type of stakeholders.

Figure 3 Conceptual framework of evaluation in the context of Cohesion Policy



Source: Authors, based on Trochim, 2009.

2. EU REGULATORY FRAMEWORK GOVERNING COHESION POLICY EVALUATION

KEY FINDINGS

-] Rules organising Cohesion Policy evaluation are set at the EU level in the Common Provisions Regulation (CPR), but also in delegated acts and other legislative documents. These rules have evolved over time through a trial-and-error process, while ensuring a relatively stable framework.
-] Evaluation of Cohesion Policy takes place in the broader context of the evaluation of EU policies. The Better Regulation approach has been influential in consolidating attention to evaluation since the mid-2010s.
-] The 2014–2020 rules set out specific requirements for evaluation of Cohesion Policy, particularly the obligation to carry out ex-ante, ongoing and ex-post evaluations, including impact-oriented ones. The rules also define general principles, governance and practical aspects to organise evaluation. There is a basic division of responsibilities between the European Commission (responsible for ex-post evaluations) and Managing Authorities (responsible for ex-ante and ongoing evaluations).
-] Compared to the 2007–2013 rules, the current period is characterised by more stringent requirements and increased emphasis on results.

The Commission approach is to combine regulatory provisions with a soft, culture-oriented approach to evaluation. While this later aspect is analysed in Chapter 3, this chapter proposes a first level of analysis of the evaluation of Cohesion policy, focusing on EU-level rules that are mainly framed in regulations. It takes a long-term view of the evolution of these rules, before proposing an in-depth analysis of its current regulatory basis (2014–2020), and a comparison with the preceding programming period (2007–2013).

2.1. Historical evolution of the EU rules for evaluation of Cohesion Policy

EU-level rules contribute to the **institutionalisation of the role of evaluation in Cohesion Policy**, mainly through **dedicated regulations** but also other **types of legislative acts** (e.g., delegated regulations). These rules shape the number, types, content and organisation of evaluations, while the methods, findings and use of produced evaluations are more related to the practical implementation of these rules under different contexts.

Evaluation of Cohesion Policy is integrated into a **more comprehensive EU context framing evaluation**. Since the 2000s, there has been a trend towards a **consolidation of the role of evaluations** at the EU level. The **Better Regulation Approach has been especially influential in that direction**. A fundamental principle pushed by the European Commission is that evaluations should contribute to the different phases of the policy cycle, influencing policy before and after design and implementation in an evidence-based way (Hristcheva, 2019; Kubera, 2017). The Better Regulation Guidelines emphasise evaluations as a way to inform policymaking on existing interventions and policies and to plan future ones (European Commission, 2019b). In particular, evaluations are complemented with impact assessments that aims at ensuring that there is a case for EU action and the likely consequences of a legislation or programme prior to implementation (European Commission, 2019c). **The consolidation of this approach is ongoing**, and it could have an important qualitative impact on the evaluation of EU policies. As Cohesion Policy is designed and implemented under a system of shared management, the Better Regulation approach reverberates on Member States as well.

2.1.1. Long-term overview of Cohesion Policy evaluation rules

The **origins of Cohesion Policy evaluation** can be traced back to the late 1980s. Its long history involves numerous changes related to social, economic, political and technical issues as well as transformations of the policy itself. Schematically, evaluation has been gradually incorporated into the framework of Cohesion Policy – i.e., its formal set of rules – through a **trial-and-error process** (Authors, based on EPRC, 2007; Manzella, 2009; Petropoulos, 2013; interviews with stakeholders, 2019–2020). **The role of evaluation of Cohesion Policy has not evolved smoothly or linearly** but has rather experienced a process of experimentation and a series of attempts to refine the framework or adapt it to actual or perceived constraints and priorities. In particular, changes introduced in different periods have sometimes pushed in opposite directions. The political situation can explain some of these shifts (Authors, based on interviews, 2019–2020). For instance, some periods have been characterised by a focus on the formal obligations to conduct a wide range of evaluations, such as the 2000–2006 period, while others have left more room for Managing Authorities to decide the exact coverage of evaluations, such as the 2007–2013 period.

The historical evolution of the number, types, content and organisation of evaluation in Cohesion Policy, as set out in EU rules, is briefly presented in Figure 4.

Figure 4 Summary of the historical evolution of EU rules framing Cohesion Policy evaluation

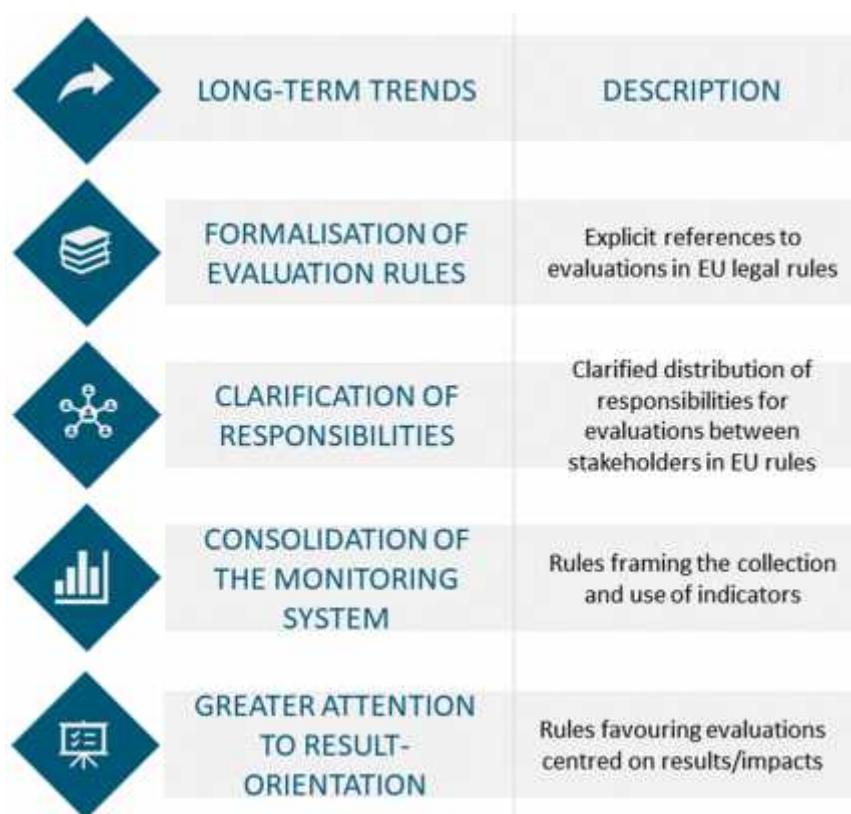
	Number, types and content of evaluation	Organisation of evaluation (roles of stakeholders)	Comments
1989-1993	Reference to ex-ante and ex-post evaluations in EU rules, but without clear implications in terms of number, types or content	<ul style="list-style-type: none"> Unclear distribution of responsibilities in EU rules (in practice, European Commission: ex-post and ex-ante evaluations, limited evaluation activities of Member States) 	Experimentation phases characterised by problems of organisation and insights in methodological terms
1994-1999	Reference to ex-ante evaluations, in-itinere surveillance (including ongoing evaluations) and ex-post evaluations in EU rules. Consolidation of the expected content of evaluations in rules, but still with important uncertainties (number, types...)	<ul style="list-style-type: none"> Member States: ongoing evaluations European Commission: ex-ante and ex-post evaluations 	
2000-2006	Reference to ex-ante, mid-term and ex-post evaluations in EU rules (all compulsory) with more defined implications in terms of number, types and content	<ul style="list-style-type: none"> Member States: ex-ante evaluations, midterm evaluations (all OPs) European Commission: ex-post evaluations 	Consolidation of the role of evaluations and massive increase in their number, though with several limits (limited interest, quality of indicators, timing...)
2007-2013	Reference to ex-ante, ongoing and ex-post evaluations in EU rules. All compulsory but with flexibility in the types, number and content of evaluations	<ul style="list-style-type: none"> Member States: ex-ante evaluations, ongoing evaluations European Commission: ex-post evaluations 	Maturation phase of the role of evaluations, with additional flexibility and the introduction of new optional tools (e.g., evaluation plans)
2014-2020	Reference to ex-ante, ongoing and ex-post evaluations in EU rules. All compulsory with the notable requirement of impact evaluations (at the level of OP priority)	<ul style="list-style-type: none"> Member States: ex-ante evaluations, ongoing evaluations, including impact evaluations (each priority of the OPs) European Commission: ex-post evaluations 	Strong push for a result-oriented approach. More stringent requirements (e.g., number/types of evaluations, mandatory evaluation plans...), with risks of delays and “tick-box” approach to evaluation

Source: Authors, based on Bachtler and Wren, 2006; EPRC, 2007; Manzella, 2009; Naldini, 2018. Template from 24slides.com

2.1.2. Analysis of long-term trends for the evaluation of Cohesion Policy in EU rules

A more in-depth analysis of the EU rules framing Cohesion Policy will be presented for the 2007–2013 and 2014–2020 programming periods in the dedicated section (2.2). However, historical analysis of EU rules governing Cohesion Policy evaluation distinguishes **long-term trends**, which summarise the general direction of changes in EU rules across time.

Figure 5 Long-term trends related to EU rules governing the evaluation of Cohesion Policy



Source: Authors. Template from 24slides.com.

The long-term trends have typically undergone a process of consolidation across the early period of Cohesion Policy evaluation, though they remain subject to changes and reversal.

Across programming periods, there has been a trend towards **formal and explicit consideration of evaluation of Cohesion Policy in EU rules**, meaning that evaluation of Cohesion Policy has been explicitly integrated into the legal texts governing Cohesion Policy at the EU level (mainly regulations). Indeed, in early programming periods, explicit references to evaluations in EU rules were often limited and open to a high degree of interpretation (e.g., unclear division of responsibilities between stakeholders, such as during the 1989–1993 period). Formalisation of evaluation rules can be considered as having reached a high level since the 2000–2006 period, with explicit requirements in the regulations (Authors, based on Naldini, 2018). Since that period, evaluation rules have always been explicitly mentioned in the EU regulations governing Cohesion Policy, though they are still subject to some degree of interpretation (e.g., on the actual content of evaluations). However, the simplification of EU rules could partly reverse this trend (see Chapter 5).

There has also been a **long-term trend towards the clarification of responsibilities regarding the evaluation of Cohesion Policy**. The 1989–1993 and 1994–1999 periods were characterised by the experimental integration of evaluation into the EU rules governing Cohesion Policy, yielding an unclear

division of evaluation responsibilities between the European Commission and Managing Authorities (Member States and regions) (Bachtler and Wren, 2006). Since the 2000–2006 programming period, there has been a stabilisation and clarification of the division of key responsibilities, with the Managing Authorities (Member States and regions) responsible for ex-ante and ongoing evaluations, and the European Commission responsible for ex-post evaluations (EPRC, 2015a, 2007; Naldini, 2018). However, this division remains open to changes, especially for the 2021–2027 period.

Data availability and quality is a long-standing issue in the context of Cohesion Policy evaluations (EPRC, 2007). There has been an **important effort** across the programming periods to **consolidate monitoring activity** (e.g., through the introduction of lists of result indicators) in the EU rules, with benefits in terms of evaluations. This includes more precise definition of which indicators to collect, common definitions to ensure their quality, requirements regarding the information systems, and linkages between monitoring and programming (e.g., the definition of targets that can then be used during evaluations). This trend is particularly notable for the 2007–2013 and 2014–2020 programming periods (EPRC, 2015a, 2007). However, it should be noted that EU rules organising the monitoring system (regulations, delegated regulations and implementing acts) lead to trade-offs in defining adequate indicators in terms of collection efforts and utility of data. Indeed, important monitoring requirements pose high burdens for the Managing Authorities, and the collected indicators are not always relevant/useful for tackling specific evaluation questions, especially at the regional level (Authors, based on case studies). It is thus important to reach a balance in EU rules for this aspect.

Last but not least, there has been a trend towards **greater emphasis on result-orientation in the EU rules**, especially since the 2007–2013 and 2014–2020 periods, which implies that the EU rules have been increasingly oriented towards evaluations that explore the impacts of an intervention. This development takes different forms, such as consolidation of monitoring systems and requirements to carry out impact evaluations.

2.2. Analysis of the regulatory framework governing Cohesion Policy evaluation in 2014–2020

2.2.1. Overview of the framework of the 2014–2020 period

In the context of the 2014–2020 programming period, there are **different types of formal rules** constituting the framework governing Cohesion Policy evaluation **at the EU level: regulations and delegated acts/implementing acts**. These are all applied directly in the different Member States without transposition into national rules. Regulations shape most rules related to evaluation of Cohesion Policy. In contrast, delegated acts are restricted to supplementing or amending “non-essential elements of legislation”, while implementing acts “ensure uniform implementation of European legislation”. Delegated and implementing acts are typically of a technical nature (EU Monitor, 2020a, 2020b).

It should be noted that in spite the fact that regulations, delegated and implementing act apply directly in all EU countries, Member States often add extra requirements in their national legislation. It is sometimes done unnecessarily, an issue known as “**gold plating**” (European Parliament, 2017). This is a concern in several areas of Cohesion Policy (e.g., implementation rules, controls...). However, evidence from different countries suggests that it is not a major concern regarding evaluation in the 2014–2020 period (see section 4).

In practice, other important elements allow the implementation of the legal rules organising evaluation and complement them. It is particularly the case regarding the methods of evaluations promoted by

the European Commission. This includes different mechanisms of soft guidance, such as networks (Evaluation Network), specific support (Evaluation Helpdesk) or guidance documents. These will be presented and analysed in greater detail in Chapters 3 and 4.

The **following legal texts form the core of the EU rules** for the evaluation of Cohesion Policy during the 2014–2020 programming period:

-)] **Common Provisions Regulation** (CPR, Regulation No. 1303/2013) setting out most of the formal rules related to the evaluation of Cohesion Policy (Official Journal of the EU, 2013a), in terms of number, types, content and organisation of evaluation (including monitoring aspects).
-)] **Fund-specific Regulations** – i.e., regulations applicable only to some funds which underpin some specificities for evaluations: Regulation No. 1299/2013 (European Territorial Cooperation) and No. 1304/2013 (European Social Fund and Youth Employment Initiative – ESF/YEI) (Official Journal of the EU, 2013b, 2013c). They mostly mention governance specificities and include additional requirements in terms of scope of evaluations, such as the obligation to evaluate the impact of the ESF/YEI. Other fund-specific regulations (including those for the European Regional Development Fund and Cohesion Fund – ERDF and CF) do not contain elements regarding evaluations and are thus entirely covered by the Common Provisions Regulation (Official Journal of the EU, 2013d, 2013e).
-)] **Delegated and Implementing Regulations**, which do not directly affect evaluations. However, they set standards for the information systems and requirements for monitoring indicators (Implementation Regulation No. 821/2014 and Delegated Regulation No. 480/2014), which have implications for the evaluations in practice (Official Journal of the EU, 2014a, 2014b).

This study covers core aspects related to evaluation. In this respect, **EU-level rules** are mainly **focused on defining the number, types, content and organisation (especially the roles of stakeholders)** in evaluating Cohesion Policy. Other relevant aspects are also addressed including **monitoring and indicators**, as well as elements of the broad framework provided for in the regulations, like the approval procedure of major projects. Figure 6 below synthesises the main arrangements of the 2014–2020 period. A.2Table A.3 in the Annexes presents a more detailed overview, with references to the specific articles of the regulations.

It shall be mentioned that these rules are complemented by softer measures of guidance and the actual practices of stakeholders (see Chapters 3 and 4).

Figure 6 Main arrangements for the evaluation of Cohesion Policy in 2014–2020 in the EU legal rules

	Number, types and content of evaluation	Organisation of evaluation	Methods	Findings and their use
General principle / All stakeholders	Obligation to carry out ex-ante, ongoing and ex-post evaluations Existence of a specific selection procedure for Major projects with Cost-Benefit Analysis	Functional independence of evaluators	No generic obligation	Obligation to publish evaluation results No formal requirements to use evaluations for specific purposes
European Commission	Obligation to carry out ex-post evaluations addressing different criteria (effectiveness, efficiency, impact, contribution to EU strategies)	Responsibility for ex-post evaluations Advisory role in Monitoring Committees	Obligation to provide guidance to the Managing Authorities	Provisions of comments on the Annual Implementation Reports and debates of evaluations with MAs during Annual Review Meetings Synthesis of the Annual Implementation Reports at the EU level in Summary/Strategic Reports Synthesis of the results of ex-post evaluations
Managing Authorities / Member States	Obligation to carry out ex-ante evaluations covering all OPs Obligation to carry out ongoing evaluations with at least one impact evaluation addressing each OP priority Obligation to carry out 2 specific impact evaluations for the YEI	Responsibility for ex-ante and ongoing evaluations Monitoring requirements and obligation to use indicators in programming Obligation to set-up Monitoring Committees for the follow-up of evaluations Obligation to draft evaluation plans and to complete the planned evaluations thanks to adequate evaluation capacity	No specific obligation regarding methods	Follow up of evaluations in Monitoring Committees Debates of evaluations with the European Commission during Annual Review Meetings Synthesis of evaluations in Annual Implementation Reports

Source: Authors, based on European Commission, 2015a; Naldini, 2018; Official Journal of the EU, 2013a. Template from 24slides.com.

As highlighted in Figure 6, the formal **EU rules set out in the main relevant regulations** define a **clear picture** regarding the number, types, content and organisation of the evaluation of Cohesion Policy. Several provisions are legal obligations, but rules also explicitly open the possibility of additional actions by stakeholders (see Chapters 3 and 4).

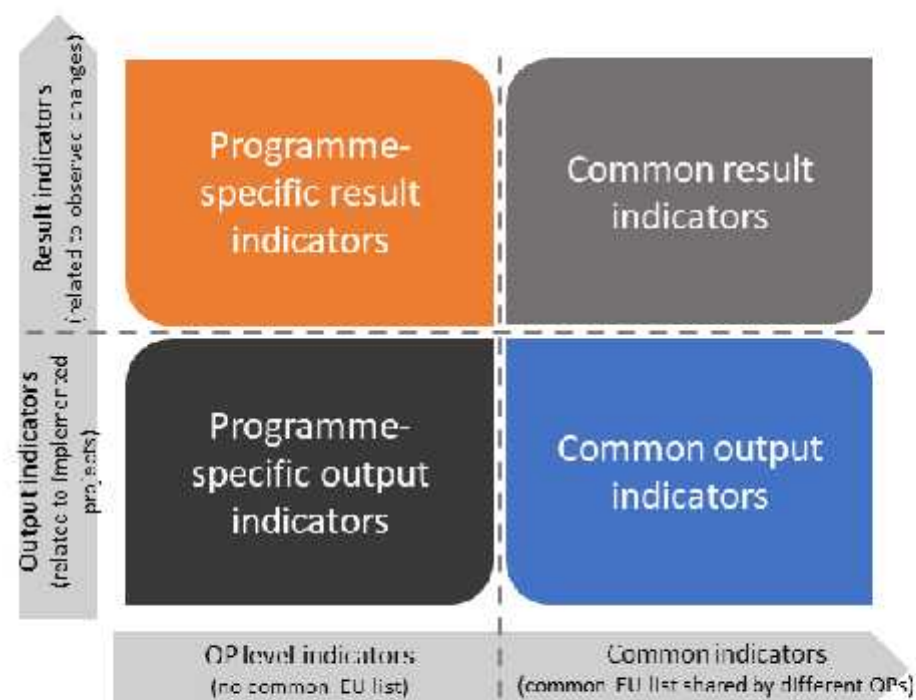
a. Number, types and content of evaluations

In terms of **number, types and content**, the EU rules for 2014–2020 **set out relatively stringent obligations to carry out evaluations**. Indeed, evaluations are considered mandatory at each stage (ex-ante, ongoing and ex-post) for this period. Moreover, there is a specific focus on impact-oriented evaluations, with the obligation to conduct at least one of them at a detailed level of analysis (OP priority, which is part of the Operational Programmes set up by Managing Authorities) (Naldini, 2018; Official Journal of the EU, 2013a). In particular, the YEI shall be evaluated at least twice, with specific deadlines (Official Journal of the EU, 2013c). The particular content of evaluations is broadly defined depending on their timing, which leaves some room to evaluators for interpretation. A notable feature is that the ex-ante evaluations shall cover each OP, which generates a considerable workload at the beginning of the period. Beyond these provisions directly related to the evaluation of Cohesion Policy programmes, there is also a procedure dedicated to the approval of major projects. This procedure is relevant for large-scale projects above a financial threshold (EUR 50–70 billion) and includes an application process in which the Member States have to mandatorily submit a comprehensive set of information to the European Commission (European Commission, 2015b). This includes, among other information, a cost–benefit analysis (CBA) carried out according to a well-defined set of methodological rules and in line with international best practices in the field. It is a project-specific ex-ante evaluation and provides a justification of public support by assessing the magnitude of effects of the project on society in relation to the resources used.

b. Organisation of evaluation

The **responsibilities for evaluations are split between the European Commission and the Managing Authorities/Member States**. Schematically, the Managing Authorities/Member States are responsible for ex-ante evaluations, while the European Commission focuses on ex-post evaluations, though the regulations leave room for some flexibility. Indeed, ex-post evaluations can be conducted by the Member States, and the European Commission can decide to evaluate specific OPs during the period based on its own initiative (Official Journal of the EU, 2013a).

The underlying logic of the 2014–2020 EU rules organising Cohesion Policy evaluation is the **focus on result-orientation**. Concretely, it implies that Managing Authorities have important responsibilities linked to monitoring – i.e., organising information systems, collecting data on indicators and using them at different steps. Indeed, result-orientation is performed through legal obligations linking programme design, monitoring and evaluation (EPRC, 2015a; Polverari, 2016a), with the idea that these other activities will improve evaluation. For instance, the regulations insist that the OPs designed by Managing Authorities must identify how the objectives will be attained (intervention logic) and track their progress with clearly defined indicators (Articles 27 and 96 of the CPR). Managing Authorities also have to collect different types of indicators that they can then use in their evaluations (Articles 27 and 96 of the CPR). As their name indicates, “common” indicators apply uniformly across Member States and regions and are defined by the EC. These are useful for reporting on overall Cohesion Policy performance. The other indicators are specific to national/regional OP and are set at this level. They are presented in the following figure.

Figure 7 Presentation of monitoring indicators in 2014–2020

■ Programme-specific result indicators (All Funds)

They are collected on the basis of the specific objectives of an Operational Programme, i.e. its goals. They measure the observed change in a policy area (e.g., transportation...), capturing the effect of the OP but also of external factors and other policies. The progress of these indicators over time must be compared to a baseline and a target. They are not common across the different OPs.

■ Common result indicators (ONLY FOR ESF/YEI)

They are collected on the basis of the specific objectives of an Operational Programme, i.e. its goals. They measure the observed change in a policy area (e.g., youth employment...), capturing the effect of the OP but also of external factors and other policies. The progress of these indicators over time must be compared to a baseline and a target. They are selected from a list included in the Annexes of Fund-specific Regulations and allow an EU-wide aggregation.

■ Programme-specific output indicators (All Funds)

They are collected on the basis of the types of interventions supported by an Operational Programme, i.e. according to which projects are undertaken. For instance, it can refer to number of start-ups supported, length of built railways... They focus on the implementation of interventions and are linked to targets/milestones. They are not common across the different OPs.

■ Common output indicators (All Funds)

They are collected on the basis of the types of interventions supported by an Operational Programme, i.e. according to which projects are undertaken. They focus on the implementation of interventions and are linked to targets/milestones. They are selected from a list included in the Annexes of Fund-Specific Regulations (all Funds) and allow an EU-wide aggregation.

Source: Authors, based on European Commission, 2018b; Official Journal of the EU, 2013a; Polverari, 2016b. Template from 24slides.com.

In terms of **concrete organisation for the planning of evaluations**, the Managing Authorities/Member States have to set up Monitoring Committees, which are also central in the shared management process beyond evaluation. Monitoring Committees include representatives from the Managing Authorities, Member States and European Commission. These ad-hoc bodies have a long history in Cohesion Policy and have multiple missions in following the implementation of the Operational Programmes. These include reviews of planned evaluations, debates on their findings and the provision of recommendations to the Managing Authorities based on these (Official Journal of the EU, 2013a). This is a potential channel for using the produced evaluations. Evaluators working on the evaluations have to be functionally independent of the Managing Authorities**8Member States. They can thus be external (e.g., private consultants) or internal (e.g., civil servants from a different unit than the one implementing/managing the fund). The novelty of the 2014–2020 programming period is that to organise the overall evaluation activity during the period, Managing Authorities/Member States must draft evaluation plans. These documents list all the evaluations that will be carried out during the programming period. They have to be followed and updated by the Monitoring Committees. Moreover, the Managing Authorities must ensure that adequate resources are available to realise them (Official Journal of the EU, 2013a).

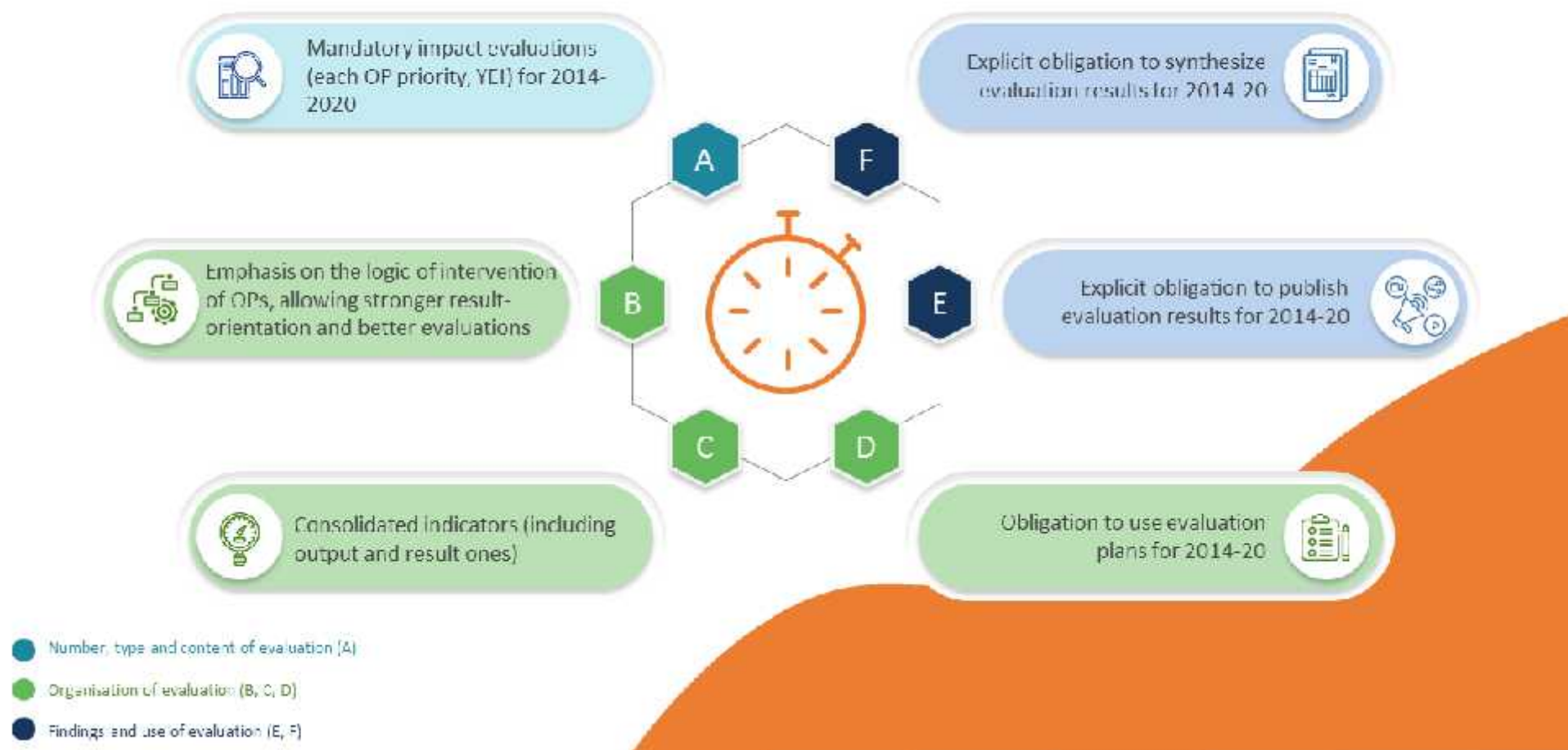
c. Methods and findings

In **terms of methods**, the **EU rules contain limited provisions**. A notable exception is the fact that the European Commission must provide methodological guidance to the Managing Authorities (Official Journal of the EU, 2013a), but its exact content is not detailed in the legal text. It shall be noted that regulations are not the relevant vehicle to provide methodological support. Chapter 3 analyses the contribution of the guidance provided by the Commission in this respect.

Similarly, the **use of findings is not well defined in the EU legal rules**, leaving ample room for manoeuvre. There are obligations to publish the results of the conducted evaluations, as well as to synthesise them in different documents. Indeed, the Managing Authorities have to summarise the results of evaluations in Annual Implementation Reports. These AIRs are then compiled and synthesised in Summary Reports at the EU level by the European Commission. Similarly, the results of ex-post evaluations have to be synthesised by the European Commission. Evaluations have to be followed up by the Monitoring Committees of the OPs during the programming period. The EU rules also mention that evaluations can be indirectly debated during the Annual Review meetings between the Managing Authorities and the European Commission, which cover the content of the Annual Implementation Reports (Official Journal of the EU, 2013a).

2.2.2. Comparative assessment with the framework of the 2007–2013 period

The current EU rules organising the evaluation of Cohesion Policy can be **contrasted with those of the 2007–2013 programming period**. Rules of this previous period were defined in the General Provisions Regulation No. 1083/2006 (Official Journal of the EU, 2006). Changes introduced between these two periods feature **elements of continuity** and **rupture**. The main differences are presented in Figure 8 below. A more detailed table (A.2Table A.4), with references to the individual articles of the regulations, is available in the Annexes.

Figure 8 Main changes in EU rules governing Cohesion Policy evaluation between the periods 2007–2013 and 2014–2020

Source: Authors, based on European Commission, 2015a, 2007; Naldini, 2018; Official Journal of the EU, 2013a, 2006. Template from 24slides.com.

The transition from the 2007–2013 to the 2014–2020 programming period is characterised by **more stringent requirements in terms of evaluations**, and by a **stronger emphasis on the logic of intervention** underlying programmes. This broad picture can be broken down into more specific aspects.

a. Number, types and content of evaluation

There has been an important **evolution of the number, types and content of evaluations**, with **more requirements and increased result-orientation** overall. This can be observed for **ex-ante and ongoing evaluations**. In contrast, the legal rules have not significantly altered the requirements affecting ex-post evaluations between the periods. As a consequence, changes in rules are disproportionately affecting the Managing Authorities as opposed to the European Commission.

Concretely, the **requirements for ex-ante evaluations are strengthened in terms of coverage** (Authors, based on A.2Table A.4). During the 2007–2013 programming period, ex-ante evaluations were also compulsory, but there was explicit room for flexibility in the legal rules. Indeed, ex-ante evaluations had to separately address each OP falling under the Convergence Objective (i.e., in the less developed regions), but there were possibilities to conduct a single ex-ante evaluation for multiple OPs falling under the Regional Competitiveness and Employment/European Territorial Cooperation Objectives (i.e., more developed regions or cross-border). During the 2014–2020 period, ex-ante evaluations have to cover all OPs, and there is no explicit provision in the rules to regroup different OPs under a single ex-ante evaluation. In practice, this can be interpreted by many Member States as an obligation to conduct a dedicated ex-ante evaluation for each OP, which means a considerable number at the EU level. However, it should be noted that this lack of explicit possibility is not a formal prohibition.

Similarly, the fact that **further requirements of impact evaluations have been added for 2014–2020 has substantially increased the complexity and workload for Managing Authorities, as compared to 2007–2013** (Authors, based on A.2Table A.4). Impact evaluations are typically challenging in terms of skills and data. Moreover, the legal rules for 2014–2020 precisely state that at least one impact evaluation, addressing each OP priority, should be conducted during the period. This obligation (OP priority) corresponds to a refined level of analysis, ascribable to a policy priority (e.g., development of regional SMEs). Moreover, there are also **specific requirements of impact evaluations for the Youth Employment Initiative**, with tight deadlines (2017 and 2019).

b. Organisation of evaluation

In terms of organisation, the **overall architecture has remained relatively stable** between the 2007–2013 and 2014–2020 programming periods (Authors, based on A.2Table A.4). Indeed, basic principles, such as the central role of Managing Authorities, the functional independence of evaluators and the provision of evaluation guidance by the European Commission, have remained unaltered. The division of responsibilities for evaluations between the European Commission (ex-post) and the Member States/Managing Authorities (ex-ante, ongoing) has also not been altered. At a more refined level, the action of Monitoring Committees has continued, though with an enhanced emphasis on the transparency of these bodies during the 2014–2020 programming period.

However, there have been some **crucial changes of rules regarding the organisation of Cohesion Policy evaluation between these periods** (Authors, based on A.2Table A.4). They mainly relate to the **monitoring aspects** and the **use of evaluation plans**. Details on how these new requirements are applied on the ground are included in Chapter 4. As mentioned in section 2.2.1, evaluation plans are documents that list all evaluations expected to be carried out by Managing Authorities during the

programming period. Their use was optional in the 2007–2013 period, but has been made compulsory for 2014–2020. The rationale underlying that change is to promote the preparation of evaluations by Managing Authorities, in particular regarding the anticipation of data needs (Authors, based on interviews, 2019–2020). **The core principles of monitoring remain similar between the two periods** (e.g., obligation to operate information systems and to collect indicators). However, **the rules for 2014–2020 introduce a focus on the logic of intervention of Operational Programmes, which promotes the actual use of indicators at different steps.** Indeed, **Managing Authorities are being asked to reflect on how their interventions would lead to concrete consequences on the ground, and in fine, which objectives they would fulfil.** In that context, indicators are included in the programming phase of the different OPs, where Managing Authorities have to mention which indicators will be used based on the types of interventions they want to finance. This attention to indicators and logic of intervention can promote the **tracking of progress and feed into the evaluation process.** Moreover, legal rules for 2014–2020 include (mandatory) common indicators in the annexes of fund-specific regulations, which was not the case in the 2007–2013 period.³ These common indicators can notably enhance the aggregation of results at the EU level.

c. Methods, findings and use of evaluation

There have been relatively **few changes for methods and findings** in the legal rules between the 2007–2013 and 2014–2020 periods (Authors, based on A.2Table A.4). This is linked to the fact that these aspects are usually not the main targets of regulations. For methods, the importance of the **role of the European Commission in providing guidance** is highlighted during both periods. In terms of findings, the 2014–2020 period has **emphasised the transparency aspects** by making the publication and synthesis of findings explicitly mandatory. In 2007–2013, the synthesis aspect was not present. Moreover, the publication of evaluation results was conditioned on applicable rules on access to documents (Article 47 of the GPR), and thus was less universal. According to research for the REGI Committee, the European Parliament is thought to have been decisive in promoting this increased transparency during the discussions shaping the 2014–2020 regulations (European Parliament, 2019a).

³ There were optional “core indicators” in 2007–2013, see: <https://cohesiondata.ec.europa.eu/2007-2013/2007-2013-ERDF-CF-achievements-core-Indicators-BY-/w9mt-s8si>

3. EVALUATION OF COHESION POLICY AT THE EU LEVEL

KEY FINDINGS

- } Besides setting out the legal basis for CP evaluation, one of the main responsibilities of the European Commission (DG REGIO and DG EMPL) is to carry out ex-post evaluations of Cohesion Policy. These ex-post evaluations tend to have a thematic focus and have improved over time, based on more robust methodologies, but some limitations in terms of coverage remain.
- } In 2014–2020, the European Commission has been deploying substantial effort to improve the evaluation capacity of the Member States through guidance documents and soft support on methodological and operational issues. It has notably relied on different networks and initiatives, such as the ESF Evaluation Partnership and the Evaluation Network.
- } There is evidence that the European Commission uses evaluation findings to feed into the policy cycle. Ex-post evaluation findings are taken into consideration, with a time lag, when designing the Cohesion Policy framework of a subsequent programming period. However, this process is not yet consolidated.
- } The different initiatives taken by the European Commission to strengthen evaluation capacity of Member States and regions have contributed to develop a community of practice around the evaluation of Cohesion Policy.

This chapter takes a closer look at how, in practice, evaluation of Cohesion policy is carried out and used at the EU level. Moreover, section A.4 of the Annexes briefly presents evaluation arrangements under Horizon 2020 and the European Investment Bank highlighting the diversity of approaches and recent developments of evaluation in the wider EU context, i.e., beyond the case of Cohesion Policy.

3.1. Involvement of EU stakeholders in Cohesion Policy evaluation at the EU level

Cohesion Policy evaluation is based on a set of legal rules, as described in Chapter 2. However, they do not capture its full organisation, as other rules and the practices of different stakeholders are also critical to its functioning. The Directorate General for Regional and Urban Policy (DG REGIO) and the Directorate General for Employment, Social Affairs and Inclusion (DG EMPL) within the European Commission are the key players to consider when examining Cohesion Policy evaluation at the EU level. However, other institutional EU actors have an indirect role or interest in these evaluations and can conduct related activities at the EU level, such as auditing of Cohesion Policy, but they are not directly involved in the realisation, coordination and use of Cohesion Policy evaluations. They include the European Parliament, the Regulatory Scrutiny Board within the European Commission and the European Court of Auditors.

3.1.1. The European Commission (DG EMPL and DG REGIO)

As stated in the regulations, **the key player** regarding evaluation of Cohesion Policy at the EU level is the **European Commission** (Official Journal of the EU, 2013a).

Specifically, the European Commission conducts three **distinct types of actions related to evaluation**:

- } **Realisation of evaluations**, in line with the requirements of the regulations – i.e., primarily ex-post and EU-wide ones (see section 3.2). The European Commission publishes the results of its

evaluations online, organised by work package. They are thus freely accessible to the general public⁴

-)] **Support for the evaluation activities of Member States and regions** (see section 3.3.1)
-)] **Synthesis of the evaluation activities** of the stakeholders involved at different levels in Cohesion Policy (see section 3.3.2)

The functions or **uses of evaluations** pursued by the European Commission mainly consist in **accountability** (ensuring that the policy delivers results), **advocacy/communication of results** and **policy-learning** (improving the policy between the different periods) (European Commission, 2019d).

Besides evaluations, the European Commission also relies on **other sources of evidence** to support its decision-making process, especially regarding improvement of the policy over time. It is especially critical given the fact that the European Commission's evaluations are typically ex-post, and thus necessarily have a time lag in influencing decisions. For instance, the European Commission's evaluations on the 2000–2006 period of Cohesion Policy could only affect the policy for the 2014–2020 period (Authors, based on interviews, 2019–2020). Examples of other sources of evidence that complement evaluations include consultations and studies.⁵

Every three years, the European Commission also publishes a **Cohesion Report**, which assesses the progress towards achieving economic and social cohesion across the European Union (European Commission, 2020b). Though it is focused on monitoring the indicators relevant to social, territorial and economic cohesion, it also considers the impacts of the policy and draws from the published evaluations. The most recent report is the 7th one.⁶

Moreover, the European Commission **provides data about Cohesion Policy** thanks to the monitoring system (definition of indicators, reporting, etc.). It is accessible online and may contribute to accountability.

Box 1 Open Data Platform of ESI Fund

The ESI funds the Open Data Platform (<https://cohesiondata.ec.europa.eu/>), also referred to as 'OpenCohesion', which is an **open-government portal managed by DG REGIO that gathers the latest data available on financial resources and achievements in the framework of the 2014–2020 ESI Funds**. The portal offers visualisations of data through graphs, and the underlying data can also be accessed and downloaded.

The data included in the Platform covers over 530 national, regional and interregional programmes adopted under the ESI funds and Youth Employment Initiative, and it is exchanged by the national and regional authorities and the Commission through a common IT platform (SFC2014).

The Platform is **targeted at citizens, journalists and researchers, but also Member State administrators and EU institutions**. By offering instant access to Cohesion Policy data, the Platform serves as a key input for policy debate and contributes to the accountability of policymakers.

The first step towards the Open Data Platform was taken in December 2015, when datasets on planned finances and achievements were first made available online, with visualisations at EU, theme, country and fund levels. Since then, the Platform has gradually and considerably expanded,

⁴ https://ec.europa.eu/regional_policy/en/policy/evaluations/ec/ for the ERDF/CF; <https://ec.europa.eu/social/main.jsp?catId=307&langId=en> for the ESF/YEI.

⁵ Accessible here: https://ec.europa.eu/regional_policy/en/information/publications/studies. They can refer to specific issues (e.g., climate change adaptation of major infrastructures) or be more exploratory (e.g., use of budget support to deliver Cohesion Policy funding).

⁶ https://ec.europa.eu/regional_policy/en/information/cohesion-report/

and according to the Commission, further developments are planned for the future – for instance, by improving the narrative behind data. In this regard, data stories are expected to incentivise the use of the Platform by journalists, a target group that has so far made only limited use of it.

Financial data is structured in three categories: data on planned amounts (financial information set out in the programme documents adopted by the Commission and made available in a common format across all funds), data on implemented amounts (cumulative information from the programmes on their financial implementation progress), and data on EU payments (cumulative payments made by EU to the Member States and Interreg programmes, updated on a daily basis). According to the Platform's website, all graphs present a split by payment type (initial pre-financing, annual pre-financing and interim payments), with an interactive legend where the user is invited to select or de-select the different types of payments. The 'Achievements' sections of the portal provide information on the fund-specific common indicators.

Source: Authors, based on interviews, 2019–2020; European Commission, 2020b.

3.1.2. Other institutional EU actors

Other stakeholders are **not directly involved in the organisation, realisation or use of evaluations of Cohesion Policy**. However, because of their own activities, they can conduct complementary activities (e.g., external auditing), assess some of the produced evaluations, or even influence the entire rules shaping Cohesion Policy evaluation.

The **European Court of Auditors** is the external auditor of the European Union, with a role clearly distinguished from Cohesion Policy evaluation. In particular, the fact that audits are not undertaken on behalf of the managers of the policy is a crucial difference. However, the ECA takes into account the produced evaluations when planning the audit work, and evaluations can form part of the audit evidence (Authors, based on interviews, 2019–2020). Moreover, the ECA also produces evidence on Cohesion Policy and its performance, which can bring valuable insights into its evaluation. For instance, evidence on evaluation is included in a 2019 ECA review on 'Delivering performance in Cohesion' (ECA, 2019).

The **Regulatory Scrutiny Board** is an independent body of the European Commission that reviews impact assessments and evaluations to ensure their quality (European Commission, 2019e). It can cover some evaluations of Cohesion Policy and propose adjustments in case of problems (Authors, based on interviews, 2019–2020). This overview and provision of comments for adjustments can notably be observed for ex-post evaluations of Cohesion Policy. For instance, the Board produces opinion on the quality of evaluations, and how they are taken into account in the decision-making process (see an example in Section 3.2.3 below).

The **European Parliament** has no formally defined direct role in the regulations regarding the evaluation of Cohesion Policy for the 2014–2020 period. However, the Parliament discusses some of the findings on the implementation and evaluation of the policy reported by the European Commission (Official Journal of the EU, 2013a). Indeed, the European Commission has to transmit a summary report on the implementation of Cohesion Policy as well as a synthesis of the evaluations of the OPs to the Parliament every year (Article 53 of the CPR). This can thus be an opportunity for MEPs to debate the evaluation aspects of the policy with other EU institutions. The European Parliament has **a critical role in setting the rules of Cohesion Policy, including on evaluation**, as it is the co-legislator together with the Council, through the ordinary legislative procedure. Under this procedure, the European Commission proposes a legal text, which is reviewed and amended by the European Parliament and Council through different readings and votes (European Parliament, 2019b). The

procedure might include interinstitutional negotiations at every stage (also called a ‘trilogue’), where the three institutions are represented and where EP and Council may reach a joint position based on their mandates (European Parliament, 2019c). However, according to a study for the REGI Committee, it seems that **the action of the European Parliament in shaping the Common Provisions Regulation for the 2014–2020 period has been relatively modest for monitoring and evaluation** (European Parliament, 2019a). Indeed, it has focused on monitoring aspects and access to information, but not on elements directly ascribable to evaluation. Its action for the 2021–2027 regulations is presented in section 5.2).

Finally, the European Parliament conducts its own studies on Cohesion Policy through its research service.⁷

3.2. Overview of evaluation of Cohesion Policy by the European Commission

3.2.1. Organisation of Cohesion Policy evaluation

The organisation of Cohesion Policy evaluation takes place in the context of the **Better Regulation approach**, which aims at ensuring that decisions are taken in an “open, transparent manner, informed by the best available evidence” (European Commission, 2017a). The European Commission is not a monolithic actor and **consists of different Directorate Generals (DGs)**. The Directorate General for Employment, Social Affairs and Inclusion (DG EMPL) is responsible for the ESF/YEI, and Directorate General for Regional and Urban Policy (DG REGIO) for the ERDF/CF. Each of these DGs then has a dedicated Evaluation Unit (responsible for evaluations) and Policy Units (responsible for other tasks and overall policy coordination). There are linkages between the Evaluation Units of the European Commission and the other Policy Units – e.g., in the use of evaluations. Beyond these close links, the evaluation units of DG EMPL and DG REGIO also cooperate with other DGs on a more ad-hoc basis (e.g., DG RTD) or with external institutions through networks (Authors, based on interviews, 2019–2020). Even though there are some differences, most features of evaluations of the ERDF/CF and ESF are shared at the EU level.

The Evaluation Units of DG EMPL and DG REGIO are composed of about 15–20 persons (European Commission, 2020d). For instance, DG EMPL has a unit of 17 persons, including 2 for the secretariat. Among them, 5–6 persons work on ESF monitoring and evaluations during most of their working time, while the others support the evaluations and impact assessments of DG EMPL’s policy units (Authors based on interviews, 2019–2020). To support the European Commission team, external consultants are often used, especially for the realisation of ex-post evaluations (Authors, based on interviews, 2019–2020).

Regarding its primary task of carrying out specific ex-post evaluations, the European Commission typically follows **specific steps**, at least in the case of the ERDF/CF (Olejniczak et al., 2011):

-)] Establishment of the conceptual basis for the evaluation, to build a reflection on its specific goals
-)] Review of existing data and evidence
-)] In-depth analysis of identified issues, typically thanks to case studies and other methods

⁷ The documents it produces are accessible at <https://www.europarl.europa.eu/thinktank/en/home.html>. See European Parliament, 2020a, 2019a; Official Journal of the EU, 2013a.

)] Drawing of conclusions and recommendations

Evaluation findings are fed into Staff Working Documents produced by the Commission services, including a consultation of all other DGs before publication (Authors based on interviews, 2019-2020).

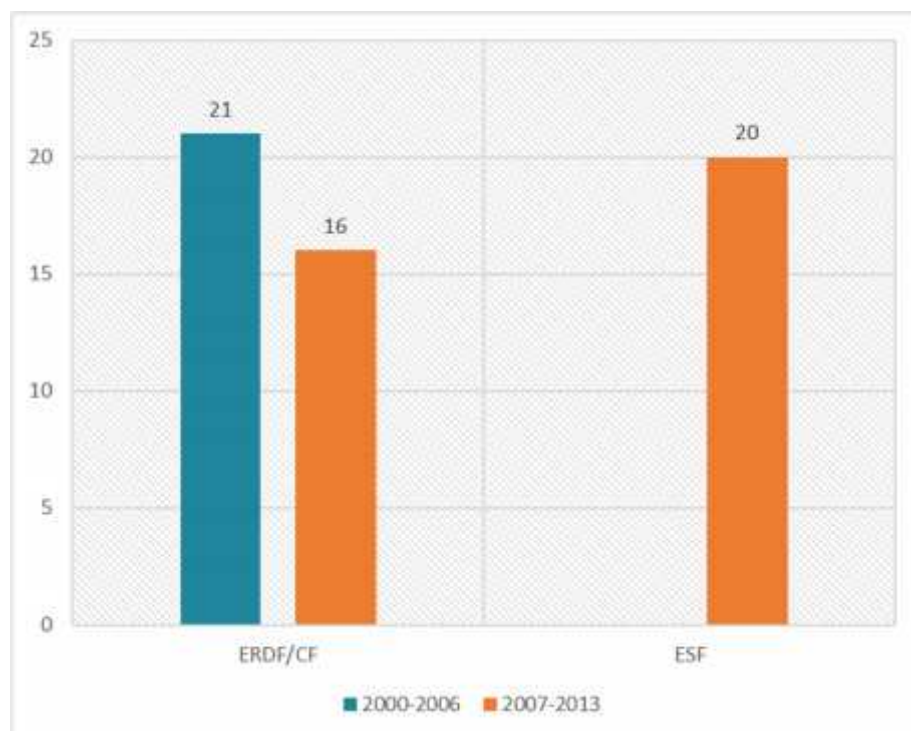
Moreover, the realisation of evaluations by the European Commission is backed by a system of **quality assurance**. For instance, it is implemented at DG REGIO to ensure the quality of evaluations, thanks to the mobilisation of steering groups with other DGs, expert committees and diffusion strategies (Olejniczak et al., 2011). This attention to quality has been further strengthened with the **Better Regulation** approach (Authors based on interviews, 2019-2020).

3.2.2. Carried out evaluations and methods used by the European Commission

EU-level evaluations realised by the European Commission are primarily of an **ex-post nature**. As a consequence, the available evaluations at the beginning of 2020 cover the period of 2007–2013 and earlier. Since 2015, the Better Regulation Guidelines focus on 5 different criteria for evaluations, including effectiveness, efficiency, relevance, coherence and EU added value (European Commission, 2017a). In the context of Cohesion Policy, the produced evaluations tend to particularly **cover the criteria of effectiveness and efficiency of the policy** – i.e., whether interventions produce results, and how these compare to the resources provided (Authors, based on the review of available evaluations). This is in line with the types and content of evaluation mentioned in the regulation (Official Journal of the EU, 2013a). As explained in section 3.2.1, evaluations are conducted by DG REGIO and DG EMPL, on the ERDF/CF and ESF, respectively.

Based on the European Commission websites, the **number of main reports dedicated to ex-post evaluations conducted can be estimated, as shown in the following figure** (European Commission, 2020e, 2019f).

Figure 9 Number of main ex-post evaluation reports of Cohesion Policy by the European Commission



Source: Authors, based on European Commission, 2020e, 2019f.

Note: Data not available for ESF for 2000–2006. Estimates based on the main ex-post evaluation reports accessible on the webpages dedicated to ex-post evaluations

As the breakdown of specific evaluations into different reports can slightly vary across the programming periods, it can be considered that the **number of evaluations conducted by the European Commission is relatively stable between 2000–2006 and 2007–2013**.

More interestingly, in terms of **content**, EU-level evaluations tend to have a **thematic focus**, at least since the 2000–2006 period (Olejniczak et al., 2011). Previously, a programme-based approach was more common. Concretely, this thematic focus takes the form of different work packages targeting different issues that are considered of high interest at the EU level, such as evaluations focusing on energy efficiency, support to SMEs or social inclusion. The following box presents the 15 work packages of the 2007–2013 period, carried out by DG REGIO for the ERDF and CF.

Box 2 Work packages of the 2007–2013 ex-post evaluations (ERDF and CF)

Work package 0 - Data collection and quality assessment

Work package 1 - Synthesis

Work package 2 - Small to medium-sized enterprises, innovation, ICT

Work package 3 - Financial instruments for enterprises

Work package 4 - Large enterprises

Work package 5 - Transport

Work package 6 - Environment

Work package 8 - Energy efficiency

Work package 9 - Tourism and culture

Work package 10 - Urban development and social infrastructure

Work package 11 - European territorial cooperation

Work package 12 - Delivery system

Work package 13 - Geography of expenditures

Work package 14a - The impact of Cohesion Policy 2007–2013: model simulations with Quest III

Work package 14b - The impact of Cohesion Policy 2007–2013: model simulations with RHOMOLO

Work packages 14c and 14d - Regression discontinuity design and propensity score matching

Source: Authors, based on European Commission, 2020e.

As can be observed from this list, work packages (ERDF/CF) typically address **sectoral aspects of the policy**, but also its **impacts** and **geographical** dimension. This approach was already present for the 2000–2006 ex-post evaluations (Authors, based on European Commission, 2020d, 2019e). Moreover, these evaluations are also completed by a smaller set of evaluations that cover a longer time frame, at the expense of a more limited geographic coverage (e.g., an evaluation of the main achievements of Cohesion Policy in 15 regions since the 1980s⁸). For the ESF, a similar approach is adopted, with

⁸ https://ec.europa.eu/regional_policy/sources/docgener/evaluation/pdf/eval2007/cohesion_achievements/final_report.pdf; evaluation studies are accessible on: https://ec.europa.eu/regional_policy/en/policy/evaluations/ec/2007-2013/#15

Other

evaluations addressing different themes, for instance social protection and inclusion, skills and qualifications or moving and working in Europe (European Commission, 2019f).

There are **specific challenges in conducting EU-level evaluations of Cohesion Policy**, which can be summarised as follows (Olejniczak, Kozak, and Bienias, 2011; Authors, based on interviews, 2019–2020):

-)] **Scale and diversity of OPs and interventions** lead to issues in designing an appropriate methodological approach and accessing data. They also make evaluation of the entire Policy unpractical and require choices to be made regarding which specific aspects of evaluation should be focused on.
-)] **Multilevel governance**, which influences the dynamics and the contexts of the different OPs and hence their evaluations
-)] **Methods** that need to be combined to account for the specificities of the policy and of each evaluation
-)] **Data for evaluations** can pose challenges due to the heterogeneities in data coverage, granularity (e.g., access to information at the project level) and quality. This issue explains the attention of the Commission on developing a monitoring system for Cohesion Policy that allows aggregation of results at the EU level across the different programming periods. Significant progress has been made and has allowed more detailed evaluations (especially for the ESF⁹). However, there are still limitations regarding the level of detail of indicators (granularity), and the quality and coverage of collected data (Authors, based on interviews, 2019–2020).

In practice, evaluations at EU level often opt for **qualitative approaches** and case studies in particular to deal with the particularities of Cohesion Policy. Among the ex-post evaluations of the ERDF/CF, about 45% rely mostly on case studies (Authors, based on DG REGIO website). Moreover, this figure takes into consideration more technical and synthetical evaluations. When considering only thematic evaluations, the use of case studies becomes even more prevalent. This implies focussing on a sample of Member States'/regions rather than carry out an EU-wide assessment. The basis for this sampling can, for instance, be based on the fact that the selected territories account for a very high share of total Cohesion Policy funding in the specific theme being studied (Authors, based on European Commission, 2020). In general, qualitative approaches are combined with quantitative approaches. For the main ex-post evaluations of the ERDF/CF published on the DG REGIO website in January 2020, approximately 40% can be considered as having an approach mobilising both qualitative and quantitative methods (Authors, based on DG REGIO website).

Moreover, the European Commission is also **experimenting with advanced evaluation methods**, such as macroeconomic modelling, counterfactual analysis and theory-based evaluations (European Commission, 2020e). For instance, theory-based evaluations have been realised through Bayesian network analysis for SME support, and contribution analysis for support of large enterprises, yielding insights into the mechanisms of change at play due to Cohesion Policy interventions (European Commission, 2020e).

Examples of findings produced in the evaluations of Cohesion Policy at the EU level are provided in the Annexes (see section Examples of findings from evaluations at EU level). These findings can then be used in different ways, as shown in the following section.

⁹ The granularity of available data is higher for the ESF, especially due to the common results indicators. It includes data on individuals and a more detailed breakdown, allowing easier (impact) evaluations than for the ERDF/CF (Authors, based on interviews, 2019–2020).

3.2.3. Use and utility of EU Cohesion Policy evaluation

The use of evaluation of Cohesion Policy at the EU level fits into the broader framework of the **Better Regulation Guidelines** (European Commission, 2019b). More specifically, the European Commission promotes a **model of evidence-based policy** where evaluation combined with other forms of evidence (e.g., monitoring, impact assessments) shall inform all the steps of the policy cycle (Hristcheva, 2019). In particular, monitoring and data requirements have **reinforced accountability** in the context of Cohesion Policy, despite certain limits (Authors, based on interviews, 2019–2020).

Concretely, different uses of Cohesion Policy evaluations can be observed at the EU level. A notable usage of EU-level evaluations is in **shaping the design of the new regulations across different periods**. Because of the timing required to conduct ex-post evaluations, findings of evaluations covering a period (n) cannot have a direct influence on the directly subsequent period (n+1), but rather on the one after that (n+2). However, other sources of evidence (studies, consultations with stakeholders, etc.) can be used to circumvent this problem. Overall, there is evidence that the influence of evaluations of Cohesion Policy for this **policy-learning** tends to be **stronger at the operational level** (i.e., on more technical aspects) than in helping to set broader, strategic political priorities (Technopolis and EPEC, 2005; Authors, based on interviews, 2019–2020). Interestingly, there is evidence that the ex-post evaluations of the 2000–2006 period (produced in 2010) were successfully taken into consideration when formulating the strategic orientation of the 2014–2020 period. Also, the CPR proposal includes an introduction presenting the findings of evaluations and how they relate to the proposed change for the 2021–2027 programming period (Official Journal of the EU, 2018a). How these findings feed into the policy process is not devoid of difficulties. For example, following a negative opinion produced by the Regulatory Scrutiny Board concerning the fact that the results of an ex-post evaluation on major projects (European Commission, 2018c)¹⁰ had not been fully incorporated into a related Staff Working Document (European Commission, 2018d),¹¹ the EC subsequently amended the document to take these comments into account (European Commission, 2020f).¹² This suggests that a **policy-learning effect is on the way at EU level, but it is not yet a linear process and it needs to be consolidated**.

Beyond this policy-learning usage, evaluations at the EU level can also be mobilised to **support positions during negotiations** between parties and to **advocate/defend the policy** – e.g., regarding its budgetary allocations (Authors, based on interviews, 2019–2020; Technopolis and EPEC, 2005).

Different factors seem to play a role in the modality of use of evaluations at the EU level, including their planning and timing, the support of the senior management and their quality (de Laat and Williams, 2014). Communication of findings can also be a channel for improving the use of evaluations, as they compete with other forms of content among decision makers and the wider public (Authors, based on interviews, 2019–2020).

3.3. Complementary activities of the European Commission for evaluation

Besides the realisation of ex-post evaluations, the European Commission carries out two other activities related to the evaluation of Cohesion Policy: support of the Member States and regions, and synthesis of results.

¹⁰ Accessible here: https://ec.europa.eu/regional_policy/en/information/publications/reports/2018/ex-post-evaluation-of-major-projects-supported-by-the-european-regional-development-fund-erdf-and-cohesion-fund-between-2000-and-2013

¹¹ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2018:0282:FIN:EN:PDF>

¹² <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2018:0282:FIN:EN:PDF>

3.3.1. Support for evaluation activities of the Member States and regions

Another major task of the European Commission mentioned in the 2014–2020 regulations (Official Journal of the EU, 2013a) is to **provide (primarily methodological) guidance to the Member States and regions regarding their own evaluation activities.**

In the context of its focus on results for the 2014–2020 period, the European Commission has especially used its guidance to push for the associated evaluation methods:

-)] **Counterfactual methods:** A comparative approach of evaluation which involves contrasting the outcomes of interests of the beneficiaries of an intervention (treated group) with those of similar individuals not benefiting from it (control group). As the only difference between the two groups is whether they have benefited from the intervention, the method results in the provision of information on “what would have happened to the members subject to the intervention had they not been exposed to it” – i.e., the counterfactual case (European Commission, 2014b).
-)] **Theory-based methods:** An approach of evaluation focusing on the mechanisms explaining the changes provoked by an intervention.

The support provided by the European Commission can take **multiple forms (guidance documents, networks and ad-hoc support bodies** providing services such as training and feedback, the organisation of dedicated conferences), developed at the initiative of DG EMPL and DG REGIO.

In the 2014–2020 programming period, the European Commission has provided the Member States with an **extensive set of guidance documents** on Cohesion Policy evaluation, in line with the result-oriented approach characterising this period’s legislative framework. In particular, the European Commission (DG EMPL and REGIO together, as well as other DGs if relevant) has developed general guidance documents covering different funds. Moreover, DG REGIO has developed (directly or by commissioning) guidance material specifically covering the ERDF and CF alike. DG EMPL, in turn, has developed ESF-specific material. All these documents are accessible in English online from the Evaluation Library¹³, with translations (into French and German) for some documents. It is worth noting that the Evalsed guide is referred to by the Better Regulation Guidelines as a best practice.

¹³ See https://ec.europa.eu/regional_policy/en/policy/evaluations/. The Evaluation Library is a Commission’s source, which is maintained with the support of the Evaluation Helpdesk (see below). The contents of the Evaluation Library are also provided in an open data format on the ODP (<https://cohesiondata.ec.europa.eu/d/iz3t-u7bv>). The open data file mirrors the Evaluation Library.

Box 3 Examples of guidance documents provided by the European Commission for Cohesion Policy evaluation

Relevant **general guidance documents issued by the European Commission (produced by DG EMPL, DG REGIO and other DGs, together or individually)** for 2014–2020 include:

-] [Guidance document on evaluation plans \(2015\)](#), which details the goals and content of evaluation plans and provides indications for their adoption, review and follow-up.
-] [Guide on ex-ante evaluation \(2014\)](#), describing the components of ex-ante evaluation (programme strategy; indicators, monitoring and evaluation; consistency of financial allocations; contribution to Europe 2020 strategy; strategic environmental assessment) and its process.
-] [Guidance on the performance framework review and reserve in 2014–2020 \(2018\)](#), presenting the building blocks of performance frameworks and the consequences of performance review.
-] [Guidance for the terms of reference for impact evaluations \(2013\)](#), setting out what should be included in such documents and why.
-] [Standardised key terminology \(2014\)](#) – i.e. a translation of key terms for Cohesion Policy in all EU languages.
-] [Evalsed – The resource for the evaluation of socio-economic development \(2013\)](#), a guide offering an introduction to evaluation as part of the policy cycle and detailed indications on how to design and implement evaluations, how to develop evaluation capacity, and how to choose methods and techniques. The guide is complemented by the [Evalsed Sourcebook – Methods and Techniques](#), a comprehensive overview of 15 approaches to evaluation, with a special focus on Impact evaluation.
-] Guidance on [impact evaluations](#) according to **two methodologies** – [counterfactual impact evaluations](#) and [theory-based impact evaluations](#) – giving practical details on how these types of evaluations might contribute to policymaking, and the methods for implementing them.

They are complemented by **additional documents focusing on the ERDF and CF** (DG REGIO):

-] [Guidance document on monitoring and evaluation of ERDF and CF – concepts and recommendations \(2014\)](#).
-] [Guidance on evaluation of innovation \(2012\)](#) (intended primarily for managers and evaluators of ERDF programmes)
-] [Guide to cost–benefit analysis of investment projects for Cohesion Policy \(2014\)](#).

As part of the guidance provided to the Member States, DG REGIO also made a set of seven reports available, prepared by academics and experts in preparation for the 2014–2020 period. These reports cover, in particular, outcome indicators and targets and also include guidance documents on the design of quantitative survey-based evaluations and the design of qualitative case study evaluations.

Source: Authors, based on European Commission (various years).

Overall, this **written guidance from the EU is mandatory and adhered to by Managing Authorities**, as it increases their perception that they are acting according to the regulations (Authors, based on interviews, 2019–2020). However, it poses the risk that guidance can be interpreted too narrowly, thus restricting the flexibility/creativity of Member States/Managing Authorities. Some stakeholders even refer to this guidance as ‘quasi-law’ (Authors, based on interviews, 2019–2020). Moreover, there are debates on the **quality and clarity of some of the guidance documents**, especially regarding the implementation of specific methods (e.g., theory-based evaluations) (Authors, based on interviews and case studies, 2019–2020).

Beyond these written documents, the European Commission also undertakes **several initiatives** to promote direct contacts on evaluation through **networking activities** with Member States and Managing Authorities. It notably includes the Evaluation Network (DG REGIO) and the ESF Partnership (DG EMPL). The uptake and perceptions of these initiatives among Managing Authorities tend to vary depending on the Member States (Authors, based on case studies, 2019–2020).

Box 4 Evaluation Network

As part of its activities to support Member States in the evaluation of Cohesion Policy, the Evaluation Unit of DG REGIO coordinates a **forum for discussion, called the Evaluation Network**, active since the 2000-2006 programming period.

This Network, which meets 2–3 times per year, includes Member State representatives who are responsible for the evaluation of Cohesion Policy. It discusses evaluation topics such as the methodological guidance provided by the Commission, indicators, evaluation plans, progress in relation to evaluations being performed at Commission and Member State level as well as evaluation results and their use. Further to networking and cooperation, the Network aims to strengthen evaluation capacity by enabling participants to share good practice, learning from each other's evaluation practices, and it represents a way to inform relevant stakeholders at Member State level of the availability of new guidance or tools (e.g., the Evaluation Helpdesk's activities).

In 2019, the Network's meetings centred on indicators for the post-2020 programming period, with the Commission engaging in consultation with Member States and collecting their feedback on objective-specific indicators and horizontal issues.

In addition to face-to-face meetings, the Network has an online exchange platform in place, which allows internal communication and sharing of material among network members. An online webpage accessible to the general public also compiles all the presentations of the network.

Source: Authors, based on interviews, 2019–2020; European Commission, 2019g.

Similarly, DG EMPL provides a vast range of guidance documents focusing on ESF evaluation. Some examples are provided in the box below.

Box 5 Examples of ESF-related guidance

- 1) [Guidance document on monitoring and evaluation of ESF \(2018\).](#)
- 2) [Design and commissioning of counterfactual impact evaluations: guidance to help employers and workers to manage the transition to the new classification, labelling and packaging system – A practical guidance for ESF Managing Authorities \(2013\).](#)

Source: Authors, based on European Commission (various years)

The **ESF Evaluation Partnership**, established in the 1990s is similar to the Evaluation Network at work for the ERDF (Authors, based on interviews, 2019–2020). In addition, the direct support provided by the European Commission (JRC and DG EMPL) to the Member States has notably been **strengthened by the Centre for Research on Impact Evaluations** (CRIE), as described in the following box.

Box 6 CRIE

The **Centre for Research on Impact Evaluation (CRIE)**,¹⁴ established in 2013, provides **scientific expertise and methodological support on counterfactual impact evaluation to DG EMPL and Member States** for interventions funded by the ESF and, more recently, the Youth Guarantee.

CRIE, which is today part of the Competence Centre on Microeconomic Evaluation within the European Commission's Joint Research Centre, supports Member States through different activities, including the organisation of **training sessions on impact evaluation methods**, the **preparation of guidance material**, and the provision of **tailor-made advice on methodological and data issues** that arise when designing, implementing and evaluating an ESF-supported initiative, as well as assessing performance of the quantitative analysis for a counterfactual impact evaluation.

Furthermore, CRIE also carries out applied and theoretical research in the field and aims to build bridges between EU policymakers and the scientific community.

On an operational level, **CRIE's three main initiatives are:**

-)] **Data Fitness Initiative for Counterfactual Impact Evaluation**, launched by CRIE and DG EMPL in 2016 to select suitable ESF interventions for which CRIE could conduct counterfactual impact evaluations and thus raise awareness among ESF MAs on the requirements of datasets to carry out this type of studies on ESF-funded interventions;
-)] **Community of Practice on Counterfactual Impact Evaluation of ESF interventions**, launched by CRIE and DG EMPL in 2016 and aiming at fostering the collaboration between DG EMPL, CRIE, the ESF MAs and other stakeholders to conduct counterfactual impact evaluations of ESF-funded interventions by sharing experiences and knowledge;
-)] **Quality Assurance Support on the Different Phases of a Successful Counterfactual Impact Evaluation**, launched in 2019 to offer tailored support to MAs by accompanying them in carrying out counterfactual impact evaluations.

CRIE also developed a **Counterfactual Evaluation Archive**, updated until December 2017, which is an online database collecting papers using counterfactual impact evaluation methods to assess the impact of labour market policies.

A study on the monitoring and evaluation systems of the ESF, issued by the European Commission in 2018, highlighted CRIE activities, and especially its 'community of practice', suggesting that this practice should be continued and given more visibility (European Commission, 2018e). To widen the dissemination of evaluation findings, the study also suggested publishing them in the Counterfactual Evaluation Archive. This takes the form of an executive summary of the findings of each counterfactual (and also theory-based) evaluation performed.

Source: Authors, based on interviews, 2019–2020; CRIE, 2020; European Commission, 2018e.

Finally, an **important initiative joins the efforts of DG EMPL and DG REGIO** in providing support to Managing Authorities and Member States. The **Evaluation Helpdesk**, composed of independent consultants, helps both the Managing Authorities and the European Commission in strengthening their evaluation capacity. It takes the form of summer schools (e.g., on theory-based evaluations¹⁵) and training sessions on evaluation tools and methods. Member States can also directly submit requests to

¹⁴ <https://crie.jrc.ec.europa.eu/>

¹⁵ See the presentations of the 2016 and 2017 editions of the summer schools here: https://ec.europa.eu/regional_policy/en/policy/evaluations/helpdesk/#1

the Helpdesk for tailored support (Authors, based on interviews, 2019–2020). The Evaluation Helpdesk is also a significant contributor to the analysis and synthesis of evaluations conducted by Member States and Managing Authorities, in an attempt to obtain an EU-wide perspective. It is described in more detail below.

3.3.2. Synthesis of the activities of the EU actors involved in Cohesion Policy evaluation

The European Commission also aims at **synthesising the evaluation activities of those stakeholders involved at other levels** (Managing Authorities of the different Member States). It includes the results of evaluations but also issues that may emerge at the other levels of governance. Given the significant number of such evaluations (see section 4.3), this is a challenging task. The European Commission has thus provided instructions and commissioned external support via the Evaluation Helpdesk.

Box 7 Synthesis of evaluations at the EU level

DG REGIO and DG EMPL are supported by an Evaluation Helpdesk, financed through the Technical Assistance budget in the **review of all evaluations performed by Managing Authorities** on interventions co-financed by ERDF, CF, ESF and YEI. The Helpdesk, composed of independent consultants selected by the Commission through public procurement, summarises the evaluations, assesses their quality and maintains an [online database providing key information](#) on each study.

In particular, the **database includes a record card on each evaluation**, briefly presenting its objectives, methodologies, main findings, limitations and policy implications (as shown in the study itself). As such, the database represents a useful tool to **gain an overview of evaluations carried out across Member States** and to categorise them with common criteria (e.g., evaluation type and method).

Further to the assessment of individual studies, the Helpdesk also performs **horizontal reviews** and typically discusses their findings in Evaluation Network meetings. For example, the Helpdesk has assessed Member States' Evaluation Plans, focusing on six areas in particular, in line with the European Commission's Guidance on Evaluation Plans: management and planning; responsibility and coordination; design and methods; data availability and data systems; skills and expertise; use and communication. The results of this review were then discussed with the Evaluation Network, highlighting the qualities of these plans as well as their overall weaknesses (Evaluation Helpdesk, 2015). Another horizontal review, similarly discussed with the Evaluation Network, has explicitly covered impact evaluations carried out by Member States (Evaluation Helpdesk, 2018).

Source: Authors, based on interviews, 2019–2020; European Commission, 2018f, 2015c.

The activity of the Evaluation Helpdesk can serve as an input for the European Commission to draft its synthetical documents on Cohesion Policy evaluation, such as staff working documents (European Commission, 2019h).

As foreseen in the regulations, the European Commission also has to **synthesise the Annual Implementation Reports** produced by Managing Authorities, which **can contain information on the evaluations conducted** and issue an accompanying Staff Working Document (Official Journal of the EU, 2013a). Thanks to these reports and additional evidence, **Summary Reports** are produced yearly at the EU level. For 2017 and 2019, these reports are more comprehensive, and are called **Strategic Reports** (e.g., European Commission, 2017a). However, it shall be noted that they typically focus more on implementation than on evaluation per se.

Overall, the different initiatives taken by the European Commission to strengthen evaluation capacity of Member States and regions have contributed to developing a community of practice across the EU, which is an important complement to build on the legal basis providing for evaluation.

4. EVALUATION OF COHESION POLICY AT MEMBER STATE AND REGIONAL LEVELS

KEY FINDINGS

-)] At Member State level, the Managing Authority is responsible for ex-ante and ongoing evaluations of Cohesion Policy under EU rules in 2014–2020. The institutional arrangement structured around the Managing Authority and the Monitoring Committee is shown to fit into the different institutional settings of Member States, accommodating their diversity.
-)] There is an important rise in the number of evaluations carried out by Member States and regions between the 2007–2013 and 2014–2020 periods, particularly regarding impact evaluations, which is consistent with the requirements of EU rules. However, the methods used remain basic and the overall quality of evaluations is low.
-)] Evaluation findings are not widely used at the national and regional levels. This is due to inadequate requirements (in terms of methods and timing), limitations in evaluation capacity and a generally low evaluation culture in some Member States and regions. However, in some regions, there is evidence that an evaluation-based learning process is taking root.

This chapter explores the variety of arrangements adopted by the Member States and regions to carry out Cohesion Policy evaluation. It analyses different models of governance and assesses their influence on how evaluation is implemented, before turning to evaluation outcomes and use. To put the experience of Cohesion Policy into perspective, it is also useful to refer to a section of the Annexes, which briefly presents the case of the evaluation of other EU policies, Horizon 2020 and the European Investment Bank (see section Examples of evaluation arrangements in other EU policies).

4.1. Importance of national and regional evaluation of Cohesion Policy

Through the system of **shared management**, the programming and implementation of Cohesion Policy largely depend on the Member States and regional authorities, which devise Operational Programmes according to EU rules and their needs and priorities. This includes the evaluation of the policy, with specific requirements for these stakeholders in terms of number, types, content and organisation (see section 2.2 for a review of the applicable rules).

However, these common EU rules leave **ample room for national and regional specificities**, with observed differences in **institutional arrangements and practices**. This important variety in how evaluation of Cohesion Policy is organised across the EU has been extensively documented for several programming periods, such as in 2007–2013 (e.g., Polish Ministry of Regional Development, 2012). It has implications for all aspects of evaluation, such as the number, types, content and organisation, but also for methods and the use of findings.

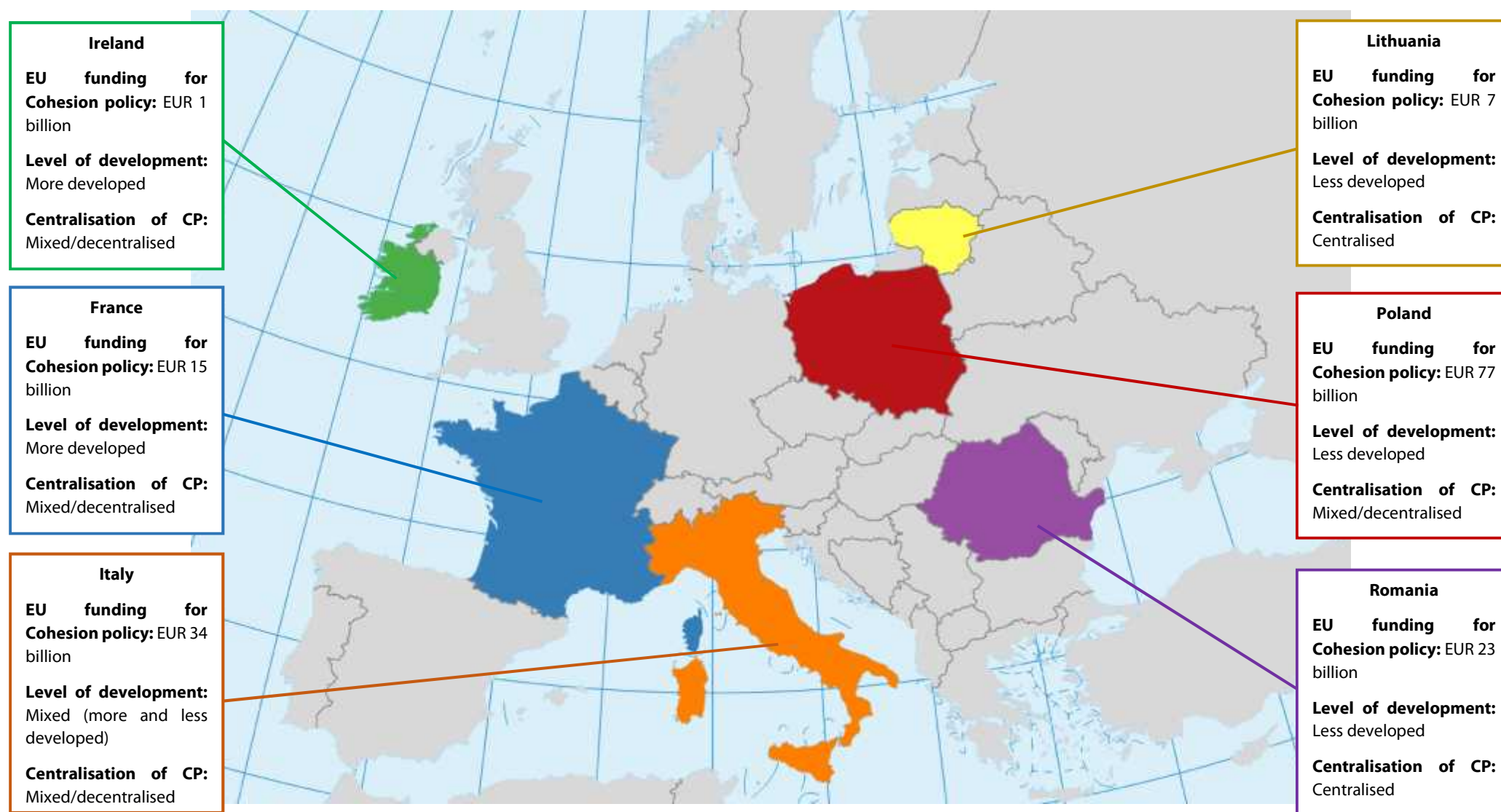
The fact that different countries have **different commitments and practices related to evaluation in general** (the so-called ‘evaluation culture’) can explain parts of this variance. For instance, some countries (Germany, the Netherlands, Sweden, etc.) typically use evaluations as an integral part of their policymaking process. In other countries, this use can be more contextual and less systematic (EPRC, 2012). It can be noted that in many countries, the very concept of evaluating public policies has been introduced through EU Cohesion Policy (e.g., Ireland, several new Member States).

This chapter builds upon the available literature and statistics (e.g., from the Evaluation Helpdesk). It also refers to a series of case studies specifically carried out in the context of this study, which ensures that the most up-to-date information is accessible. The cases were selected to achieve a balance between different criteria, including geographical location, Member State size, level of development,

Cohesion Policy funding and the centralisation level of Cohesion Policy management¹⁶ (i.e., the extent to which Structural Funds are managed at the national-central level, compared to the regional-local level). The six selected countries are Ireland, France, Italy, Lithuania, Poland and Romania (see Map 1).¹⁷ Even though they are not representative for the entire EU, their differences capture a wide range of the actual variety. Information on other countries (from interviews, the literature and a survey of Managing Authorities) helps to provide a broader picture.

¹⁶ It can be different from the overall centralisation level of the country.

¹⁷ The Annexes of this report contain the full case studies for additional details.

Map 1: Presentation of case studies (2014-2020)

Source: Authors, based on case studies, 2019–2020; Cohesion Data, 2020.

Note: Level of development refers to the categories of regions in Cohesion Policy, based on GDP per capita. Funding refers to the 2014-2020 programming period.

4.2. Organisation of Cohesion Policy evaluation in the Member States

The organisation of Cohesion Policy evaluation in the Member States takes the form of multiple **governance models**, defining which stakeholders are involved, as well as their relationships. These governance models respond to the requirements of the EU rules but have their own specificities (Official Journal of the EU, 2013a). Moreover, the organisation of Cohesion Policy evaluation by Managing Authorities relies on **specific evaluation arrangements** – i.e., mechanisms and tools that contribute to the realisation and use of evaluations. These arrangements can refer to the implementation, in practice, of elements included in EU rules (e.g., evaluation plans) but also to initiatives introduced by the Managing Authorities themselves.

It can be noted that there are no sharp differences in the organisation of Cohesion Policy evaluation overall regarding the ERDF/CF and ESF. Differences in that matter mainly concern the methods used.

4.2.1. Overview of national and regional governance models of Cohesion Policy evaluation

The **EU rules posit a limited number of requirements in terms of governance** of Cohesion Policy evaluation at the Member State and regional levels for the 2014–2020 period (see section 2.2 for a more detailed analysis). Indeed, Managing Authorities are responsible for the evaluation of Operational Programmes. The latter can include different stakeholders depending on the Member State (regional authorities, local units of the central government, national ministries, etc.). Similarly, some governance bodies are mandatory, such as the Monitoring Committees, but they can be implemented differently across the regions.

A particular focus is dedicated to **analysis of the governance of the case studies**, with details included in the full case studies (see Annexes Case studies).

In general, the Member States and regions do not add extra legislation to the EU rules to organise Cohesion Policy evaluation. Among the reviewed cases, Poland is an exception, opting for a high level of ‘institutionalisation’, even enforcing guidance in law. However, even in this case, there is **no firm evidence of gold-plating** (i.e., the addition of unnecessary national obligations generating burdens on the stakeholders) regarding the evaluation of Cohesion Policy. It contrasts with other aspects of Cohesion Policy (e.g., implementation, audits...) where gold plating may be a concern (European Parliament, 2017).

a. Centralised and decentralised approaches to evaluation

An important element of governance is **the degree of centralisation** (or decentralisation) characterising the management of Cohesion Policy. Indeed, differences in the centralisation of OP management can be reflected in the evaluation of the policy. However, the degree of centralisation of CP management and that of the evaluation activities might not be necessarily aligned. CP governance might be decentralised with OP implemented at the regional level, but evaluation can be centrally managed at the national level. An illustration of this situation is given by **Portugal**, where evaluation is organised at the national level and thematically across regional OP (Authors, based on interviews, 2019–2020). However, in the reviewed case studies, evaluation of Cohesion Policy is typically centralised when the management of OPs is centralised. Similarly, evaluation of Cohesion Policy tends to be decentralised when the management of OPs is decentralised.

In France, Italy and Poland, **regional and national OPs coexist**. They are **evaluated at both the central (national) and regional levels**. Decentralised evaluation units tend to be prominent, at least in terms of the number of evaluations. In particular, the Polish case features an unusually high evaluation activity at the decentralised level, with several regional evaluation units responsible for

evaluations. When different levels of government conduct evaluations, they are typically coordinated by a national body, such as the Nucleo di Valutazione e Analisi per la Programmazione (NUVAP) in Italy. Under mixed systems, there can be specific stakeholders responsible for the evaluation of the ESF, such as in France.

In both Romania and Lithuania, **the management of CP is centralised, as is the organisation of CP evaluation**. In Romania, all eight OPs are developed and managed at the national level. However, they are implemented at the regional level, through Intermediate Bodies. The two ministries which host the MAs of the eight OPs also host the structures responsible for the evaluation of these OPs. In Lithuania, the National Evaluation Unit within the MA hosted by the Ministry of Finance is in charge of horizontal evaluations and transversal tasks (e.g., capacity building), whereas other ministries, which have a deeper knowledge of their respective policy areas, conduct sectoral/thematic evaluations.

Based on evidence from the case studies, the **governance models based on centralised and decentralised approaches** entail both **advantages and disadvantages**.

Centralised governance tends to facilitate a high-level and more strategic perspective. It also makes it easier to plan and coordinate evaluation activity as well as to accumulate capacity (human resources and skills). In terms of disadvantages, a centralised approach risks keeping evaluation far from implementation, thus creating a disconnect from the needs of policymakers. It is also more vulnerable to changes (for example, where institutional changes affect the main body in charge), and offers less opportunity to diffuse evaluation practices across institutions.

Decentralised governance can build on the proximity of evaluators and policymakers and may promote dialogue and exchange. As such, it is closer to policymakers' needs for evidence. It also offers a significant guarantee of sustainability and opportunity for diffusing practices and producing learning effects. Disadvantages are due to the dispersion of capacity and resources, as well as coordination issues and the potential for lower-quality evaluations. Decentralised governance models also seem to produce more numerous reports, focused on implementation issues, as compared to the centralised approach.

The overall premise is that an adapted administrative set-up is a condition of the effectiveness of CP evaluation. However, concerning the respective merits and inconvenience of a centralised or a decentralised structure, there is **no single one-size-fits-all model**. Reflection on the appropriate model shall incorporate analysis of the overall organisation of the particular Member State, and the goals pursued by policymakers regarding Cohesion Policy and its evaluation. As a consequence, when countries choose to change their organisational structure, certain opportunities for improved efficiency may arise, but there may also be risks (e.g., issues due to reorganisation). It can be noted that in the observed cases, planned changes can move in opposite directions. For example, Romania has plans to decentralise the governance structure for the next programming period, while Lithuania is seeking further centralisation. Italy is caught up in tensions between centralisation and decentralisation forces, and France has recently decentralised the management and evaluation of Cohesion Policy, consolidating the role of regional authorities.

b. Coordination of Cohesion Policy evaluation and other ad-hoc bodies at the Member State level

Regardless of the level of centralisation of Cohesion Policy evaluation, the governance of Member States **generally includes a central authority in charge of coordinating the evaluation activities across the OPs**. Various levels of coordination are observed across the cases, depending on different factors such as evaluation culture and available resources.

Coordination of the evaluations of Cohesion Policy **can bring valuable benefits**, as observed, for instance, in Poland and Italy. For example, the National Evaluation Unit (NEU) of Poland is considered to be a success story, **steering the highly decentralised evaluation activity** there. This key player has established the CP evaluation system, regulating and shaping it since 2004. In Italy, the Nucleo di Valutazione e Analisi per la Programmazione (NUVAP) occupies a similar central position. It has traditionally been a driver of innovations in the national approach to Cohesion Policy implementation and evaluation (notably under the effective leadership of Fabrizio Barca). However, **difficulties of coordination may emerge** and limit the benefits of this activity. A limited number of contacts or an inadequate approach of the coordinating body can be a source of these difficulties. For instance, in Romania, there is a dedicated structure in charge of coordination, the Office for Programme Evaluation within the Ministry of European Funds. It is also supposed to coordinate the evaluation activities falling under the responsibility of another ministry (the Ministry for Public Works, Development and Public Administration – MPWDA), but this is only very partially done in practice (Authors, based on case studies, 2019–2020). In France, the coordination of evaluation activities by the central government (the Commissariat général à l'Égalité des territoires – CGET – and the Délégation générale à l'emploi et à la formation professionnelle – DGEFP) is inhibited by the relatively **scarce resources attributed to that task**.

This overall coordination is **complemented by several ad-hoc bodies** involved at different levels of governance, depending on the Member States.

An interesting feature is the existence of **bodies or networks that bring together different stakeholders**. They are generally steered and coordinated by the coordination authorities mentioned above. Their composition varies, but they typically include MAs and evaluation units, intermediate bodies and experts (usually either at the operational or a high level). They serve the purpose of **exchange and learning**. For instance, in Italy, the ASSIST project fosters networking and exchange of good practices. They can even diffuse CP evaluation practices to policy areas outside CP.

Additional bodies diffusing **specialised or technical knowledge** are also active in the Member States. They can be new structures specifically created to support the evaluations of Cohesion Policy (e.g., evaluation steering committees), or already existing structures mobilised to help with CP evaluation. Examples are the Regional Territorial Observatory (RTO) and National Territorial Observatory (NTO) in Poland, which are observatories of socio-economic development, and the National Institute for the Analysis of Public Policies (INAPO) and the National Agency for Active Labour Policies (ANPAL) in Italy, dedicated to supporting employment policy strategy.

Different modalities of **guidance for evaluation** are implemented throughout the different Member States. In general, among the cases reviewed, support is provided through direct interactions between the MA/evaluation unit, as well as through various events and workshops. The use of online platforms is also common. This can, for instance, be observed with a dedicated 'EU investments' website in Lithuania¹⁸ and a digital network of evaluators in France. In Ireland, the Irish Government Economic and Evaluation Service (IGEES) provides methodological guidance and support for all evaluations of public policies, including Cohesion Policy. **Support instruments offered by the EC**, such as the Evaluation Helpdesk (described in section 3.3.1), are used to varying degrees. For example, evidence from France shows limited access and use due to language and the practical difficulties of collaboration. In Lithuania, due to differences in experience and capacity across the administration, not all EU-level guidance documents are equally relevant and useful. However, the Summer Schools from the Evaluation Helpdesk tend to be well appreciated. Moreover, EU support initiatives (e.g., Evaluation

¹⁸ www.esinvesticijos.lt

Helpdesk) are used in Romania, but some operational difficulties are reported (e.g., delay of response). Still, **Managing Authorities of the reviewed countries tend to find access to EU guidance useful in their evaluation activity.**

c. Other issues related to the governance of Cohesion Policy evaluation

A general principle included in the EU rules for Cohesion Policy evaluation is the **functional independence of evaluators** (Official Journal of the EU, 2013a). This principle has a direct influence on the governance of evaluation in the Member States and regions. Indeed, it implies that the evaluations shall not be carried out directly by the stakeholder implementing the policy. However, it leaves **room for different organisations**, in particular regarding the **location of the unit or body having an evaluation function with respect to the MA**. The Managing Authorities can thus choose to devolve this duty to a unit within the MA itself or entirely outside. This location is likely to be a relevant factor affecting the evaluation purpose and outcome. In particular, internal evaluation units can be more associated with the use of evaluations for learning, while units that are more independent can have greater focus on challenging the use of funds (accountability). Still, **the fact that the MA is responsible for evaluation of the Operational Programme it also manages may be a source of difficulty** (Naldini, 2018), even if there is a formal distinction between the evaluator (external or internal) and the part of the MA implementing the programme. There are also operational shortcomings arising when the MA does not have sufficient capacity to meet all of its obligations (e.g., closing one programming period while preparing for the following one) (Authors, based on interviews, 2019–2020).

Of course, the governance arrangement is not the fully decisive factor – much depends on the **actual capacity** of the evaluation unit (rather than its location). A good case in point in this respect is Italy. The centres for evaluation of public investment have been set up at regional (and national) level independently from the MA and are expected to provide technical support to MA evaluation activity. In fact, they are unevenly organised and staffed, with somewhat different capacities across regions (as the law instituting them left considerable discretion regarding how to organise them). According to the case study on Italy, the distance between administration officials tasked with preparing procurement documents and the officials dealing with Cohesion Policy implementation does not favour a positive dynamic, but ultimately, it all depends on specific regional conditions. In the other countries reviewed, evaluation units are generally within the MA, but they are organisationally separated.

In practice, regardless of the organisation of evaluation units, the principle of functional independence is often implemented through the **use of external consultants** to carry out evaluations. This may have benefits in terms of evaluation capacity and independence, but external evaluators might also lack contextual knowledge and have an incentive to adapt their findings to please their clients (Authors, based on interviews, 2019–2020). Evaluations of Cohesion Policy are also carried out by the evaluation units themselves, though this requires important resources, especially given the high number during the 2014–2020 programming period.

Another essential requirement in the EU rules regarding the governance of Cohesion Policy evaluation is the use of **Monitoring Committees**. They notably cover the review of evaluations and the provision of comments to the Managing Authorities to improve the implementation of the policy. However, Monitoring Committees are also responsible for several other tasks beyond the follow-up of evaluations, such as tracking how funds are implemented (number of projects, use of funds, etc.). Accordingly, in many cases, Monitoring Committees give low priority to evaluations as compared to their other tasks (Authors, based on case studies; Korotka and Groenendijk, 2014). There are exceptions in some countries and regions, where Monitoring Committees may act as information hubs to

disseminate results of evaluations (e.g., Lithuania). Moreover, Member States sometimes set up other bodies with blurred objectives compared to the Monitoring Committees.

4.2.2. Specific evaluation arrangements in the Member States and regions

Beyond the overall governance of Cohesion Policy evaluation, Member States and regions also use specific evaluation arrangements – i.e., tools or systems to facilitate the organisation of evaluations. They may be included in the EU rules or be additions that are decided upon independently by various regions and Member States.

An important tool for Managing Authorities to organise their evaluation activity is the **Evaluation Plan**, which includes a list of evaluations to be carried out during the programming period, and describes how this will be achieved. In the 2014–2020 programming period, Evaluation Plans **have become mandatory**, which is in contrast to their optional use in the previous period (see section 2.2.2). The rationale for this change was to promote the preparation of evaluations. This has not had a significant impact in countries where they were already used extensively in 2007–2013, such as Poland and Lithuania (Authors, based on case studies, 2019–2020). The Evaluation Plans for 2014–2020 have **very diverse coverage** in terms of the number of OPs (as they can be realised for one or more OPs). For instance, in Wales, a single plan covers multiple OPs (EPRC, 2015a). Similarly, the **level of detail** concerning the number and content of evaluations **varies substantially**, with some Evaluation Plans providing a full list while others remain quite generic (as seen in France). Overall, the Evaluation Plans are considered flexible and living documents (EPRC, 2015a), which may cast **doubt on whether the Managing Authorities will actually conduct evaluations**. This doubt is exacerbated by the delays in implementation that were observed in some Member States (Authors, based on case studies, 2019–2020). According to analysis of the Evaluation Helpdesk, the quality of the Evaluation Plans is acceptable regarding governance aspects, but more limited when it comes to methodological and data issues (European Commission, 2015c).

The consolidation of monitoring systems and their **linkages with evaluations** have been an important objective of the changes in EU rules for the 2014–2020 programming period (see section 2.2). In practice, it is an area where **varying levels of improvements are recorded** based on case studies. At the global level, there are some problems for Managing Authorities in accessing appropriate data to carry out relevant evaluations. For the ESF evaluations, a study of the European Commission has found that 19% of polled Managing Authorities had significant difficulties with this issue (European Commission, 2018e). Still, there is evidence that there has been progress on monitoring between the 2007–2013 and 2014–2020 periods. For instance, in France, stakeholders of the central government recognise that significant progress has been made regarding the quality and coverage of indicators (e.g., with access to individual-level data for the ESF¹⁹) even if there is still no single information system for Cohesion Policy data, but several coexisting ones.²⁰ In some Member States, there are unified and integrated information systems to monitor Cohesion Policy. For instance, in Poland, the Central Information System (CIS) SL2014 has been developed, replacing the previous KSI SIMIK 07-13. Additional local information systems (LISs) are allowed, providing they are interoperable. Some of these LISs allow collection of other data – e.g., on unsuccessful applicants.

¹⁹ Note that micro-data on participants is a general requirement of the regulation, applying to all Member States.

²⁰ It includes Ma démarche FSE (part of the ESF that is managed at the national level) and Synergie (ERDF and the part of ESF managed by the regions), but also the different information systems of the regions themselves (e.g., Argos in Hauts-de-France). Precisely, Synergie was planned to enable the aggregation of data from the different regions at the French level (CGET, 2019). Still, difficulties of interoperability with the information systems of the different regions inhibit this task.

An issue with monitoring requirements is that they can **pose substantial administrative burdens** for the Managing Authorities in terms of data collection (e.g., individual-level data for ESF/YEI beneficiaries). In some countries (Poland, France, etc.), national and European data protection laws (e.g., GDPR) can be burdensome for MAs as well. Moreover, some of the mandatory indicators are perceived by Managing Authorities as being more relevant to the needs of the EU level (e.g., aggregation of contextual indicators at the EU level), and are thus **not always useful for informing regional or national evaluations**.

Some regions innovate when it comes to data collection for monitoring and evaluation. For instance, the Rhine-Westphalia region of Germany has used mobile phone collection to track the beneficiaries of the ESF in the 2014–2020 programming period (Ehlert, 2019).

There are also initiatives in some Member States to **facilitate the diffusion and usage of monitoring data**, both of which may contribute to evaluation and public debates on Cohesion Policy. This is the case in Italy, with OpenCoesione.

Box 8 The OpenCoesione initiative (Italy)

In 2012, the Department of Cohesion Policy within the Presidency of the Council of Ministers launched **OpenCoesione**. An open government initiative related to the implementation of Cohesion Policy in the country. Through its online portal,²¹ OpenCoesione makes available, for all interventions co-financed under Cohesion Policy under programming periods 2007-2013 and 2014-2020, data on the financial resources allocated and those disbursed, together with information on the thematic objectives addressed, and each project's location, promoters, and implementation times. These data are regularly updated and presented consistently. As such, OpenCoesione represents a rich source of information, allowing civil society to monitor the policy's implementation. This function is amplified by efforts to engage citizens in active monitoring – for instance, through a project which promoted the use of the portal among 20,000 students across the country. Since 2019, the European Commission has promoted an experimentation of this project, called 'At the School of OpenCoesione', in other Member States (Bulgaria, Croatia and selected regions of Greece, Portugal and Spain), in recognition of its value in promoting citizens' participation in the monitoring of the policy.

Source: Authors, based on case studies, 2019–2020.

Member States and regions sometimes add other evaluation arrangements, such as **systems to track the completion of evaluations or the implementation of their recommendations**. For instance, a system to monitor implementation has been adopted in Poland, which attracted the attention of the wider EU evaluation community. This system for implementing evaluation recommendations is organised around an electronic database managed by the National Evaluation Unit, which collects all recommendations and conclusions leading to them from completed evaluation studies. There is a formal obligation binding all evaluation units to supply the database (Authors, based on case studies, 2019–2020). There is a standardised typology of recommendations and implementation statuses to ease the usage of this database. This tool thus allows for tracking of the degree of recommendation use at the programme, organisation, or whole system level.

Similar systems, though often less complex, can also be implemented at the regional level, such as in the Hauts-de-France region of France.

²¹ <https://opencoesione.gov.it/it/>

Box 9 Tracking recommendations in Hauts-de-France (France)

In the Hauts-de-France region, which is one of the top recipients of ERDF/ESF/YEI funding in France, with 8% of planned EU allocations (European Commission, 2019i), the implementation of recommendations from evaluations are tracked through a dedicated committee. Overall, 80% of the recommendations from evaluations (combining EU-related and others) are implemented in the region. The region also benefits from a service dedicated to evaluations and from a large team of eight persons. For the 2014–2020 period, delays in the implementation of the OPs and the high number of mandatory impact evaluations have limited the use of evaluations of Cohesion Policy so far. Indeed, monitoring and implementation issues tend to be of higher interest for the regional stakeholders, including administrators of different sectoral policies and policymakers. Still, there are examples of concrete implementation of recommendations, such as the insights of the YEI evaluation on apprenticeship, which suggested extending and enhancing the follow-up of trainees. This recommendation was implemented for the second phase of the YEI in the region.

Source: Authors, based on interviews with stakeholders, 2019–2020.

4.3. Overview of evaluations carried out in the Member States

4.3.1. Number, types and content of evaluations

Over the 2014–2020 programming period, the Member States and regions have **carried out numerous important evaluations of Cohesion Policy**. This is in line with the quite extensive requirements in terms of number and types of evaluations in the EU rules (see section 2.2). However, case studies reveal that there are important **variations between the regions and Member States in terms of resources dedicated to evaluations** (number of persons, skills, budget, etc.). For instance, in France, evaluations are typically carried out by small teams (1–2 persons) in regions, while in some other Member States (e.g., Poland), evaluation teams tend to be larger. Moreover, OPs with a large budget do not necessarily benefit from the largest budgets dedicated to evaluations, as observed in France (EPRC, 2015a).²²

There is an **important rise in the number of evaluations by Managing Authorities** (Member States and regions), as compared to the previous programming period (2007–2013). This is most likely due to the requirements of the legal framework presented in section 2.2.

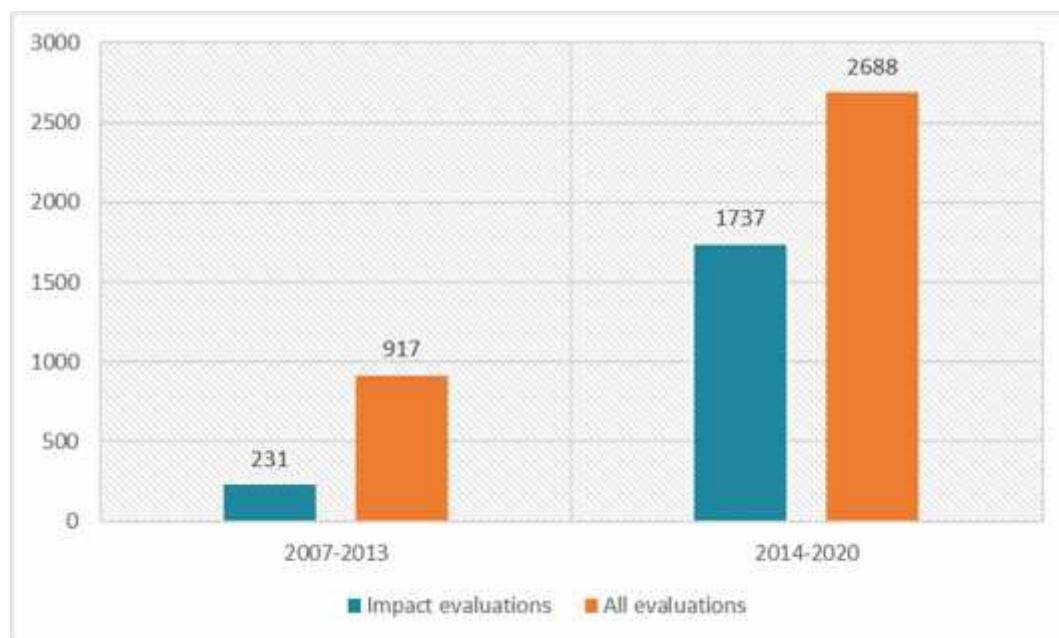
Indeed, according to the Evaluation Helpdesk, 2,688 evaluations of Cohesion Policy are planned in the Member States, which represents a three-fold increase compared to 2007–2013 (917) (European Commission, 2018f). Moreover, this **evolution is even more notable when considering only impact/result-oriented evaluations**, which have been heavily promoted by the European Commission (European Commission, 2018a, 2018g). For this type of evaluations, the increase is seven-fold over the same time frame, jumping from 231 to 1,737.

However, it is **important to be cautious in interpreting this rise in the number of evaluations, for several reasons**. Firstly, the figures for the 2014–2020 period are **estimates** (based on the review of Evaluation Plans drafted by Managing Authorities). Indeed, the programming period is still ongoing, and there is no guarantee that all planned evaluations will actually be carried out. Moreover, **impact evaluations are required at the level of the priority axis for the 2014–2020 programming period**, which is a small level of analysis. A part of the increase in the number of evaluations could then

²² For example, the Réunion region has a total planned budget for evaluations (ERDF and ESF) of EUR 1.28 million (Région Réunion, 2015a, 2015b). The Poitou-Charentes region has planned to mobilise EUR 1.55 million for the same scope and period (Région Poitou Charentes, 2014) while receiving 83% less EU funding than Réunion (European Commission, 2019i). For the national ESF/YEI OP, the budget for evaluation activities is EUR 6 million, excluding the salaries of the two evaluation officers (DGEFP, 2015).

potentially be attributed to the fact that previous evaluations had a wider scope (e.g., at the level of the entire OP) and were thus more limited in terms of numbers. Finally, the **identification of impact evaluations before their actual realisation is challenging**, given that the Member States often include within them approaches that can be considered as simple monitoring and process evaluations (Authors based on case studies, 2019-2020; European Commission, 2018f)

Figure 10 Comparison between the number of evaluations at the Member State level for 2007–2013 and 2014–2020



Source: Authors, based on European Commission, 2018f.

Note: Figures for the 2014–2020 period are estimates.

The observed evolution towards more impact evaluations may suggest an overall shift in the function of evaluation, from learning to accountability, especially in Central and Eastern Europe (Kupiec, forthcoming; Kupiec et al., forthcoming). However, this may not be the universal preference of administrators and policymakers, as demonstrated by the French and Polish case studies. In these countries, **policymakers might prefer ‘diagnostic’ and implementation-focused studies**, which can be easier to mobilise in dialogues between stakeholders. In France, it is argued that this shift towards result-orientation might be in part formalistic, meaning that evaluations are presented as ‘impact-oriented’ to comply with EU priorities, while actually being more focused on monitoring and implementation.

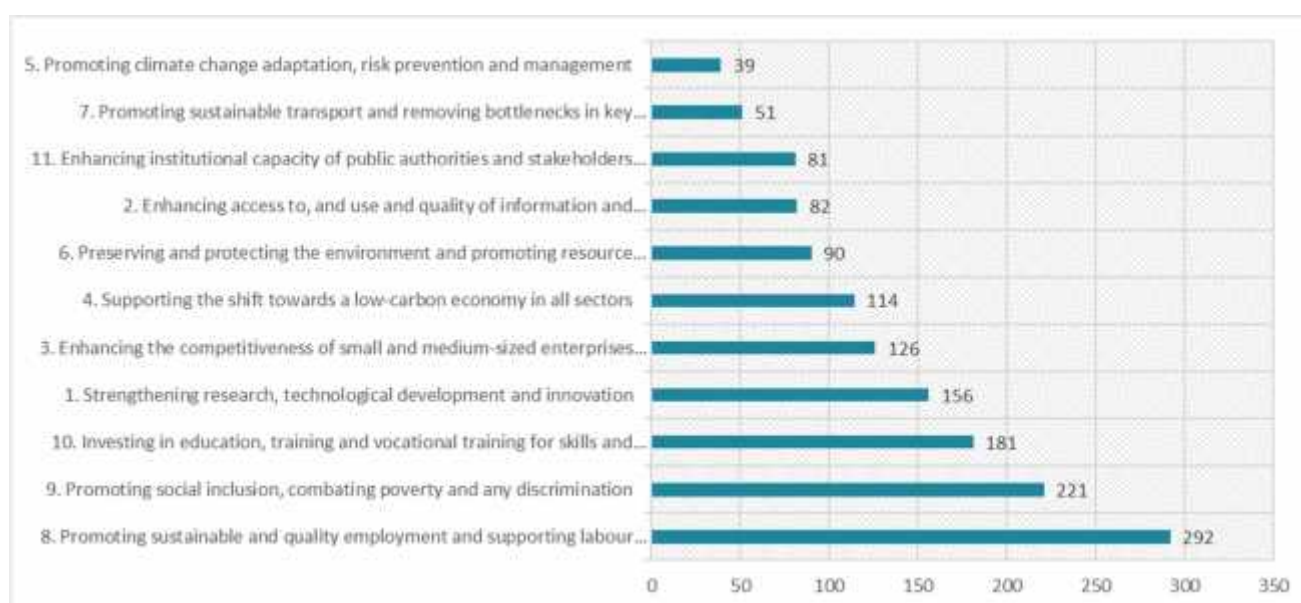
By **December 2019, 713 evaluations** had been published and reviewed by the Evaluation Helpdesk for the 2014–2020 programming period alone (European Commission, 2019a). Of these evaluations, **433 were of the monitoring/progress-oriented type, 556 of the implementation/process type and 126 of the impact type**.²³ This breakdown shows that only a small fraction of the planned evaluations, and especially the impact ones, have been implemented so far. It will take a few years after the end of the programming period to retrieve complete statistics regarding the actual types and coverage. Reasons for these delayed evaluations include overly optimistic planning, and delays in the implementation of funds themselves (European Commission, 2019j).

²³ They add up to more than the total of evaluations because one evaluation can belong to different types at once.

Moreover, the **distribution of evaluations realised so far is uneven across countries**. The country with the largest number of evaluations included in the dataset is Poland, with 197 evaluations in 2014–2020. This is consistent with its high share of Cohesion Policy funding and its organisation with several OPs. However, further analysis of these disparities is premature at this stage, given the fact that evaluations are still ongoing.

In terms of **themes of evaluations**, it seems that the Member States have focused on those related to employment, social inclusion and education-training. Indeed, the analysed evaluations (December 2019) for the related thematic objectives are the most numerous, as shown in Figure 11 below. This thematic focus could be related to the fact that there are obligations to conduct impact evaluations of the YEI by 2019, as stated in the regulations (Official Journal of the EU, 2013c). Moreover, it does not imply that funding or scope dedicated to these evaluations has been higher than for other themes. However, it can be noted that there is a very limited number of evaluations on the topic of climate change published by Member States so far.

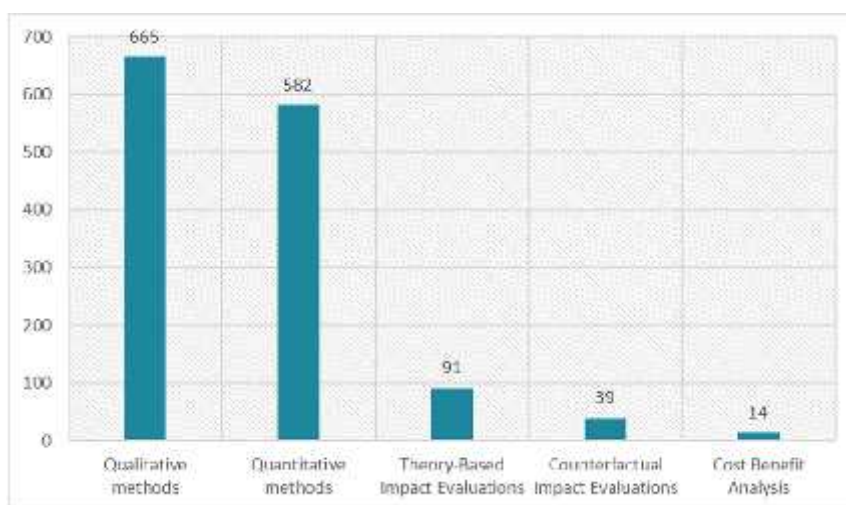
Figure 11 Themes of the evaluations conducted by Member States (2014–2020) by December 2019



Source: Authors, based on European Commission, 2019a.

4.3.2. Methods and quality of evaluations

Regarding the **methods used by the Member States in their evaluations** by the end of 2019, relatively simple qualitative and quantitative methods, which are often combined (European Commission, 2019j), seem to prevail, although it shall be noted that it is partly due to the fact that published evaluations are typically of the progress and implementation-oriented types. Symmetrically, the **uptake of more advanced methods**, such as counterfactual analyses and theory-based approaches, **have not fully materialised so far** in spite of their active promotion by EU stakeholders. This might be because they tend to be more adapted to ex-post analyses and require important resources and skills that might not always be readily available in all the Member States and regions.

Figure 12 Methods used by the Member States in their evaluations (2014–2020) by December 2019

Source: Authors, based on European Commission, 2019a.

There is evidence of some **progress in the use of advanced methods as compared to the previous programming period** (European Commission, 2018f). For instance, YEI evaluations have notably relied on counterfactual methodologies using individual-level data, such as in France (Authors, based on case studies, 2019–2020). The **case of the ESF** is specific for at least two reasons. It lends itself to the counterfactual methodology more easily, as its beneficiaries are individuals, and it is subject to specific regulatory provisions (collection of common result indicators and mandatory impact evaluations of the YEI). However, it does not always secure an in-depth approach – as in Poland, for instance – as evaluations of the ESF can sometimes skew towards a simple monitoring approach (Authors based on case studies, 2019–2020).

There are difficulties in defining the **methodological quality** of evaluations, but the case studies show that in some of the countries reviewed there have been serious efforts to **develop evaluation capacity**. This encapsulates the skills and resources at disposal to carry out evaluations, which are essential to methodological quality. Examples of initiatives in that direction are presented in the following box.

Box 10 Evaluation capacity-building measures in Poland, Lithuania and Italy

In Poland, counterfactual and TBIE approaches are advised in national guidelines. The National Evaluation Unit has provided training for evaluation units to build capacity to conduct this type of studies. A textbook on macroeconomic modelling and counterfactual analyses is about to be published by the Polish Agency for Enterprise Development, and one on TBE was published in 2017. A panel on the counterfactual approach is often organised as part of biannual evaluation conferences.

In Lithuania, evaluation capacity-building measures are in place, such as drafting methodological guidelines, organising training for civil servants, organising international evaluation conferences, etc. High-level conferences on evaluation have been organised bi-annually since 2005.

In Italy, the Plan for Administrative Strengthening (Piano di Rafforzamento Amministrativo or PRA, planned in the Partnership Agreement of 2014) aims to analyse the necessary administrative capacities within each MA, identifying concrete measures to tackle the existing gaps. To do so, these plans establish sets of indicators and targets and foresee ad-hoc initiatives for monitoring and independent evaluation.

Source: Authors, based on case studies, 2019–2020.

There is **evidence that these initiatives can help the development of better-quality evaluations** (Authors, based on case studies, 2019–2020). However, this is **not observed across the board at the EU-wide level**. According to early evidence from the Helpdesk, two-thirds of impact evaluations of the 2014–2020 period reviewed in 2018 had major shortcomings in some aspect related to their quality (European Commission, 2018f). More recent data shows that for 80% of impact evaluations analysed in 2019, “the findings are fully or partly reliable for the majority of the evaluations” but the average quality of completed impact evaluations remains limited, with an average rating of 2.5 out of 4 points (European Commission, 2019j). According to case studies, **notable disparities in evaluation capacity** are observed within several Member States (e.g., Poland, France, Italy), **which may hinder the methodological quality of conducted evaluations**. In particular, within a decentralised context, some units in charge of evaluation can be insufficiently staffed or lack the required skills.

Addressing some shortcomings could help Managing Authorities to improve the methodological quality of evaluations. As evaluations are often carried out by external evaluators, drafting **precise Terms of Reference** and **having procurement rules that reward quality** should be promoted (Ward, 2019; Authors, based on interviews, 2019–2020). Procurement rules shall notably consider the quality and not only low prices. Similarly, assessment criteria that are easily manipulated shall be avoided. For instance, in Romania, there is evidence of requirements of the ‘number of methods’ in the selection of evaluators, rather than their quality or complementarity, which leads to poor decisions (Authors, based on case studies, 2019–2020). **Triangulation of different methods and the in-depth use of those mentioned can also consolidate findings**. Lastly, the issue of **timing** remains, especially for impact evaluations. If these evaluations are carried out too early, they might not bring valuable evidence, especially when using counterfactual methods. The use of theory-based methods could be encouraged.

Examples of the findings of evaluations produced by Managing Authorities can be found in the annexes (see section Examples of findings from evaluations at EUMember State level).

4.4. Evidence on the use of evaluations by the Member States and regions

Limited use of evaluations at the Member State and regional levels has been an issue for Cohesion Policy across different periods (Authors, based on interviews, 2019–2020). In particular, the fact that some evaluations are perceived as an obligation can produce this effect. The 2014–2020 period is still ongoing and there are some well-identified issues affecting the potential use of evaluations – namely, delays and low methodological quality (European Commission, 2019j). As a consequence, the available **evidence on the extent to which evaluations are used by Member States remains limited**.

4.4.1. Documented examples of evaluation use

Concrete cases of direct use of evaluations remain rare for the 2014–2020 programming period. However, a small-scale online survey of MAs, academics and other stakeholders involved in Cohesion Policy evaluation (54 respondents) has shown that about half of them considered that evaluations are occasionally used by their Managing Authorities. A third thought that they were always (or almost always) used (Authors, based on the online survey, 2019–2020). This survey is not, however, a definitive representation of the overall picture and does not allow an identification of concrete channels of use.

The case studies bring some examples of ways that Member States and Managing Authorities may valorise the produced evaluations. These examples can help to **distinguish different potential uses of evaluations by Member States** – namely, to support **accountability, advocacy, policy-learning and engagement of stakeholders**.

Several Member States use evaluations for **accountability purposes** – i.e., to ensure and show that Cohesion Policy mobilises financial resources to complete specific projects or objectives. In practice, it is mainly done through the publication of evaluation results (as planned in the regulations). Indeed, the online availability of evaluations can benefit citizens in allowing them to check how the resources linked to Cohesion Policy are used. It is difficult to estimate to what extent citizens and politicians actually access and use these evaluations, but some Member States facilitate this by implementing diffusion strategies and instruments. For instance, libraries of evaluations are accessible in Romania. Results of the evaluations performed, and other events related to the evaluation of Cohesion Policy, in Romania may be found on the Evaluation Library website – *Biblioteca de evaluare*.²⁴ In Lithuania, the website called ‘EU Investments’ (www.esinvesticijos.lt) has a special section dedicated to evaluation. Here, all the evaluation reports and other relevant information (guidance documents, material of the evaluation conferences, legal acts, etc.) are stored and made available to the public, even though its user-friendliness could be improved.

Another notable use of evaluations in different Member States is to mobilise them in the context of **advocacy**. This refers to the fact that the findings of evaluations can be used strategically as arguments to advance specific positions. For example, in Lithuania, results of evaluations are being used as a basis for discussions with decision makers at the highest (political) level, but according to the case study, progress in this area could be more significant. Similarly, the *Evaluation of benefits to the EU-15 resulting from the implementation of CP in the Visegrad countries* (Polish Ministry of Regional Development, 2016) has been widely used as a justification in political debates during the negotiations of the 2014–2020 EU budget. It was quoted by representatives of the EC and by EP members, and commented on by media outside Poland. In France, ex-ante evaluations have largely been seen by MAs as regulatory obligations, but they have been used in negotiations on OPs with EU institutions in some cases.

Based on the case studies, the main use of evaluations by Member States during the 2014–2020 period so far has probably been in their influence on the design and implementation of programmes – that is to say, a **policy-learning function**. However, there are few documented examples even for this type of use. Policy-learning has two aspects: firstly, evaluations can bring evidence on practical operational issues, and propose recommendations that can usually be implemented during the programming period. Secondly, evaluations can also provide policy lessons on more strategic and political aspects, often relevant for the following programming periods. It seems that the influence of Cohesion Policy evaluations is stronger for operational rather than strategic aspects in Member States, as noted, for instance, in Poland (Kot, 2019). An example of a concrete implementation of evaluation recommendations for the 2014–2020 programming period can be found in France. In the Hauts-de-France region, insights of the YEI evaluation on apprenticeship has suggested extending and enhancing the follow-up of trainees, which has been implemented (Authors, based on case studies, 2019–2020). In Ireland, an evaluation of the Fund for Students with Disabilities (supported by the ESF) has recommended reforming the allocation model to deal with a predicted rise in the number of students, and this recommendation has been implemented (Authors, based on case studies, 2019–2020). There is also some evidence of the use of evaluation findings between the 2007–2013 and 2014–2020 periods. For instance, Poland is a compelling case where the **use of evaluation findings can be documented**. According to the case study, the impact of the 2007–2013 evaluations on the Operational Programmes for the 2014–2020 period is ‘moderate’. Around half of the OPs of 2014–2020 contain references to evaluation studies, thus enriching the analytical part of these programming documents, and justifying intervention choices.²⁵

²⁴ <http://www.evaluate-structurale.ro/>

²⁵ The average number of references is six.

Last but not least, there is some limited evidence of **participatory use of evaluation** in the context of Cohesion Policy. This means that evaluations can be used as a way to strengthen relationships between stakeholders at the local or regional levels. For instance, NGOs and citizens can be associated to evaluations. The importance of the participatory approach of ex-ante evaluations has been highlighted, for instance, for the 2014–2020 period in Poland (Authors, based on case studies, 2019–2020). The EU framework for Cohesion Policy evaluation has also previously been used in Sweden to promote participatory evaluations in 2007–2013 (Nordesjö, 2019).

4.4.2. Factors influencing evaluation use

Besides the still partial evidence on the actual use of Cohesion Policy evaluations by the Member States and regions during the 2014–2020 period, it is possible to **analyse the factors that might influence whether evaluations are used or not**. These factors and their relative importance will of course depend on the type of uses identified in the previous section, but commonalities can be found. A simple model can be derived from the case studies and the literature to sort out these critical factors (Ferry and Olejniczak, 2008; Authors, based on case studies, 2019–2020), as presented in Figure 13 below.

Figure 13 Factors affecting the use of Cohesion Policy evaluation at the Member State and regional levels



Source: Authors.

It is **difficult to assess the respective importance of these different factors across the board**. According to the small-scale online survey of Managing Authorities carried out for this report, timing and the content of evaluations are judged as especially critical to explain their use. In contrast, the methodological quality of evaluations is perceived as a moderate factor by stakeholders in this sample (Authors, based on the online survey, 2019–2020). However, the **role of each factor largely depends on the specific situation of each Managing Authority and region**.

a. Evaluation culture and legitimacy

Overall differences in **evaluation culture** are well documented among the different Member States and regions of Europe (EPRC, 2012). This influences the perception of evaluations and their **legitimacy**

to influence the various steps of the policy process and the decisions of policymakers. As such, this factor affects the use of evaluations of Cohesion Policy during the 2014–2020 period.

The case studies suggest that there might be a **difference in the perceived legitimacy of evaluations between high-level policymakers and administrators/policymakers at the operational level.** The former can be less receptive to evaluations, while the latter can be more receptive. For example, it is reported that in Lithuania, there is a clear understanding of the usefulness of the evaluations at specialist and intermediate management levels. However, it is not always the case at the highest political level. Likewise, in Poland, the same distinction between the operational level and higher politics is noted. There is less awareness and openness in the latter case, which constitutes a barrier for evaluation to inform political debates.

The evaluation culture and interest of policymakers interact with all the other factors leading to evaluation usage. In particular, a small sample of the Managing Authorities surveyed online cited the support of policymakers as one of the **most important factors in explaining evaluation use** (Authors, based on the online survey, 2019–2020).

b. Types, content and needs

The case studies highlight an issue concerning the definition of the **types and content of evaluations**, and their **adequacy in responding to policymakers' and administrators' needs for evidence.** For instance, in Poland, the focus of the 2014–2020 programming period on impact evaluations has been perceived by stakeholders as detrimental to the learning objective of evaluations, thus potentially affecting their use. At the same time, there has been an increase in studies providing strategic knowledge useful for the purpose of accountability (Authors, based on case studies, 2019–2020). Similarly, French stakeholders also complained about the high number of compulsory evaluations, stating that they may not even be relevant (e.g., ex-ante evaluations, impact evaluations for each OP axis). There is a risk of fuelling a compliance-based approach to evaluation, limiting their use by the Member States and regions.

The **content of evaluations, with the unit of analysis set at the OP or even the OP axis**, might also not be fully adapted to promote their use. In Poland, a positive trend is the increase in the number of evaluations that go beyond the framework of one OP, sometimes even covering interventions that are conducted outside the scope of Cohesion Policy. In Romania and Lithuania, 'meta evaluations' are performed to overcome issues with the too narrowly defined parameter of evaluations. In Italy, there is a clear approach supported by the Nuclei di Valutazione (NUVAL) in favour of adopting the whole regional programme as an appropriate unit of analysis. **Evaluations could be thematic** rather than centred on OP, and cover both CP-funded programmes and nationally funded programmes. This might trigger additional interest and spur their use. However, one issue is the eligibility of such evaluations for CP funding.

c. Organisation and resources

The level of **resources dedicated to the evaluation of Cohesion Policy** (e.g., budget, number of persons, skills) might be a **cause of the differences in use across the Member States and regions.** Indeed, small teams of internal evaluators typically do not have the opportunity to promote the diffusion and uptake of their findings, as is the case in several French regions (Authors, based on case studies). This is especially the case if Managing Authorities are required to conduct a high number of evaluations, as during the 2014–2020 period. Moreover, monitoring requirements can pose significant burdens and are sometimes carried out by the same teams responsible for evaluation. In such cases, the organisational framework can limit the use of evaluations due to limited resources. A possible way

to reduce the actual and perceived burden could be to ensure that evaluation requirements are aligned with the needs of Managing Authorities, which could further encourage their use. However, it shall be noted that, in general, **the case studies do not identify excessive burden associated with evaluation activity per se**. According to an ECA study, the vast majority of working days at the MA level are dedicated to programming itself rather than to other activities (about 78% for the ERDF/CF, and about 85% for the ESF) (ECA, 2018).

The fact that **the timing of evaluation is aligned with the overall organisational and political schedules of the Managing Authorities** is also a key element in promoting their influence (Authors, based on interviews and case studies, 2019–2020). Indeed, evaluations that are not realised with adequate timing cannot feed into the decision-making process.

Specific **organisational and institutional arrangements** can also contribute to the use of evaluations of Cohesion Policy. Making evaluation reports available is the first step – for instance, through **libraries of evaluations**. Examples include the previously mentioned Romanian Evaluation Library *Biblioteca de evaluare*.²⁶ Systems that **track the implementation of recommendations** might also **provide an incentive to follow the recommendations more often**. For instance, in Lithuania, the MA is keeping track of the percentage of implemented recommendations. However, it is difficult to calculate the indicator accurately, because some recommendations (especially strategic ones) are implemented only partially, so there is a high subjective element in decisions to include (or not) such recommendations when calculating the estimate of the indicator. During 2015–2018, a total of 175 recommendations were submitted, of which 120 were reported as implemented (69%) (Authors, based on case studies, 2014–2020).

d. Importance of Cohesion Policy

The **importance of Cohesion Policy** in a specific country or region might affect the actual use of evaluations. This importance can be understood in terms of funding but is also linked to the place of Cohesion Policy in political debates.

In the Member States where the share of **Cohesion Policy in overall public funding is low**, such as France or Italy, carrying out evaluations on just a tiny percentage of spending might be of **low interest to policymakers** (Authors, based on case studies, 2019–2020). This also raises **methodological issues** linked to the fact that it is difficult to attribute changes to Cohesion Policy if it only accounts for a tiny part of the regional or national policies. Of course, this issue is more acute when the proportion of CP funding is low, but to some extent, the problem remains even when CP is a substantial source of financing. The issue is strengthened by the fact that requirements to carry out evaluations are present even when Cohesion Policy funding is low.

Moreover, in contexts where Cohesion Policy funding is low, **evaluators can have somewhat limited contact with the standard domestic policies and their evaluations**. This might limit the use of Cohesion Policy evaluations. There is some evidence that this could be the case, even if stakeholders implement initiatives to promote dialogue between the stakeholders responsible for EU policies and others (e.g., at the Ministry of Labour) (Authors, based on case studies, 2019–2020).

e. Quality of evaluations

The **overall low quality of evaluations** highlighted in section 4.3.2 above might be a factor **limiting their use, especially as it interacts with the general capacity of administrations**. In this respect, the

²⁶ <http://www.evaluate-structurale.ro/>

case studies show that capacity might be missing both on the supply side (evaluators) but more critically on the demand side (administrators and policymakers). Evaluators are generally external consultants, who can sometimes be insufficiently prepared to apply sophisticated methodologies. Administrators may lack the capacity to write adequate terms of reference – a fundamental prerequisite for producing a quality evaluation (Ward, 2019).

The timing of evaluations is also a critical element of their quality. For instance, complex procurement procedures can delay the realisation of evaluations and affect their quality. Difficulties of this sort are recorded in, for example, Romania, Lithuania and Italy. More generally, **deadlines mentioned by the EU regulations are often seen as a source of difficulty** in the reviewed case studies, as they set strict dates for completion and lead to the realisation of evaluations even when impacts have not fully materialised on the ground, which can thus restrict the quality and insights derived from evaluations.

Finally, **recommendations should also be of quality to ensure their actual use**. As suggested in the Polish case study, some evaluations might build on a sound methodological basis, but the resulting recommendations might be shallow, impairing the overall utility of evaluations. An original position of NUVAL in Italy in this respect is that evaluations should not necessarily include recommendations. Leaving policymakers to formulate recommendations could imply their stronger commitment in following up actions. Good recommendations that can be used in practice should be precise and realistic (van der Kaaij, 2019). **User-friendliness of reports** can also be a way to improve their use (Ferry and Olejniczak, 2008).

5. ANALYTICAL ASSESSMENT OF THE CURRENT FRAMEWORK AND CHALLENGES FOR THE POST-2020 PERIOD

KEY FINDINGS

-] Overall, the 2014–2020 framework ensures effective organisation of evaluation at different levels of governance. It has strengthened the evidence-based policy approach across the EU, though the use of evaluations for policy-learning is still rare. At the national and regional levels, impact evaluations have not yet been shown to fulfil their accountability function.
-] The European Commission's proposal for the 2021–2027 period aims at simplifying rules in order to minimise the constraints associated with evaluations. This includes, for instance, the removal of: the requirements of mandatory ex-ante evaluations; the reference to the obligation of using programme-specific indicators, and the specific assessment procedure dedicated to large infrastructures.
-] The potential benefits of the Commission's proposal will hold only if there is a pro-active stance of Managing Authorities to carry out evaluations adapted to their needs. According to this study, there is limited evidence that this is the case across the board.
-] During the legislative process, the European Parliament has not strongly challenged the underlying rationale of the European Commission's proposal. The EP has proposed few amendments related to monitoring and evaluation, some of which have even been withdrawn by the EP's negotiators during the trilogues held until December 2019
-] An alternative scenario for Cohesion Policy evaluation in the future is based on a more participatory approach. It would help go beyond the dilemma between, on the one hand, strict requirements that ensure the realisation of evaluations but may result in a mere formal compliance and, on the other hand, flexibility which promotes ownership but risk leaving less capable regions behind.

Using evidence from EU rules and their implementation at different levels, this chapter conducts an overall assessment of the effectiveness and efficiency of the current framework governing Cohesion Policy evaluation. It also builds upon this analysis to give useful insights for the post-2020 period, through a review of the European Commission's regulatory proposals (mainly the Common Provisions Regulation's proposal, but also Fund-specific ones when relevant) and a presentation of alternative scenarios.

5.1. Effectiveness and efficiency of the 2014–2020 framework

EU rules, in the form of regulations, largely set the framework for the evaluation of Cohesion Policy during the 2014–2020 programming period. In particular, they are critical in determining the number, types, content and generic organisation of this activity (see section 2.2). These EU-wide rules are applicable in a variety of contexts, leaving ample room for differences in governance setting on the ground (see Chapter 4).

Assessing the effectiveness and efficiency of the Cohesion Policy evaluation framework for 2014–2020 (whether it achieves its stated goals) thus requires analysis of the **interactions between EU rules and the observed practices at different levels**, as presented in the previous chapters.

Effectiveness and efficiency will be **assessed based on a series of objectives of the 2014–2020 framework** for Cohesion Policy evaluation. These objectives are inferred from policy documents, regulations and interviews (Authors, based on interviews, 2019–2020; Hristcheva, 2019; Official Journal of the EU, 2013a). They notably include:

-] Ensuring adequate organisation and planning of evaluation of Cohesion Policy;

-)] Promoting evidence-based policy, through a generalisation of evaluation and a consolidation of their quality and their actual use by policymakers;
-)] Favouring result-orientation of Cohesion Policy, especially in assessing its actual impacts and putting them at the centre of decision-making.

5.1.1. Adequacy of the framework to organise and plan evaluations of Cohesion Policy

The basic organisation of Cohesion Policy evaluation is set in the EU regulations. In particular, there is a key distinction in the responsibilities of carrying out evaluations. The European Commission performs ex-post evaluations at the EU level, while Managing Authorities (Member States and regions) are responsible for ex-ante and ongoing evaluations, including impact evaluations of the OP priorities. This distinction has been **stable across the most recent programming periods** and can be seen as a positive aspect of the 2014–2020 framework. Indeed, this stability helps stakeholders at different levels to capitalise efficiently on previous experiences. Overall, Member States have the flexibility to decide how to organise their evaluations. This strengthens their effectiveness by allowing responsive adaptation. The different governance arrangements observed in the Member States have strengths and weaknesses, which have to be assessed on a case-by-case basis.

In most of the reviewed cases, Cohesion Policy evaluations are only organised by the EU rules. As such, the risk of gold-plating (unnecessary addition of extra, national rules) does not seem to be a direct issue in most countries for the evaluation of Cohesion Policy (Authors, based on case studies, 2019–2020). The 2014–2020 framework also includes an obligation of the European Commission to **provide methodological guidance** to Managing Authorities for carrying out their evaluations (Official Journal of the EU, 2013a). This organisational arrangement is quite controversial, because guidance can be very influential in shaping the behaviour of national and regional authorities, while lacking the political and legal legitimacy of EU regulations. Guidance is thus sometimes referred to as ‘quasi-law’, which may disproportionately affect how Managing Authorities act (Authors, based on interviews, 2019–2020). However, it is clear that Managing Authorities demand guidance from the EU, and that restricting guidance could harm the organisation and quality of evaluation, especially in places where it is already less developed (Authors, based on case studies and interviews, 2019–2020). As such, even if the risk of quasi-law may exist in some cases, it is likely to be small as compared to the risk linked to the absence of guidance. Even if the existing guidance could still be improved (e.g., in terms of clarity for Managing Authorities and alignment with their priorities), evidence suggests that it is an element promoting good organisation of evaluation of Cohesion Policy (Authors, based on case studies, 2019–2020).

An unresolved issue impacting the effectiveness of the EU framework’s ability to organise evaluation of Cohesion Policy adequately has to do with the fact that Managing Authorities are responsible for evaluation while also implementing the policy. Even with the principle of functional independence, which implies that the exact units responsible for evaluation should not also be responsible for implementation, the **centrality of Managing Authorities** could still be a source of problems (Naldini, 2018). For instance, there might be pressures regarding evaluation and their findings. Also, from a more operational point of view, Managing Authorities can have difficulty in facing numerous and sometimes overlapping obligations (e.g., closing a programming period, while already preparing an ex ante impact evaluation).

The framework for 2014–2020 has introduced a **mandatory use of Evaluation Plans** for the Managing Authorities, with the rationale of anticipating the preparation (and use) of their evaluations. In some Member States, this new obligation has not led to significant effects, as evaluations were already used extensively during the previous period. Nevertheless, there is some evidence that Evaluation Plans might have consolidated the approach to evaluations among Managing Authorities, especially in terms

of organisation and anticipation/planning (European Commission, 2015c). However, evaluation plans can be easily revised by Managing Authorities during the programming period, with virtually no consequences if the number and scope of initially planned evaluations are lowered. EU guidelines encourage MS to consider evaluation plans as living documents and recommend an examination and update, if necessary, once a year. This important flexibility, though it has benefits, might limit the commitment to complete the evaluations of the initial plans, especially in areas where evaluations are not common practice (Authors, based on interviews, 2019–2020). Overall, these plans still appear to be a positive feature of this programming period.

Still, there have been notable issues of **delays** for evaluation during this period (European Commission, 2019a), suggesting that the framework might not be fully effective in ensuring adequate organisation of planning. For instance, strict and early deadlines (e.g., 2017 and 2019 for the YEI; at least one evaluation of OP priorities during the period) could harm the value and further use of mandatory impact evaluations by regional and national stakeholders (Authors, based on interviews and case studies, 2019–2020). Indeed, carrying out evaluations this early could mean that the impacts have not yet happened on the ground. Moreover, these deadlines are not necessarily aligned with local or regional schedules (e.g., implementation of other strategies, elections...).

Overall, the 2014–2020 framework is thus **effective in ensuring adequate organisation of evaluation at different levels**, owing to its stability of key requirements and capacity to account for different realities on the ground. However, issues remain – for instance, with the planning of evaluations – in part because of strict deadlines set in EU rules.

5.1.2. Ability of the framework to promote the use of evaluation findings and an evidence-based approach

The European Commission has long pushed for an evidence-based model of Cohesion Policy. This entails the use of evidence at each stage of policy decisions (Hristcheva, 2019). From that perspective, the framework shall focus on ensuring that **evaluations are carried out (good coverage)**, with an acceptable level of **quality**, and then **actually used** by policymakers in their decisions (policy improvement).

In terms of coverage, the 2014–2020 framework has been fully aligned with this logic. Indeed, EU regulations for this period are characterised by their relatively stringent requirements in terms of number, types and content of evaluations, and evaluations are mandatory at different steps of the implementation of the policy (ex-ante, ongoing and ex-post). Moreover, impact evaluations are explicitly requested of Managing Authorities, at a low level of analysis (OP priority) and for the YEI (Official Journal of the EU, 2013a). These requirements have proved effective in generating full coverage of Cohesion Policy interventions by evaluations, at different levels of governance and stages of policy-making.

Indeed, there is an overall rise in the number of evaluations carried out by Member States and regions as compared to the previous programming period (European Commission, 2019j, 2019a). In particular, the EU rules may promote the use of evaluation findings in contexts where their legitimacy and inclusion in the normal decision-making process are still low. Without obligations, it is unlikely that evaluations would be carried out at all in these contexts. However, it is still unclear whether all the planned evaluations will actually be carried out (Authors, based on case studies, 2019–2020). Moreover, the drawback of these stringent requirements in the number, types and content of evaluations is the **risk of a 'tick-box' approach**, whereby Managing Authorities perceive evaluations as mere legal obligations (Naldini, 2018). This compliance-oriented approach can be observed in different Member States and regions and stems from limited resources dedicated to evaluations, but more critically from

potential misalignments between the requested evaluations and those of interest to regional and national policymakers and administrators. For instance, regional stakeholders typically tend to demand implementation-oriented evaluations, which can bring operational lessons, rather than impact evaluations. A further difficulty is that these needs might vary depending on specific Member States or regions, which are all covered by the same EU rules. For instance, ex-ante evaluations for all OPs can be considered as a formal obligation in some Member States, while having recognised benefits in terms of preparation and participation in others or across the board (ECA, 2019).

At the EU level, the legal obligations to carry out evaluations are less detailed (see Regulatory provisions governing Cohesion Policy evaluation

in the Annexes). The number and coverage of evaluations carried out remains quite stable across the last two programming periods at this level, with a focus on thematic aspects and impacts.

Promoting the development of an evidence-based approach through the evaluation of Cohesion Policy assumes the achievement of an adequate methodological quality. Numerous guidance documents and support instruments developed at EU level provide specific indications and orientations in this respect. Soft support is also available through the Evaluation Helpdesk and dedicated evaluation networks. However, in spite of the European Commission's push towards advanced methods and the provision of guidance, evaluations at the national and regional levels rely on simple methods and are **often of limited quality** (European Commission, 2019j, 2019a, 2018f; Ward, 2019). Nevertheless, several Member States have dedicated efforts to improving their evaluation capacity during the 2014–2020 programming period, which may be effective in yielding effects in the future (Authors, based on case studies, 2019–2020). At the EU level, the quality of evaluations is higher and benefits from more advanced methods. Overall, the effectiveness of the 2014–2020 framework in ensuring the quality of evaluations to support evidence-based decisions is thus mixed.

The EU framework for 2014–2020 also comprises **few explicit provisions on the use of evaluations**. They are limited to the obligation to synthesise and publish the findings of evaluations, as well as to discussing them during Monitoring Committees and Annual Review meetings (Official Journal of the EU, 2013a). These elements might not be fully effective. Indeed, the important number and diversity of carried out evaluations makes it difficult to reach clear synthetic conclusions that apply to different situations. The synthesis process might also lead to an excessive burden with unclear benefits, especially for Managing Authorities (Authors, based on case studies, 2019–2020). Similarly, the meetings where evaluations are discussed also cover other issues. In several cases, evaluations thus have a low priority in these discussions, reducing the potential that they effectively lead to evidence-based decisions (Authors, based on case studies and interviews, 2019–2020; Kot, 2019). In practice, there is **mixed evidence regarding how policymakers actually use the findings of evaluations in their decision-making process**. Overall, by international standards, the EU is considered as having a good level of integration of evaluation in its decision-making process (OECD, 2019). In particular, the European Commission tends to use evaluation findings from previous periods to inform the proposed regulations for the following periods (with a time-lag condition that cannot be avoided, as ex-post evaluations are conducted after the end of a period). However, there are **some limits**, with some findings of evaluations not fully incorporated into the decisions across periods. It should also be mentioned that other sources of evidence and political priorities are also crucial in shaping the Commission's decisions (Authors, based on interviews, 2019–2020). In the **Member States and regions**, there is **sparse evidence of the use of findings of evaluations** for the current programming period. Concrete examples are still limited and several factors seem to hinder the contribution of evaluations to policy improvements (see section 4.4). This might be because the 2014–2020 framework implies a high number of mandatory evaluations, including impact ones, that do not always feed into

the decision-making process (Authors, based on case studies and interviews, 2019–2020). Moreover, findings of some evaluations might only be available on the programming period is already over. This reflects the **limited effectiveness of the current framework in promoting the use of evaluations**.

5.1.3. Promotion of result-orientation through the evaluation framework

Another main area of focus of the 2014–2020 framework for evaluation has been its attention to result-orientation (Authors, based on interviews, 2019–2020; EPRC, 2015a; Official Journal of the EU, 2013a; Polverari, 2016a). It thus aims at documenting that **Cohesion Policy delivers results and that EU added value is ensured**. Concretely, it revolves around two aspects: the focus on impact evaluations, and monitoring requirements.

Impact evaluations are indeed strongly linked to result orientation, because they specifically aim at assessing the effects of Cohesion Policy. In line with the requirements of the EU regulations for 2014–2020, their number has significantly risen at the regional and national levels, with a seven-fold increase as compared to 2007–2013 (from 231 to 1,737) (European Commission, 2018f). They are also present at the EU level, with specific ex-post evaluations dedicated to impacts (European Commission, 2020e). It seems that the framework has been effective in promoting result-orientation through a high number of impact evaluations. However, this should be nuanced. Indeed, the methodological quality of impact evaluations carried out so far is considered low in the Member States (European Commission, 2018f). In particular, the uptake of related advanced methods (e.g., counterfactual analyses or theory-based approaches) remains rare (European Commission, 2019a). The fact that impact evaluations are mandatory and framed by strict deadlines from the legal framework is also an issue in ensuring their quality and ability to inform policymaking (Authors, based on case studies and interviews, 2019–2020). This is particularly so given that in many cases, national and regional policymakers tend to prefer evaluations focusing on implementation rather than impacts, because they are easier to use and more aligned with their stated needs (Authors, based on case studies, 2019–2020). Overall, there seems to be limits concerning the contribution of the 2014–2020 framework in promoting result-orientation through impact evaluations, at least at the national and regional levels. Reliable impact evaluations include those produced at the EU level (i.e., ex-post evaluations) and a subset of national and regional ones. This implies that the **framework does not fully allow an assessment of the impacts of Cohesion Policy**, because of the identified methodological issues of several impact evaluations and the difficulty in synthesising them across different Member States and regions (European Commission, 2019j).

Monitoring has also been strengthened by the 2014–2020 framework, with an ambition to serve result-orientation (Polverari, 2016b). **Substantial improvements have been realised**, both in the definition of indicators (with common indicators set in the annexes of regulations) and in their actual collection in the different regions and Member States (Authors, based on case studies and interviews, 2019–2020). This has allowed new aggregation of evidence at the EU level, which has been valorised through the Cohesion Data platform, or specific platforms in Member States (e.g., OpenCoesione in Italy). Linkages between these indicators and programming, which feed into evaluations, have also been strengthened through the framework (Official Journal of the EU, 2013a). However, several Member States and regions still have **relatively limited use of this data for evaluations**, as it may not be directly usable for tackling their questions of interest (Authors, based on case studies, 2019–2020). Moreover, for the ERDF, there is an important issue concerning the coherence between different levels of indicators. There are problems in linking financial aspects (amounts of funding) to the output or results produced. This is because the levels of reporting for these two types of indicators are different,

which causes problems for their use in evaluations. For the ESF, the regulations allow this linkage.²⁷ Thus, there should be increased commitment to ensure that the indicators are adequate and coherent across their different levels. This is especially the case in promoting accountability, but also to avoid unnecessary data collection burdens on Managing Authorities. Thus, the 2014–2020 framework has been increasingly effective in promoting result-orientation through monitoring, but there is still room for improvement.

5.2. Analysis of the proposed framework for 2021–2027

As of April 2020, the **process of defining the EU framework of Cohesion Policy for the 2021–2027 programming period is still ongoing**. The European Commission has presented a proposal for a regulation laying down Common Provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, and the European Maritime and Fisheries Fund and financial rules for those and for the Asylum and Migration Fund, the Internal Security Fund and the Border Management and Visa Instrument (COM/2018/375 final) (Official Journal of the EU, 2018a). As during previous periods, it covers evaluation aspects, in particular in terms of number, types, content and organisation. It is complemented by draft regulations for specific funds. However, these fund-specific draft regulations do not typically include provisions related to evaluations, with some minor exceptions (e.g., in the ESF+ draft regulation, there are some details on evaluation specificities for this fund).

The draft proposals of the Commission have to be adopted by the European Parliament and Council under the ordinary legislative procedure. Based on the draft regulations proposed by the European Commission, the European Parliament has adopted its position on the Common Provisions Regulation at first reading in February 2019. (European Parliament, 2020c). As of March 2020, negotiations are still ongoing. In early 2020, large parts of the negotiations have even been frozen by the European Parliament.

This section will thus **analyse the draft regulations as proposed by the European Commission, focusing on the proposal for the Common Provisions Regulation which sets the core provisions on evaluation and monitoring of Cohesion Policy. The role of the European Parliament as a co-legislator (amendments)** (1st reading position and role in trilogue) will also be highlighted.

5.2.1. Assessment of the European Commission's regulation proposal

Important changes characterise the **Common Provisions Regulation proposal as published in May 2018 as compared with the 2014–2020 programming period**. It takes place in the broader context of effort by the European Commission to **simplify the implementation and access to ESI funds²⁸ and Cohesion Policy in general**. This logic has direct implications for evaluation (European Commission, 2018h).

Accordingly, the proposed legal texts governing evaluations for 2021–2027 are much **more succinct and generic than in the previous periods** (Naldini, 2018). In the Commission proposal, most of the evaluation of Cohesion Policy would be mainly organised by two short articles (39 and 40), one for the Member States/Managing Authorities and the other for the European Commission. Other elements related to evaluation (e.g., monitoring) are covered by other articles, or in the annexes of Fund-specific regulations (e.g., indicators). Moreover, some elements that were previously explicitly mentioned in

²⁷ All indicators are reported to all Investment Priorities uniformly and their achievement value can be compared to financial indicators (as the Investment Priorities match the categories of intervention).

²⁸ https://ec.europa.eu/regional_policy/de/policy/how/improving-investment/high-level-group-simplification/

the regulations are not included anymore, such as the fact that the European Commission shall provide guidance on evaluation (Article 54 of the GPR for 2014-2020, absent for post-2020). Similarly, there is no mention of the need for Managing Authorities to ensure adequate evaluation capacity and resources to carry out evaluations (Articles 54 and 56 of the GPR for 2014-2020, absent for post 2020). The primary arrangements proposed by the European Commission in its draft regulations are presented in the following figure and further analysed below. More details with specific references to articles are included in the Annexes (see Table A.5).

a. Description of the proposed framework for 2021-2027

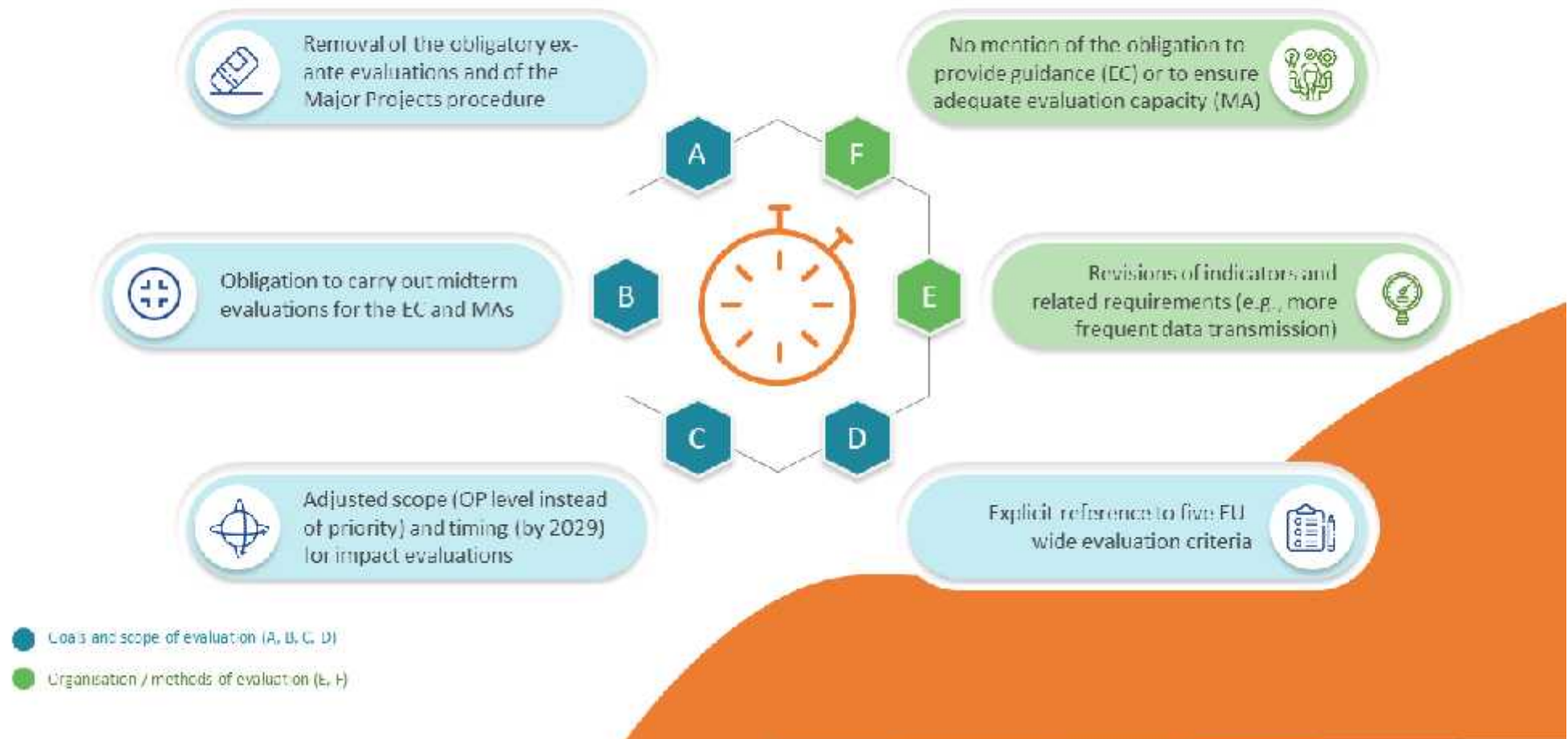
In terms of **number and types of evaluation**, the proposal of the European Commission entails **major changes** as compared to the past periods. Indeed, it would **cut the overall requirements in favour of more flexibility** while introducing some new elements. The main changes as compared to the 2014-2020 rules are presented in Figure 15. The elements refer to the CPR, unless otherwise specified.

Figure 14 Main legal arrangements proposed by the European Commission for Cohesion Policy evaluation for the 2021-2027 period

	Number, type and content of evaluations	Organisation of evaluation	Methods	Findings and their use
General principle / All stakeholders	<p>Obligation to conduct ongoing and ex-post evaluations, including impact ones. No obligation to conduct ex-ante evaluations</p> <p>Explicit reference to 5 evaluation criteria for all evaluations</p> <p>Absence of a specific selection procedure for Major projects</p>	Functional independence of evaluators	No generic obligation	<p>Obligation to publish evaluation results online but no explicit obligation to synthesize them</p> <p>No formal requirements to use evaluations</p>
European Commission	Obligation to carry out midterm and ex-post evaluations of each Fund	<p>Responsibility for midterm and ex-post evaluations of each Fund</p> <p>Advisory role in Monitoring Committees</p>	No obligation to provide guidance	<p>Organisation of Annual Performance Review meetings with the MAs, with the possibility to discuss evaluations</p> <p>Provision of comments on the Final Performance Reports</p>
Managing Authorities / Member States	<p>No obligation to carry out ex-ante evaluations</p> <p>Obligation to carry out ongoing/ex-post evaluations with at least one impact evaluation at the OP level</p>	<p>Responsibility for ongoing and ex-post evaluations of the OPs (including impact ones)</p> <p>Monitoring requirements with increased frequency for data transmission</p> <p>Obligation to set-up Monitoring Committees for the follow-up of evaluations, with increased transparency</p> <p>Obligation to draft evaluation plans</p> <p>No explicit mention of evaluation capacity requirements</p>	No specific obligation regarding methods	<p>Follow-up of evaluations in Monitoring Committees</p> <p>Organisation of Annual Performance Review meetings with the European Commission, with the possibility to discuss evaluations</p> <p>Obligation to draft a Final Performance Report for each OP (partly based on evaluations)</p>

Source: Authors based on Official Journal of the EU, 2018a, 2018b. Template from 24slides.com.

Figure 15 Main changes in EU rules governing Cohesion Policy evaluation between the 2014-2020 period and the proposal for 2021-2027



Source: Authors, based on Official Journal of the EU, 2018a; Naldini, 2018. Template from 24slides.com.

An important focus on **result-orientation** and impacts is still at the centre of the draft regulations, but with adjusted practical modalities. The following features are noteworthy (Official Journal of the EU, 2018a):

-)] To promote simplification, **ex-ante evaluations** would not be compulsory for Managing Authorities anymore.
-)] **Impact evaluations** would still be mandatory for the Managing Authorities, though with a broader unit of analysis (considering the whole OP instead than each of its priorities) and timing (they would have to be delivered by 2029, after the end of the programming period).
-)] The obligation to carry out **midterm evaluations** is also introduced for the European Commission, for each fund of Cohesion Policy (ERDF, CF and ESF), with the aim to contribute to proposals for the next Multiannual Financial Framework.
-)] The **specific assessment procedure** for major projects which includes the submission of a Cost-Benefit Analysis, is discarded in the proposal. It is replaced by a follow-up of strategic projects by the Monitoring Committees in the Member States.

Accordingly, the **fundamental division of responsibilities** between the Member States/Managing Authorities and the European Commission would slightly evolve. Managing Authorities would remain responsible for ongoing evaluations and the European Commission for ex-post evaluations. However, the European Commission would also have to carry out midterm evaluations and Managing Authorities would have to complete impact evaluations after the end of the programming period, which can thus be considered as ex-post evaluations.

In terms of the **content of evaluations**, the proposed CPR does not provide detailed information but makes explicit reference to the five evaluation criteria mentioned in the Better Regulation framework, namely effectiveness, efficiency, relevance, coherence and EU added value.

General principles of organisation such as the functional independence of evaluators or the setting up of a Monitoring Committee are still mentioned in the draft Common Provisions Regulation. Evaluation plans are mandatory in the proposal as in the previous programming period (Official Journal of the EU, 2018a). Changes include **increased public transparency** of the functioning of the Monitoring Committees, with the obligation to publish online its rules of procedure and all the documents discussed during its meetings (including evaluation plans and evaluation results) (Official Journal of the EU, 2018a). However, the proposed regulation does not explicitly mention the fact that the evaluations presented in the plans shall be carried out²⁹, unlike in the previous period (Official Journal of the EU, 2018a, 2013a).

In terms of **monitoring and reporting**, the proposal of the European Commission pursues the logic of the previous programming period, i.e. it promotes the result-orientation of Cohesion Policy. In this regard, it is expected that monitoring be tightly related to programming through short intervention chains. Indicators would have to be used to design and track the Operational Programmes with data to be reported at a detailed level (specific objective). The major change has to do with the introduction of a more complete set of common indicators, including not only output but also result ones. An updated categorisation system of indicators for climate aspects is also proposed (European Commission, 2018i). However, indicators that are programme-specific are no longer mandatory, but should be used if there is no relevant common indicator available. Under the proposed rules, Managing

²⁹ The proposed regulation states that 1. Managing Authorities shall carry out evaluations and that 2. they shall draft evaluation plans; However, the text does not explicitly state that the Managing Authorities shall carry out **the** evaluations mentioned in the plans.

Authorities would have to transmit data more frequently to the European Commission, every two months, and only when there are changes in value. This replaces Annual Implementation Reports, which would no longer be required.

As previously mentioned, the draft regulation **does not include provisions** related to the obligation of the **European Commission to provide guidance** to Managing Authorities. Similarly, there is **no explicit mention of the obligation for Managing Authorities or Member States to provide adequate resources to evaluation**. It contrasts with the requirements of the 2014-2020 regulations.

Few elements of the regulation proposal refer to the findings and use of evaluations, as is the case in 2014-2020. Basic features, such as the fact that evaluations shall be followed-up during meetings of Monitoring Committees and discussed between the European Commission and Managing Authorities during annual meetings (“Annual Performance Review meetings” for the 2021-2027 period) remain. Similarly, the fact that the final performance reports shall be drafted by the Managing Authorities on the basis of different sources of evidence (including the evaluations) is preserved. A change is that the 2021-2027 proposal puts an increased emphasis on the transparency of findings, requiring Managing Authorities to publish them on a dedicated website (Official Journal of the EU, 2018a). However, the fact that the European Commission and Managing Authorities have to synthesise the results of their evaluations is no longer mentioned in the proposal.

b. Assessment of the proposal

In this section, **advantages and disadvantages** of the post-2020 proposals described above are discussed. **On this basis, an assessment is proposed**, extrapolating from past experience (2014–2020 and before) used as a benchmark.

) Number and nature of evaluations

The proposal **does not mention a minimum number of evaluations to be conducted by the MAs but requires coverage of all operational programmes**, which thus introduces some additional flexibility to organise evaluations in line with needs. However, as seen in past programming periods (2000–2006 and 2007–2013), it also entails some risk that only a minimum number of evaluations are eventually carried out.

) Ex-ante evaluations

The removal of the **ex-ante evaluations** may have detrimental consequences in spite of expected benefits. Evidence collected in this study shows that during 2014–2020, ex-ante evaluations have often been performed merely to comply with the regulatory requirement – i.e., in a formalistic way. On these grounds, it can be argued that Managing Authorities would perform ex-ante evaluations if they really need and are committed to them, and not just to merely comply with the requirements. However, the risk is that Managing Authorities actually decide to not perform them: The absence of ex-ante evaluations constitutes a deviation from the model of evidence-based policy promoted by the Commission, which expects evaluations or other form of evidence at each stage of the policy cycle (Naldini, 2018). It would deprive the Managing Authorities of useful information for preparing their programmes (Authors, based on interviews; ECA, 2019). It would also represent an obstacle when negotiating with the European Commission, as ex-ante evaluations are supposed to be a basis for partnership and dialogue. The fact that ex-ante evaluations have not yielded the expected benefits in 2014–2020 does not justify their removal all together, but adjustments are necessary to ensure they actually perform their expected function.

) Selection procedure for large infrastructure projects

The **end of the specific approval procedure** for major projects also stems from a simplification logic aimed at removing a costly requirement. This takes place in a context where less priority is expected on large infrastructure projects, and where the MA and the MC are supposed to hold projects of strategic importance under scrutiny. However, ceasing the use of a rigorous methodology to assess large infrastructure projects would imperil the efforts realised over the last decades to have a sound and harmonised assessment framework (Authors, based on interviews, 2019–2020).

) **Timing issues**

The proposal raises timing issues. The introduction of compulsory **mid-term evaluations** for the funds to be carried out by the European Commission is expected to enable assessment of whether the concerned funds fulfil their objectives and to make adjustments possible. The credibility and quality of these mid-term evaluations of funds could be reinforced by the fact that they would be conducted by the Commission rather than by the Managing Authorities responsible for implementing the OPs (as was the case in the 2000–2006 period, for instance). However, the planned date for this mid-term evaluation (2024) appears to be problematic, as the implementation is likely to still be at an early stage, and the available evidence would be relatively scarce. Whether it will be possible to learn valuable lessons as regards the design of the programmes, the adoption process, project selection etc – all issues critical for a good implementation and high likelihood for impacts is an open question. Another timing issue involves the deadline **of the mandatory impact evaluations (2029)**. This leaves more time for MAs to conduct impact evaluations, as compared to the 2014–2020 period, but it is still relatively early to assess the impacts of interventions, and yet too late to successfully inform the following programming period (Naldini, 2018).

) **Methodological issues**

Setting the mandatory impact evaluations at the OP level might be a source of methodological difficulty, as suggested from the 2000–2006 programming period. During the 2014–2020 programming period, impact evaluations were mandatory for the Managing Authorities for each priority of the Operational Programmes, which corresponds to a relatively detailed unit of analysis (policy priority such as the development of SMEs, for instance). The issue with this approach was that it implied a very high number of required evaluations for MAs (Authors, based on case studies, 2019–2020), with doubts regarding their quality and potential use. Shifting the impact evaluation to the whole OP level reduces their number and could increase their quality. However, it poses important methodological problems due to the fact that a single OP can fund several types of interventions, making analysis difficult. It may also be challenging to distinguish the effect of Cohesion Policy as compared to the effects of the broader mix of regional policies when focusing on the impact of the entire OP (Authors, based on case studies, 2019–2020).

The explicit reference to the **five evaluation criteria** in line with the Better Regulations framework provides a common setting for structuring evaluations, but it is open to interpretation. If it is interpreted by MAs as tracking the progress of corresponding indicators, it entails the risk of a formalistic or minimalistic approach to evaluations (Naldini, 2018). If MAs interpret the criterion of effectiveness by following a narrow definition (e.g., comparing outcomes with targets), it could also make evaluation more akin to auditing (Authors, based on interviews, 2019–2020). Moreover, the proposal could be interpreted by the MAs as an obligation to consider all evaluation criteria in all evaluations, without adapting them to the specific features of these evaluations (Authors, based on interviews, 2019–2020).

Data reporting and monitoring

As far as **monitoring and reporting** are concerned, the proposal of the European Commission is intended to alleviate the administrative costs associated with data collection and reporting. Efforts are being made to streamline indicators and to facilitate their aggregation at the EU level, thereby improving the possibility of obtaining evidence at this level. However, **removing the obligation to define programme-specific indicators**, making them optional when common indicators are not sufficient, may have detrimental effects on the deployment of a sound intervention logic, and on the effective monitoring and evaluation of programmes at the Member State and regional levels (Authors, based on interviews, 2019–2020). Also, discontinuation of the mandatory Annual Implementation Reports will eliminate a report which is often seen as burdensome and useless, but **data reporting every two months** might be resource-consuming. Much will depend on the readiness of regions and Member States, and the quality of their information systems (Authors, based on case studies, 2019–2020). According to an interviewee, quality rather than frequency of data reporting is the most important aspect for evaluation (Authors, based on interviews, 2019–2020). There is also an unresolved issue regarding how **ERDF indicators can be aggregated and matched to financial data**.

Findings of evaluations, and their use

Increased **transparency** applied to the publication of findings is beneficial to the diffusion and use of evaluations, and increases the possibility of strengthening the role of evaluation in policy debates. Removing the obligation to synthesise evaluation findings could be seen as positive, as it represented a significant workload without delivering clear advantages. However, it **weakens the attempt to deliver global messages** from the variety of evaluations conducted at Member State level, with no clear alternative proposed to reach that goal. Earlier phases are probably decisive in this respect. If Member States and regions are committed to the evaluation effort, it is likely that they will also commit to communicate evaluation findings. An illustration is the participation to dedicated conferences organised by the EC.

Capacity building and support

Finally, **what is not included** in the proposal is important. The **lack of a legal basis for the necessity of dedicating adequate capacity and resources** to evaluations could undermine the whole exercise. This is especially critical given the limited resources already dedicated to this task by several MAs (Authors, based on case studies, 2019–2020). Similarly, the **absence of a formal obligation for the Commission to provide guidance to the Managing Authorities** contrasts with the commitment of the latter to improve the methodological quality during the 2014–2020 period (Naldini, 2018). The underlying rationale is that written guidance can be interpreted as ‘quasi-law’ by the Managing Authorities, without having the legitimacy of regulations, and resulting in a one-size-fits-all implementation by Member States (Authors, based on interviews, 2019–2020). However, the risk is that reducing the guidance provided to Managing Authorities (or withdrawing it completely) would lead to a decline in the quality of evaluations, damaging the consolidation of progress in this regard.

Overall assessment

Overall, the assessment of the proposal is mixed, for several reasons. Firstly, it **argues in favour of simplification, removing several obligations**. This may be beneficial when considering requirements that did not prove to be effective and raised administrative costs or workload during the 2014–2020 period (e.g., mandatory ex-ante evaluations, numerous small impact evaluations at the OP priority level), but **at the same time, the draft regulation also maintains or (re)introduces different requirements** (e.g., Evaluation Plans, mid-term evaluations). In the absence of strong follow-up or

support measures, the **risk of a bureaucratic and formal ‘tick-box’ approach to evaluation is thus still present with the draft regulation**. For instance, this risk of a formalistic approach may materialise in 2021–2027 in relation to how Evaluation Plans are drafted or how evaluation criteria are applied by Managing Authorities. In addition, the proposal also comes back to solutions already tested in past programming periods that did not prove to be effective (e.g., ex-post evaluation at the programme level).

Secondly, the focus on simplification and flexibility instead of requirements poses the **risk of limiting the commitment of stakeholders to carry out evaluations**. The drawback is that it could **impede stakeholders in reaping the potential benefits of evaluations** (e.g., accountability, policy-learning). This risk is highest for stakeholders and for regions where the traditional policy processes do not include evaluations. This risk could be mitigated by providing **adequate support to make the most of the draft regulation** (e.g., enhanced flexibility to tailor evaluations to needs), **but the provision of this relevant support is not explicit** (e.g., removal of the Commission’s obligation to provide methodological guidance).

In general, the benefits of the proposal rest on a strong hypothesis. It assumes that Managing Authorities would take advantage of these simpler, shorter and more flexible rules to take a pro-active stance towards needs-based evaluations and enhanced policy-learning. Evidence from this report suggests that this is unlikely to be universal. The risk is that the benefits of evaluations would be concentrated in a limited number of Member States and regions, with others neglecting this valuable tool. It contrasts with the European Commission’s efforts during previous periods to develop evaluations across the board in the EU (Authors, based on interviews, 2019–2020).

5.2.2. Overview of the actions of the European Parliament regarding the post-2020 regulation proposal

At the time of writing the negotiations on the future Cohesion Policy have not been finalised. Nevertheless, based on this draft regulation of the European Commission, the European Parliament has **adopted its official position** (1st reading), **including amendments to the proposed text**. In particular, MEPs have suggested specific amendments concerning monitoring and evaluation, which form part of the EP mandate for negotiations (see Box 11).

Box 11 European Parliament's main amendments on monitoring and evaluation (first reading position)

-] The content of **Member States/Managing Authorities' evaluations is detailed**, through the **addition of extra evaluation criteria** to the list provided by the European Commission, namely: inclusiveness, non-discriminatory nature and visibility (Amendment 233).
-] The content of the **European Commission's ex-post evaluations is also detailed**, with the **addition of a requirement** to include an evaluation of the socio-economic impact and the funding needs and a focus on some EU strategies/objectives (e.g., ICT connectivity...) (Amendment 234)
-] Some **responsibilities are clarified**, such as the explicit mention of the obligation to publish the results of ex-post evaluations by the European Commission (Amendment 234)
-] **There is an emphasis on the involvement and roles of the MAs** at different steps of the programming, monitoring and evaluation process, e.g. to set up the Monitoring Committees (Amendment 214)
-] The push for **additional flexibility of the monitoring requirements**, including slightly delayed dates for the transmission of data to the Commission (Amendment 229) and the possibility to have multiple information systems to manage the OPs (Amendment 287).
-] The **reintroduction of a specific procedure for major infrastructure projects** (Amendment 21 and Amendments 173-176), in contrast to the Commission's original proposal.

Source: Authors based on European Parliament, 2020c.

As such, the proposed changes mostly entail **precisions and further flexibility** for the MAs. However, with these amendments, the **European Parliament does not challenge the core architecture of the draft regulation proposed by the Commission**, even when the latter introduces major changes. For instance, the Commission's position to remove the obligatory ex-ante evaluations or to change the unit of analysis of impact evaluations have not been addressed by the EP amendments. The exception is Parliament's proposal to reintroduce the major projects approval procedure into the post-2020 CPR.

At the time of writing (April 2020), not all the points linked to evaluation and monitoring of Cohesion Policy have been negotiated but on the major projects procedure the European Parliament has largely accepted the proposals of the Commission (a decisive trilogue took place in December 2019, see General Secretariat of the Council (2019)).




5.3. Alternative scenarios for the post-2020 period

In this section, **three scenarios for the role of evaluation in Cohesion Policy are presented**. The intention is to help think critically about future options for the post-2020 period.

Scenarios can be defined as conceptual descriptions of a future situation (Kosow and Gassner, 2007). They have intentionally been designed to show an "extreme" situation, or an ideal type to make clear their respective merits and drawbacks. These three scenarios are inspired by **three main functions of evaluation presented in Chapter 1: accountability, policy-learning and participation**. As argued earlier, they are broadly ascribable to three main paradigms underlying evaluation in Cohesion Policy, i.e., a positivist, a realist and a constructivist approach. Their respective features are described and contrasted with the organisational elements proposed by the European Commission in its draft Common Provisions Regulations for the post-2020 period.

They are presented in Figure 16.

Figure 16 Alternative scenarios for Cohesion Policy evaluation post-2020

SCENARIO	DESCRIPTION	PROS	CONS
 SYSTEMATIC, INTEGRATED MODEL (strong requirements and coordination, focus on EU-wide issues)	Evaluation focused on EU-wide issues following political debates Mandatory evaluations at all stages Central coordination with EU-wide harmonisation of scope/methods	Systematic coverage of EU political priorities Increased accountability and potential for policy-learning Potential economies of scale (harmonisation)	Important coordination costs Risk of one-size-fits-all approach
 OPEN, FLEXIBLE MODEL (limited requirements, needs-based approach)	Limited evaluation requirements Enhanced monitoring Evaluations focused on needs	Flexibility and more needs-based evaluations Stronger potential for policy-learning, planning and appropriation of results	Limited coverage and comparability of evaluations Limited accountability Risks for MAs with limited evaluation culture and capability
 PARTICIPATORY MODEL (engagement with stakeholders, co-production)	Delegation of evaluation goals, scope and methods to external stakeholders (wider society) Coordination and provision of information by EC/MS/MAs	Maximal engagement of stakeholders through participatory approach Tailor-made evaluations	Limited accountability Unstructured process with major coordination issues Confusion between political and administrative debates

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In the first scenario, the role of evaluation in Cohesion Policy is **more structured, to emphasise accountability**, i.e., that Cohesion Policy puts its resources at good use. An interesting way to achieve that would be to **organise evaluation around major EU challenges** (e.g., Green New Deal, Digital Agenda...). In that end, some kinds of ex-ante and interim evaluations will be needed from the Managing Authorities, aiming at ensuring that Cohesion Policy OPs are addressing these challenges. This effort would favour synergies between the interventions of Cohesion Policy across all the MS, but also with other EU and domestic policies. This re-introduction of the ex-ante evaluation will require clear, simple rules to avoid the extra administrative burden, taking stock of the criticism which led the European Commission to repeal it in its 2021-2027 proposal. Moreover, the introduction of an ex-ante evaluation covering the entire EU could open the opportunity for a major political discussion on the goals to be achieved by the Cohesion Policy, and the European Parliament might contribute setting the policy goals and agenda thanks to the structured, organised evaluation exercise. Ex-post evaluations would then take stock of the progress made to tackle the EU-wide challenges, at different levels (European Commission for the EU level, Managing Authorities for national and regional levels). This organisation would require some alignments in the methods and coordination between the different levels of governance. It is likely to trigger some consolidation of evaluation capacity. It would be a chance to highlight the potential context-specific issues of different territories regarding matters of high political priorities, but they might be lost in high-level debates.

In the second scenario, **a more flexible, needs-based model of evaluation** is developed and implemented across Europe. It is centred on the **policy-learning** use of evaluation. While the EC will continue the main tasks of monitoring and auditing to guarantee accountability and legal compliance, the role of evaluation will rely mainly on MS and MAs. The ex-ante and mid-term evaluation will be replaced by an upgraded reporting of data about expenditures, outcomes and impacts, but without needs for a formal evaluation of results. The public availability of these data and information will enable a policy debate engaging stakeholders at various levels, but without formal, administrative requirements. Coordination and harmonisation of evaluations will be led by policymakers. Only the evaluations corresponding to the needs of policymakers will be carried out. It would reduce the administrative burden and focus the evaluations on political priorities. Without formal obligations, it would be possible to adapt the methods used for the evaluations to the scope and the policy issues at stake. It shall favour the uptake and actual use of evaluations on the ground for concrete recommendations. In this framework, the European Parliament might take the initiative for a political debate beyond the formal legal obligations.

In the third scenario, **the types and content of evaluation will be delegated by the European Commission and MS/MAs to external stakeholders**. The goal is to maximise the contribution of evaluation to the **participation of the wider society**. A process of co-production of policy-relevant evaluation studies will be organised coordinating the various bodies, the types of evaluation needed and the related data and sources of information. While the European Commission and MA/MS will be responsible for providing the data and information enabling the process, stakeholders will be in charge of defining scope, methods and organisation of the evaluation exercises, respecting the EU policy cycle. In this scenario, the EP can play a central role as the Europe-wide political arena further contributing to the process. While this approach is likely to increase the relevance of evaluation studies, the coordination costs having multiple actors might be relevant.

The **three scenarios presented in this section have all pro and cons**.

The **first scenario** aims to structure the evaluation of the EU Cohesion Policy in an integrated, unified European process. The main benefit would be to have a harmonised evaluation system focused on EU-wide priorities, with precise, comparable results aligning ex-ante expectations with ex-post results.

While MS/MAs will have the chance to highlight context-specific issues, the administrative burden is likely to be reduced by achieving economies of scale since evaluation reports can be carried out centrally. This structured, integrated evaluation process could also consolidate evaluation capacity and even promote policy-learning by mobilising all European stakeholders. However, there is a significant risk of more superficial, generic evaluation findings unable to provide an in-depth understanding of context-specific challenges. Managing Authorities might also have varying degrees of interest in the identified EU-wide challenges, though it is also an opportunity to engage and mobilise them. Additionally, this integrated and structured organisation would require an important coordination effort from the European Commission.

The **second scenario** is more flexible and open. The possibility for MS and MAs to tailor-made the evaluation is expected to reduce the administrative burden significantly, by focusing on what they consider central. This model is likely to be better adapted to national and regional/ local specificities. Policy-learning should be driven by the interests of the MS/MAs to deliver better results following their own needs. While MS and MAs with strong administrative capacities are expected to know 'how to learn from evaluation'; the weaker ones risk being unable to benefit from an evaluation, which would lead to further divergences and disparities. In many cases, some MAs could even reduce their evaluation activity. In this frame, the European Parliament might contribute to the promotion evaluation studies and animate an open debate on results achieved. Finally, this second, open model aims at facilitating the integration of regional and local stakeholders since it can be adapted more easily to context-specific situations.

The **last scenario** is focused on building a participatory approach through the evaluation exercise. As such, it is likely to maximise the engagement of stakeholders and to concentrate evaluations on topics of high local and social interests. However, it deviates substantially from the current practices and may pose problems of coordination and confusion between administrative and political debates. It may also produce evaluations of limited accountability value.

6. CONCLUSIONS AND RECOMMENDATIONS

This final chapter compiles all the evidence presented in the previous chapters to reach conclusions on the role of evaluation in Cohesion Policy. It also provides evidence-based recommendations.

6.1. Main findings

Over the recent decades, the EC has made considerable effort to **deploy an ambitious evaluation framework** fitting the specific case of Cohesion Policy (CP). Evaluation has gradually been incorporated into the CP institutional framework since the 1990s and CP has become the most evaluated EU policy. The specificities of CP evaluation are intimately linked to the constituent features of CP itself. It is an institutionalised process enshrined in regulations involving numerous stakeholders at different levels of governance and of different statuses. This complexity is amplified by the fact that CP evaluation is implicitly expected to fulfil some important functions and objectives which are at the heart of the policy but are not always explicitly differentiated and systematically detailed in strategic policy documents: to promote the result-orientation of CP, to provide reliable data and evidence on CP achievements (among other things) to serve an accountability purpose, and to promote evidence-based policy-learning.

For the assessment of the current situation and future proposal, it is useful to take a step back and adopt a **historical perspective**. In the programming period 1994-99, the main elements of the evaluation framework, which still exist today, were introduced: ex-ante, interim and ex-post evaluations. The following three programming periods describe several variations (or oscillations) of the framework along with some more structural improvements. **In 2000-2006, all types of evaluations were compulsory**. Ex-ante and midterm evaluations were under the responsibility of the Member States, while the EC carried out the ex-post evaluations. However, the Member States faced a timing issue, and the evaluations were often weak in terms of coverage and depth. **In 2007-2013**, the Member States had **significant flexibility** to organise the ex-ante, ongoing and ex-post evaluations. New arrangements were proposed such as Evaluation Plans, but they were not mandatory. Progressively, more explicit references to result-orientation and increased attention to the methodological quality were developed in guidance documents, especially towards the end of the programming period (promotion of advanced methods, such as theory-based impact evaluation and counterfactual impact evaluation). Overall, issues of delays remained, and several programmes were not fully evaluated. Significant methodological improvements were recorded, although unevenly across Member States.

Besides these variations, **more steady features or evolutions** are worth noting. Specifically, the competences for ex-ante and ongoing evaluations are typically under the responsibility of MAs, which plays a central role in CP evaluation at Member States level, while the EC generally carries out the ex-post evaluations. Meanwhile, continuing improvements have been introduced concerning monitoring and data reporting across the periods.

Different features characterise the CP evaluation framework in the programming period **2014-2020**. In contrast with the 2007-2013 programming period, it includes **more stringent mandatory requirements** in terms of number, types and content of evaluations. Evaluations are compulsory at the different steps of the implementation of the policy (ex-ante, ongoing and ex-post). Moreover, impact evaluations are requested from Managing Authorities at the level of priorities within Operational Programmes and for the Youth Employment Initiative. Major projects are approved by the Commission on the basis of a well-defined set of information submitted by the Managing Authority, including a cost

benefit analysis (following specific guidelines of the Commission, often adapted and further developed by some Member States).

Another distinctive trait of the CP evaluation framework is that it tries to foster a more strategic approach to evaluation and **consolidate result-orientation**. In particular, it requires that Member States define a performance framework based on an explicit intervention logic and the use of indicators. Also, Managing Authorities are required to draw up Evaluation Plans to anticipate evaluation needs and manage resources accordingly.

Finally, to help Member States and regions navigate these different regulatory requirements and strengthen their evaluation capability, the European Commission has produced or commissioned a large number of **guidance documents**, addressing methodological or operational issues (e.g., dealing with indicators and monitoring). The Evaluation Network (for the ERDF), the ESF Evaluation Partnership and the Evaluation Helpdesk (for both the ERDF and the ESF) as well as the Centre for Research on Impact Evaluation in the Joint Research Centre of the Commission also offer tailored support.

Whether these evolutions and current arrangements have yielded a sound framework to effectively and efficiently carry out CP evaluation can be assessed against the main functions and specific purpose of CP evaluations. In general, informed stakeholders agree that the **capacity of the framework to release evidence on the achievements of CP and fulfil an accountability function has improved at EU level**. This is obtained by, for example, setting up a monitoring system allowing for the collection of data that is useful for evaluations. There are improvements both in the definition of indicators (with common indicators set in the annexes of regulations) and in their actual collection in the different regions and Member States. However, some significant limits remain in the case of indicators applying to the ERDF, which cannot be completely aggregated at EU level and subsequently compared to financial input (i.e., it is not possible to measure which output or result is obtained for a given amount of financial investment).

The EC has also made steady progress in the realisation of ex-post evaluations. For example, early on, it shifted from a programme-based approach to a thematic one, and it has adopted more robust methodologies. There are still limitations in terms of coverage as ex post evaluations often adopt qualitative approaches and these can only look at a sample of Member States and regions. Evidence on how **ex post evaluations feed into strategic development at EU level and impact on the definition of strategic orientation shows that the process is happening but it has to be consolidated**. The results and recommendations of the ex post evaluations cannot directly feed into the next programming period because they are produced too late but they can, in principle, be considered in the following one. Since 2000-2006, there is indeed evidence that the results of ex post evaluation were taken into consideration for designing regulations with a time lag, but this is not systematic. Also, until now, the EC has made little use of the wealth of evaluations conducted at the Member States level, as results are too disparate to aggregate and compare.

At the Member State level, rules and procedures set out in 2014-2020 **constitute, in principle, an adequate framework to assess CP achievements, but there are important limits in practice**. Indeed, there is an overall rise in the number of evaluations carried out at Member State and regional levels as compared to the previous programming period, and an important number of impact evaluations are planned even if there is no certainty that they will actually all be implemented. Specific improvements related to the adoption of more explicit intervention logic at the programming stage, better planning of evaluation activities, and increased awareness of the need for, and use of robust, advanced methods.

In some Member States, especially in Central Europe, a coordinated effort is progressively taking place to make the most of CP evaluation, and there is evidence that an evaluation-based learning process is taking root. EC support and guidance are instrumental in this regard. The case studies reviewed in the report suggest positive results from Member States that have institutionalised evaluation introducing legislative provisions and guidance, as in the case of Poland, or have instead opted for guidance and capacity-building measures, as in Lithuania. However, even in the most favourable case, doubts remain about the sustainability of such positive developments. It is not clear whether the learning process would last if the incentives to keep carrying out CP evaluation were removed.

There is also evidence from the analysis of the Evaluation Helpdesk that the **quality of the evaluations carried out at Member State level requires further improvement**. Also, evidence collected from case studies suggests that **Member States and regions make little use of evaluation findings to feed into the policy process**. The case studies identify significant examples of good practice (for instance in Poland, a specific arrangement tracks the implementation of evaluation recommendations) but show the lack of interest by policy makers in Member States regarding evaluation results.

Based on a review of the literature, case studies and interviews, the report identifies **different reasons for the limited use of CP evaluations in Member States**. A first series of reasons deal with some obligations contained in the CPR and funds-specific regulations. Requirements on deadlines and methods – and specifically, their combination – are not seen as appropriate to deliver the type of evidence needed, when needed. For example, impact evaluations produce evidence that does not match MAs' interest for more operational aspects. Furthermore, the timing of evaluation is not adequate to feed into the subsequent programming period. Also, an issue exists with the parameters and scope of evaluations, especially when CP funding is of limited scale. It is difficult to disentangle the contribution of CP from the overall impact of policies on regional development. Regional policymakers are typically more interested in this overall impact, rather than in just the effect of CP.

Another factor limiting the relevance of CP evaluation for the purpose of learning is Member States' and regions' **insufficient evaluation capacity**. Indeed, in some Member States, the MA lacks the skills required to apply sophisticated, advanced evaluation methods. Moreover, difficulties in organising the work of external consultants can be an issue. For instance, problems in drafting meaningful Terms of Reference asking relevant evaluation questions is highlighted as a critical weakness. These issues can be more broadly related to the **low level of 'evaluation culture'** of the concerned Member States (i.e., receptiveness to the evaluation process and findings).

The view in some Member States that evaluations are not useful and that they are an imposed exercise inevitably generates a sense of excessive **'administrative burden'**, as the effort is disproportionate compared to the expected benefits. A clear example comes from the ex-ante evaluations, which several Member States report having conducted mainly for compliance reasons. In these cases, the ex-ante evaluations have not fulfilled their important function in the evaluation process. Likewise, data collection is often perceived to be burdensome, especially when the utility of indicators is not clear (e.g., in the case of common indicators useful at EC level for accountability purpose but not at Member State level for policy-learning). However, there is **no clear evidence that evaluation procedures are burdensome as such**. It seems more accurate to state that the issue is not the administrative burden as such, but the consideration that evaluations are not useful and actually hardly feed into policy-learning and decision-making.

In this context, the **Commission's proposal for the 2021–2027 programming period** tries to **reduce the administrative costs** associated with evaluation and to **simplify procedures**. Examples include the removal of the obligations to carry out ex-ante evaluations, to define programme-specific

indicators, and to compile annual implementation reports. Also, the obligation to follow a specific approval procedure, with a dedicated assessment framework, for the selection of major projects is removed, following the elimination of a threshold distinguishing between large and smaller project.

The reference to the obligation for MAs to ensure evaluation capacity and for the EC to provide guidance is also eliminated. At the same time, the proposal maintains some obligations for MAs (e.g., to carry out impact evaluations) and introduces new ones for the EC (realise mid-term evaluations) and the MAs (more frequent data reporting, reference to evaluation criteria defined by the Better Regulations framework).

The core idea motivating the EC proposal is to simplify rules and procedures to **overcome the sense of formal compliance** by minimising mandatory provisions and written guidance accused of becoming 'quasi-law'. The underlying hypothesis is that Member States and MAs will autonomously carry out evaluations, resorting to soft support measures such as the Evaluation Helpdesk, when needed. The assumption is that the evaluation framework is sufficiently consolidated and evaluation practices diffused to allow for more flexibility and responsibility granted to Member States and regions. The latter are expected to have the necessary level of maturity to make the most of this improved context.

These expectations have to be verified on different grounds. First, available evidence compiled in this study shows that the primary cause of a compliance approach is the perceived lack of utility of evaluations and insufficient evaluation capacity at the level of the Member States, rather than burdensome procedures per se. Moreover, **simplification may entail risks**. As learnt from 30 years of CP evaluation, legally binding provisions provide a common framework for a wide array of policymakers and stakeholders, obliging them to carry out evaluations within the same framework. The possible drawback is that evaluation is done as an end in itself, merely to comply with the requirements. On the other hand, a flexible approach with soft support from the EC is expected to promote ownership and capacity building, though with an increased risk of leaving behind those insufficiently committed or with insufficient capacity.

Overall, the report shows that the **causes of dissatisfaction with the role of CP evaluation in Member States are complex**. This requires a comprehensive response that the generic objective of "simplification" can hardly provide alone. The risk, if these causes are not tackled properly, is to imperil the historical commitment of the EC to steer a strong push in favour of CP evaluation in the Member States and regions together and the considerable effort made so far. Indeed, it is not clear how an evaluation framework, albeit simplified, will be preserved in the future. This would do away with past effort and fragilize an important basis for justifying the *raison d'être* of Cohesion Policy, and a potentially powerful instrument for policy learning.

So far, the **European Parliament has adopted a rather passive stance**, without challenging the core of the European Commission's proposal for evaluation for the 2021–2027 period. Yet, the European Parliament could play an important role in raising the political dimension of Cohesion Policy based on evaluation findings, among other evidence. It is ideally placed to take stock of evaluation findings on one of the major EU policies and contribute to the diffusion of an evaluation culture in Member States and regions.

6.2. Recommendations

Based on the findings from the study, two lines of action could be envisaged: **strategic recommendations** which focus on structural and longer-term issues, and **operational recommendations**, expected to improve rules and procedures in the short-term.

6.2.1. Strategic recommendations

A reflection on the **expected purpose of evaluations** should be the basis for strengthening the role of evaluation in Cohesion Policy. This report shows that the evaluation framework set up by the European Commission is mostly centred on accountability and policy-learning objectives, and that these remain largely implicit. Yet, some indecision as to the objectives pursued by evaluations done at the Member States level contributes to eroding their perceived utility. A first recommendation is therefore to **clearly spell out when evaluation at the Member State level is carried out for accountability and/or policy-learning purposes**, as this has implications on how it should be carried out, by whom and when – and overall, for its conditions of effectiveness.

The second implication concerns the need to enlarge the conceptual underpinnings of CP evaluation. The paradigms that underlie the accountability and policy-learning purposes of CP evaluation are ascribable to, respectively, positivist and realist approaches. A more participatory approach is embryonic in CP, but it has not taken root until now. This report suggests embracing **a more participatory approach** as a way to overcome the lack of commitment at the level of Member States/regions. The EC, Member States and regions could co-design evaluation framework (or elements of it, e.g., Terms of Reference) to promote interest for, and use of, evaluations across the board.

A final fundamental consideration involves the need to raise the political profile of Cohesion Policy, based on evaluation and other evidence. **The role of the European Parliament in this regard is potentially decisive**, as it should highlight the crucial political relevance of Cohesion Policy at the EU, national and regional levels and use evaluation as a basis for discussion and awareness raising. For instance, the European Parliament could promote policy dialogue around key political issues at the EU level by using evaluations of Cohesion Policy – e.g., on climate or digital aspects, among other evidence. MEPs are also well placed to **reflect and engage on the reasons for low evaluation interest and uptake** in several Member States and regions, as they are aware of both national and EU dynamics. Finally, MEPs should influence the definition of related regulatory provisions, in the specific ways suggested below.

6.2.2. Operational recommendations

A series of **operational recommendations can be addressed to the main stakeholders** of CP evaluation.

- 1) **Co-legislators (the European Parliament and the Council)** should, if possible, consider revising some provisions of the Common Provisions Regulation or fund-specific regulations when agreeing on their final version. For example:
 -)] **Ex-ante evaluations should be mandatory** and could be done by authorities other than MAs to challenge the mainstream vision and make them more relevant.
 -)] Managing Authorities should have **flexibility in deciding the coverage (programme or axis level, thematic) of impact evaluations**.
 -)] The **timelines** proposed should be indicative, or dependent on absorption of funds to ensure they are adapted to the actual needs of MAs.
 -)] **Requirements concerning indicators** should be included, such as the necessity to design programme-specific indicators and to ensure that common indicators can be aggregated at EU level for comparison purposes.

-)] It should be elucidated that the five evaluation criteria of the Better Regulations framework are a basis for **defining specific evaluation questions** adapted to the programme being evaluated;
 -)] The dedicated **major projects selection and approval procedure should be reintroduced** to preserve a harmonised approach to infrastructure appraisal at the EU level;
 -)] **Building capacity in Member States and the obligation for the EC to provide support** should be enshrined in the regulation to help align requirements with Member States' ability to fulfil them.
- 2) At the **Member State level**, the improvement of evaluation capacity and culture should be pursued and supported by adequate resources. Professionalism of evaluation teams should be an explicit objective. Discussions of evaluation findings should be encouraged, including in political debates. The possibility to substitute or flank the MA with a competent alternative body when the MA cannot guarantee a sufficient level of capacity should be envisaged.
 - 3) The **European Commission** should build upon its progress so far and continue consolidating evaluation capability in Member States and regions. It should strive to strike a balance between prescription and flexibility and continue supporting the regions most in need, in the most effective way.
 - 4) Evaluations of the **long-term impacts of Cohesion Policy** could be carried out in the framework of programmes like ESPON, Horizon Europe or other relevant EC funded programmes to allow for alternative perspectives.

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ANNEXES

A.1 Methodological Annex

List of the **research questions addressed by this report**:

-)] Comprehensive overview of the rules and procedures governing evaluations in the field of cohesion policy.
-)] Overview of the methodologies used for the evaluation of cohesion policy.
-)] Identification of major differences in the implementation of evaluation rules.
-)] Critical assessment of the evaluation exercises performed in the previous programming period 2007-2013, including the rules and methodologies used.
-)] Analysis of the relevant evaluation reports from the European Commission and EU Member States from the current programming period.
-)] Brief comparison with other EU policy areas and instruments with possible lessons learned for evaluations in cohesion policy.
-)] Assessment of the potential for simplification and increased efficiency.
-)] Overview of the Commission proposals for the next programming period 2021-2027 concerning the role of evaluations in the field of cohesion policy. Comparison with the current programming period, including the expected consequences and implications.
-)] Identification of key issues likely to be of concern and recommendations for actions that could be taken by the EU institutions and other major EU stakeholders.

The following **methodological tools** have been used:

-)] **Literature review:** Collection and analysis of the different documents highlighting the role of evaluation in Cohesion Policy alongside different dimensions. It includes the scientific literature and materials produced by policy-makers at different levels (See References).
-)] **Semi-structured interviews:** Discussions with stakeholders involved in Cohesion Policy evaluation or related activities at different levels (EU, national, regional). See Table A.1 below for the full list of interviews.
-)] **Small-scale online survey (54 respondents):** Collection of evidence on the perceptions of rules and use of Cohesion Policy evaluations. Respondents include Managing Authorities of different EU Member States, consultants, and academics (see Table A.2 below).
-)] **Case studies:** In-depth analysis of how evaluations are organised and carried out in some EU Member States, namely France, Ireland, Italy, Lithuania, Poland and Romania. The full analysis of these cases is included in the section on Case studies.
-)] **Scenario-building:** Prospective design of the potential future evolution of the role of Cohesion Policy post-2020, including the identification of the relative advantages and disadvantages (see section 5.3).
-)] **Triangulation of evidence:** Combination of the different relevant methods to reach more robust conclusions.

Table A.1. List of interviewed stakeholders (anonymised)

Institution	Type of interview	Date
Budapest International Monitoring and Evaluation Conference (multiple stakeholders)	Conference	21-22/11/2019
CSIL	Brainstorming session	24/01/2020
European Court of Auditors	Written interview	28/01/2020
European Investment Bank – Evaluation Unit	Phone interview	21/01/2020
European Commission – DG EMPL Evaluation Unit	Phone interview	16/01/2020
European Commission – DG EMPL Policy Unit	Phone interview	22/01/2020
European Commission – DG REGIO Evaluation Unit	Interview	08/11/2019
European Commission – DG REGIO Policy Unit	Phone interview	04/12/2019
European Commission – DG RTD Evaluation Unit	Phone interview	22/01/2020
European Commission - Other	Phone interview	10/12/2020
Evaluation Helpdesk	Interview	08/11/2019
OECD	Phone interview	28/11/2019
Lancaster University, University of Bristol	Phone interview	19/11/2019
Free University of Brussels	Brainstorming session	24/01/2020
University of Milan	Brainstorming session	24/01/2020
University of Padova	Phone interview	04/12/2019

Source: Authors.

Table A.2. Overview of respondents to the online survey

Type of Stakeholders	Country
Independent worker involved in CP evaluations (consultant, evaluator...)	Luxembourg
Other (please specify)	Greece
Regional public authority	Czech Republic
National public authority (ministry...)	Italy
Regional public authority	Greece
Regional public authority	Greece
Regional public authority	Greece
National public authority (ministry...)	Poland
Private enterprise/network of enterprises involved in CP evaluations	Lithuania
Local public authority	Other
Regional public authority	Belgium
EU institution	Belgium
National public authority (ministry...)	Denmark
National public authority (ministry...)	Bulgaria
Academia/Research	Netherlands
Private enterprise/network of enterprises involved in CP evaluations	Croatia
National public authority (ministry...)	Croatia
Academia/Research	Greece
Academia/Research	Italy
Other (please specify)	Belgium
Academia/Research	Poland
EU institution	Belgium
Academia/Research	Italy
Academia/Research	Italy
Academia/Research	Romania
EU institution	Spain
Private enterprise/network of enterprises involved in CP evaluations	Luxembourg
NGO/Trade union/Political party	Germany
Academia/Research	Czech Republic
Independent worker involved in CP evaluations (consultant, evaluator...)	Germany
Academia/Research	Austria
National public authority (ministry...)	Croatia
Academia/Research	Belgium
National public authority (ministry...)	Czech Republic
National public authority (ministry...)	Czech Republic
National public authority (ministry...)	Czech Republic
National public authority (ministry...)	Czech Republic
National public authority (ministry...)	Czech Republic
National public authority (ministry...)	Czech Republic
National public authority (ministry...)	Czech Republic
National public authority (ministry...)	Czech Republic
National public authority (ministry...)	Portugal
National public authority (ministry...)	Czech Republic
National public authority (ministry...)	Estonia
Independent worker involved in CP evaluations (consultant, evaluator...)	France
National public authority (ministry...)	Republic of Cyprus
Independent worker involved in CP evaluations (consultant, evaluator...)	Italy
Independent worker involved in CP evaluations (consultant, evaluator...)	Belgium
Independent worker involved in CP evaluations (consultant, evaluator...)	France
EU institution	Belgium
National public authority (ministry...)	Finland
Regional public authority	Germany
National public authority (ministry...)	Romania
National public authority (ministry...)	Sweden

Source: Authors.

A.2 Regulatory provisions governing Cohesion Policy evaluation

Table A.3. Main EU rules governing Cohesion Policy evaluation during the 2014-2020 programming period

Topics	Number, types and content of evaluation	Organisation of Evaluation		Methods	Findings and use
		Managing Authorities/Member States	European Commission		
Overall evaluation arrangement	Obligatory ex-ante, ongoing and ex-post evaluations, with multiple goals: improvement of the design and implementation of OPs, assessment of effectiveness, efficiency and impact. Impacts are examined based on EU strategies, missions of funds, and socio-economic aspects of the territory (Article 54 of the CPR).	<p>Obligation to use indicators (financial, output and result ones), depending on the OP objectives and Fund-specific rules. Each priority of the OPs should have clear objectives and attached indicators (Articles 27 and 96 of the CPR)</p> <p>Obligation to set up a Monitoring Committee (covering one or more OPs), according to national legislation and composed of the relevant stakeholders (Articles 47 and 48 of the CPR).</p> <p>Obligation to draft evaluation plans (covering one or more OPs) listing ongoing/impact evaluations and to ensure adequate evaluation capacity (Article 56 of the CPR)</p> <p>Functional independence of (internal or external) evaluators (Article 54 of the CPR)</p> <p>Possibility to use Structural Funds for technical assistance related to evaluation (Article 59 of the CPR)</p>	<p>Advisory role in the Monitoring Committees (Article 48 of the CPR)</p> <p>Obligation to provide evaluation guidance to Member States (Article 54 of the CPR)</p> <p>Possibility to use Structural Funds for technical assistance related to evaluation (Article 58 of the CPR)</p>	European Commission: Obligation to provide evaluation guidance to Member States (Article 54 of the CPR)	European Commission and Managing Authorities: Obligation to make all evaluations public (Article 54 of the CPR)

Topics	Number, types and content of evaluation	Organisation of Evaluation		Methods	Findings and use
		Managing Authorities/Member States	European Commission		
Ex-ante evaluations	<p>Obligatory for each OP to improve the quality of the OP design (Article 55 of the CPR). Obligatory inclusion of a CBA for Major Projects (Article 101 of the CPR)</p> <p>Coverage: contribution to EU strategies, internal coherence, consistency of the budget with objectives, coherence with other strategies, indicators quality and relevance, intervention logic, policy capacity, transversal objectives, requirements of the strategic environmental assessment when appropriate... (Article 55 of the CPR)</p>	Obligation to carry out ex-ante evaluations for the OPs and send them to the European Commission (Article 55 of the CPR)	N/A	N/A	N/A

Topics	Number, types and content of evaluation	Organisation of Evaluation		Methods	Findings and use
		Managing Authorities/Member States	European Commission		
Ongoing evaluations	<p>Obligatory evaluation of each OP priority at least once during the programming period to assess the contribution of Funds (Article 56 of the CPR)</p> <p>Obligatory evaluations on the effectiveness, efficiency and impact of joint support from the ESF and the specific allocation for YEI at least twice (by 31/12/2015 and 31/12/2018) (Article 19 of the ESF Regulation)</p>	<p>Obligation to carry out the planned evaluations (Article 56 of the CPR), including those of the YEI (Article 19 of the ESF Regulation)</p> <p>Obligatory Monitoring Committee meeting at least once a year to review the progress of OPs, review all evaluations and provide recommendations to the MAs (Articles 56, 49 and 110 of the CPR). It includes the YEI (Article 19 of the ESF Regulation)</p> <p>Obligation to draft Annual Implementation Reports covering information of the OP progress, including a synthesis of conducted evaluations (Article 50 of the CPR). It includes information on the YEI (Article 19 of the ESF Regulation). Organisation of an Annual Review Meeting to examine the performance of each OP (Article 51 of the CPR)</p> <p>Obligation to synthesise all the evaluation findings and send them to the European Commission by 2022 (Article 114 of the CPR)</p>	<p>Possibility to carry out, by its own initiative, ongoing evaluations of OPs. The corresponding MA and MC must be informed and get the results (Article 56 of the CPR)</p> <p>Obligatory provision of comments on the Annual Implementation Reports and dialogue with the Managing Authorities on their content and potential issues (Article 50 of the CPR). Organisation of an Annual Review Meeting to examine the performance of each OP (Article 51 of the CPR)</p> <p>Obligatory yearly synthesis of the Annual Implementation Reports (Article 53 of the CPR)</p>	N/A	<p>Obligatory Monitoring Committee meeting at least once a year to review the progress of OPs, review all evaluations and provide recommendations to the MAs (Articles 56, 49 and 110 of the CPR). It includes the YEI (Article 19 of the ESF Regulation)</p> <p>Obligation to synthesise evaluations, at the OP level for Managing Authorities, at the EU level for the European Commission (Articles 50 and 53 of the CPR)</p> <p>Obligation to do meetings of the Monitoring Committees and Annual Review meetings, where evaluations are a source of evidence (Articles 49, 50, 51, 56 and 110 of the CPR)</p>
Ex-post evaluations	Obligatory ex-post evaluations by the European Commission, or by the MS in collaboration with the European Commission (by 31/12/2024). Assessment of the effectiveness, efficiency, impact and contribution of Structural Funds to EU strategies (Article 57 of the CPR)	Possibility to conduct ex-post evaluations in collaboration with the European Commission (Article 57 of the CPR)	Obligation to carry out ex-post evaluations and produce a synthetical report by 31/12/2025 (Article 57 of the CPR)	N/A	European Commission: Obligation to synthesise ex-post evaluations (Article 57 of the CPR)

Source: Authors based on European Commission, 2015b; Naldini, 2018; Official Journal of the EU, 2013a, 2013c.

Table A.4. Comparison of the main evolutions of EU rules governing the evaluation of Cohesion Policy between 2007-13 and 2014-20

Topics	Evolution Across Periods	2007-2013	2014-2020
Number, types and content of evaluations	Stability or minor changes across periods	Obligatory CBA for Major Projects (Article 40 of the GPR)	Obligatory CBA for Major Projects (Article 101 of the CPR)
		Obligatory ex-post evaluations for each objective, covering all relevant OPs and investigating resources used, effectiveness, efficiency and socio-economic impacts. Obligatory identification of lessons for policy, success/failure factors and good practices (Article 49 of the GPR)	Obligatory ex-post evaluations for effectiveness, efficiency, impact and contribution of the Structural Funds to EU strategies (Article 57 of the CPR)
	Major changes across periods	Distinction of strategic and operational (monitoring) evaluations (Article 47 of the GPR)	No explicit distinction between strategic and operational evaluations mentioned in the regulation
		Obligatory ex-ante evaluations to optimise the allocation of resources and programming quality of the OPs (Article 48 of the GPR), but with possibility to cover multiple OPs with one evaluation (Regional Employment and Competitiveness and European Territorial Cooperation Objectives) (Article 48 of the GPR)	Obligatory ex-ante evaluations to improve the quality the design of each OP (Article 55 of the CPR)
		Obligatory ongoing evaluations on monitoring aspects but without clear requirements in terms of number/content (Article 48 of the GPR)	Obligatory (ongoing) evaluation of each priority for effectiveness, efficiency and impact, at least once during the period (Article 56 of the CPR)
Organisation of evaluation (overall evaluation arrangement)	Stability or minor changes across periods	Division of responsibility of evaluations between the European Commission and the MS according to the proportionality principle (Article 47 of the GPR)	Proportionality principle not explicitly stated in the regulation, but can be deduced from other rules
		Functional independence of evaluators (Article 47 of the GPR)	Functional independence of evaluators (Article 54 of the CPR)
		Use of the technical assistance budget to fund evaluations (Article 47 of the GPR)	Possible use of Technical assistance to support evaluations (Articles 58 and 59 of the CPR)
	Major changes across periods	See roles of MA/MS and EC	See roles of MA/MS and EC
Organisation of evaluation (Role of Managing Authorities/Member States)	Stability or minor changes across periods	Obligatory provision of resources to carry evaluations, including the organisation of data collection and monitoring systems (Article 48 of the GPR).	Obligatory to ensure adequate evaluation capacity (Article 56 of the CPR)
		Obligatory use of indicators (financial, output and result ones), including in OP design (Article 37 of the GPR)	Obligatory use of indicators (financial, output and result ones), including in OP design (Articles 27 and 96 of the CPR)
		Cooperation with the European Commission to support the realisation of ex-post evaluations (Article 49 of the GPR)	Cooperation with the European Commission to support the realisation of ex-post evaluations and Possibility to

Organisation of evaluation (Role of the European Commission)			conduct (its own) ex-post evaluations in collaboration with the European Commission (Article 57 of the CPR)
		Obligatory set up of Monitoring Committee(s) in accordance with EU and national rules to review the progress, effectiveness and quality of the implementation of the OPs. It includes the reception of evaluations and provision of relevant comments to the MAs (Articles 48, 49, 63, 64, 65, 66 of the GPR)	Obligatory set up of Monitoring Committee(s) in accordance with EU and national rules, with at least once yearly meeting to review the progress of the OPs. It includes the review of evaluations and provision of relevant comments to the MAs (Articles 47, 48, 49, 56, 110 of the CPR)
		Obligatory Annual Reports on the implementation of the OPs, including the steps taken for effectiveness and quality which cover evaluations (Article 67 of the GPR). Organisation of an Annual meeting with the European Commission on OP performance, including results of evaluations (Article 68 of the GPR).	Obligatory Annual Implementation Reports on OPs progress (including a synthesis of evaluations) and organisation of Annual Review Meetings (Articles 50 and 51 of the CPR)
	Major changes across periods	N/A	Annexes of the Fund-specific Regulations with a list of common indicators
		Optional draft of an evaluation plan listing the evaluations to be conducted (Article 48 of the GPR). Obligation to ensure evaluations are conducted (Article 60 of the GPR)	Obligatory draft of evaluation plans (covering one or more OPs) listing ongoing/impact evaluations, and realisation of the planned evaluations (Article 56 of the CPR)
		Obligatory separate ex-ante evaluations for the Convergence Objective, with potential derogations. Obligatory ex-ante evaluations for Regional Competitiveness and Employment/European Territorial Cooperation Objectives, but with flexible scope/number (Article 48 of the GPR).	Obligatory ex-ante evaluations for (all) the OPs and transmission to the European Commission (Article 55 of the CPR)
		Obligatory ongoing (monitoring) evaluations, especially for OPs with significant departures from initial goals (Article 48 of the CPR)	Obligatory synthesis of all evaluations and transmission to the European Commission (Article 114 of the CPR)
		Possibility to conduct strategic evaluations (Article 49 of the GPR)	N/A
	Stability or minor changes across periods	Possibility to conduct monitoring evaluations of OPs, in partnership with the Member States (Article 49 of the GPR)	Possibility to conduct ad-hoc evaluations of the OPs during the programming period (Article 56 of the CPR)
		Obligatory ex-post evaluations, in cooperation with MS/MAs (Article 49 of the GPR)	Obligatory ex-post evaluations (on its own or in cooperation with MAs/MS) and synthesis of the results (Article 57 of the CPR)
		Advisory role in the Monitoring Committees (Article 64 of the CPR)	Advisory role in the Monitoring Committees (Article 48 of the CPR)
		Obligatory provision of guidance to the Member States on evaluation methods (Article 47 of the GPR)	Obligatory provision of evaluation guidance to the Member States (Article 54 of the CPR)

		Obligatory provision of comments on the Annual Reports and organisation of Annual meetings with the MAs (Articles 67 and 68 of the GPR)	Obligatory provision of comments on the Annual Implementation Reports and organisation of Annual Review Meetings (Articles 50 and 51 of the CPR).
	Major changes across periods	N/A	Obligatory synthesis of the Annual Implementation Reports (Article 53 of the CPR)
Methods	Stability or minor changes across periods	Obligatory provision of guidance by the European Commission to the Member States on evaluation methods (Article 47 of the GPR)	Obligatory provision of evaluation guidance by the European Commission to the Member States (Article 54 of the CPR)
Findings and Use	Stability or minor changes across periods	Obligatory Annual Reports and organisation of Annual meetings between the European Commission and the MAs (Articles 67 and 68 of the GPR). Content includes evaluation results.	Obligatory Annual Implementation Reports on OPs progress and organisation of Annual Review Meetings between the European Commission and the MAs (Articles 50 and 51 of the CPR). Content includes evaluation results
	Major changes across periods	Diffusion of results of evaluations according to the applicable rules on access to documents (Article 47 of the GPR)	Obligation of public diffusion of all evaluations (Article 54 of the CPR)
		N/A	Obligatory synthesis of all evaluations by the Managing Authorities and transmission to the European Commission (Article 114 of the CPR) Obligatory synthesis of the Annual Implementation Reports by the European Commission (Article 53 of the CPR)

Source: European Commission, 2015b, 2007; Naldini, 2018; Official Journal of the EU, 2013a, 2006.

Table A.5. Analysis of the EU rules proposed by the European Commission for evaluation of Cohesion Policy post-2020

Topics	Number, types and content of evaluation	Organisation of evaluation		Methods	Findings and their use
		Managing Authorities/Member States	European Commission		
Overall evaluation arrangement	<p>No obligatory ex-ante evaluations for this programming period</p> <p>Obligatory ongoing evaluations, including midterm evaluations (Articles 39 and 40 of the CPR proposal)</p> <p>Obligatory (ongoing/ex-post) impact evaluations at the OP level by 2029 (Article 39 of the CPR proposal)</p> <p>Obligatory ex-post evaluations at the Fund level (EU) (Article 40 of the CPR proposal)</p> <p>Specific goals of evaluations are not mentioned, but explicit reference to the 5 EU evaluation criteria for all evaluations: effectiveness, efficiency, coherence, relevance and EU added value (Articles 39 and 40 of the CPR proposal)</p>	<p>Obligation to set up a Performance framework allowing monitoring and evaluation, including through the use of output and result indicators as defined in Fund-specific rules (with milestones and targets) (Article 12 of the CPR proposal)</p> <p>Obligation to ensure the necessary procedures to produce and collect the data necessary for evaluations (Articles 39 and 66 of the CPR proposal)</p> <p>Obligatory to set up a Monitoring Committee (covering one or more OPs), adopting its own procedure rules and composed of the relevant stakeholders (Articles 33 and 34 of the CPR proposal)</p> <p>Obligation to draft evaluation plans (covering one or more OPs), including midterm evaluations for the AMIF, the ISF and the BMVI (Article 39 of the CPR proposal)</p> <p>Functional independence of (internal or external) evaluators (Article 39 of the CPR)</p> <p>Obligation to publish the procedures of the Monitoring Committees, data shared with it, all evaluations and Final Performance Reports on a dedicated website of the MA (Articles 33, 38 and 39 of the CPR proposal)</p>	<p>Advisory role in the Monitoring Committees (Article 34 of the CPR proposal)</p> <p>Possibility to use Structural Funds for technical assistance related to evaluation at the initiative of the Commission (Article 29 of the CPR proposal)</p> <p>Explicit mention of the importance of timeliness for the evaluations of some ESF+ strands (Article 35 of the ESF+ Regulation proposal)</p> <p>Explicit obligation to transmit the results of the evaluations of some ESF+ strands to other EU stakeholders (Article 35 of the ESF+ Regulation proposal)</p>	<p>No generic obligation</p> <p>No obligation for the European Commission to provide guidance to the Managing Authorities</p>	<p>Obligation to publish all evaluations and Final Performance Reports on a dedicated website of the MA (Articles 38 and 39 of the CPR proposal)</p> <p>Explicit obligation to transmit the results of the evaluations of some ESF+ strands to other EU stakeholders (Article 35 of the ESF+ Regulation proposal)</p>
Ex-ante evaluations	<p>Ex-ante evaluations not included in the rules</p> <p>No Major Project dedicated approval procedure (including the obligation to conduct a CBA)</p>	N/A	N/A	N/A	N/A

Topics	Number, types and content of evaluation	Organisation of evaluation		Methods	Findings and their use
		Managing Authorities/Member States	European Commission		
Ongoing evaluations	<p>Obligatory ongoing evaluations to assess OPs' effectiveness, efficiency, relevance, coherence and EU added value with the aim to improve the quality of the design and implementation of programmes (Article 39 of the CPR proposal)</p> <p>Obligatory midterm evaluations of the OPs for the following funds: AMIF, the ISF and the BMVI by 31/03/2024 (Article 39 of the CPR proposal)</p> <p>Obligatory midterm evaluations at the EU level assessing the effectiveness, efficiency, relevance, coherence and EU added value of each Fund by the end of 2024 (Article 40 of the CPR proposal). Specific obligation of interim evaluation for some strands of the ESF+ (Article 35 of the ESF+ Regulation proposal)</p>	<p>Obligation to carry out evaluations, including midterm evaluations for the AMIF, ISF and BMVI and impact evaluations at the OP level (by 2029) (Article 39 of the CPR proposal)</p> <p>Obligatory Monitoring Committee meeting at least once a year to review the progress of OPs, approve the evaluation plans and its modifications, review all evaluations and provide recommendations to the MAs (Articles 33 and 35 of the CPR proposal)</p> <p>Organisation of an Annual Performance Review meeting (chaired by the EC, possibility to co-chair it upon request) to examine the performance of each OP (Article 36 of the CPR proposal)</p> <p>No annual implementation reports, but obligatory transmission of monitoring data to the European Commission every two months during starting in 2022, covering financial, output and result indicators (Article 37 of the CPR proposal)</p>	<p>Obligation to carry out midterm evaluations at the Fund level by 2024 (Article 40 of the CPR proposal). Specific obligation to carry out an interim evaluation for some strands of the ESF+ no later than by 2025 (Article 35 of the ESF+ Regulation proposal)</p> <p>Organisation of an Annual Performance Review meeting (chaired by the EC, possibility to co-chair it with the MS/MA upon request) to examine the performance of each OP (Article 36 of the CPR proposal)</p>	N/A	<p>Obligatory Monitoring Committee meeting at least once a year to review the progress of OPs, approve the evaluation plans and its modifications, review all evaluations and provide recommendations to the MAs (Articles 33 and 35 of the CPR proposal)</p> <p>Organisation of an Annual Performance Review meeting (chaired by the EC, possibility to co-chair it with the MS/MA upon request) to examine the performance of each OP (Article 36 of the CPR proposal)</p>

Topics	Number, types and content of evaluation	Organisation of evaluation		Methods	Findings and their use
		Managing Authorities/Member States	European Commission		
Ex-post evaluations	<p>Obligatory impact evaluation of each OP by 30/06/2029 (Article 39 of the CPR proposal)</p> <p>Obligatory ex-post evaluations assessing the effectiveness, efficiency, relevance, coherence and EU added value of each Fund by 31/12/2031 (Article 40 of the CPR proposal). Specific obligation of final evaluation for some strands of the ESF+ (Article 35 of the ESF+ Regulation proposal)</p>	<p>Obligation to carry out impact evaluations of each OP by 30/06/2029 (Article 39 of the CPR proposal)</p> <p>Obligation to draft Final Performance Reports (ERDF, CF and ESF+ OPs) and to transmit them to the European Commission by 15/02/2031. It assesses the achievement of programme objectives based on different elements, including the evaluations.</p> <p>Obligatory response and adaptations to the Commission's comments (Article 38 of the CPR proposal).</p>	<p>Obligation to carry out retrospective evaluations at the Fund level (Article 40 of the CPR proposal). Specific obligation of final evaluation for some strands of the ESF+ (Article 35 of the ESF+ Regulation proposal)</p> <p>Obligatory provision of comments to the Final Performance Reports of the MAs and dialogue with the MAs on the measures to be taken accordingly (Article 38 of the CPR proposal)</p>	N/A	<p>Obligation to draft Final Performance Reports (ERDF, CF and ESF+ OPs) and to transmit them to the European Commission by 15/02/2031. It assesses the achievement of programme objectives based on different elements, including the evaluations. Obligatory response and adaptations to the Commission's comments (Article 38 of the CPR proposal).</p> <p>No formal obligation of synthesis of results</p>

Source: Authors based on Official Journal of the EU, 2018a, 2018b.

A.3 Examples of findings from Cohesion Policy evaluations

The evaluation of Cohesion Policy has important specificities, notably stemming from its shared management system, which makes direct comparison with other EU policies difficult. However, it is useful to take a comparative look at the evaluation approach adopted by other EU policies and learn possible lessons from specific arrangements.

A.3.1 Examples of findings from evaluations at EU level

In general, the findings of the European Commission's evaluations deal with the **impact of Structural Funds** and with **operational aspects** of their implementation. They also provide insights on **strategic issues** related to the policy (e.g., priorities of the policy).

Based on a synthesis of findings issued in a Staff Working Document of the Commission (European Commission, 2016a), for the **2007-2013** programming period the key findings on **Cohesion Policy's impacts** include the following ones:

-)] Cohesion Policy has contributed to a **reduction in regional disparities** in GDP per head across the EU. At the same time, according to macroeconomic models, all Member States have been positively impacted by the policy, since the income generated by the co-financed investments led to increased imports into the countries supported, in light of a tightly integrated European economy. Macroeconomic models further indicate that investments co-financed by Cohesion Policy have a continuing effect long after the expenditure has ended because they increase the productive potential and the growth rate that economies can sustain in the long term. However, the positive findings on Cohesion Policy's impact on regional disparities and economic growth from the EU evaluations are nuanced in the relevant academic literature (EPRC, 2017; Mohl and Hagen, 2016).
-)] Cohesion Policy has had **specific positive impacts in different policy areas**. For example, by supporting SMEs and innovation, it has enabled investments which have been crucial to withstand the effects of the economic crisis. By supporting large enterprises, it has led to productivity gains and increases in employment as well. Support for transport has increased the accessibility of countries and regions and enabled new trade opportunities. In the environment sector, Cohesion Policy has enabled new or upgraded connections to drinking water supply and wastewater treatment facilities for millions of citizens. Other policy areas positively impacted by Structural Funds include energy efficiency and social inclusion (e.g. through social infrastructure and support for job creation).

From an **operational perspective**, the delivery of Cohesion Policy has been found to work well in terms of fund absorption, although with different effectiveness levels across EU Member States (European Commission, 2016a). In a few Member States, the implementation of programmes has however suffered delays mainly due to lengthy project appraisal, inefficient procurement processes and high staff turnover. The administrative burden has widely been perceived as excessive by policy stakeholders, especially because of the existence of different layers of control, the difficult interpretation of regulations and the limited use of digital technology. Issues with the development of common core indicators have also been highlighted. For example, in the cultural sector, an evaluation has identified differences across programmes in the use of indicators. Besides this, targets were in some cases unrealistic, and data collection and monitoring systems have generally been limited to output indicators, with results indicators not always being considered (European Commission, 2015d).

Evaluation findings have also covered more **strategic considerations** related to the overall framework and priorities of Cohesion Policy, among which are the following (European Commission, 2016a):

-)] The dispersion of funding over numerous sectors and objectives has led in some areas to an insufficient level of spending for the achievement of meaningful results (accordingly, in 2014-2020 an obligatory thematic concentration has been foreseen).
-)] In both EU12 countries and convergence regions in the south of the EU, Cohesion Policy funding has represented the main source of development expenditure over the 2007-2013 period, and in some cases the only one.
-)] Interreg programmes financed under the European Territorial Cooperation Objective have generated EU added-value and would not have taken place without funding being available. The same is true of the support for transport and the TEN-T in particular.

Evidence from evaluations in the **2014-2020** period is at present still limited. Meaningful insights on the impact of the programmes, in particular, will by nature become available at a later phase. However, some findings on operational elements can already be highlighted, based on first evaluations as well as strategic, implementation and progress reports.

-)] Some Member States have formulated lists of result indicators common to all the OPs investing in specific objectives. This approach has enabled the possibility of country-wide evaluations, which can potentially offer a new perspective on policy effectiveness at the EU level (European Commission, 2016b).
-)] Thanks to the 2014-2020 legislative framework (and especially ex-ante conditionalities, alignment with country-specific recommendations, reinforced performance framework and synergies with other instruments), cohesion has led to an improvement in framework conditions for investments, thus leading to policy leverage that extends beyond Structural Funds (European Commission, 2017b).

A.3.2 Examples of findings from evaluations at EU Member State level

According to the Strategic report of December 2019, based on EU Member States' implementation and progress reports, the **evaluations conducted by Member States so far have mainly addressed the implementation process of the policy and the progress towards achieving the targets set in the OP documents** (European Commission, 2019j). More evidence on the policy's effects is expected to become available in the next years in further evaluations by Member States (European Commission, 2019k).

Providing an overview of the findings of the important number of produced evaluations (see section 4.3) is challenging as synthetic documents typically aggregate numeric values with limited insights on the actual content of evaluations. In this regard, some **Member States' evaluations** have been extracted from the European Commission (Evaluation Helpdesk) database (2014-2020) to give examples of the type of topics explored by Managing Authorities in their evaluations.³⁰

A **distinctive feature** of evaluations conducted at Member State level is that they tend to embed the discussion of the implementation and impacts of Cohesion Policy in a **highly contextualised perspective**. Moreover, the review of the sample reveals an **important variety in terms of themes covered and level of analysis**. The degree to which these evaluations provide critical feedback is also

³⁰ The evaluations were randomly selected from the full list of evaluations analysed by the Helpdesk. They include examples from the following countries: Greece, Czech Republic, Estonia, Poland, Spain, Slovakia, Italy and the United Kingdom.

subject to variations. A useful distinction to synthesise this diversity of findings can be made, between **studies aiming to provide feedback in time for fine-tuning the implementation of the programme** (or selected measures) during the current period and **studies with the ambition to draw lessons for the next period**. However, it does not necessarily imply that these studies will be used as such in reality.

Consistently with the types of evaluations conducted by EU Member States so far (see section 4.3.1), several studies contain **findings akin to implementation aspects**. For example, a study on Implementation schemes and the administrative burden on beneficiaries in Estonia (Eesti tuleviku heaks et al., 2017) has found that Implementation Bodies and Implementation Agencies typically lack information about how staff use their time to undertake various activities. Therefore, it has recommended introducing a time management system for personnel. Another evaluation providing a first assessment of the Spanish 2014-2020 ERDF OP Cantabria (Gobierno de Cantabria, 2017) has found that progress in achieving the targets set for the result indicators has been satisfactory, but largely due to other factors than the programme itself. It has thus recommended re-examining management structures to find ways of making project selection and implementation more efficient.

While these evaluations pursued the goal of offering useful indications for fine-tuning the implementation in the current programming period, other evaluations have a **focus on drawing conclusions that are expected to be useful in post-2020 programmes**. For example, a background study for the preparation of the implementation structure for the 2021+ period in the Czech Republic (Czech Ministry of Regional Development and EY, 2019) has offered an overview of the ESIF architecture in the different Member States. Concerning the implementation structure in the country, it has found that the National Coordination Authority could have a stronger coordinating role, that the administrative burden needs to be considered when defining the roles of implementation bodies of integrated territorial instruments, and that goals and implementation of financial instruments have to be determined through an in-depth analysis. In Germany, an evaluation assessing a technology transfer measure financed by the ERDF OP Bayern in 2014-2020 has found that the measure has been in line with regional needs and that around two-thirds of companies would not have undertaken cooperation with universities without ERDF support (Ramboll, 2018). For the next period, the study has recommended maintaining the same funding approach, simplifying administrative procedures further, widening the target group of companies eligible for support and intensifying exchanges between companies.

In other cases, the **evaluations' objectives are less clear-cut and could contain feedback to be used for various purposes (implementation, post-2020 and other information diffusion)**. This mixed-purpose can be observed, for instance, with evaluations focused on project selection systems. As an example, an evaluation about the selection system of the Competitiveness and Cohesion OP in Croatia (Ecorys, 2019) has found that the selection system supports a reduction in regional inequalities only to a minimal extent, because in numerous procedures regional criteria are missing, and that there is insufficient consistency between indicators, selection criteria and evaluation forms. An Interim Impact Evaluation on YEI in the United Kingdom (UK Department for Work and Pensions, 2018) has found that specific aspects of YEI delivery have been especially effective (e.g. provision of training in English and Mathematics, in respect of which a lack of competence and qualifications was a critical barrier to finding work; training linked to employment; community-based activities and volunteering, such elements being key in reducing isolation and increasing confidence as part of moving towards employment). There are also cases where Member States' evaluations specifically **combine an ex-post analysis with a mid-term perspective**. In Greece, for instance, a study has achieved an ex-post evaluation of the Greek Human Resource National Programme 2007-2013 and also offered a first assessment of the Human Resource, Education and Life-Long Learning National Programme 2014-2020 (CMT Prooptiki and ESPA, 2017).

A.4 Examples of evaluation arrangements in other EU policies

The evaluation of public policies is not restricted to Cohesion Policy at EU level. Indeed, several other sectoral and investment policies are also evaluated, fitting into the wider Better Regulation framework. Evaluation of these other EU policies has specificities that do not fully apply to Cohesion Policy, in particular due to their governance system that typically does not involve several layers of stakeholders. However, their analysis can allow the identification of critical elements to consolidate Cohesion Policy evaluation. From that perspective, the **cases of the EU R&D programme** (Horizon 2020/Horizon Europe) and **the EIB evaluation approach** (especially of the EFSI) will be presented. In particular, the first case will focus on monitoring aspects and how to link them with impacts in evaluation. The second case will mainly deal with governance and organisation of evaluations.

A.4.1 Horizon 2020 and Horizon Europe

Horizon 2020 is the EU's main research and development programme for the 2014–2020 period, with a budget of EUR 77 billion (European Commission, 2017c). Its evaluation is organised by a legal text: Regulation (EU) No. 1291/2013 (Official Journal of the EU, 2013f). Unlike Cohesion Policy, which is managed by both the European Commission and Managing Authorities (Member States and regions), H2020 is **centrally managed**. As a consequence, the European Commission is responsible for its monitoring and evaluation, through the obligation to carry out an interim and ex-post evaluation of the policy. **Horizon Europe** is the EU research and innovation programme for 2021–2027. The Commission first issued a proposal on the programme in 2018, foreseeing a budget of EUR 100 billion. In 2019, the European Parliament and the European Council reached an agreement on it. As part of preparatory works towards Horizon Europe, the European Commission has developed an ambitious approach to programme indicators and evaluation, which has taken the name of **Key Impact Pathways** (Bruno and Kadunc, 2019).

Box A.1 Key Impact Pathways

Past experience at international level, as well as relevant literature, have shown that research and innovation activities are characterised by a difficulty in predicting their impact trajectories, as they are embedded within complex systems and are rarely linear. Timing issues for the realisation of impacts are also critical. The idea of '**impact pathways**' has emerged. They correspond to the likely and straightforward interpretation of how an intervention is expected to have an impact.

The Key Impact Pathways approach **foresees three impact dimensions**. Each of these is, in turn, structured into three pathways:

- 1) The first impact dimension is the **scientific impact**, which is structured through following impact pathways: creating high-quality new knowledge; strengthening human capital in R&I; fostering diffusion of knowledge and open science.
- 2) The second dimension is the **societal impact**, covering the goal to generate knowledge and support the uptake of innovations in society. It is structured through the following pathways: addressing EU policy priorities and global challenges through R&I; delivering benefits and impact via R&I missions; strengthening the uptake of R&I in society.
- 3) The third dimension is the **economic and technological impact**, which covers the goal to facilitate technological development and knowledge transfer. It is structured thanks to these pathways: generating innovation-based growth; creating more and better jobs; leveraging investments in R&I.

Each pathway features a **storyline** (e.g., "The programme creates and diffuses high-quality new knowledge, as shown by high-quality publications that become influential", for the first pathway) and **three categories of indicators** (for the short, medium and long term).

Source: Bruno and Kadunc, 2019.

The approach serves advocacy and accountability, as well as policy-learning functions. It results from the interim evaluation of H2020 carried out by the evaluation unit of DG RTD. It has highlighted a big issue in terms of data. In Horizon 2020, objectives were defined in a rather vague manner and through indicators that do not directly and clearly depend on the effects of H2020 (e.g., the 3% of GDP R&D target). There was also a problem with communication about progress. To respond to these challenges, the Key Impact Pathways formulate **objectives and storylines more clearly and in advance**. Also, the Key Impact Pathways build on **digital technologies and microdata** instead of collecting data from beneficiaries. This approach is based on a unique ID number attached to each researcher, making it possible to track information on him/her in available databases, or through the use of artificial intelligence and machine learning (e.g., web scraping techniques). This produces data that is more robust, meaningful and timely, thus potentially reducing the requests for data transmission, which is likely to alleviate the reporting burden. In parallel, more traditional data on the programme will still be produced. The EC plans that the interim evaluation of H2020 will feed into the impact assessment of Horizon Europe, and the ex-post evaluation of H2020 will feed into the interim evaluation of Horizon Europe.

Box A.2 Insights from the experience of the Key Impact Pathways for Cohesion Policy

Innovation, independence and participation: An internal evaluation defined the Key Impact Pathways as an innovative approach to monitor and evaluate EU research policy. Important support work is realised to mobilise stakeholders within and outside the European Commission, so that they contribute to defining the pathways and the corresponding tools (template to collect information, information system, etc.).

Uses: The Key Impact Pathways are thought to simultaneously pursue a combination of uses – advocacy, accountability and policy-learning.

Methodology: The use of new technology and the recourse to a single identification number as a basis for monitoring are a powerful way to reduce data collection burden, promote simplification, and ensure utility and accuracy of data collected. The VAT number of companies benefiting from the ERDF could be an option to explore a comparable system in the context of Cohesion Policy.

Timing of evaluation: A ‘back to back’ principle is adopted, whereby the results of the interim evaluation of one programme feed into the impact assessment of the following one.

Source: Authors, based on interviews, 2019–2020; Bruno, 2019

A.4.2 The European Investment Bank and the EFSI

The **European Investment Bank** conducts evaluations covering all its activities, as mentioned in its Terms of Reference (EIB, 2009), with the main client being the Board of Directors. The EIB has introduced evaluation in its practices since the late 1990s, with an initial focus on the evaluation of individual projects. The scope of evaluation has expanded progressively during the last 10 years, with evaluations increasingly taking a strategic nature (Authors, based on interviews, 2019–2020). They mainly serve two roles: accountability and learning.

Evaluation at the EIB operates within a **highly formalised governance structure**. This activity is undertaken by Evaluation Operations (EV), which is part of the Inspectorate General. This unit belongs to the EIB but is structurally independent. This independence is notably backed by the guarantee that the Board of Directors cannot modify the reports presented by the EV. To carry out evaluations that are relevant to the needs of the institution, the EV has strong links with the different stakeholders of the bank, including the Managing Committee, the Board of Directors and the different EIB services. It can,

for instance, take the form of internal consultations with the relevant EIB services. This governance is strengthened by the existence of formalised mechanisms to track the recommendations of the evaluations and implement them. Indeed, the Board of Directors must provide a written reply to the evaluation reports and put in place action plans with specific measures and deadlines (Authors, based on interviews, 2019–2020). Implementation of these measures/recommendations is also followed through dedicated software and is subject to frequent reports to the Managing Committee and Board of Directors.

There is an **ongoing process of institutionalisation of the evaluation culture** at the EIB. Some key elements promoting this are the development of links with the services (while maintaining independence) and conducting evaluations that are aligned with the interests of the decision makers (Authors, based on interviews, 2019–2020), in terms of sectors, products and mandates (van der Kaaij, 2019). Accordingly, a **working programme** listing the planned evaluations is developed in collaboration with the different stakeholders. It covers a three-year period, with a yearly revision on a rolling basis (EIB, 2019a). Its content depends on the portfolio of the bank, its representativeness and also specific themes of high interest. It has to be adopted by the Board of Directors.

There are **no official targets in terms of the number of evaluations** to be conducted, with the focus instead being on their utility. On average, about three to five evaluations are performed each year. They tend to be ex-post and of a vast scope, though with variations depending on sectors. Even if a relatively small team is dedicated to evaluations compared to the size of its operations, EIB staff are directly involved in the carrying out of evaluations, sometimes with the support of external consultants. The importance of **continuously keeping up to date in terms of methods** of evaluation (macroeconomic, theory-based, counterfactual, etc.) is particularly underlined by the EIB evaluators to ensure the credibility of their work. This entails contact with other institutions and academics (Authors, based on interviews, 2019–2020).

The **European Fund for Strategic Investments** (EFSI) is an important initiative co-launched by the EIB and the European Commission. It aims at securing investments for projects in the real economy (at least EUR 500 billion by 2020), including those with a relatively high risk compared to traditional EIB projects. Concretely, it rests on a guarantee from the EU budget and on an allocation from the EIB's capital (EIB, 2019b). In line with the regulation of the EFSI, its evaluation was independently conducted by the EIB and the European Commission (Official Journal of the EU, 2015). The methodologies used by both institutions were largely convergent, based on interviews, surveys of beneficiaries and portfolio analysis. The fact that evaluations of similar scope were conducted in parallel led to evaluation fatigue among the interviewees. The results of the Commission and EIB evaluations were coherent, but the risk with this parallel approach is that the credibility of evaluations in general in case of inconsistencies could have been undermined. Key insights from these evaluations include the relevance of EFSI to address issues of limited structural investments in some sectors, but with a less convincing counter-cyclical role. Indeed, the EFSI was rolled out at a time when most countries had already started to recover from the crisis. The EFSI was an efficient intervention, but with limits regarding its coordination with other instruments (Authors, based on interviews with stakeholders, 2019–2020).

The EIB also uses **evaluation to investigate cohesion**, including how its own interventions relate to Cohesion Policy (with reports in 2007, 2011, 2018) – for instance, with an evaluation of the Structural Programme Loans to support it (EIB, 2018). The EV mobilises the evaluation reports of Cohesion Policy

produced by the European Commission to support its work. Moreover, the EIB also evaluates its contributions to cohesion in a broader meaning of support to the less developed regions.³¹

There are apparent differences between the evaluation activities of Cohesion Policy and the experience at the EIB. In particular, the multilevel governance nature of Cohesion Policy leads to the issue of potentially conflicting prioritisation and uses of evaluations between the different levels of government. However, **several lessons can still be drawn from the EIB experience**, as shown in the following box.

Box A.3 Insights for Cohesion Policy from the EIB evaluation experience

Evaluation independence can take different forms and does not necessarily require the use of external consultants. It does, however, require internal processes and governance that guarantee the reliability of findings and ensure that they are not altered following pressures.

Building a culture of evaluation at all levels of an organisation is essential to ensure that the conducted works are adapted to needs and can feed the decision-making process.

Flexibility in the number and coverage of evaluations allows the conducted evaluations to closely follow the needs and interests of the clients, without a specified mandatory number of evaluations. However, this implies a pre-existing commitment to evaluations.

Continuous updating of methods ensures that evaluations of interventions are credible and successfully inform the different stakeholders. This can be achieved through training or networking with other evaluators, institutions and the academic community.

Source: Authors, based on interviews with stakeholders, 2019–2020; EIB, 2019a, 2009; van der Kaaij, 2019.

³¹ Indeed, by treaty obligations, the EIB has to support investments in the less developed regions.

A.5 Case studies

A.5.1 France

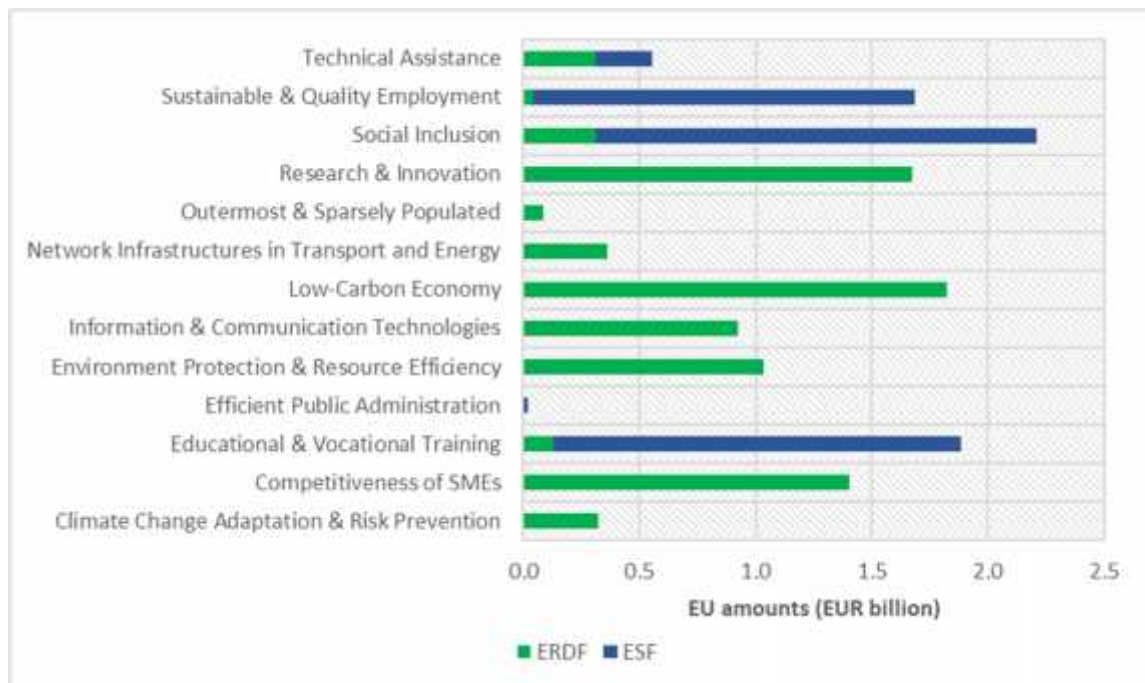
A.5.1.1 Background information

Overview of Cohesion Policy in France

In absolute terms, France ranks 12th among Member States benefiting from Cohesion Policy EU funding, with a total of about EUR 14.9 billion for 2014-2020³² (European Commission, 2019). As France is a highly developed Member State, Cohesion Policy only constitutes a small share of the resources available to national and regional stakeholders (Polish Ministry of Regional Development, 2012). According to interviewed stakeholders, it is thus primarily viewed as **complementary to other sources of funding**, by allowing an increase in the total volume of interventions. Cohesion Policy is still highly relevant in some contexts, such as the less developed regions of mainland France or the overseas territories.

In terms of priorities, Cohesion Policy funding in France is concentrated on human capital thematic objectives (employment, training, social inclusion), with a total of about 40% of funding. Other important priorities include R&DI, decarbonisation of the economy and competitiveness of SMEs (see Figure A.1).

Figure A.1 EU funding in France by fund and priority theme



Source: European Commission, 2019b.

In France, Cohesion Policy is implemented through a combination of **national Operational Programmes** (3 OPs managed by the central authorities for the ESF, YEI and Technical Assistance), regional Operational Programmes (32 OPs managed by regional authorities, typically covering ERDF,

³² ERDF and ESF/YEI, EU amounts only (excluding national co-financing). France does not benefit from the CF.

ESF and YEI together though there are exceptions) and **interregional/cross-border Operational Programmes** (10 OPs)³³. It is thus a mixed system with features of centralisation and decentralisation.

There have been significant changes due to the transition between the 2007-13 and the 2014-20 programming period in France. Indeed, the management of the majority of Structural Funds³⁴ has **been transferred from the national level to the regional authorities**. (Cour des Comptes, 2015). As a consequence, the evaluation responsibilities and activities have also been transferred to regional authorities (Jolidon, 2012; CGET, 2018). An essential French administrative reform rolled out in 2016 has also **merged several of the previous regions into larger ones**, leading to changes of perimeters for public policies (including Cohesion Policy). This process has raised transition issues (e.g., administrative disorganisation) in many regions according to interviewed stakeholders.

There have been **delays for the implementation of Cohesion Policy** during the 2014-2020 programming period, impacting the realisation of evaluations and leading to a risk of formalistic compliance by regional authorities.

Evaluation culture in France

The evaluation culture of France takes place in the context of a “continental” administrative structure and legal system, which is not considered favourable to the development of evaluation (EPRC, 2012). In such context, evaluation has been traditionally used on an ad-hoc/non-systematic basis (EPRC, 2012). In spite of various initiatives since the 1960s, the **institutionalisation of evaluation practices remains fragile in France** (Lacouette Fougère and Lascoumes, 2013). However, at the regional and local level, European Structural Funds have played a role in its development, though **political demands for such evaluations are often limited** according to interviewed stakeholders.

The evaluation market is mostly private, heterogeneous and in extension, in France (Matyjasik, 2010). In the case of the evaluation of Structural Funds, a relatively limited number of private stakeholders are active and carry out evaluations (European Commission, 2019).

A.5.1.2 The organisation of Cohesion Policy evaluation in France

Governance of Cohesion Policy evaluation in 2014-2020: roles and responsibilities

The **governance of evaluations of Cohesion Policy thus mobilises different types of stakeholders**. It involves regional authorities, which have the responsibility of managing and evaluating a large portion of the policy since the 2014-2020 period. National authorities coordinate evaluations of the different Managing Authorities (CGET³⁵ for the ERDF, DGEFP³⁶ for the ESF/YEI) and conduct the evaluations of the nationally-managed OPs (DGEFP for the nationally managed share of the ESF/YEI). Other stakeholders, such as the *Préfectures* or *DIRECCTE* (regionalised entities of the national authorities) can also be involved, though to a lesser extent.

In France, the **legal basis** for Cohesion Policy evaluation is EU-level regulations (DGEFP, 2015). Indeed, there are no additional legal requirements at the national level to organise the governance or scope/themes of evaluations. Ad-hoc bodies (not planned in EU regulations) may exist for some OPs,

³³ See <https://www.europe-en-france.gouv.fr/fr/programmes-europeens-2014-2020> for a full list

³⁴ Almost all the ERDF management has been transferred to regional authorities and about 35% of ESF funding – 65% of ESF remaining managed by French national authorities.

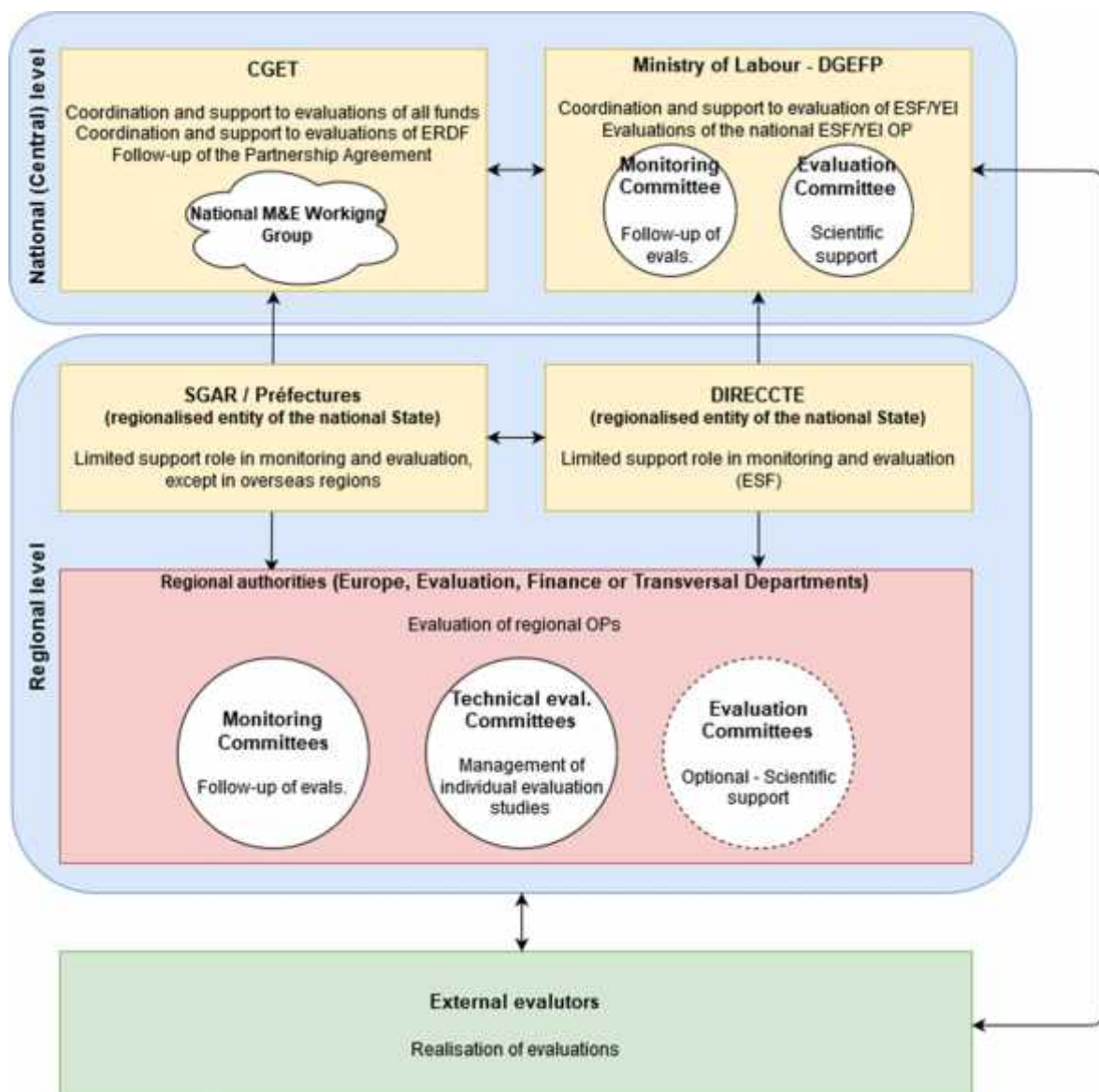
³⁵ *Commissariat général à l'Égalité des territoires – General Commission for the Equality of Territories*, is a central and national administrative entity responsible for territorial development policies

³⁶ *Délégation générale à l'emploi et à la formation professionnelle – General Delegation for Employment and Training*, is a part of the national Ministry of Labour

but they are not defined in legal documents. For instance, there is an Evaluation Committee of the national ESF/YEI OP supplementing the Monitoring Committee.

There are **variations in the governance arrangements of evaluation of CP among the different regional Managing Authorities**. Units responsible for Cohesion Policy evaluations belong to regional authorities, either to the European Affairs Department (the majority of cases), a transversal Administrative/Technical Department or a dedicated Finance/Evaluation Department, such as in Brittany or *Hauts-de-France*. According to interviews, the units dedicated to the evaluation of Cohesion Policy in France are typically small (i.e., 1-2 persons) and tend to have high turnovers between the programming periods. This situation suggests that evaluation of Cohesion Policy is a rather low priority in the French national and regional contexts. Moreover, it poses practical problems (e.g., difficulty to exchange with other evaluators, limited time/resources to conduct tasks, heterogeneous skills).

Figure A.2 Governance of Cohesion Policy evaluation in France



Source: Authors based on Interviews and regional/national documents.

Table A.6. Governance of Cohesion Policy evaluation in France for 2014-2020

Name of the Stakeholder	Level of Governance	Number/Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
CGET (General Commission for the Equality of Territories)	National (central level)	1	<p>Coordination Authority of the different Funds and the ERDF</p> <p>Coordination of evaluation and monitoring activities (dedicated national M&E working group, online platform regrouping the MA and other interested stakeholders, specific seminars and exchanges...)</p> <p>Drafting of Partnership Agreement and other documents related to evaluation and monitoring</p>	<p>Provision of guidance and coordination of the different Managing Authorities to conduct monitoring and evaluation of Cohesion Policy.</p> <p>Adaptive response to the needs expressed by the MAs.</p> <p>Difficulties to have an overall vision of the French situation due to limited resources.</p>
Ministry of Labour – DGEFP (General Direction of Employment and Training)	National (central level)	1	<p>Managing Authority for the national ESF/YEI OP</p> <p>Responsibility for the evaluation of the national ESF/YEI OP (drafting of the evaluation plan, selection of evaluators, follow up and valorisation...)</p> <p>Coordination of evaluation and monitoring activities for the ESF/YEI (dedicated group in the CGET-backed network, exchanges and meetings/seminars with MAs, mutualisation of YEI evaluations with regions...)</p>	<p>Management of several audits and evaluations on the national ESF/YEI OP with an improvement of methodological quality (linked to better data availability)</p> <p>Provision of support to the MAs in their evaluation effort (ad-hoc support based on demands of MAs)</p> <p>Difficulties to have an overview of the French situation due to limited resources</p> <p>Attention to increasing the diffusion and use of evaluation findings</p>
DIRECCTE (Regional directions of enterprises, competition, consumption, labour and employment)	Regional (regionalised entity of the national authorities)	18 (27 before 2016)	<p>Monitoring of implementation of funds</p> <p>Support for evaluation efforts</p>	<p>More limited role than in the previous programming period due to the overall transfer of evaluation responsibilities to the regions.</p>

Name of the Stakeholder	Level of Governance	Number/Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
Préfectures - SGAR (General secretariat for regional affairs)	Regional (regionalised entity of the national authorities)	18 (27 before 2016)		Supportive role in monitoring/evaluation committees Stronger role for management and evaluation of Cohesion Policy in overseas territories
Regional authorities	Regional	18 (27 before 2016)	<p>Managing Authorities for regional ERDF/ESF OPs Responsibility for the evaluation of their regional OPs, often through the European Affairs Departments (sometimes through a dedicated Evaluation, Finance Department): drafting of the evaluation plan, selection of evaluators, follow up and valorisation</p> <p>A regional technical committee follows individual evaluations</p>	<p>Heterogeneity in the organisation, perceived importance and resources dedicated to evaluations of Cohesion Policy (often limited).</p> <p>Management of external consultants to produce evaluations, though some evaluations are conducted internally (e.g., in Hauts-de-France)</p> <p>Consolidation of the role of regions with the transfer of the management of Funds for this period.</p> <p>Risk of formalistic compliance with evaluation requirements (high number, misalignment with needs)</p> <p>Difficulties for evaluations (methodology, political priority) linked to the fact that EU funds are only a small share of the regional policies' funding</p> <p>Contribution of Cohesion Policy to institutionalise evaluation at the regional levels</p>

Name of the Stakeholder	Level of Governance	Number/Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
				Attempts at valorisation of findings among the different regional stakeholders (depending on available resources)
Monitoring Committees of the OPs	Regional/National	About one per OP (often multifunds, together with EARDF...), including national, regional and interregional/cross border OPs	Monitoring of the implementation of evaluations Debate of the evaluation and their results Provision of recommendations to the Managing Authorities	Review of the results of evaluations (usually limited debates around them) Provision of recommendations to the Managing Authorities
Evaluation Committees	Regional/national	Very low number (much less than one per OP – fully optional structure)	Supplement to the monitoring committees in some OPs (e.g., Lorraine, national ESF/YEI): follow-up of evaluations, provision of scientific advice...	Provision of scientific and practical judgments/advice on evaluations
External evaluators (private sector/academia)	Market largely national	Concentrated in a limited number of companies (EDATER, Eureval, Amnyos, EY...)	Realisation of evaluations after a selection process (framework contracts, call for tenders)	Dialogue with the MAs to conduct evaluations Relatively mature market with potential room for more entrants

Source: Authors based on Interviews and regional/national documents.

Main evaluation arrangements in France for 2014-2020

National authorities coordinate the overall evaluation effort in the different Managing Authorities (CGET for the overall coordination and the ERDF, DGEFP for ESF/YEI) (CGET, 2018; DGEFP, 2015). This coordination is primarily performed through the “national working group on Monitoring and Evaluation” established by the CGET in 2013. The DGEFP contributes to this group through dedicated ESF/YEI sessions. The national working group includes all the Managing Authorities and meets 4-5 times a year. It allows exchanges and needs-identification between the different stakeholders involved in Cohesion Policy evaluations. It is also complemented by an online platform³⁷ of 270 members (evaluation units and other interested stakeholders), granting access to 600 documents on different aspects of evaluation (notes, recommendations).

National authorities also address the specific requests of Managing Authorities by providing feedback on their evaluation demands and conducting seminars. There has been a rising interest for the exchange of good practices between Managing Authorities, but concrete advances on that aspects remain limited so far according to interviewed stakeholders. The direct use of EU support and coordination (e.g., Evaluation Helpdesk) by regional authorities is limited in France because of

³⁷ Not accessible to the general public.

unawareness, misalignment between proposed support and needs, language barriers and practical/cooperation difficulties. Guidance documents on monitoring and evaluation elaborated at EU level are however widely used by French stakeholders and generally considered useful, though not always clear (e.g., EAFRD).

In line with the governance structure of France, there is **no unified evaluation plan but multiple ones with different scopes**. There is one evaluation plan for the national ESF/YEI OP (DGEFP, 2015) and usually, one evaluation plan for each region³⁸, covering the ERDF and ESF. There are also dedicated evaluation plans for cross-border and multiregional OPs. Different approaches have been followed by the regional authorities to draft their evaluation plans according to interviewed stakeholders. Some plans are minimalistic (e.g., *Nord-Pas-de-Calais*) while others have a high level of details in their content and scope (e.g., *Picardie*). Some regions have initially planned too many evaluations and have reacted by scaling down. For instance, the *Provence-Alpes-Côte d'Azur* region has reviewed and adjusted its initial extensive plan by focusing on major regional themes (in terms of funding amounts), such as training or tourism (Interviews with French stakeholders, 2019). Overall, these plans are considered by French stakeholders as documents that give overall guidance rather than a strict list of evaluations to be conducted.

Regarding the **monitoring and data collection system**, there have been significant improvements compared to the 2007-2013 programming period, regarding the quality and coverage of indicators (e.g., individual-level data for the ESF). However, there is no single information system for Cohesion Policy data but several coexisting ones. It includes *Ma démarche FSE* (part of the ESF that is managed at the national level) and *Synergie* (ERDF and the part of ESF managed by the regions), but also the different information systems of the regions themselves (e.g., *Argos* in *Hauts-de-France*). Precisely, *Synergie* was planned to enable the aggregation of data from the different regions at the French level (CGET, 2019). Still, difficulties of interoperability with the information systems of the different regions inhibit this task.

Moreover, **requirements of data collection** at the individual level have led to heavy administrative burden for the regional authorities, projects promoters and beneficiaries, especially for the ESF/YEI. Overall, significant attention has been dedicated by the French stakeholders to the monitoring/indicators and performance framework aspects, in particular at the beginning of the programming period. This attention has then gradually been shifted to evaluations per se.

Unlike in some other Member States with larger teams dedicated to the evaluation of Cohesion Policy and its coordination, **there is no national system to systematically track the realisation of evaluations and the implementation of their recommendations**. However, it exists in some regions, such as *Hauts-de-France*, where it is reported that 80% of the recommendations of evaluations (including but not restricted to those of Cohesion Policy) are implemented (see Section 2.2).

[Comparative analysis with the 2007-13 programming period and main factors underlying current arrangements](#)

Main changes compared to 2007-13

There have been substantial changes regarding the evaluation of Cohesion Policy in France between the 2007-13 and 2014-20 programming periods.

³⁸ Evaluation plans were drafted before the merger of French regions in 2016 when their number fell from 27 to 18. There are thus more evaluation plans than current administrative regions. After the reform, some regions did not merge their evaluation plans (e.g., *Région Grand Est*, 2016), while others did (e.g., *Hauts-de-France*). Moreover, some regions (e.g., *Alsace*) have separate ERDF and ESF OPs, yielding additional complexity.

Regarding the types of stakeholders involved, the **transfer** of most of the management of the Structural Funds from the national government (through its regionalised entities, mainly the Préfectures) to **the regional authorities** has been the major feature, including a transfer of the responsibilities linked to evaluations. This decentralisation of responsibilities has been accompanied by a transfer of money to regional authorities, and some transfer of personnel (Interviews with French stakeholders, 2019-2020), though the scope of these transfers is not clear. National stakeholders are still involved in Cohesion Policy evaluation, especially for the ESF (DGEFP evaluating the national ESF/YEI OP) and for the coordination of Funds (CGET/DGEFP).

In line with these governance changes, **actions to support the different regions** in their evaluation effort have been introduced, in particular with the working group on Monitoring and Evaluation organised by the CGET since 2013. Guidance has gradually shifted from attention to monitoring/indicators towards administrative aspects (e.g., selection of evaluators), result/impact-orientation, and exchange of good practices (though concrete actions on this last aspect remain scarce). Moreover, the YEI impact evaluations have been mutualised between the different regions and the national authorities, using a single external evaluator and methodology (DGEFP, 2015).

The introduction of **mandatory evaluation plans** might have somewhat improved the planning of evaluations, for example, by favouring the use of framework contracts to recruit external evaluators. However, regions that have initially developed detailed evaluation plans (in a rather formalistic way) have had to justify potential changes to the EU authorities, generating additional work, unlike regions that have used a more flexible (less detailed) approach. Cooperation between the different regions to mutualise similar evaluations has not borne fruit, except for the YEI.

Another significant change was an **overhaul of the monitoring information system** compared to the 2007-13 programming period (EPRC, 2015). Combined with the **effort to improve data collection**, it has had significant benefits regarding the **quality and availability of data**. However, as previously described, there are still issues impeding the smooth operation of these information systems and substantial administrative burden linked to data collection (Interviews with French stakeholders, 2019-2020)³⁹.

Potential causes of the observed changes and main determinant of current arrangements

The **main driver of the observed changes** between the 2007-13 and 2014-20 programming periods regarding the evaluation of Cohesion Policy in France is very likely the **internal reforms of decentralisation** which have transferred most of the management of Cohesion Policy towards regional authorities, including evaluations. The **merger of French regions** in 2016 has not altered the scope of the OPs: OPs corresponding to the regions before the merger continue to exist in the newly formed regions until the end of the programming period. For instance, in the new region of Occitanie, OPs corresponding to the two previous regions of Languedoc-Roussillon and Midi-Pyrénées continue to exist. Some regions, such as Hauts-de-France, have decided to rationalise the evaluation of Cohesion Policy, based on similarities in the planned evaluations of the former regions. The merger of regions has led to some transition issues (e.g., administrative reorganisation, political debates), partly explaining the delays in implementing and evaluating Cohesion Policy in France during the 2014-2020 programming period.

EU level rules also have had a definite impact on the practices and guidance of the different stakeholders, for instance regarding the focus on result/impact-orientation and the attention

³⁹ In particular, some contextual indicators are mandatory but of low interest to the regional authorities (because of imputability issues in a situation where Cohesion Policy is only a marginal share of public funding).

dedicated to the monitoring system feeding into evaluations (Interviews with French stakeholders, 2019-2020).

As there are no **additional legal requirements** for evaluation of Cohesion Policy in France, this is not a determinant of changes. Similarly, the use of EU soft measures is low in France (e.g., network, Evaluation Helpdesk), suggesting that this channel does not have significant influence on the observed changes.

It is **unlikely that evaluations of the 2007-13 period have been a leading determinant of changes** in the overall evaluation arrangements, as compared to broader institutional reforms. However, there is some evidence that these previous evaluations have been used in the current programming (for instance, DGEFP, 2014; see section 2.2. for more details).

Overall assessment of the organisation of Cohesion Policy evaluation in France

Critical changes have been introduced in the organisation of evaluation of Cohesion Policy in France between the 2007-13 and 2014-20 programming period. The **transfer** of most of the management and **evaluation** of Funds from the Préfectures/DIRECCTE **to regional authorities** was an **opportunity** to bring **evaluations closer to actual territorial needs**. However, there is evidence that this **opportunity has not been seized yet**. Indeed, the prioritisation of evaluations and the resources dedicated to them by national and regional authorities are often low, though with substantial variations (EPRC, 2015). The requirements of EU rules in terms of number and deadlines of evaluations also put pressure on the evaluation units in France. It occurs in a context where Cohesion Policy is only a small share of funding for regional policies. Moreover, political support for evaluation is still limited. The combination of these factors leads to a **high risk of compliance/formalistic approach to evaluations**.

Overall, the **French organisation of evaluation of Cohesion Policy is complex**, with several stakeholders involved, notably in the case of the ESF/YEI, which are split between the national and regional authorities. However, this does not lead to administrative gold plating, as there are no French laws/legal documents framing the evaluation of Cohesion Policy. Still, there are limited resources available for the coordination of the evaluation effort of the different Managing Authorities, which may lead to untapped benefits. However, mutualisation efforts have been introduced with the YEI impact evaluations (regrouping regions and national level). Additionally, this complex governance might favour the institutionalisation of evaluation of public policies at different levels, even if it remains weak at this stage in France.

A valuable benefit of the new period in terms of organisation is the **consolidation of monitoring systems** and **more considerable attention to data collection** at different levels, which have allowed more precise data to feed evaluations. However, some problems of interoperability and aggregation remain, alongside the traditional issues of administrative burden.

A.5.1.3 Analysis of planned and conducted evaluations and their contribution to policy-making

Main characteristics of the evaluations carried out in France

Scope of evaluations

Regarding the **ex-ante evaluations**, they have sometimes been launched by the *Préfectures* before the transfer of the management and evaluation of Cohesion Policy to the regional authorities themselves (Interviews with French stakeholders, 2019-2020). The process has been conducted as expected, with the involvement of different stakeholders. According to a synthetic analysis of the CGET (CGET, 2019),

ex-ante evaluations have been conducted satisfactorily, with some heterogeneities. Ex-ante evaluations tend to rely on synthetical grids (e.g., Région Aquitaine, 2014) or theory-based methods, such as logical causal chains (e.g., Région Haute-Normandie, 2014). Overall, it seems that **ex-ante evaluations** have been perceived as a **rather formalistic exercise** by Managing Authorities, with costs likely exceeding their benefits according to interviewed stakeholders. Moreover, changes due to reprogramming during the 2014-2020 period might have undermined the value of these evaluations.

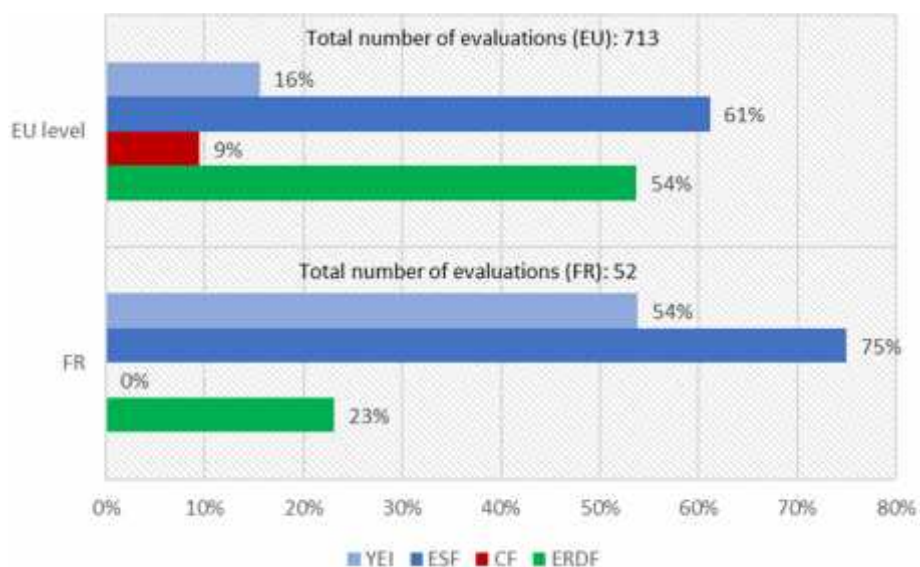
For ongoing and ex-post evaluations, according to a CGET analysis from 2017, there were more than 360 evaluations planned by regional authorities (in a sample of the 27 main plans) for the 2014-2020 period. However, **evaluation plans remain indicative** (Interviews with French stakeholders, 2019-2020). Due to the implementation delays of Cohesion Policy in France, it is not clear to which extent they will be conducted (e.g., several could be regrouped). For the national ESF/YEI OP, 14 evaluations are planned with only minor adjustments in coverage and calendar (DGEFP, 2015). In terms of topics covered, planned evaluations depend on the OPs. For instance, the implementation evaluation of the Rhone-Alpes region has focused on the awareness of the citizens of EU Funds, the organisation of fund management and communication in the region, and the experience of projects beneficiaries (Région Auvergne Rhone-Alpes, 2017). The DGEFP has conducted thematic evaluations on the employment and training of migrants (DGEFP, 2016). **Several regions follow the EU regulation closely and mention in their evaluation plans impact evaluations for each OP axis** (e.g., Région Réunion, 2015; Interviews with French stakeholders, 2019-2020). This approach of comprehensive impact evaluations might be inefficient according to French stakeholders, given the relatively low share of EU funding in the financing of French regional policies, leading to methodological difficulties⁴⁰ and a disproportional task for regional authorities.

The **overall budget for evaluations** of Cohesion Policy in France for the 2014-2020 period has been estimated at EUR 38 million. However, this envelope will be **distributed unevenly** across the French regions, with no correlation with the financial scale of the OP (EPRC, 2015). For instance, the Réunion region has a total planned budget for evaluations (ERDF and ESF) of EUR 1.28 million (Région Réunion, 2015; Région Réunion, 2015). The Poitou-Charentes region has planned to mobilise EUR 1.55 million for the same scope and period (Région Poitou Charentes, 2014) while benefiting from 83% less EU funding than Réunion (European Commission, 2019). For the national ESF/YEI OP, the budget for evaluation activities is of EUR 6 million, excluding the salaries of the two evaluation officers (DGEFP, 2015).

Even if there are delays in the implementation of evaluations, the analysis of those that have already been conducted by late 2019 can bring valuable insights. The total number of evaluations (52) is heavily biased towards ESF/YEI (see Figure A.3) (European Commission, 2019a). It is consistent with the delays in the implementation of ERDF evaluations noted by the French stakeholders.

⁴⁰ Especially in attributing what is due to CP and what is expected from broader regional policies. The latter is of higher interest to regional policy-makers and administrators.

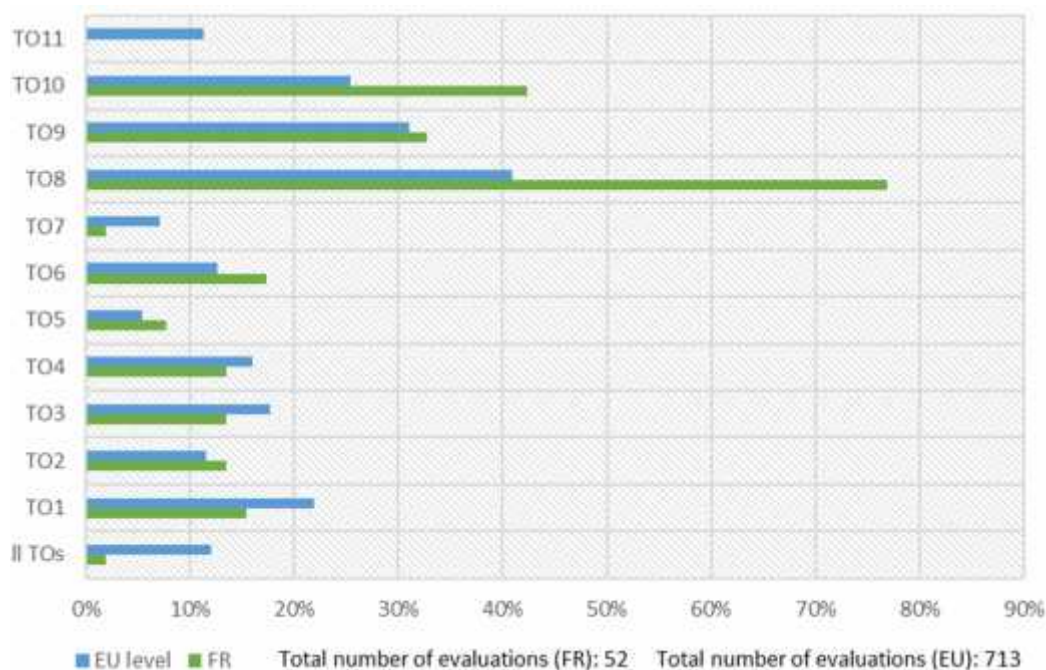
Figure A.3 Evaluations already executed in France during the 2014-2020 programming period by Fund (excluding ex-ante ones)



Source: Authors based on European Commission, 2019a.

This element also explains why the realised evaluations mainly target the Thematic Objectives related to the ESF/YEI (see Figure A.4), namely TO8. - Promoting sustainable and quality employment and supporting labour mobility, TO9. - Promoting social inclusion, combating poverty and any discrimination and TO10. - Investing in education, training and lifelong learning (European Commission, 2019a). French evaluations also focus on TO6. - Preserving and protecting the environment and promoting resource efficiency, slightly more than the EU average. However, as evaluation plans are subject to constant adaptations by Managing Authorities, it is unclear whether these patterns will remain stable after the closure of evaluations for the 2014-2020 period.

Figure A.4 Evaluations already executed in France during the 2014-2020 programming period by Thematic Objective (excluding ex-ante ones)



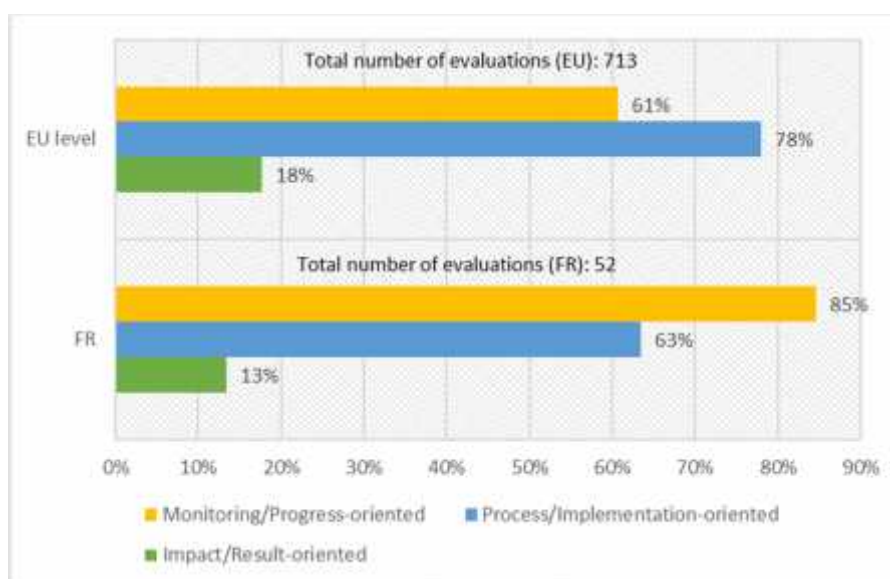
Source: Authors based on European Commission, 2019a.

Types of evaluations

According to a CGET analysis conducted in 2017, of the 360 planned evaluations for the 2014-20 period, 278 were identified as a result or impact-oriented, compared to 71 monitoring or progress-oriented ones (Interviews with French stakeholders, 2019-2020). There is a **noted rise of the result/impact-orientation** of the evaluations of Cohesion Policy during the period in France, consistently with the EU-sponsored priorities. Still, the extent to which this trend will materialise in reality is mostly unknown. It is due to the delays in the implementation of evaluations in France and to the risk of formalistic compliance with regulatory requirements (i.e., impact evaluations that are more like monitoring evaluations). For instance, there are uncertainties on the feasibility (resources, data availability, human resources, prioritisation) to conduct high-quality impact evaluations in the different regions. The **number of mandatory evaluations and the focus on impact ones may not be fully adapted to the French context**, given that Cohesion Policy only accounts for a small share of the regional policies budget. In that context, regional stakeholders are more interested in the impacts/evaluations of whole regional programmes, rather than the part that is supported by EU funds. French administrators and policy-makers might also be more oriented towards implementation issues according to the feedback of interviewees.

This situation leads to a relatively high share of monitoring/progress-oriented evaluations in France as compared to the EU average so far (see Figure A.5). Moreover, impact and result-oriented evaluations already implemented in France are almost exclusively ESF/YEI-related (European Commission, 2019a).

Figure A.5 Types of evaluations already executed in France during the 2014-2020 programming period (excluding ex-ante ones)



Source: Authors based on European Commission, 2019a.

Methodological approach

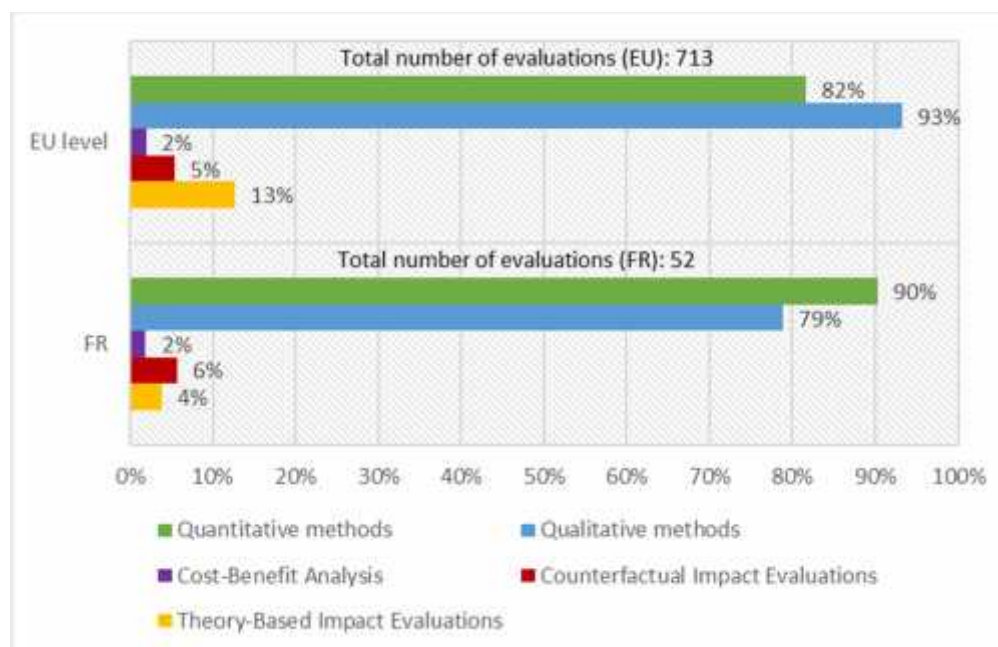
In general, evaluation plans do not clearly mention the methods to be used during the analysis. They are usually selected thanks to call for tenders/offers proposed by external consultants. Methods can be adjusted after the selection of the evaluators, through discussions regarding the best way to address specific evaluation questions. (Interviews with French stakeholders, 2019) However, the evidence so far (see Figure A.6) suggests that **methods used** for evaluations in France are **increasingly diversified**, using a mix of qualitative and quantitative approaches. According to interviewed stakeholders, it

notably relies on administrative and microdata from the monitoring systems, case studies, interviews, focus groups and ad hoc surveys (EPRC, 2015).

Improvements in the monitoring system linked to 2014-2020 requirements have led to changes in the methods that can be applied, with a noted increase in the feasibility of counterfactual analyses. However, there are some practical issues related to data protection laws (GDPR at the EU level, CNIL at the French level), which generate additional burden for the Managing Authorities. Consistently with the EU priorities, result and impact-orientation evaluations are promoted by national authorities, alongside the associated methods (counterfactual impact evaluations and theory-based methods). However, the vast majority of evaluations are planned to rely on qualitative and theory-based rather than counterfactual methods, especially for the ERDF and regional part of the ESF. **Qualitative methods associated with evidence on the mechanisms of change** (rather than the quantification of net impacts) also seem to be **more popular with French administrators and policy-makers**, allowing direct use in their daily/strategic practices. For the ESF/YEI (nationally managed part), the use of counterfactual methods is more common, for instance, with the evaluation of the net effect of the YEI (DGEFP, 2019).

Regarding the methods used in evaluations conducted so far, a relatively low share of theory-based and qualitative methods compared to the EU average can be observed, alongside a relatively high share of counterfactual and quantitative methods (European Commission, 2019a) (see Figure A.6). It contrasts with the preferences of French stakeholders for qualitative/theory-based methods identified in interviews. Biases in the statistics can explain this inconsistency. Indeed, delays in implementation of ERDF evaluations have led to a sample containing largely ESF/YEI evaluations, which tend to rely more on quantitative methods. It is thus unlikely that it will represent the overall situation for the entire period.

Figure A.6 Types of evaluations already executed in France during the 2014-2020 programming period (excluding ex-ante ones)



Source: Authors based on European Commission, 2019a.

There is evidence that **regional evaluators are more trained in advanced methods** than in previous periods. However, some problems of adequate skills seem to remain according to some stakeholders.

Moreover, there are additional methodological difficulties linked to the fact that Cohesion Policy funding only represents a small share of investment spending in France, making it difficult to distinguish the effect of the policy from other interventions. The timing of evaluations is a significant methodological problem for impact evaluations, as the effects of policies take time to materialise. This problem has been worsened by the delays in the implementation of the policy in France, combined with the deadlines of the mandatory impact evaluations. The small size of regional units dedicated to evaluations, combined with the number of mandatory evaluations, is also a factor affecting the methodological quality of French evaluations (Interviews with French stakeholders, 2019-2020).

ESF/YEI interventions also feature unique methodological difficulties, such as the fact that a single person can be counted as two beneficiaries if s/he benefits from more than one project during the period (Interviews with French stakeholders, 2019-2020).

Overall assessment of conducted evaluations in France

At this stage, a fully-fledged assessment of the evaluation effort in France regarding Cohesion Policy is not yet possible. Indeed, there have been **notable delays in the implementation of evaluations in France**. It is unclear whether the evaluations outlined in the plans will all be conducted as planned. Indeed, evaluation plans are heterogeneous in their content. Some of them are minimalistic, while others extensively list planned evaluations in a rather formalistic way.

As a consequence, the **vast majority of evaluations conducted so far belong to the monitoring and/or implementation types** (European Commission, 2019a), though there is evidence of a **rise of the impact evaluations. Methodological quality seems to have improved** as compared to the previous period, stemming from improvements in the monitoring system and the skills of the evaluators. However, disparities subsist across regions and individual evaluations.

Moreover, there might be **tensions regarding the required number and goals of evaluations**, with the needs of Managing Authorities potentially more oriented towards implementation issues than impacts per se (as opposed to EU-level stakeholders).

Evidence on the use of evaluation findings in France

There are global **challenges on how to use evaluations of public policies in France**, that also apply to Cohesion Policy. It leads to variations in the actual use of evaluations of Cohesion Policy during the period. It seems that several conducted evaluations are not concretely used to support direct policy decisions, but rather serve an **informative purpose**. However, the **actual recommendations** provided by evaluations can also be implemented on the ground, as mentioned by interviewed regional stakeholders. There are different channels for the implementation of recommendations, through informal (e.g., discussions between colleagues) or formal (publication of reports, seminars) means. For instance, the *Provence-Alpes Cote d'Azur* has organised a dedicated workshop on the findings of implementation evaluations. There is **no evidence of systematic use of evaluations from the 2007-2013 period** in the programming documents. However, this may be because the management of Cohesion Policy has been transferred to regional authorities between the periods. **Ex-ante evaluations are often perceived as a formalistic exercise** by the Managing Authorities, yielding doubts on its added value per se. However, they can be used as arguments in the negotiation processes with the EU/national institutions according to some stakeholders.

Factors explaining this overall situation might include (Lacouette Fougère and Lascoumes, 2013; Interviews with French stakeholders, 2019-2020):

-)] Weak institutionalisation of evaluation of public policies in France

-)] Limited resources dedicated to evaluations (small teams and funding)
-)] Perception of evaluations as a formalistic exercise (as they are mandatory under regulations)
-)] Perception of evaluations as negative judgments
-)] Misalignment between evaluation topics/approaches and the needs of administrators/policy-makers
-)] Delays of implementation of Cohesion Policy and strict deadlines for mandatory evaluations
-)] Limited diffusion of findings
-)] Low share of public investments coming from Cohesion Policy

Regional authorities **share difficulties** in using the evaluations of Cohesion Policy, due to the list of factors previously mentioned. The Hauts-de-France region has some specificities (including relatively higher prioritisation of evaluation and larger team than in most regions) but still brings valuable insights into the general French situation.

Box A.4 Use of evaluations in the Hauts-de-France region

In the case of the Hauts-de-France region, which is one of the top recipients of ERDF/ESF/YEI funding in France with 8% of planned EU allocations (European Commission, 2019b), the implementation of recommendations from evaluations are tracked through a dedicated committee. Overall, 80% of the recommendations from evaluations (combining EU-related and others) are implemented in the region. The region also benefits from a service dedicated to evaluations and from a large team of 8 persons. For the 2014–2020 period, delays in the implementation of the OPs and the high number of mandatory impact evaluations have limited the use of evaluations of Cohesion Policy so far. Indeed, monitoring and implementation issues tend to be of higher interest for the regional stakeholders, including administrators of different sectoral policies and policy-makers. Still, there are examples of the actual implementation of recommendations, such as the insights of the YEI evaluation on apprenticeship, which suggested extending and enhancing the follow-up of trainees. This recommendation was implemented for the second phase of the YEI in the region.

Source: Authors based on interviews with stakeholders.

Regarding the ESF/YEI part that is managed at the national level, evaluations are usually not used to implement specific recommendations, but rather to inform the different stakeholders involved in employment/social policies (e.g., the DARES⁴¹) of the results and mechanisms of the ESF/YEI. For instance, the YEI evaluation showed that few innovative actions have been undertaken under the YEI and that it mostly supports the existing strategies of regions (in terms of volume, by increasing the number of potential beneficiaries). It is thus the regional employment strategies that are critical in explaining the successes and failures of the YEI in France. Specificities of Cohesion Policy make the diffusion and use of evaluation results challenging. It includes its parallel multiannual financial framework (outside the scope of the French budget laws) and the fact that stakeholders involved in EU policies and other employment/social policies have traditionally loose interactions⁴². However, the national evaluation team endeavours to increase the interest of other DGEFP departments and other stakeholders to their studies, and to improve the linkages between purely national and EU-backed policies. It includes the diffusion of the findings through a dedicated website⁴³ and the organisation of a final seminar in 2020.

A.5.1.4 Conclusions, lessons learnt and recommendations

Overall, the evaluation of Cohesion Policy takes place in a **complex governance structure mobilising multiple stakeholders in France**. There are notable heterogeneities in the approach, funding and human resources dedicated to evaluations across the different regions. However, the **means and prioritisation level for evaluations are often relatively limited**. National authorities act as evaluators for their share of the ESF/YEI but also as coordinators for the evaluation effort of the different regions (ERDF and ESF/YEI). Moreover, the **monitoring effort and related information systems** have significantly been consolidated during the period. There are still issues of implementation and data collection burden.

2014–2020 presents important particularities in the French context. It is linked to the reforms **transferring the management and evaluations of Funds** from the national government to regional

⁴¹ *Direction de l'Animation de la recherche, des Études et des Statistiques* – Direction for Research, Studies and Statistics, is a part of the national Ministry of Labour.

⁴² Even among the different stakeholders involved in non-EU employment/social policies, linkages and communication may be modest.

⁴³ <http://www.fse.gouv.fr/evaluations>

authorities, and to the **merger of a large number of previously existing regions**. It has led to transition difficulties, adversely affecting the implementation and evaluation of Cohesion Policy.

In terms of **types of evaluations performed**, the **ex-ante** ones are primarily perceived as a **formalistic exercise**, even though they might serve as an argument in negotiations between the different institutions. For the **ongoing evaluations**, the regions have followed the **mandatory requirements in their evaluation plans**. Still, the high number of requested impact evaluations (one per OP axis) has proved to be burdensome in a Member State with limited Cohesion Policy funding and resources for evaluations. Moreover, French stakeholders have typically more interest in implementation evaluations, which yield direct recommendations in their activities. The fact that stakeholders are interested in the evaluation of whole regional policies (rather than of the part funded by Cohesion Policy) is also critical, given the low share of funding coming from CP in France. **Methods are varied** (qualitative, quantitative, counterfactual and theory-based) and decided based on the individual evaluation questions and dialogue with the evaluators. There is evidence of rising methodological quality and diversification as compared to previous periods.

There are **notable differences in the evaluation of the different funds** since the ESF/YEI are partially managed nationally. In particular, there is a mutualisation of YEI evaluations between all the French regions and the national government. Methods also tend to be more quantitative/counterfactual for the ESF.

In terms of use **of evaluations** of Cohesion Policy, there are **obstacles in the French context**, because of structural (e.g., limited evaluation culture and resources, misalignment with needs) and conjunctural (delays in implementation during the 2014-20 period, the merger of regions) factors. Further analysis could obtain a more comprehensive picture of how evaluations are used in France. Still, **different channels of use** of evaluations can already be observed: **information of policy-makers and administrators**, or **specific implementation-related recommendations**.

Box A.5 SWOT analysis of Cohesion Policy evaluation in France

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> Consolidation and improvements to the data collection effort and monitoring systems Rise of impact evaluations and period of greater methodological quality/exploration Development of a national network of coordination and support for evaluations Mutualisation effort for some evaluations (YEI) 	<ul style="list-style-type: none"> Limited institutionalisation and political attention to evaluation Overall limited resources dedicated to evaluations and their coordination Context of administrative reforms (transfer of the management of Funds to regions, mergers of regions) with transition issues Delays of implementation of Cohesion Policy in France with impacts on evaluations (strict deadlines) High risk of formalistic approach of evaluations (number and types required VS interests of stakeholders) Timing issues for the use of evaluations
OPPORTUNITIES	THREATS
<ul style="list-style-type: none"> Ongoing regionalisation of the evaluation of Cohesion Policy Potential consolidation of evaluation culture Rising interest in the exchange of evaluation good practices between regions (beyond administrative aspects) Interest in further mutualisation of evaluations (including between regions with common interests) Further adaptation to territorial needs/potential increased flexibility in the number and content of evaluations (depending on regulations for 2021-2027) 	<ul style="list-style-type: none"> Unstable evaluation culture and resources Inadequate evaluation requirements in the French context (number and scope of evaluations) Administrative burden linked to monitoring requirements with no apparent use for regional evaluations

-)] Based on the French situation, **different recommendations** can be formulated regarding the future of Cohesion Policy evaluation:
-)] **Secure resources** (funding, personnel and skills) to conduct the planned evaluations in an adequate way
-)] Stabilise the main requirements in terms of monitoring and data collection to capitalise on the work executed on these aspects so far in the future. Some indicators might be dropped due to limited evaluation use at the regional level.
-)] **Abandon the mandatory ex-ante evaluations**, which have proved to be of limited added value in the French context
-)] **Ensure a more flexible and needs-based approach for evaluations in terms of scope, number, timing and methods**; to avoid the risk of formalistic approach and limited use of findings. One of the causes is the fact that Cohesion Policy only accounts for a small share of regional spending, leading to methodological issues and limited interest of stakeholders in evaluating the effects of CP per se (as they are included in much larger regional policies).
-)] Engage further with administrators not directly involved in EU affairs and policy-makers to increase the probability of use of evaluations
-)] **Encourage further coordination and mutualisation of evaluations** across the different stakeholders of the governance structure, including between the different regions working on similar themes/priorities
-)] **Encourage further uptake of EU support instruments** (e.g., Evaluation Helpdesk) by ensuring awareness among French stakeholders but also adaptation to their needs (language barriers, content of support)
-)] Continue to provide methodological and practical support to regions and other stakeholders through EU-level guides on Monitoring and Evaluation, while ensuring their clarity

A.5.1.5 Annexes

Summary of the characteristics of the French case**Table A.7. Checklist summarising the French case study**

Item	Check (Yes/No)
Are there national legal requirements on evaluation to which CP evaluation is subject?	No
Is(Are) there autonomous national/regional agency(ies) dedicated to evaluation?	No
Are there independent Evaluation Units outside the Managing Authorities? (Yes: outside the MA, No: evaluation units are within the MA)	No
Are academic evaluators involved in CP evaluations?	Usually no (with exceptions)
Does a permanent and open list of evaluation experts exist?	No
Are Framework contracts used to conduct evaluations (externalised to private or academic consultants)?	Yes (sometimes)
Has the role of Monitoring Committees been strengthened in the country between 2007-13 and 2014-20?	Unclear
Is there a unified national data collection system to Monitoring CP? (VS: different monitoring systems depending on regions)	No
Is there systematic support to evaluation provided by the authorities at the national/regional level?	Yes (with limited resources)
Is there a national database of CP evaluations?	No
Is there a formal system to track whether evaluation findings are followed up?	No (exists in some regions)
Is there a single national evaluation plan?	No
Are there regional evaluation plans?	Yes
Are there major differences between regions for the organisation of CP evaluations? (governance, practices)	Yes
Are there major differences by fund for the organisation of CP evaluations? (governance, practices)	Yes
Are evaluations typically large-scale and few in number?	No (with exceptions)
Are evaluations typically small-scale and high in number?	Yes
Are specific methods of evaluation promoted by regional or national authorities?	Yes
Has the methodological quality of evaluations improved between 2007-13 and 2014-20?	Yes (to some extent)
Are there major differences in the scope and methods of evaluations by region?	Yes
Are there major differences in the scope and methods of evaluations by fund?	Yes (more CIE for the ESF)
Are evaluations typically carried out with timing that allows them to inform policy-making decisions?	No
Are evaluation reports from 2007-13 cited in national/regional policy documents for 2014-20?	Yes (to some extent)
Overall, are CP evaluations an important influence on policy-making decisions in the country?	Variable (implementation evaluations seem to be more used)
Are there major differences in the use of evaluations by region?	Yes
Are there major differences in the use of evaluations by fund?	No

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-) CGET, officers responsible for Monitoring and Evaluation of Cohesion Policy.
-) DGEFP, officers responsible for Monitoring and Evaluation of Cohesion Policy.
-) Hauts-de-France region, officers from the Evaluation and European Affairs departments.
-) Provence-Alpes Cote d’Azur Region, officer responsible for Monitoring and Evaluation of Cohesion Policy.

A.5.2 Ireland

A.5.2.1 Background information

Overview of Cohesion Policy in Ireland

Cohesion Policy in Ireland has traditionally been well integrated into national development strategies, and it is assessed in the literature as having had a **positive impact on the country's development** (Miller, 2013; Bachtler et al., 2013). As the country's development trajectory has evolved, the priorities of Cohesion Policy in Ireland have changed as well, maintaining over the years a strong relevance to Ireland's development needs (Fitzpatrick, Crosbie, and Shiels, 2013). In particular, the focus of ERDF expenditure has shifted from relatively direct approaches to industry development and job creation - often employing hard interventions such as capital grants provided to firms - towards research and development, innovation and 'soft' support to the service sector and high-value-added industries (Miller, 2013). Between the mid-1980s and 2008 (when it was hit by the financial and economic crisis), Ireland's considerable economic growth was the result of a combination of favourable factors, including Cohesion policy⁴⁴, which contributed to the modernisation of the country's economy. In 2003, Ireland became the first Cohesion country to cease to meet the eligibility criteria for Cohesion Fund co-financing, raising above 90% of EU average GNP per capita.

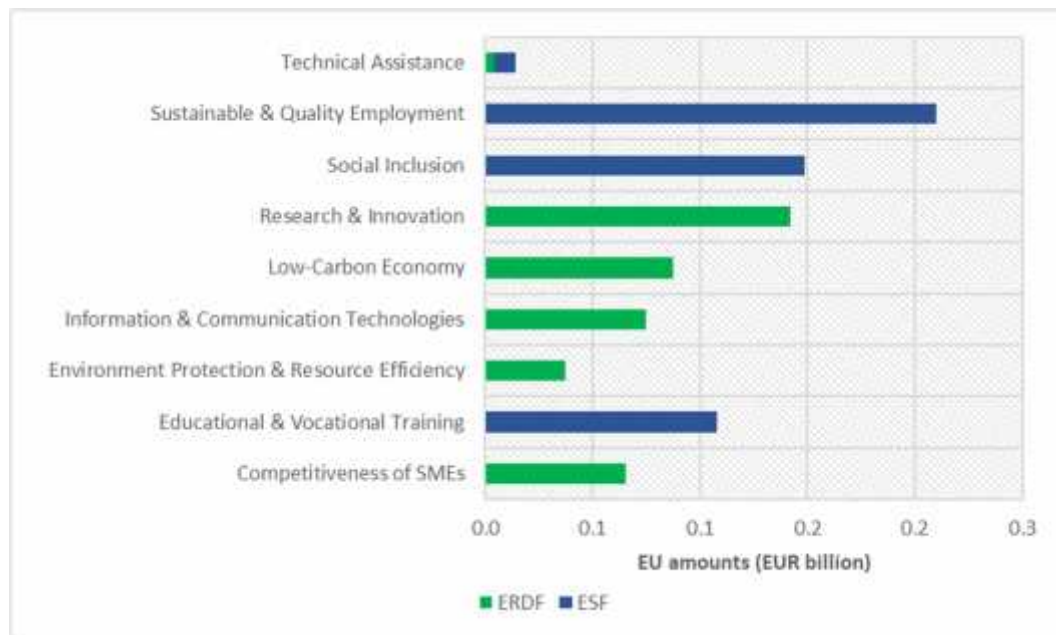
For the country, Cohesion Policy has been not only a crucial driver during phases of growth but also a buttress in phases of recession (Quinn, 2014). In the 2007-2013 programming period, in light of a declining national economic contribution made by the manufacturing sector, Structural Funds delivery incorporated a greater emphasis on training and support to micro-enterprises, and after 2008, budgets for activities such as skills training for the unemployed were increased (Miller, 2013).

In the 2014-2020 programming period, Cohesion Policy is delivered in Ireland through **three Operational Programmes** (OPs): **two Regional OPs** co-funded by the European Regional Development Fund (ERDF), covering respectively the Southern and Eastern Region and the Border, Midland and Western Region, and **one National OP** co-funded by the European Social Fund (ESF), called Programme for Employability, Inclusion and Learning (or ESF Programme).

The total budget of the Southern and Eastern ROP is EUR 500 million, while that of the Border, Midland and Western ROP is EUR 321 million. In both ROPs, the share of EU co-financing is 50%. The ESF Programme's budget amounts to EUR 1.2 billion, made up of EUR 613 million from EU funding (including 68 million from the Youth Employment Initiative, or YEI) and EUR 545 million of national contribution.

Between 2015 and 2017, according to data from the European Commission, Cohesion Policy in Ireland has provided funding equivalent to **3% of government capital investment**, below the EU average of 8.5%. On this indicator, Ireland is 19th out of the 28 EU Member States, far from the highest shares recorded in Portugal and Croatia (84% and 80% respectively) and with a value similar to that of Germany, Belgium, France and the United Kingdom (all with shares between 2 and 4%).

⁴⁴ Other factors include fiscal retrenchment and a high level of foreign direct investments (Miller, 2013).

Figure A.7 EU funding in Ireland by fund and priority theme

Source: European Commission, 2019.

The priority theme absorbing the highest share of funds by Cohesion Policy in Ireland in 2014-2020 is Sustainable & Quality Employment, followed by Social Inclusion and Research & Innovation. In comparison with total amounts planned in the whole EU in 2014-2020, the most salient difference can be identified in **Network Infrastructures in transport and energy not being financed by Cohesion Policy** in Ireland, while being by far the most funded priority theme in the EU as a whole (with a total funding for this theme of almost EUR 60 billion, considering ERDF and Cohesion Fund combined). While in Ireland transport and energy infrastructures did not represent the most funded priority in 2007-2013 either, ROPs did fund them during that programming period (especially road projects in the Border, Midland and Western Region).

Evaluation culture in Ireland

In the **1960s and 1970s**, interest for policy evaluation in Ireland was confined mainly to academic debates and far from the core of policymaking. While in these decades first pioneering practices of the evaluation were carried out in the country, focused on industrial policy and mainly based on an economic perspective (e.g. through cost-benefit analysis), these remained isolated experiences. Out of an interest in rational analysis and in its application to planning and budgeting, different national authorities put in place training initiatives to develop evaluative skills, yet policy evaluation practices remained limited. In the **1980s**, in a context of economic crisis, the government's willingness to cut back public expenditure (without re-examining its use) did not offer a favourable context for the development of evaluation either. However, evaluation of EU-funded programmes began in this decade, especially in the areas of industrial training, employment creation and anti-poverty initiatives (Boyle, 2014).

In the **1990s**, through the key driver of formal requirements for evaluation of Structural Funds established at European level, an evaluation culture progressively matured in the country (Hofman, 2012; Hegarty, 2013). For Ireland, the introduction of evaluation requirements represented a profound change: initially encouraged in the framework of Structural Funds, today evaluation is common practice in the Irish public service (Quinn, 2014).

In addition to external leverages from the European level and also from the OECD, especially in the area of education (O'Hara et al., 2007), internal developments played a role as well in increasing awareness about evaluation's crucial role. In particular, as part of broader public service reforms, value-for-money audits and comprehensive expenditure reviews were introduced (Boyle, 2005; Boyle, 2014).

However, interest in evaluation lost momentum in the 2000s as the Irish economy grew rapidly (earning the country the definition of "Celtic Tiger"). When, in 2008, a grave economic recession and a banking crisis intervened in the country, the evaluation culture had reduced significantly (Boyle, 2009; Boyle, 2014). At that time, questions were raised on the capacity of the Irish civil service to perform policy analysis and a renewal of the structure, and the practices of the public sector were initiated, combined with higher political rhetoric around the need for evaluation.

In the aftermath of the crisis, the **Irish Government Economic and Evaluation Service (IGEES)** was established in 2012. The IGEES has the task to provide guidance and support administrations in carrying out policy analysis and evaluation, making use of data and analysis to inform policy (OECD, 2017). IGEES' research spans across all aspects and phases of the policy life, covering ex-ante appraisal, in-itinere monitoring and ex-post evaluation (although the latter is still more in a development phase). Today it has a staff of 150, recruited between 2012 and 2019 and placed across all ministries, especially in the Department of Public Expenditure and Reform. While originally IGEES focused on recruiting evaluation experts with an economic and econometric profile, over time, experts in statistics and policy analysis have joined it as well. IGEES' role includes an effort to build analysis and evaluation capacity through different activities. Among these, there is formal training (e.g. on cost-benefit analysis, regulatory impact assessment, statistical programming), seminars, policy discussions, but also informal consultation with the administrations aiming at learning and development. In light of its data-driven activities, IGEES also works in close cooperation with the national statistics office.

As part of a wave of renewed interest in policy analysis and evaluation, in 2013 the **Public Spending Code** came into effect as well, which provided a set of rules and procedures aimed at ensuring that the best possible value for money is obtained whenever public money is being spent or invested⁴⁵.

As regards the **type and methods of evaluations**, it can be noted that the isolated evaluations performed in the 1960s and 1970s on industrial policy were mainly in-itinere studies, i.e. evaluations looking at the efficiency and effectiveness of programmes during their implementation, looking for insights into how to fine-tune the policy. They can be ascribed to the category of rational policy analysis, with cost-benefit analysis being their primary tool. Since then, according to evidence collected during the interviews conducted, policy evaluation in Ireland has been characterised by a fair degree of methodological plurality. In particular, starting in the 1980s and 1990s, a range of different approaches were put into practice (e.g. before/after studies, impact assessments, case study works, focus groups, econometric analysis). Randomised control trials, on the contrary, have been rarely used in Ireland, mainly due to their methodological difficulties (e.g. the necessary scale and the lack of an appropriate control group) and their cost. Finally, some approaches have been adopted in selected policy areas more than in others: for example, while for the evaluation of industrial policy quantitative, econometric and counterfactual approaches have been common (also with complex statistical modelling), evaluation of labour force development and anti-poverty measures have generally been addressed using qualitative approaches.

⁴⁵ The Code was updated in 2019 (e.g. to update economic appraisal parameters).

A.5.2.2 The organisation of Cohesion Policy evaluation in Ireland

Governance of Cohesion Policy evaluation in 2014-2020: roles and responsibilities

Evaluation of Cohesion Policy is performed in Ireland based on the legal requirements set by the EU regulatory framework for 2014-2020. The national legislator has not established additional legal provisions.

The governance of the ESF OP foresees a standing committee for the evaluations of the Programme also referred to as the **Evaluation Steering Group**. In this Steering Group, there are representatives from the Managing Authority (MA), from the IGEES, from Intermediate Bodies and social partners (e.g. trade union representatives). The main task of the Evaluation Steering Group is to advise on the public procurement process as well as on the performance of evaluations and to assess the quality of the completed work. The outputs of the Evaluation Steering Group's activities are brought to the **Monitoring Committee** for approval. For example, the Steering Group examines the interim reports and prepares a decision on the final reports to be approved by the Monitoring Committee. In addition to the OP-specific Evaluation Steering Group, for each evaluation, an **ad-hoc Steering Group** is created. This individual Steering Group set up for each evaluation assists in drafting the Terms of Reference of the evaluation (in most cases). In general, the topics of evaluations to be conducted are already decided by the Evaluation Plan instead.

In the case of ERDF ROPs, no standing committee is in place, but a Steering Group is established for each evaluation. At the beginning of the programming period, the Monitoring Committees of the ESF and ERDF OPs examined and approved the Evaluation Plans. Steering Groups de facto work on the evaluations that the Monitoring Committee has approved to be carried out. At each Monitoring Committee meeting (generally two per year⁴⁶) the Committee is provided with an update on evaluations that have been concluded and planned evaluations and has the opportunity to make observations. Also, follow-ups to previous recommendations are discussed.

Within **the MAs**, there is an evaluation team, which works in close relation with the implementation unit (working within the same organisation and generally located within the same offices, with regular staff meeting across all teams) or is a subset of it. MAs draw on the **IGEES'** expertise not only through its inputs within the Steering Groups but also through guidance on how to review and assess programmes and projects made available by IGEES.

The actual evaluations are carried out by **external evaluators**. However, IGEES' capacity building effort ensures that independent evaluation is embedded in a wider process, as the administration needs to have an excellent grasp internally of how independent evaluators proceed.

Table A.8 illustrates the different stakeholders' roles and contributions in Cohesion Policy evaluation.

⁴⁶ Generally one per year, for the Southern and Eastern ROP.

Table A.8. Governance of Cohesion Policy evaluation in Ireland for 2014-2020

Name of the Stakeholder	Level of Governance	Number/ Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
IGEES	National	1 (but spread across administrations)	<ul style="list-style-type: none"> Provides guidance and support Participates in OP-specific Evaluation Steering Groups 	Methodological suggestions
Managing Authorities	1 National/2 Regional	3 (one per OP)	<ul style="list-style-type: none"> Overall responsibility for evaluation processes Prepares Terms of Reference 	Contribution to initiate evaluations, to contextualise evaluation findings, to implement recommendations.
Monitoring Committees	1 National/2 Regional	3 (one per OP)	<ul style="list-style-type: none"> Approval of Evaluation Plan Discussion of evaluations concluded and planned Discussion of follow-ups to individual evaluations 	After the approval of the Evaluation Plan, it can limit itself to “ratify” the Evaluation Steering Group’s work or assume a more proactive role when discussing it.
Evaluation Steering Groups	National (ESF standing committee)/National and regional (evaluation-specific Steering Groups)	1 standing committee (ESF) and ad-hoc Steering Groups for each evaluation (ESF and ERDF)	<ul style="list-style-type: none"> Provide advice on the Terms of Reference for evaluations as well as on the public procurement process Assess the quality of the completed evaluations Give opinion on amendments to the Evaluation Plan (ESF) Consider requests for financing of evaluations (ESF) 	Central role in shaping the evaluation practices at OP level.
External evaluators (private sector)	National	Concentrated market	<ul style="list-style-type: none"> Carry out the actual evaluations (all funds) 	Provision of functionally independent expertise.

Source: Authors

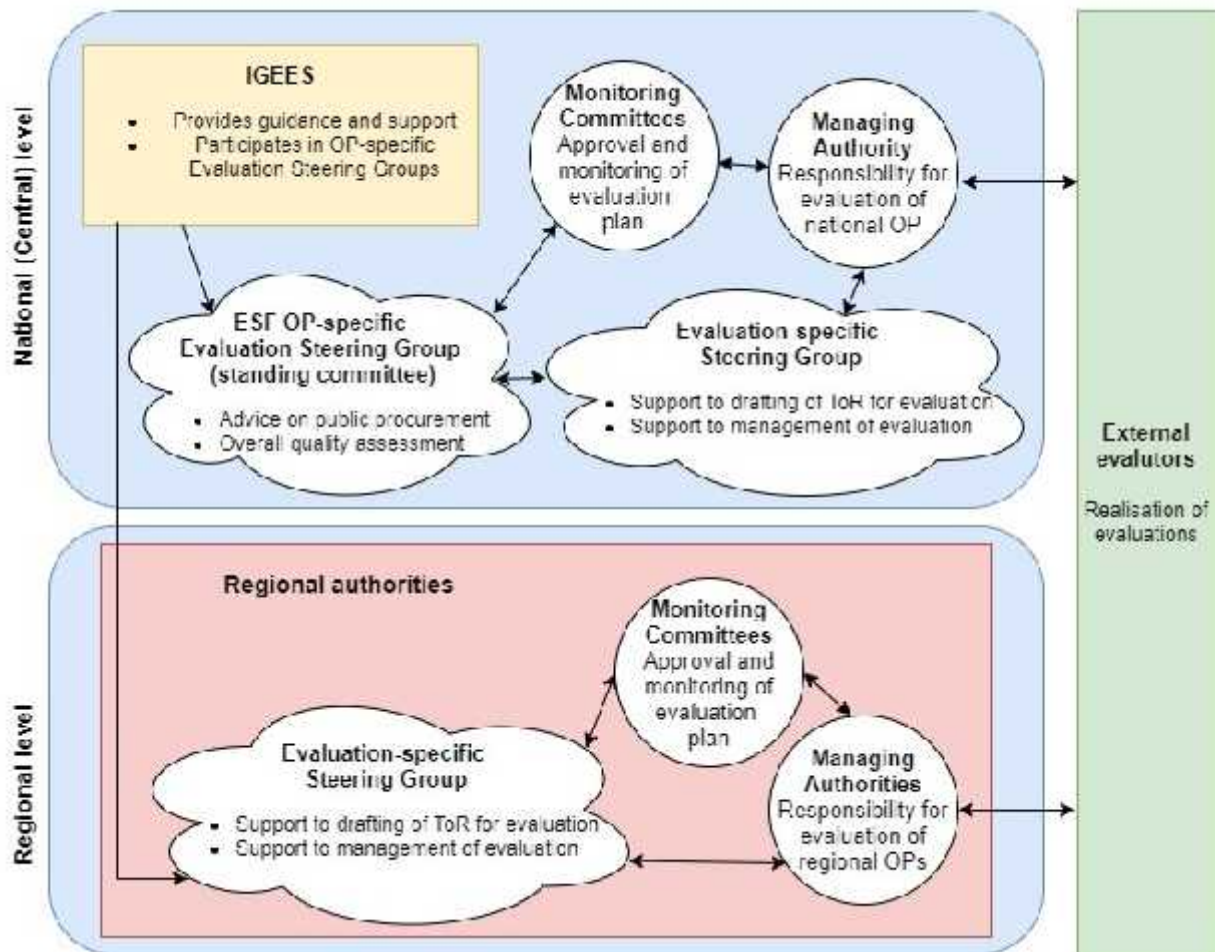
In the case of the ESF Programme, the evaluation plan has provisions for and encourages **Intermediate Bodies and beneficiaries** to perform their evaluations in addition to those specified in the evaluation plan. Concretely carrying out the evaluations are external evaluators, selected by Intermediate Bodies and beneficiaries themselves through public procurement processes (most of the beneficiaries of the ESF Programme are public authorities). The MA generally sits on the individual evaluation steering groups set up for each evaluation also in the case of Intermediate Bodies’ and beneficiaries’ evaluations.

While the evaluations carried out by the MA have so far been focussed either at Priority level or at OP level, evaluations carried out by Intermediate Bodies and beneficiaries have been at the Activity level. The MA seeks to support the evaluation activities of relevant bodies where those activities are particularly relevant to the efficient and effective implementation of the OP. For instance, it was in that capacity that the MA co-financed, with an Intermediate Body, the research project “Kickboxing and Kindness and Go the Extra Mile” published in 2017.

In the case of the ERDF OPs, the Intermediary Bodies carry out their evaluations, but these studies often cover activities outside the current OPs, and they are not funded under the Technical Assistance budget. To date, the practice has been to present the relevant findings in the Monitoring Committee, but not to submit these reports to the Evaluation Helpdesk. The ERDF MAs generally do not sit on the Intermediate Bodies’ evaluation steering groups.

Figure A.8 illustrates the governance of Cohesion Policy evaluation in Ireland.

Figure A.8 Governance of Cohesion Policy evaluation in Ireland



Source: Authors.

Main evaluation arrangements in Ireland for 2014-2020

In Ireland, in 2014-2020 one Evaluation Plan has been prepared for the ESF Programme and a joint Evaluation Plan for the two ERDF ROPs. Both Evaluation Plans are aligned with EU requirements and remain at a rather general level. Some differences between the two Plans can, however, be identified, partly related to the different scope of the respective OPs. The **ESF Evaluation Plan** lists the evaluations required by the 2014-2020 regulatory framework, but does not explicitly foresee additional evaluations on specific topics, nor does it provide indications on potential evaluation questions. Despite this, actual evaluations beyond those indicated in the Evaluation Plan have been performed, to address evaluation needs which emerged during the implementation of the OP. Besides, the Evaluation Plan encourages Intermediate Bodies and the beneficiaries to carry out additional evaluations and stresses the need for the MA to liaise with other bodies for evaluation activities (e.g. a state agency under the Department of Education and Skills, the Department of Housing, Planning, Community and Local Government, the Department of Rural and Community Development). The **Joint Evaluation Plan for the two ROPs** sets out the types of evaluations to be carried out, providing also indicative evaluation questions but does not offer a detailed list of evaluations. The Plan identifies 3 types of necessary evaluations: implementation/performance evaluations; impact evaluations; thematic evaluations. However, especially for thematic evaluations, details of the studies are not provided and left "to be determined". Also, this Evaluation Plan also requires a "Gateways and Hubs Development Index", to be updated in

2017 and 2022, which is aimed at offering a detailed assessment of the socio-economic performance of individual cities and towns⁴⁷.

Further, **evaluation recommendation tracking systems** are in place for both ESF and ERDF. For example, for the ESF Programme, the MA follows up on the recommendations and reports regularly at each Monitoring Committee meeting on the recommendations that were made on the programme by previous evaluations. The tracking system is updated by the MA's evaluation team. Concretely, the system consists of a digital document where the different recommendations are inserted, tracking how and when recommendations are to be implemented, with the respective responsibilities. While there is not a legal requirement to track recommendations, this practice is seen by the MA as the way to ensure the evaluations' usefulness.

Similar initiatives for tracking of recommendations are put in place by the MAs of ERDF ROPs as well. Also, to follow up on recommendations, after the Mid-term Evaluation of the Southern and Eastern Region Programme was issued in May 2019, during the Programme Monitoring Committee of the following month the MA presented a response paper providing an answer to each of the evaluation's recommendations. Since then, the MA has been working on all recommendations and is expected to provide a paper for the Monitoring Committee in April 2020, updating its members about the status of their implementation.

As regards the **timing of evaluations**, the Irish experience is characterised by the same problems common across the EU Member States, among which the results of evaluation becoming available too late to inform the next programming period as well as the fact that the impact of most interventions is not immediate but rather materialises over the long term. Part of the rationale for including comprehensive mid-term evaluations, however, lay in informing the next programming period. On a more operational basis, a timing problem characterised, in particular, the first YEI evaluation, which was completed as required by the end of 2015, even though a relative lack of data as the Programme had just been approved (in 2015). As a result, according to interviewees, this evaluation's significance was limited.

In terms of cooperation and exchange of views, there is a regular coordination between the three Irish MAs (e.g. as of end-2019, authorities with responsibility for the ESF and ERDF are undertaking a joint needs analysis to underpin the development of a Partnership Agreement for the next programming period covering the OPs for both ESF and ERDF) and, importantly, they sit on the respective Monitoring Committees. As such, the three MAs are **informed of each other's evaluations**. A systematic exchange at the national level of information/good practices, specifically concerning evaluation is not in place.

On a different note, as regards the procurement of evaluation studies, the **Office of Government Procurement** put in place a framework agreement for evaluations across the public sector. That framework has produced a panel of pre-qualified consultancies, and every time an administration puts an evaluation to tender, pre-qualified bidders can compete again for the specific contract. Evaluations in the framework of Cohesion Policy OPs can draw from these pre-qualified bidders as well, especially if the contract's value is over EUR 25,000, while if it is a smaller-scale evaluation, the authorities can select the evaluator by themselves, as a general rule, through autonomous procurement processes.

⁴⁷ The 2019 Mid-term Evaluation of the Southern and Eastern ROP noted that this Index was no longer fit for the purpose. The MA is working on a new alternative result indicator on urban development.

Comparative analysis with the 2007-13 programming period and main factors underlying current arrangements

Main changes compared to 2007-13

Overall, **no significant country-specific changes** between the previous and the current programming period have been identified concerning the evaluation of Cohesion Policy (for instance, in terms of national/regional legal requirements linked to evaluation).

On a practical level, since 2017 a **new system for data collection** and exchange has been introduced, called E-Cohesion, managed by the Department for Public Expenditure and Reform and serving the purpose to monitor and control expenditure under ERDF, ESF and YEI. E-Cohesion allows MAs to store in computerised form data on each operation necessary for monitoring, evaluation, financial management, verification and audit, including data on individual participants in operations, where applicable. During the procurement phase of E-Cohesion and before its development was completed, the less comprehensive ICT system in use for the 2007-2013 period was used, with minimal modifications, in agreement with the Commission (source: Dáil Éireann debate, Answer by Minister for Public Expenditure and Reform, 22 March 2018).

Besides, the **establishment of the IGEES in 2012** and its growth since then have slightly changed the 2014-2020 evaluation practices, offering an additional useful layer of methodological guidance, supervision and capacity building which was not available in the 2007-2013 period. Nevertheless, IGEES' guidance is generic and not specifically addressing Cohesion Policy challenges.

Potential causes of the observed changes and main determinant of current arrangements

The introduction of the **E-Cohesion project** was the result of EU-level requirements (specifically, Articles 122.3, 125.2 (d) and 126 (d) of Regulation (EU) No. 1303/2013) and of guidance documents issued by the Commission (European Commission, 2017). More broadly, the project is aligned with wider initiatives promoting e-government practices and the reduction of the administrative burden for Structural Funds stakeholders.

As regards **IGEES** instead, as already mentioned the main reason behind its establishment can be found in the economic and financial crisis that hit Ireland starting in 2008 and in the identification of lacking evaluation capacity within the public service as a key administrative and technical gap.

Overall assessment of the organisation of Cohesion Policy evaluation in Ireland

Overall, the Irish Cohesion Policy evaluation system is **shaped by EU requirements and EU guidance**, with **evaluation practices left to the MAs' responsibility**. The lack of an actual national coordination at central level can be linked to the low number of OPs in the country, which does not call for a strong coordination effort, in light of the remarkable differences in terms of scope and objectives between the ESF NOP, on one side, and the two ERDF ROPs, on the other side.

At the central level, only generic methodological guidance for evaluation is provided. For 2014-2020, the introduction of IGEES and in particular the provision of capacity building on evaluation principles and techniques represents a positive development, which could be especially useful for the administrations to be able to steer the evaluation process. According to interviewees, in particular, through increased capacity administrations could be expected to prevent evaluations from being merely compliance-driven, as well as to ensure proper understanding and contextualisation of the procedures followed by private evaluators. At the same time, the fact that IGEES' guidance is not Cohesion Policy-specific prevents it from having a substantial impact on actual evaluation practices in this particular area.

The effort to track evaluation findings and recommendations appears to be a best practice, which reflects a high level of awareness of the importance of evaluations and their role within the policy cycle.

A.5.2.3 Analysis of planned and conducted evaluations and their contribution to policy-making

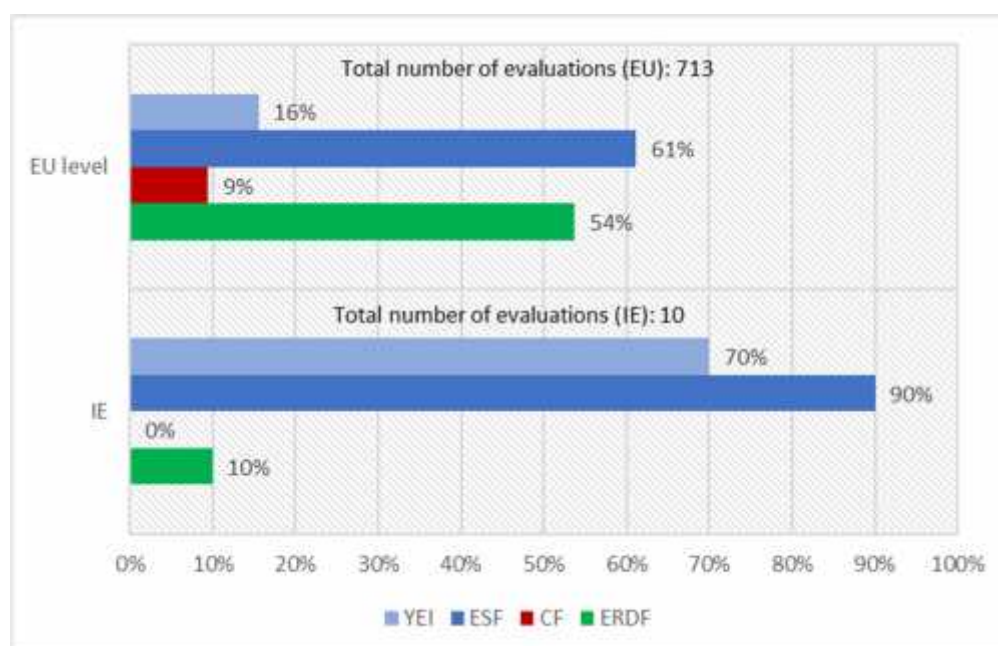
Main characteristics of the evaluations carried out in Ireland

Scope of evaluations

As of the end of 2019, according to data from the European Commission, 10 evaluations⁴⁸ have been completed in Ireland for the 2014-2020 programming period, out of a total of 713 evaluations in the whole EU (see Figure A.9).

Out of these, 9 have been completed on the ESF Programme, while only one was completed on an ERDF ROP (see Figure A.9)⁴⁹. Among these, one evaluation on ESF and the only one on ERDF consist of OP-wide mid-term evaluations.

Figure A.9 Evaluations already executed in Ireland during the 2014-2020 programming period by Fund (excluding ex-ante ones)



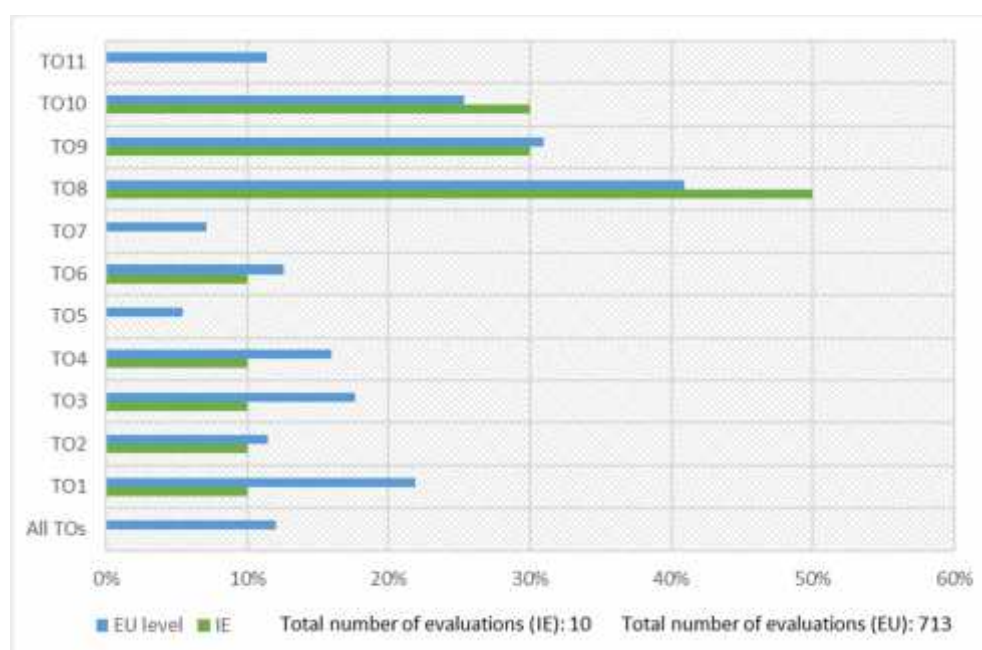
Source: Authors based on European Commission, 2019.

Accordingly, in terms of Thematic Objectives (TOs), the most evaluated TO is TO8, on quality employment and labour mobility, followed by other two TOs at the core of the ESF Programme: TO9 on social inclusion, combating poverty and discrimination and TO10 on education and training.

⁴⁸ In addition to these 10 evaluations, according to interviewees, a mid-term evaluation on the Border, Midland and Western ERDF ROP, addressing the whole OP, has been performed as well, although not yet included in the Commission database.

⁴⁹ The low number of OPs in Ireland and the fact that Commission figures only include completed evaluations highlight a difference between ESF and ERDF, which, although significant as of end-2019, should not be overemphasised. In fact, to draw conclusions on differences between evaluations carried out under the two Funds in the current period, further analysis should be performed at a later point, basing on a larger sample of evaluations.

Figure A.10 Evaluations already executed in Ireland during the 2014-2020 programming period by Thematic Objective (excluding ex-ante ones)



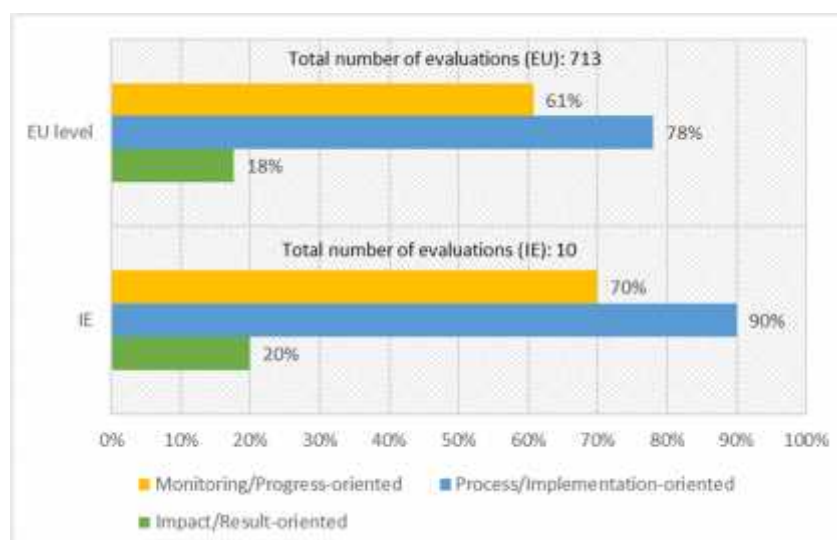
Source: Authors based on European Commission, 2019.

Types of evaluations

According to data from the European Commission collected at the end of 2019, Ireland is largely in line with EU averages in terms of split of evaluations by type (monitoring/progress-oriented vs process/implementation-oriented vs impact/result-oriented), as illustrated by the following Figure. The fact that for each of the three types of evaluation Ireland shows higher shares than EU averages may suggest that in the country the distinction between the three categories is not clear cut and that, as a result, evaluations are categorised under multiple types at the same time.

The ERDF mid-term evaluations, in particular, were characterised by terms of reference with a focus on monitoring and progress as well as process and implementation, with only a limited focus on impact.

Figure A.11 Types of evaluations already executed in Ireland during the 2014-2020 programming period (excluding ex-ante ones)



Source: Authors based on European Commission, 2019.

Methodological approach

The **ESF Evaluation Plan does not push for any methodological approach in particular**. On the contrary, the document expressly recognises that “a range of methods are available and there is no one ‘best’ method”.

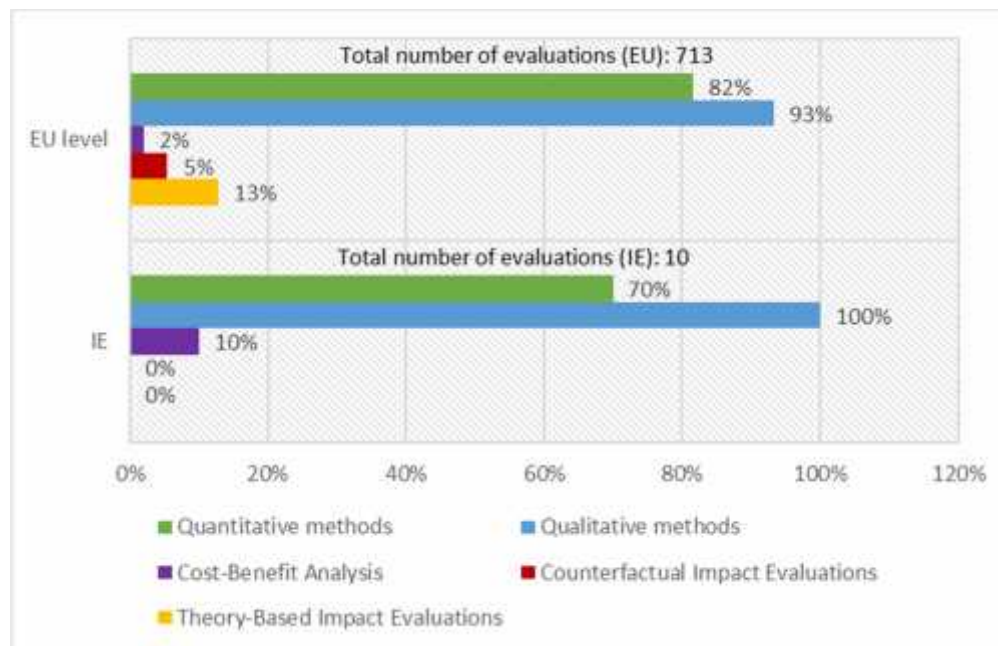
No approach appears to be specially promoted by the IGEES either. On the contrary, in IGEES’ view, a **plurality of methods** needs to coexist to ensure a comprehensive understanding of the policy.

The **Joint Evaluation Plan for the ERDF ROPs** does, however, offer some **indications on the methods to be used** in implementation evaluations and impact evaluations. In particular, for implementation evaluations, the methods are identified in quantitative and qualitative analysis of programme-derived and administrative data, combined with interviews and/or questionnaires to Implementing Bodies and other key stakeholders and with the literature review of relevant studies. For impact evaluations, the Plan indicates quantitative and qualitative analysis of programme-derived, sectoral and socioeconomic data, combined with the review of relevant studies.

Data from the Commission at end-2019 indicate that all 10 evaluations carried out so far in Ireland on the current programming period have used qualitative approaches, 7 have adopted quantitative methods for their analysis, and in one case cost-benefit analysis has been used as well. In no case, counterfactual and theory-based impact evaluations were performed⁵⁰.

⁵⁰ The lack of counterfactual and theory-based evaluations is the relevant as Commission guidance has promoted this type of studies in 2014-2020. In this case as well, however, the low number of OPs and evaluations completed so far in Ireland might lead to premature conclusions. In this regard, further analysis based on a larger sample of completed evaluations at a later point might offer a more comprehensive vision than what can be inferred from official Commission data as of end-2019.

Figure A.12 Methods of evaluations already executed in Ireland during the 2014-2020 programming period (excluding ex-ante ones)



Source: Authors based on European Commission, 2019.

As regards the counterfactual impact approach, it may be noted that the Joint Evaluation Plan for the two ROPs does not mention it. The ESF does mention the method instead, but only as a reference to the European Commission's approach to impact evaluation, without thus providing any insight on the extent to which counterfactual approaches may be useful for the evaluation of the Programme.

Under the ESF Programme, however, counterfactual analysis has been used as part of evaluation studies issued in the current programming period but related to 2007-2013 (and thus not included in the Figure above). For example, a review of the Back to Work Enterprise Allowance (BTWEA) Activity was conducted in 2016 and published in 2017. The review included a counterfactual analysis undertaken on BTWEA participants and non-participants. Similarly, an evaluation of the JobsBridge activity, published in 2016, included counterfactual analysis. According to interviewees, under the ESF Programme, a counterfactual evaluation of the JobsPlus activity is currently underway, being carried out under the Centre for Research on Impact Evaluation's Data Fitness Initiative. Further, an external evaluation of education and training programmes, including the ESF co-funded Back to Education Initiative (BTEI) is being performed, which will include counterfactual analysis.

Counterfactual techniques have been considered in other evaluations but not used. For example, the report of the 2019 Youthreach evaluation states that "given that any strategy to identify a control group for counterfactual analysis would necessarily involve the selection of individuals who are less marginalised than Youthreach participants, the adoption of techniques such as Propensity Score Matching would almost inevitably generate a negative treatment effect by the more positive human capital characteristics among the control group."

Overall assessment of conducted evaluations in Ireland

Ireland appears to be generally **in line with EU averages as regards the types of evaluation performed and the methods adopted**, although the small sample of evaluations conducted so far does not allow for strong conclusions. Moreover, the unbalance of the sample as of end-2019 (9 evaluations out of ten performed on the ESF Programme) represents a bias to be considered.

Overall, no **strong coordination of Cohesion Policy evaluation** (from a methodological as well as an organisational point of view) is **present at the central level** and no specific indications are provided on methodological approaches to be followed. As such, the Irish evaluation system is shaped mainly by the EU regulatory framework and guidance and even more by the own initiative of the individual MAs.

Evidence on the use of evaluation findings in Ireland

Based on the performed interviews, a high level of awareness about the role of evaluation of Cohesion Policy as feeding into the policy cycle characterises MAs and is reflected in the attention towards evaluation findings and recommendations and their follow-up.

During the interviews, one concrete example of how evaluation recommendations have been implemented in the framework of the ESF Programme has been reported as follows: after the Higher Education Authority (HEA) commissioned the Review of the Fund for Students with Disabilities, one of two funds assisted by the ESF through the Third Level Access activity, the review found that demand for the Fund had grown rapidly in recent years. Between 2008 and 2016, the number of students supported by the Fund each year grew from 3,800 to almost 10,500. Recommendations included to reform the allocation model and to revise the Student Assistance Fund guidelines for Higher Education Institutions and students. As a result, a new funding model and revised guidelines were developed in 2017.

A.5.2.4 Conclusions, lessons learnt and recommendations

Historically, Cohesion Policy evaluation has had a **remarkable role in promoting evaluation practices** across the Irish public service. However, Cohesion Policy's role in the overall policy mix has partially lost its importance during the last few decades, thanks to the economic growth rates attained from the mid-1980s until 2008 and from 2013 onwards. Since 2003, the country is no longer eligible for Cohesion Fund co-financing, and Cohesion Policy's share of total government investments has decreased from 10% in 2000-2006 (The World Bank, 2003) to 3% in 2015-2017.

Today, the **Irish evaluation system is characterised by an acute awareness within administrations of the role of evaluation within the policy cycle**. New measures to promote evaluation have been taken after the crisis that hit the national economy in 2008 and the following years. In particular, today, a central body, IGEES, provides specialised staff to different administrations, disseminating evaluation culture and enhancing evaluation capacity. However, its impact on the quality of evaluations on Structural Funds programmes and interventions is hampered by a lack of guidance specific to Cohesion Policy.

The **absence of Cohesion Policy-specific guidance by IGEES** can likely be attributed to **the limited role of Cohesion Policy** in the current national policy mix and to the fact that evaluation of Structural Funds is already shaped by EU-level requirements and provisions. Moreover, the **low number of OPs** in the country (and their different scope) is **not conducive to highlighting the need for a strong coordination** effort on evaluation from the central level. As a result, **evaluation practices are largely left to the MAs' responsibility**. Nevertheless, IGEES could usefully increase its role by developing and promoting guidance, materials and training explicitly for Cohesion Policy evaluation, rather than relevant yet largely generalist support and supervision.

In view of the **already planned extension of IGEES activities to ex-post evaluation**, the closure of the 2014-2020 programming period could represent an ideal occasion to take advantage of. The

development of an ex-post methodology by IGEES could in fact be attached to the concrete needs of Cohesion Policy evaluation of programmes and interventions.

IGEES could act as a **platform for coordination and an exchange of good practices** between the three MAs, ensuring that not only central government administrations, but also Regional Mas, benefit from its support.

Advantages and disadvantages of Ireland's approach to Cohesion Policy evaluation are synthesised Box A.6.

Box A.6 SWOT analysis of Cohesion Policy evaluation in Ireland

STRENGTHS	WEAKNESSES
Creation of IGEES and capacity building activities on evaluation methods and practices High awareness of evaluation's role in shaping policymaking Existence of systems to track evaluation findings and recommendations and follow up on them Central role of Steering Groups in shaping evaluation practices	Lack of Cohesion Policy-specific guidance by IGEES Lack of national coordination from a methodological and organisational perspective Low number of counterfactual and theory-based evaluations on the 2014-2020 period
OPPORTUNITIES	THREATS
Potential extension of activities of IGEES (e.g. on ex-post evaluation) The three MAs take part in each other's Monitoring Committees and are thus informed of each other's evaluations. On this basis, systematic exchange of information/good practices specifically concerning evaluation could be established	IGEES more active at the central level than at the regional level Loose linkage between Evaluation Plans and actual realisation of evaluations Cohesion Policy less important in the national policy mix than in the past

A.5.2.5 Annexes

Summary of the characteristics of the Irish case

Table A.9. Checklist summarising the Irish case study

Item	Check (Yes/No)
Are there national legal requirements on evaluation to which CP evaluation is subject?	NO
Is(Are) there autonomous national/regional agency(ies) dedicated to evaluation?	YES
Are there independent Evaluation Units outside the Managing Authorities? (Yes: outside the MA, No: evaluation units are within the MA)	YES
Are academic evaluators involved in CP evaluations?	YES
Does a permanent and open list of evaluation experts exist?	NO
Are Framework contracts used to conduct evaluations (externalised to private or academic consultants)?	YES
Has the role of Monitoring Committees been strengthened in the country between 2007-13 and 2014-20?	YES
Is there a unified national data collection system to Monitoring CP? (VS: different monitoring systems depending on regions)	YES
Is there systematic support to evaluation provided by the authorities at the national/regional level?	YES
Is there a national database of CP evaluations?	NO
Is there a formal system to track whether evaluation findings are followed up?	YES
Is there a single national evaluation plan?	NO
Are there regional evaluation plans?	YES
Are there major differences between regions for the organisation of CP evaluations? (governance, practices)	NO
Are there major differences by fund for the organisation of CP evaluations? (governance, practices)	YES
Are evaluations typically large-scale and few in number?	YES
Are evaluations typically small-scale and high in number?	NO

Item	Check (Yes/No)
Are specific methods of evaluation promoted by regional or national authorities?	NO
Has the methodological quality of evaluations improved between 2007-13 and 2014-20?	YES
Are there major differences in the scope and methods of evaluations by region?	NO
Are there major differences in the scope and methods of evaluations by fund?	YES
Are evaluations typically carried out with timing that allows them to inform policy-making decisions?	NO
Are evaluation reports from 2007-13 cited in national/regional policy documents for 2014-20?	NO
Overall, are CP evaluations an important influence on policy-making decisions in the country?	NO
Are there major differences in the use of evaluations by region?	NO
Are there major differences in the use of evaluations by fund?	YES

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-)] Head of Irish Government Economic and Evaluation Service (IGEES)
-)] Head of Research - Institute for Public Administration
-)] Managing Authority – Regional Operational Programme Border, Midland, Western
-)] Managing Authority - National ESF Programme

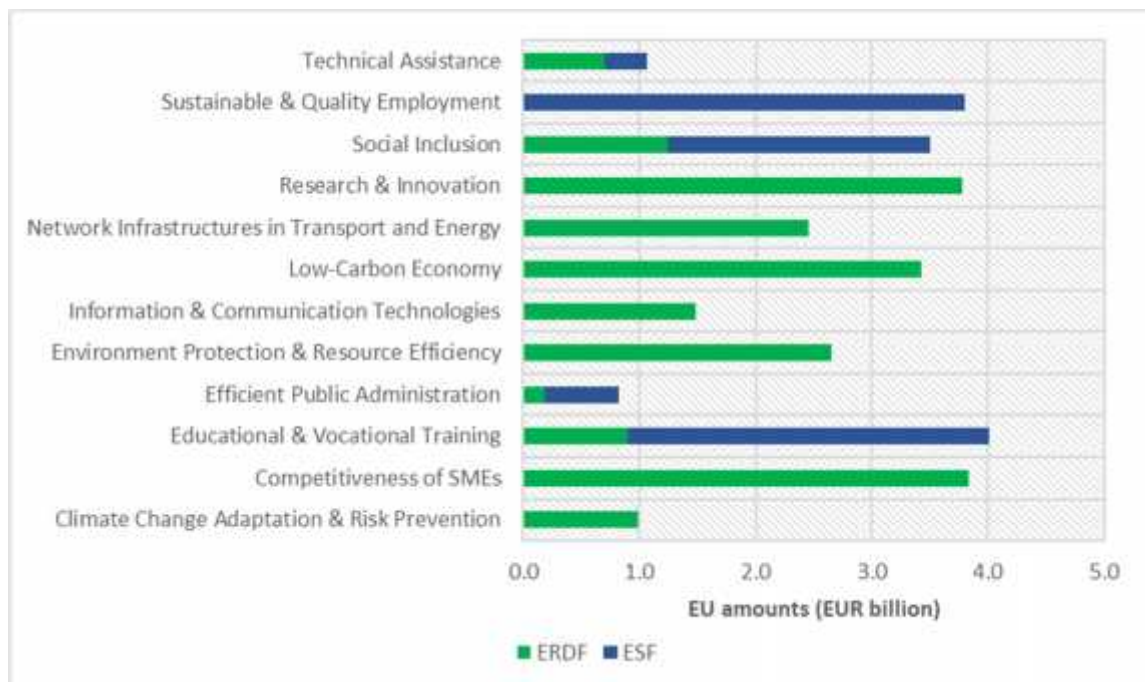
A.5.3 Italy

A.5.3.1 Background information

Overview of Cohesion Policy in Italy

In the 2014-2020 programming period, EUR 21.7 billion have been allocated to Italy from the European Regional Development Fund (ERDF) and EUR 11.1 billion from the European Social Fund (ESF)⁵¹. Out of the total ERDF contribution, EUR 18 billion are allocated to Southern Italy (the less developed part of the country) and the rest to Central and Northern Italy. Similarly, out of the total ESF contribution, EUR 6.9 billion are allocated to the South. **Public investments in Southern Italy, especially in infrastructures, are largely driven by European Structural and Investment funds.**

Figure A.13 EU funding in Italy by fund and priority theme



Source: European Commission, 2019.

The **priority theme** absorbing the highest share of funds by Cohesion Policy in Italy in 2014-2020 is Educational & Vocational Training, followed by Sustainable & Quality Employment, Research & Innovation and Competitiveness of SMEs. In comparison with total amounts planned in the whole EU in 2014-2020, the main difference can be identified in Network Infrastructures being ranked only as the eighth most-funded theme in Italy, while being by far the most funded one in the EU as a whole (with a total Cohesion Policy funding for this theme of almost EUR 60 billion). Such difference can largely be explained by the fact that Italy also includes more developed regions having investing priorities more related to the knowledge economy thematic objectives than to network infrastructures (which are however the core of investment priorities in the less developed regions in the South).

⁵¹ These figures refer to planned financial resources (i.e. total budgets of Operational Programmes), not to the financial resources allocated to selected projects (project pipeline) or funds spent. Data on the financial allocations for 2014-2020 are from the OpenCoesione portal (<https://opencoesione.gov.it>), the open government initiative on Cohesion Policy in Italy.

Evaluation culture in Italy

Historically, evaluation of public policies in Italy developed later than in countries having a well-established evaluation tradition such as the United States and the United Kingdom. Until the 1980s, evaluation remained primarily confined to academic publications and debates, with only some minor yet important exceptions. In particular, the *Cassa per il Mezzogiorno*, a public body aimed at the development of Southern Italy and dissolved in 1984, made use of cost-benefit analysis to evaluate infrastructures ex-ante, for instance in the water sector.

The concept of “**public policy**”, as the unit of analysis of evaluation, was not widely explored in Italy until the 1980s (La Spina and Espa, 2011). One major reason for this delay can be found in Italy's administrative culture, based mainly on a legalistic approach to public management (i.e. focusing on laws, as opposed to policies) and in the limited permeability of Italian academic debate to the intellectual developments in the Anglo-Saxon sphere.

In 1982, the Budget Law took a step towards a rigorous evaluation of public investments, by creating the Investment and Employment Fund (*Fondo Investimenti e Occupazione*, or FIO) and a Centre for Evaluation of Public Investments (*Nucleo per la valutazione degli investimenti pubblici*). The Fund and the Centre were aimed to introduce transparent techniques for the appraisal of public investments and promote a new administrative culture. The new way to programme investments was meant to be based on individual projects and their ex-ante analysis (performed mainly at microeconomic level) rather than on sectoral programming laws. However, politically-driven allocation of funding and the lack of a consistent methodology for project appraisal (on which administrations enjoyed large discretion) contributed to an early end of the experience, which lasted only few years (Florio, 2002; Gallia, 2006; Pennisi, 2008; Rubino, 2016). Nevertheless, this **pioneering effort** represented an important initial step to disseminate an evaluation culture in the national administration.

At the end of the 1980s and even more in the 1990s, evaluation requirements set at the European level in the framework of **Structural Funds regulations** led to a new beginning for evaluation in the country. Cohesion policy rapidly became the main field on which evaluation was performed. In addition to the external pressure to develop evaluation practices coming from Cohesion policy regulations, endogenous processes contributed as well to increase awareness on the role of evaluation (La Spina and Espa, 2011). In particular, administrative reforms at the beginning and the end of the 1990s, inspired by principles of New Public Management, led to increased attention in public administration for the evaluation of policies and staff.

Further, a **tension between centralisation and decentralisation** has characterised the history of evaluation in Italy. The end of the 1990s saw the line of thought in favour of decentralisation prevailing. In terms of national institutional setup, decentralisation culminated in the 2001 Constitutional reform, which shifted numerous competences from the State to the Regions. In this context, at the end of the 1990s **Centres for the Evaluation of Public Investments** (*Nuclei di valutazione e verifica degli investimenti pubblici*) were established at regional level by Law 144/1999, which also introduced a mandatory feasibility study for public works above a financial threshold corresponding to about EUR 10 million. However, efforts to centralise competences have surfaced periodically, as a reaction to differentiated outcomes at regional level and driven by a willingness to monitor and control administration officials (thus reflecting a rather limited understanding of evaluation's purposes).

Today, the Centres for the Evaluation of Public Investments carry out evaluations of policies and projects and also request independent analysts to perform studies (De Luca and Parmentola, 2002; Stame and Leone, 2013; Boscariol, 2015). However, the Centres have not been implemented in a consistent way across the **different regions**, as Law 144/1999 left broad discretion on their

organisational setup. In the different administrations, the institutional configuration of the Centre can vary, and its tasks can include not only evaluation but also more comprehensive support to the administration. Further, the competences required by its staff are not consistently identified. Something that unifies the Centres, however, is the short-term nature of contractual arrangements of the Centres' staff, who are not part of the administrative body. On the one hand, this can represent an advantage in terms of functional independence; on the other hand, contract expiries frequently result in significative administrative capacity problems. Accordingly, the 2014-2020 Partnership Agreement describes the Centres as having elements of "great variability and instability".

In the field of Cohesion Policy, **evaluation is coordinated by the Centre established within the Presidency of the Council of Ministers** (*Nucleo di Valutazione e Analisi per la Programmazione*, or NUVAP). As will be explained below, the NUVAP and the Network of Centres play a central role in Cohesion Policy's evaluation in the country.

The NUVAP (previously known as UVAL until 2014) has traditionally been a driver of innovations in the national approach to Cohesion Policy implementation and evaluation, also thanks to the inputs by Fabrizio Barca, a leading expert of regional policies at international level, who covered a leadership role for eight years between the 1990s and 2000s. For example, the Centre's work on developing measurable objectives for the provision of public services in Southern Italy as part of the 2000-2006 **Performance Reserve** framework gained attention at European and international level for the identification of indicators and targets of performance, which were linked to a system of rewards to Managing Authorities (MAs). Such experience represented an important result-based programming practice, which acted as an incentive for MAs to maximise the performance of Programmes and increased accountability (Anselmo et al., 2004; Anselmo, 2012). While the EU Performance Reserve system aimed to ensure better programme management and effective spending, the Italian mechanism extended this logic by promoting the modernisation of administrative capacity and the finalisation of regional legislation in different sectors, by setting aside a reserve of a programme's budget and distributing it only if specific objectives were achieved (OECD, 2009).

Despite individual good practices (such as this elaboration on indicators and rewards), an overall weakness of the Italian evaluation system lies in the **use of findings**. Evaluations remain largely compliance-driven and their potential to shape the other steps of the policy cycle is not fully developed, thus hampering the achievement of one of evaluation's main objectives, i.e. policy learning (Marra, 2016).

From a **methodological perspective**, in Italy evaluation started in the context of economic analysis, mainly through ex-ante evaluation of individual projects, rather than as a multidisciplinary effort (also combining political and sociological perspectives) as it was the case in the US, for instance. The hegemony of the economic approach was pervasive until the 1990s and 2000s, when performance management made its way in Italy, shifting attention from the design of an intervention (i.e. allocative efficiency) to the capacity of organisations to manage complex projects. In line with this evolution, in the evaluation of Cohesion Policy, there was initially a predominance of prospective studies (i.e. ex-ante evaluations), but over time thematic, in-itinere and ex-post evaluations have gradually increased.

A.5.3.2 The organisation of Cohesion Policy evaluation in Italy

Governance of Cohesion Policy evaluation in 2014-2020: roles and responsibilities

Evaluation of Cohesion Policy is performed in Italy based on the legal requirements set by the EU regulatory framework for 2014-2020. **The national legislator has not established additional legal provisions.**

NUVAP coordinates evaluation of Cohesion Policy in the country in a threefold capacity:

-)] Acting as a contact point with the Commission for all aspects related to evaluation;
-)] Acting as a contact point with administrations at central and regional level dealing with evaluation;
-)] Supporting the Network of Centres for the Evaluation of Public Investments through numerous activities such as the provision of guidance documents, the organisation of formal training sessions as well as on-the-job training, networking events.

In light of this multiple role, NUVAP has consolidated over the years a National Evaluation System (*Sistema Nazionale di Valutazione*, or SNV), which consists in a set of materials (e.g. Guidelines on how to prepare Evaluation Plans; on the use of evaluations; on impact evaluations; on field research) and activities supporting evaluation practices.

19 **Centres for the Evaluation of Public Investments** are established at regional level (one per Region⁵²). As already mentioned, the Centres have been established inconsistently across different regions and with varying outcomes, with some Centres playing a mostly formal and compliance-driven role, while others adopting a more proactive approach, mainly depending on the availability of specialised staff and the existence of political support for evaluation. In the field of Cohesion Policy, the Centres provide technical support to the **MA**s in dealing with evaluation. The Centres may carry out evaluations themselves or support in the design, management and dissemination of evaluations performed by external analysts. Besides, they may contribute to the enhancement of evaluation capacity within the MA. However, few Centres structurally work with MAs and the relationship between the two is in many cases still underdeveloped. Ultimately, evidence of an actual contribution by the Centres to Cohesion Policy evaluation remains scattered and anecdotal.

Despite the Centres' role, MAs remain responsible for the evaluation processes, in line with the EU regulatory framework. Within MAs, typically, one or more officials are assigned to evaluation tasks, and this MA evaluation unit generally works in close relation with the implementation unit.

Centres for the Evaluation of Public Investments are also foreseen within **central administrations**. Nevertheless, at the central government level, they have been established only in few ministries (e.g. Ministry of Transport, Ministry of Health). In most ministries, they either have not yet been established or, de facto, they do not operate. A reflection on Centres for Evaluation within national ministries is currently ongoing: since numerous ministries already feature some units (or external bodies) performing evaluation tasks⁵³, the added value of an additional Centre may be questionable.

NUVAP's cooperation with the Network of Centres for Evaluation is supported by a project co-funded under NOP "Governance and Institutional Capacity" and called "Assist". The project aims to enhance the activities of the National Evaluation System and the coordination among Centres, as well as to improve the quality of evaluation practices and the diffusion of evaluation findings.

Two further bodies with responsibilities in the field of evaluation are **NUVV** (*Nucleo di Valutazione e Verifica degli Investimenti Pubblici*, or Centre for Evaluation and Assessment of Public Investments) and **NUVEC** (*Nucleo di Verifica e Controllo*, or Centre for Assessment and Control). NUVV is established within the Presidency of the Council of Ministers and performs evaluation and monitoring activities of investment projects and policies in numerous different fields, such as research and innovation,

⁵² The Autonomous Provinces of Trento and Bolzano do not have a Centre for Evaluation. Nevertheless, they generally cooperate in the Network's activities.

⁵³ For example, in the field of education and research only, relevant bodies can be identified in INVALSI (National institute for the evaluation of the education and training system) and ANVUR (National agency for the evaluation of university and research).

transport, energy, environment, local development, support to enterprises, healthcare, social policies, public finance. In addition, NUVV carries out regulatory impact analysis, providing insights into the financial and socioeconomic effects of laws. In the field of Cohesion Policy, NUVV contributes to the assessment of Italy's Strategy for Inner Areas and of investments funded through national resources (e.g. *Fondo Sviluppo e Coesione*, or Development and Cohesion Fund). Moreover, it takes part in the preparatory works for the 2021-2027 programming period, with a vision covering investments funded by both national and EU funds.

NUVEC is established within the Agency for Territorial Cohesion instead, and it is responsible for assessing and monitoring, especially implementation aspects of OPs. In fact, among NUVEC's tasks, there are: monitoring the implementation of programmes and projects; performing audit functions; creating tools for integrating databases concerning public investments; monitoring initiatives aimed at accelerating the implementation of investments.

External evaluators are involved in the preparation of evaluation studies through open tenders. Over the years, a small set of consultancies and/or research centres with strong academic background and specialising in Cohesion Policy evaluation have emerged in Italy, whose quality is recognised at European level as well. Terms of Reference for evaluation tenders are typically prepared not by the Centres for Evaluation, but by legal offices within the administrations, having no specific experience or training in the field of evaluation. For this reason, a typical practice consists of reiterating the structure and requirements of previous Terms of Reference, which may limit the innovation potential and added value of new evaluations⁵⁴.

For **ESF Programmes** (and YEI/Youth Guarantee), two further public stakeholders are relevant, with whom NUVAP cooperates. These are INAPP (National Institute for the Analysis of Public Policies, formerly ISFOL) and ANPAL (National Agency for Active Labour Policies). Among other activities, they carry out evaluations of ESF Programmes.

Table A.10 briefly presents the different stakeholders' roles and contributions in Cohesion Policy evaluation.

Table A.10. Governance of Cohesion Policy evaluation in Italy for 2014-2020

Name of the Stakeholder	Level of Governance	Number/Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
NUVAP	National	1	<ul style="list-style-type: none">) Contact point with Commission and administrations on aspects related to evaluation of Cohesion Policy) Support to Network of Centres for the Evaluation of Public Investments) Management of National Evaluation System) Capacity building 	NUVAP's main contribution lies in its role of overall coordination and support. Despite its activities, differences remain in the performances of regional Centres.

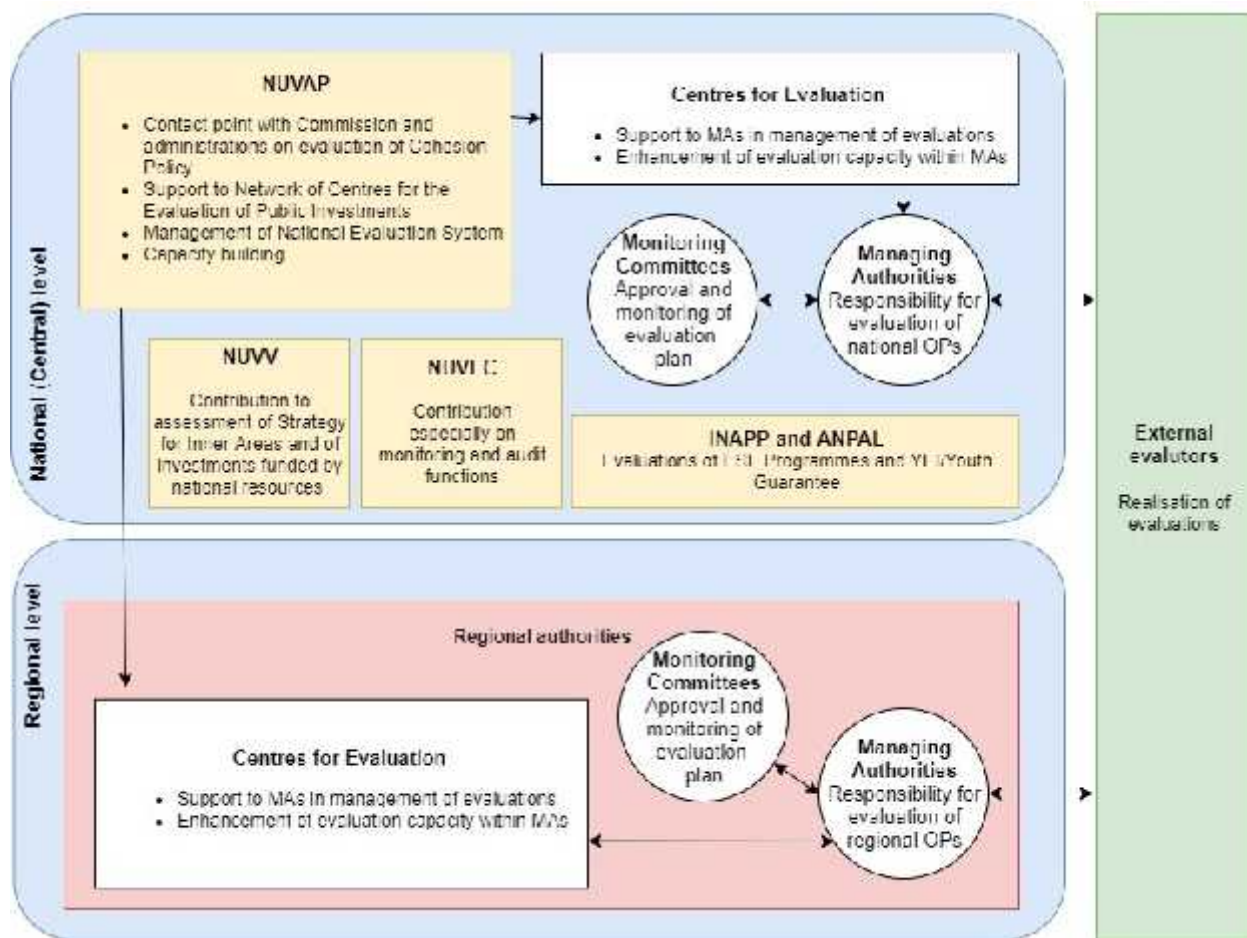
⁵⁴ More broadly, according to interviewees, the procurement of evaluation studies is affected by a broader problem: the inadequacy of the national legal framework for procuring intellectual services. Since the mechanism is strongly in favour of bidders offering significant discounts, quality work is discouraged. In turn, this aspect leads to i) barrier to entrance of new players; ii) a lack of acknowledgement by the administrations of evaluation's importance; and iii) lack of demand for evaluation.. In this regard, the distance between administration officials tasked with preparing procurement documents and the officials dealing with Cohesion Policy implementation does not favour a positive dynamic.

Name of the Stakeholder	Level of Governance	Number/Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
Managing Authorities	National/Regional	One per OP	<ul style="list-style-type: none"> Responsibility for the evaluation of OPs In some cases, an evaluation official within the MA is responsible for the OP evaluation activities 	While MAs can steer evaluation activities, evaluation is typically perceived as a secondary task and MAs' interest in this topic is generally low.
Monitoring Committees	National/Regional	One per OP	<ul style="list-style-type: none"> Approval and monitoring of Evaluation Plan Overall supervision of evaluation processes 	Supervisory role, de facto with little concrete impact on evaluation design and implementation.
Centres for the Evaluation of Public Investments	National/Regional	19 (one per Region) + in few selected Ministries	<ul style="list-style-type: none"> Performance of evaluations Support to MAs in the design, management and dissemination of evaluations performed by external analysts Contribution to the enhancement of evaluation capacity within the MA 	The Centres' main contribution lies firstly in their analyses and provision of expertise, secondly in their support to MAs and capacity building. De facto, their performances vary on a case-to-case basis.
NUVEC	National	1	<ul style="list-style-type: none"> Monitoring of the implementation of programmes and projects Audit functions Creation of tools for integrating databases concerning public investments Monitoring of initiatives aimed at accelerating the implementation of investments 	NUVEC's contribution is centred, especially on monitoring and audit functions.
NUVV	National	1	<ul style="list-style-type: none"> Contribution to the assessment of Italy's Strategy for Inner Areas and of investments funded through national resources Participation in preparatory works for 2021-2027 programming period 	NUVV's contribution lies in its ability to offer a vision which covers not only public investments co-financed through EU funds but also those financed by national funds, in view of an integrated Cohesion Policy.
INAPP and ANPAL	National	ESF OPs	<ul style="list-style-type: none"> Performance of evaluations of ESF Programmes and YEI/Youth Guarantee 	Competence Centres on vocational training and labour policies.
External evaluators (private sector)	National/Regional	Concentrated market	<ul style="list-style-type: none"> Performance of evaluations (all funds) 	Provision of functionally independent expertise.

Source: Authors.

Figure A.14 graphically summarises the governance of Cohesion Policy evaluation in Italy.

Figure A.14 Governance of Cohesion Policy evaluation in Italy



Source: Authors.

Main evaluation arrangements in Italy for 2014-2020

The **evaluation plans** have been prepared in Italy **either at the OP level** (for national programmes) or **regional level** (with a unified evaluation plan for both the ESF and ERDF ROPs). Also, NUVAP has elaborated an evaluation plan at the level of Partnership Agreement (in line with provisions included in the Partnership Agreement itself).

- Overall, evaluation plans were prepared in line with EU requirements. Numerous ones merely cover the areas required by the EU regulatory framework in a rather mechanical way (e.g. with only very few and only indicative evaluation questions per each evaluation), suggesting that they were largely compliance-driven.
- Despite the high number of OPs implemented in Italy in 2014-2020 and the numerous Managing Authorities involved, a specific pattern can be identified in terms of number of evaluations foreseen by the plans: most of them chose to foresee **a low number of wide-ranging evaluations**, rather than, for example, a high number of specific ones.
- Monitoring/Data collection systems differ at the OP level.** For example, for ERDF-ESF NOP "School", the monitoring system has been developed ad hoc by INDIRE (the National Institute of Documentation, Innovation and Educational Research) during the 2007-2013 programming period and fine-tuned for 2014-2020, aiming to address the NOP's specific needs (e.g. need to

ensure active participation of numerous stakeholders in the monitoring system). Individual monitoring systems at MA level feed the national monitoring system using a standard data structure. A set of common indicators is established at national level.

- J Since 2012 the Department of Cohesion Policy within the Presidency of the Council of Ministers has launched **OpenCoesione** (<https://opencoesione.gov.it>), an open government initiative on the implementation of Cohesion Policy in the country. Through its online portal, OpenCoesione makes available, for all interventions co-financed under Cohesion Policy (under the 2007-2013 and 2014-2020 programming periods), data on the financial resources allocated and those disbursed, together with information on the Thematic Objectives addressed, the projects' location, project promoters, implementation times. These data are regularly updated and presented consistently. As such, OpenCoesione represents a crucial source of information allowing civil society to monitor the policy's implementation. This function of the portal is amplified by efforts to engage the citizenship in active monitoring, for instance through a project which promoted the use of the portal among 20,000 students across the country. Since 2019, the European Commission has promoted experimentation of this project, called "At the School of OpenCoesione", in other Member States (Bulgaria, Croatia and selected regions of Greece, Portugal and Spain), in recognition of its value in promoting citizens' participation in the monitoring of the policy.

On a different note, no evidence has been found of the existence in Italy of systems to track the implementation of recommendations included in evaluation studies or to keep track of evaluation findings.

[Comparative analysis with the 2007-13 programming period and main factors underlying current arrangements](#)

Main changes compared to 2007-13

Overall, no **major country-specific changes** between the previous and the current programming period have been identified concerning the evaluation of Cohesion Policy (for instance in terms of types of stakeholders involved and their relationships/responsibilities, the organisation of the monitoring/data collection system, national/regional legal requirements linked to evaluation). It can be said that Italy even anticipated some of the changes introduced later. For example, in 2007-2013 evaluation plans were made mandatory in the National Strategic Framework, despite being optional in the EU regulations.

In the 2014-2020 period, a significant platform for orientation and guidance to the individual Centres for Evaluation and administrations (managed by NUVAP and the Network of Centres) is represented by the abovementioned **Assist project**. The project has foreseen not only a series of in-person meetings on evaluation topics, fostering networking and the exchange of good practices, but it has also provided the materials used during the meetings (in some cases including the video recordings of the meetings themselves) online, thus offering an easy access to a set of tools that can be useful to Centres and administrations.

- J A new element introduced in 2014-2020 in the country (as a first-time experience across the EU) is the **Plan for Administrative Strengthening** (*Piano di Rafforzamento Amministrativo, PRA*), which aims to analyse the necessary administrative capacities within each MA, identifying concrete measures to tackle the existing gaps. To do so, these Plans establish sets of indicators and targets and foresee ad hoc initiatives for monitoring and independent evaluation.

Potential causes of the observed changes and main determinant of current arrangements

The **Assist project** and its underlying coordination effort appear to be justified by two main reasons. First, the high number of OPs, Centres for Evaluation and stakeholders involved in evaluation practices call for a coordination platform. Second, the high variability and instability characterising the Centres for Evaluation across the different regions highlight the need for a steering activity at central level to ensure consistency, as well as an exchange of good practices and the provision of guidance and support.

The **Plan for Administrative Strengthening** and the related evaluation activities stem from critical issues identified by the Commission in the 2012 Position Paper on Italy. The Position Paper, in particular, underlined widespread deficiencies in the administrative capacity of MAs responsible for 2000-2006 and 2007-2013 OPs, which had negatively impacted on the OPs' performances.

Overall assessment of the organisation of Cohesion Policy evaluation in Italy

The **two changes identified in comparison with 2007-2013** represent **two strengths** of the Italian evaluation arrangements. The **Assist project**, by promoting and consolidating the exchange of practices among Centres for Evaluation, serves as a coordination and networking mechanism. The **Plan for Administrative Strengthening** represents a considerable opportunity for administrations to improve themselves and the performances of their OPs, also in light of increasing evidence pointing to the crucial role of administrative capacity and quality of government in ensuring Cohesion Policy's success (Rodriguez-Pose and Garcilazo, 2015; Rodriguez-Pose and Tselios, 2019). As such, it represents an opportunity to seize potential effectiveness and efficiency gains (not only as regards implementation, but also evaluation, since the Plans promote the enhancement of evaluation capacity as well). At the same time, such Plans have been perceived by some MAs as an administrative burden and the related activities thus fall into a compliance-driven logic. Further, the underdeveloped conceptualisation of administrative capacity has generated difficulties in discussing it and identifying relevant indicators and measures.

A.5.3.3 Analysis of planned and conducted evaluations and their contribution to policy-making

Main characteristics of the evaluations carried out in Italy

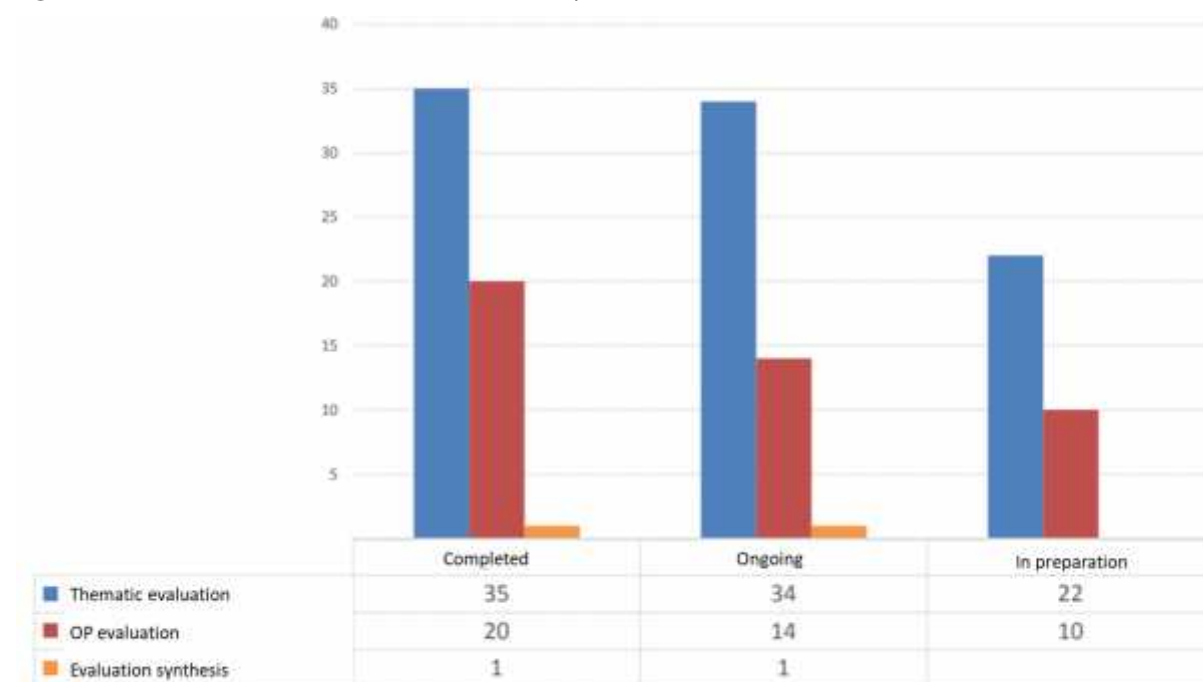
Scope of evaluations

According to the interviewees, NUVAP promotes an evaluation approach which is not limited to the evaluation of OPs as set out in the EU regulatory framework, but which instead focuses on the **outcomes of interventions of regional policy as a whole**. The primary units of analysis of evaluations are not the Programmes as such (despite compliance being ensured with requirements set at the EU level for Programme evaluation), but regional policy's interventions. This means that evaluation does not cover only projects co-financed by the EU, but, whenever it is relevant for answering evaluation questions, also interventions financed with national resources. This choice reportedly stems from the fact that OPs frequently include numerous different areas and projects, which make them hard to evaluate as a whole.

Further, this approach is in line with guidance on ERDF and ESF evaluation provided by the Commission for the 2014-2020 period, which states that evaluations can cover Programmes, but also priorities, themes across priorities, leaving a certain degree of discretion to authorities on how to perform evaluations.

In September 2018, a review of the evaluations which had been started until then was presented during a meeting of the Network of Centres for Evaluation in the framework of the Assist project (Livi, Pistis, and Venanzi, 2018). Such review was not exhaustive since it was based on a survey in which not all Managing Authorities participated. Nevertheless, it provides useful insights into the characteristics of evaluations in Italy. In line with NUVAP's approach, most evaluations (66%) were thematic ones (see the following Figure). Evaluations on the OPs made up 32% of the sample instead.

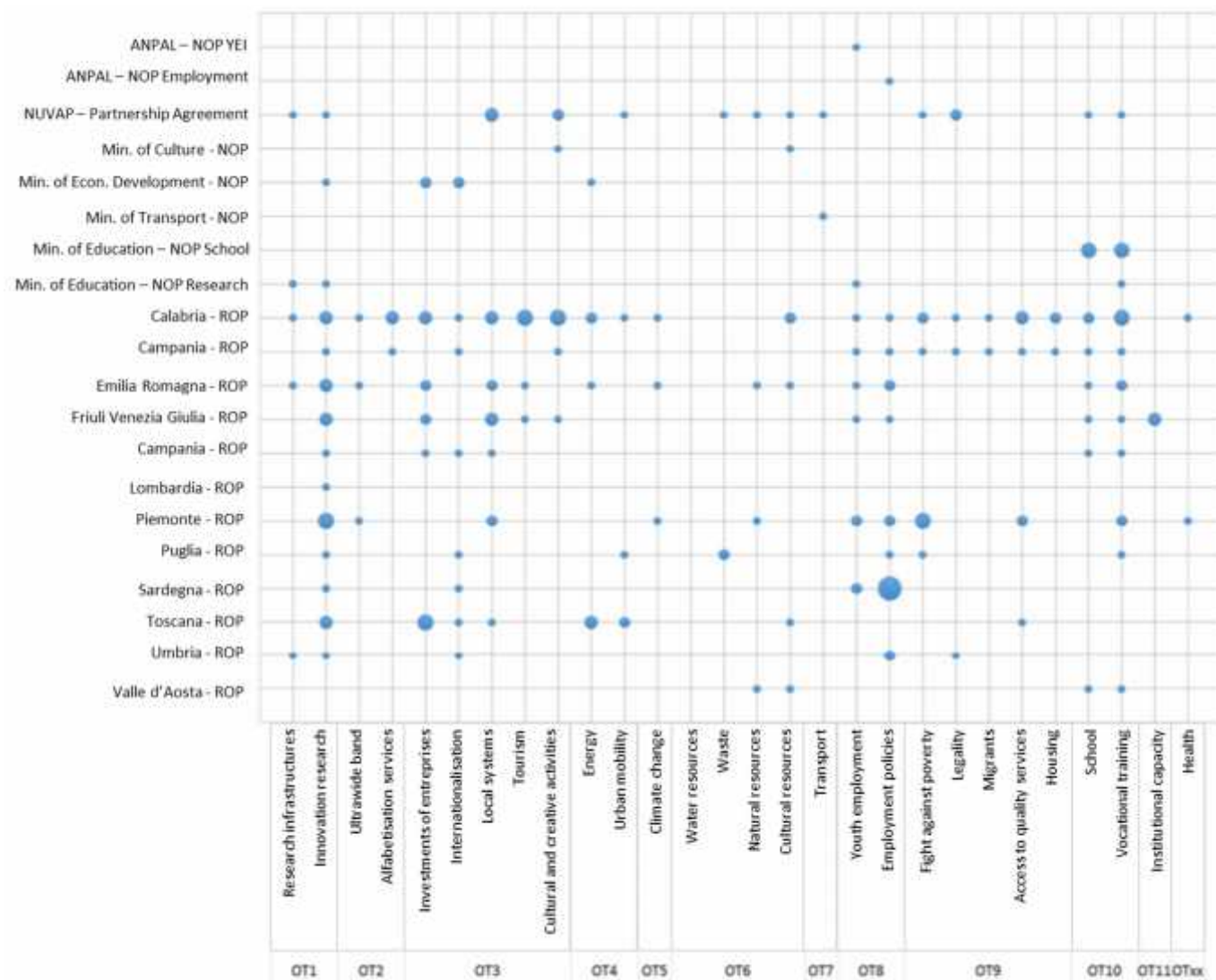
Figure A.15 Overview of evaluations in Italy as of September 2018



Source: Authors' elaboration on Livi, Pistis, and Venanzi, 2018.

Further, out of the 91 thematic evaluations reviewed in September 2018, 68% covered just one Thematic Objective (TO), 20% covered 2 TOs, 7% 3 TOs, 5% more than 3 TOs. Considering only evaluations focused on one TO, the most evaluated TOs were TO8 – Employment and TO1 – Research and innovation. Instead, considering all 91 evaluations and splitting them by Managing Authority, it can be seen that, as of September 2018, different approaches had been taken (see Figure A.16). For instance, in Calabria, the evaluations covered already a vast majority of TOs. On the contrary, in other regions such as Lombardy and Valle d'Aosta, only a small minority of TOs had been subject to evaluation.

Figure A.16 Overview of evaluations in Italy as of September 2018 by MA and TO

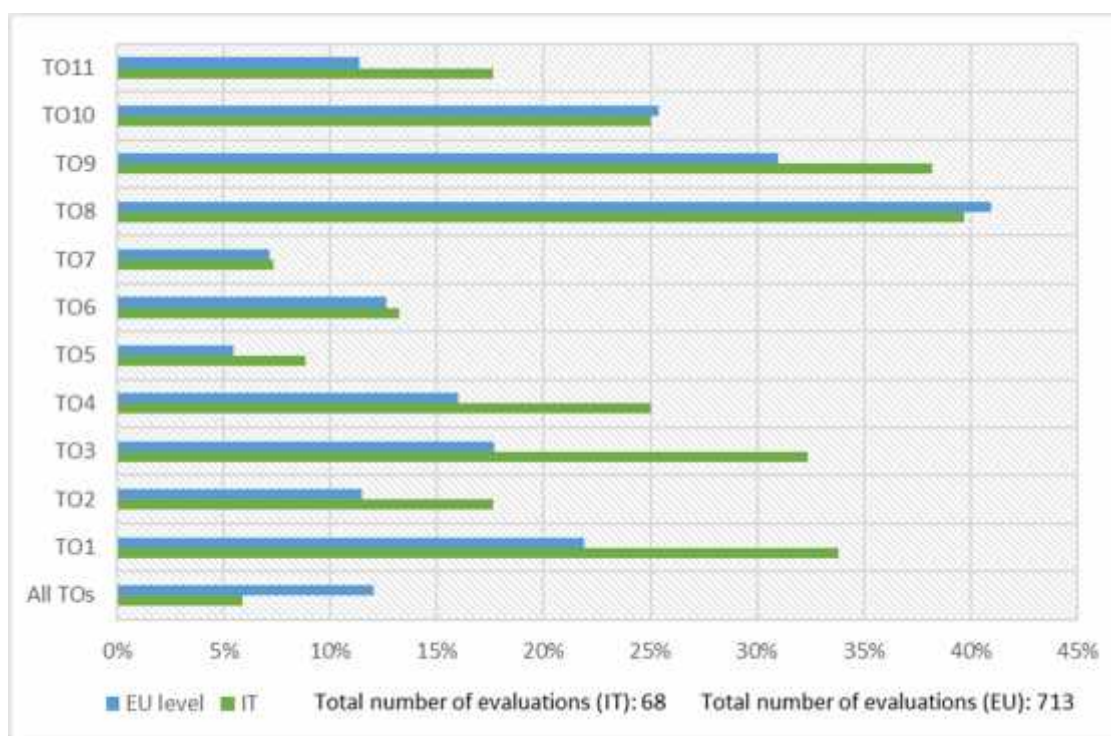


Source: Authors' elaboration on Livi, Pistis, and Venanzi, 2018. The size of the circles reflects the number of evaluations.

Not all of the evaluations considered in this review were initially included in the respective evaluation plans. As such, the evaluation plans appear to represent more indicative guidance than an operational tool to carry out assessments (Livi, Pistis, and Venanzi, 2018).

As of end 2019, according to data from the European Commission, 68 evaluations have been completed in Italy in 2014-2020, out of a total of 713 evaluations in the whole EU.

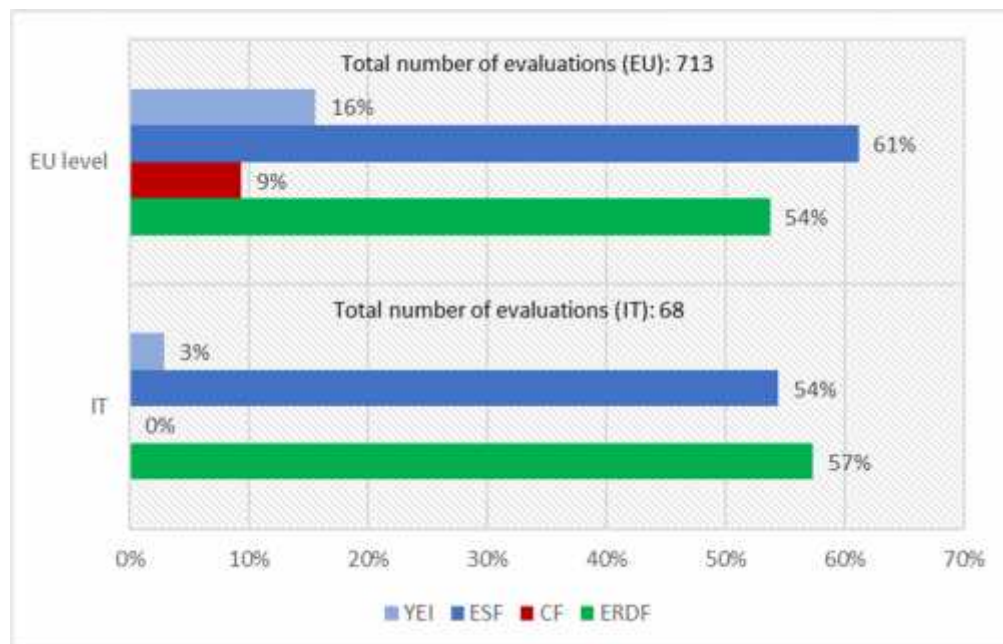
Figure A.17 Thematic objectives of evaluations already executed in Italy during the 2014-2020 programming period (excluding ex-ante evaluations)



Source: Authors based on European Commission, 2019.

Splitting by fund the 68 evaluations completed in Italy allows to recognise that, while the percentages of evaluations on ERDF and ESF are overall in line with EU averages, this is not the case for YEI. In proportion, Italy has carried out significantly fewer YEI evaluations than the EU average (3% against 16%, as illustrated in Figure A.18).

Figure A.18 Evaluations already executed in Italy during the 2014-2020 programming period by Fund (excluding ex-ante ones)

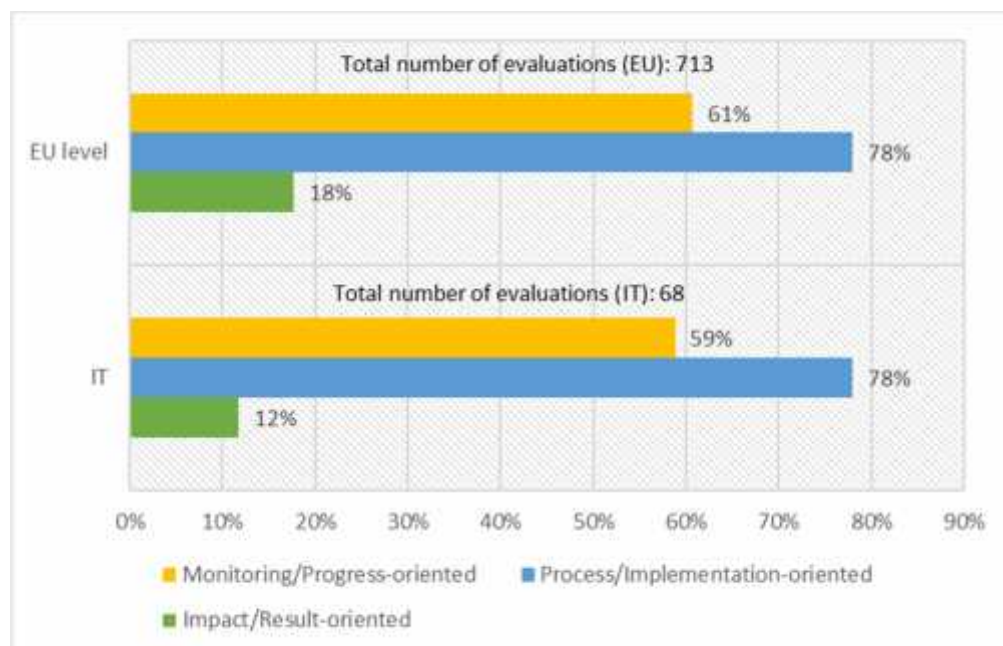


Source: Authors based on European Commission, 2019.

Types of evaluations

According to data from the European Commission collected at the end of 2019, Italy is almost precisely in line with EU averages in terms of split of evaluations by type (monitoring/progress-oriented vs process/implementation-oriented vs impact/result-oriented), as illustrated by Figure A.19.

Figure A.19 Types of evaluations already executed during the 2014-2020 programming period (excluding ex-ante ones)



Source: Authors based on European Commission, 2019.

However, it may be noted that, while the Partnership Agreement highlights the importance of impact evaluations, Italy's evaluations of this type are proportionally less than at the EU level. This fact can be linked, among other factors, to the delays characterising Italy's implementation of OPs.

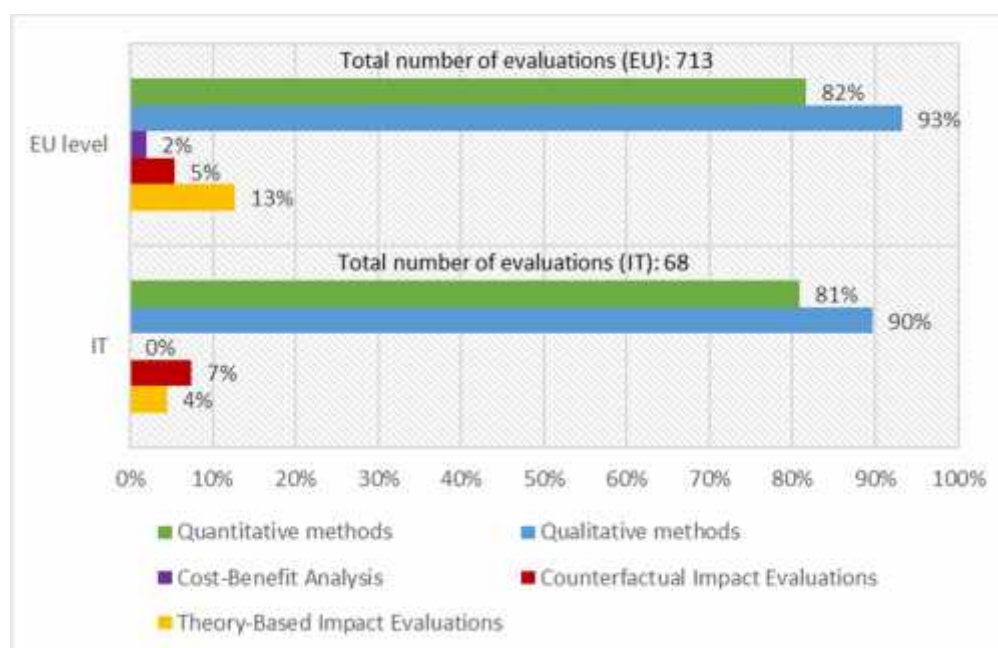
Evidence collected during the performed interviews confirmed that ex-post, result-oriented evaluations represent an area of possible improvement for the Italian evaluation system.

Methodological approach

As in the EU, also in Italy, the **majority of evaluations use quantitative and qualitative methods**. Compared to the EU, a lower share of evaluations using theory-based impact evaluations can be noted. Further, while cost-benefit analysis played an important role in the initial evaluation practices in Italy, as seen, no evaluations of this type have been performed in Italy so far in the current programming period (see Figure A.20 **Error! Reference source not found.**).

At the same time, cost-benefit analyses are carried out in Italy during the current programming period for the application of all new major projects, in line with the provisions set by Reg. (EU) 1303/2013.

Figure A.20 Methods of evaluations already executed during the 2014-2020 programming period (excluding ex-ante ones)



Source: Authors based on European Commission, 2019.

No specific approach appears to be specially promoted by national and/or regional authorities.

On the contrary, guidance material by NUVAP and OP-specific evaluation plans alike promote a mix of approaches (following EU guidance), covering, e.g. cost-benefit analysis, counterfactual impact evaluation, theory-based impact evaluation, qualitative methods, quantitative methods. In line with indications from the EU level, the importance of impact-oriented evaluation is typically stressed in evaluation plans for the current programming period.

As regards counterfactual impact evaluations, it may be noted that several evaluation plans do not even mention this approach among the different potential methods to be used. For example, the evaluation plans of NOP "School" (ERDF and ESF), NOP "Research and innovation" (ERDF and ESF), NOP "Enterprises and competitiveness" (ERDF) and NOP "Culture and development" (ERDF) do include it as

an option, while the plans of NOP “Metropolitan cities” (ERDF and ESF) and NOP “Legality” (ERDF and ESF) do not. This depends on the types of supported operations.

No significant discrepancy or pattern can be identified when considering methodological approaches adopted by different regional MAs.

Overall assessment of conducted evaluations in Italy

Italy appears to be **largely in line with EU averages as regards the types of evaluation performed and the methods adopted**.

NUVAP has traditionally tried to enable the Centres for Evaluation and the MAs to develop evaluation questions autonomously. Its activities have supported innovative practices at regional level, but generally only on an occasional basis, particularly due to the Centres’ instability in terms of staff and competences. As such, while individual evaluation studies represent good practices in terms of methodology and evaluation design, no independent approach at regional level has consolidated so far.

De facto, the **overall quality of evaluation activities at regional level varies with time and across regions**, mainly depending on the characteristics and competences of the staff in the regional Centre for Evaluation of Public Investments.

Evidence on the use of evaluation findings in Italy

Overall, the **use of evaluation findings and recommendations represents a weakness in the Italian evaluation system**. On this point, according to interviewees, NUVAP’s approach is peculiar. NUVAP tends to discourage the provision of recommendations within evaluations. In NUVAP’s view, the use of evaluation translates in an improved understanding of the effects of different interventions (i.e. what happens in case-specific measures are taken) and the evaluator’s main role is to assess interventions, not to provide practical suggestions for future implementation or programming. This could be seen to be in line with EU guidelines according to which it is generally better to develop recommendations in a dialogue between evaluator and the commissioner of evaluations because commissioners often have a clearer understanding what is feasible in a certain institutional or political context.

Accordingly, **NUVAP does not endorse systems to keep track of evaluation findings and recommendations**. Therefore, examples of findings of evaluations being used, for example, at the regional level are hardly possible to identify. Further, according to NUVAP, keeping track of recommendations and their implementation runs the risk of being a purely symbolic exercise.

To disseminate evaluation findings and increase the understanding of policy outcomes (this is NUVAP’s understanding of the use of evaluations), NUVAP and the Network of Centres have worked on **reviewing evaluations** carried out on 6 topics, jointly agreed upon: territorial imbalances and depopulation; prevention of hydrogeological risk; business innovation; territorial tool; active labour policies; social innovation. Thanks to this activity, regional Centres and other bodies (e.g. ANPAL) have been incentivised to confront themselves with the evaluation carried out on other programmes, to increase knowledge and awareness on what works and what does not work. In the future, such activity is meant to be complemented with a dissemination effort of these reviews with other Cohesion Policy stakeholders (e.g. other units of the regional administrations, partners, beneficiaries).

The possibility for evaluations to **influence future policy implementation** and to **shape public debate**, as such, **remains so far rather limited and indirect** (on the use of evaluation findings, see Marra, 2016). Hard evidence of actual policy learning and change as a result of evaluations have not been found.

In conclusion, on the one hand, NUVAP's effort to disseminate evaluation findings may indirectly lead to the use of evaluations. However, on the other hand, its lack of support for the provision of practical recommendations as well as the widespread view among administrations of evaluation as merely compliance-driven, hamper a systematic use of evaluations. Crucially, political awareness of the importance of policy evaluation and political willingness to use evaluation findings are not widespread in the country.

A.5.3.4 Conclusions, lessons learnt and recommendations

The development of a **mature evaluation culture** in Italy is **hampered by a largely legalistic mindset** in the public administration, which views its activities through the lenses of compliance with laws and regulations more than in terms of public entrepreneurship and result-oriented policy-making.

In the field of Cohesion Policy in Italy, demand for evaluation has generally been **compliance-driven**. Nevertheless, since the 1990s, the role of evaluation of Cohesion Policy in stimulating the advancement of evaluation practices in the country has been very significant (Krajnow, 2012), especially extending evaluation to policies and programmes, as opposed to limiting it to individual projects.

Over time, **evaluation of Cohesion Policy** has **fluctuated** between times of **strong central leadership** (especially at the end of the 1990s and the beginning of the 2000s, when elements of excellence were introduced in the system which gained attention at international level) and **times of insufficient awareness of evaluation's role** (Loiero and Maiolo, 2017). Overall, evaluation is not part of common political and administrative practices, and this lack of evaluation culture strongly influences the work of the evaluation community across the country.

Ultimately, the institutionalisation of evaluation in the Italian context has not yet reached a stage of maturity. Weakness is particularly visible in the unsteady organisational arrangements of the Centres for the Evaluation of Public Investments at regional level, which are characterised by severe instability and whose quality and performance differ across time and regions.

The Italian experience suggests that, **despite a competent central evaluation unit** (which is crucial for elaborating innovative tools or approaches), the **coordination of decentralised evaluation practices represents a challenge**. Platforms for networking and cooperation such as the Assist project represent a largely useful opportunity but are not *per se* sufficient to address structural issues. In particular, a trade-off emerges between the flexibility granted to Centres for evaluation for their activities and institutional set-up and the fact that across the country centres have no consistent role and no structured relationship with MAs. In sum, the creation of the centres, while stemming from an idea to streamline evaluation across administrations, has suffered from the lack of an articulated reflection about how to best embed them in administrative structures and ensure that their work does not remain peripheral to policy-making.

On a more **operative level**, the Plans for Administrative Strengthening represent pioneering **efforts towards the evaluation and improvement of administrative capacity**, which can also provide useful insights beyond Italy's borders.

While lacking awareness at the political level of the role of evaluation casts a shadow on future developments, Cohesion Policy evaluation in the country could be enhanced through stronger coordination and empowerment of the regional centres. This process could start by extending the centres' role in the preparation of Terms of Reference (as this activity is key for introducing innovations in the system), by clarifying the relationship between centres and MAs and by structurally incorporating the centres' staff into the administrative body of the regions, while ensuring their functional independence.

To improve the quality of Cohesion Policy evaluations in the country, NUVAP could also develop a transparent system to rate the methodological rigour of evaluation studies (e.g. through peer review). This rating mechanism would attribute value to evaluation activities and at the same time provide useful indications on the cost of high-quality studies, which could be informative to MAs when drafting Terms of Reference for new evaluations. Besides, by introducing criteria to assess quality, such a system would make it easier to bring well-performed studies to the attention of political officials and make them worthy of public debate.

In addition, at the central level, the **governance of Cohesion Policy evaluation appears to require streamlining**, as the division of competences between NUVAP, NUVV and NUVEC is not entirely free from overlaps.

Further, to gradually open up Italy's administrative culture, currently unfavourable to evaluation practices due to its legal phase sensitive learning, forms of systematic dialogue between the evaluation community and managers could be introduced, to raise awareness and prevent or mitigate ethical issues that may arise (e.g. the risk of administrations being prone to reject negative evaluation findings and interfering in the evaluation activity).

Finally, the recognised **good practice represented by OpenCoesione** could be further exploited if the portal made available those evaluation studies carried out on Cohesion Policy in the country (as a complement to its monitoring function) and if it kept track of evaluation findings in a user-friendly way.

Advantages and disadvantages of Italy's approach to Cohesion Policy evaluation are synthesised in the following box.

Box A.7 SWOT analysis of Cohesion Policy evaluation in Italy

STRENGTHS	WEAKNESSES
<p>Competent Centre for Evaluation at central level (NUVAP)</p> <p>Creation of open-government portal "OpenCoesione" and promotion of its use through citizen engagement projects, replicated in other EU countries</p> <p>Assist project as a platform for networking, cooperation and guidance</p>	<p>Lack of mature evaluation culture</p> <p>Insufficient use of findings (contribution to policy-making)</p> <p>Unstable institutional setup of Centres for Evaluation, with varying outcomes at regional level</p> <p>Centres for Evaluation do not cover the preparation of Terms of Reference for evaluations</p> <p>Inadequate legal framework for the procurement of evaluation studies</p>
OPPORTUNITIES	THREATS
<p>Good level of independent evaluators in the country (private sector)</p> <p>Introduction of Plans for Administrative Strengthening, as a pioneering tool to improve administrative capacity</p> <p>Further developments of "OpenCoesione"</p>	<p>Unfavourable administrative culture and compliance-driven demand for evaluation</p> <p>Ethical questions</p> <p>Unclear relationship between Centres for Evaluation and MAs</p> <p>Allocation of responsibilities between NUVAP, NUVEC and NUVV</p> <p>Lack of systems to track evaluation findings and recommendations and follow up on them</p>

A.5.3.5 Annexes

Summary of the characteristics of the Italian case**Table A.11. Checklist summarising the Italian case study**

Item	Check (Yes/No)
Are there national legal requirements on evaluation to which CP evaluation is subject?	NO
Is(Are) there autonomous national/regional agency(ies) dedicated to evaluation?	YES
Are there independent Evaluation Units outside the Managing Authorities? (Yes: outside the MA, No: evaluation units are within the MA)	YES
Are academic evaluators involved in CP evaluations?	YES
Does a permanent and open list of evaluation experts exist?	YES
Are Framework contracts used to conduct evaluations (externalised to private or academic consultants)?	YES
Has the role of Monitoring Committees been strengthened in the country between 2007-13 and 2014-20?	YES
Is there a unified national data collection system to Monitoring CP? (VS: different monitoring systems depending on regions)	YES
Is there systematic support to evaluation provided by the authorities at the national/regional level?	YES
Is there a national database of CP evaluations?	NO
Is there a formal system to track whether evaluation findings are followed up?	NO
Is there a single national evaluation plan?	YES
Are there regional evaluation plans?	YES
Are there major differences between regions for the organisation of CP evaluations? (governance, practices)	YES
Are there major differences by fund for the organisation of CP evaluations? (governance, practices)	NO
Are evaluations typically large-scale and few in number?	YES
Are evaluations typically small-scale and high in number?	NO
Are specific methods of evaluation promoted by regional or national authorities?	NO
Has the methodological quality of evaluations improved between 2007-13 and 2014-20?	NO
Are there major differences in the scope and methods of evaluations by region?	NO
Are there major differences in the scope and methods of evaluations by fund?	NO
Are evaluations typically carried out with timing that allows them to inform policy-making decisions?	NO
Are evaluation reports from 2007-13 cited in national/regional policy documents for 2014-20?	YES
Overall, are CP evaluations an important influence on policy-making decisions in the country?	NO
Are there major differences in the use of evaluations by region?	NO
Are there major differences in the use of evaluations by fund?	NO

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List of interviews

-)] Professor of Public Policy Analysis at Polytechnic University of Milan
-)] Professor of Political Economy at the University of Naples
-)] Expert at Nucleo di Valutazione e Analisi per la Programmazione (NUVAP) – Presidency of the Council of Ministers
-)] Partner and Senior Expert in evaluation at T33.

A.5.4 Lithuania

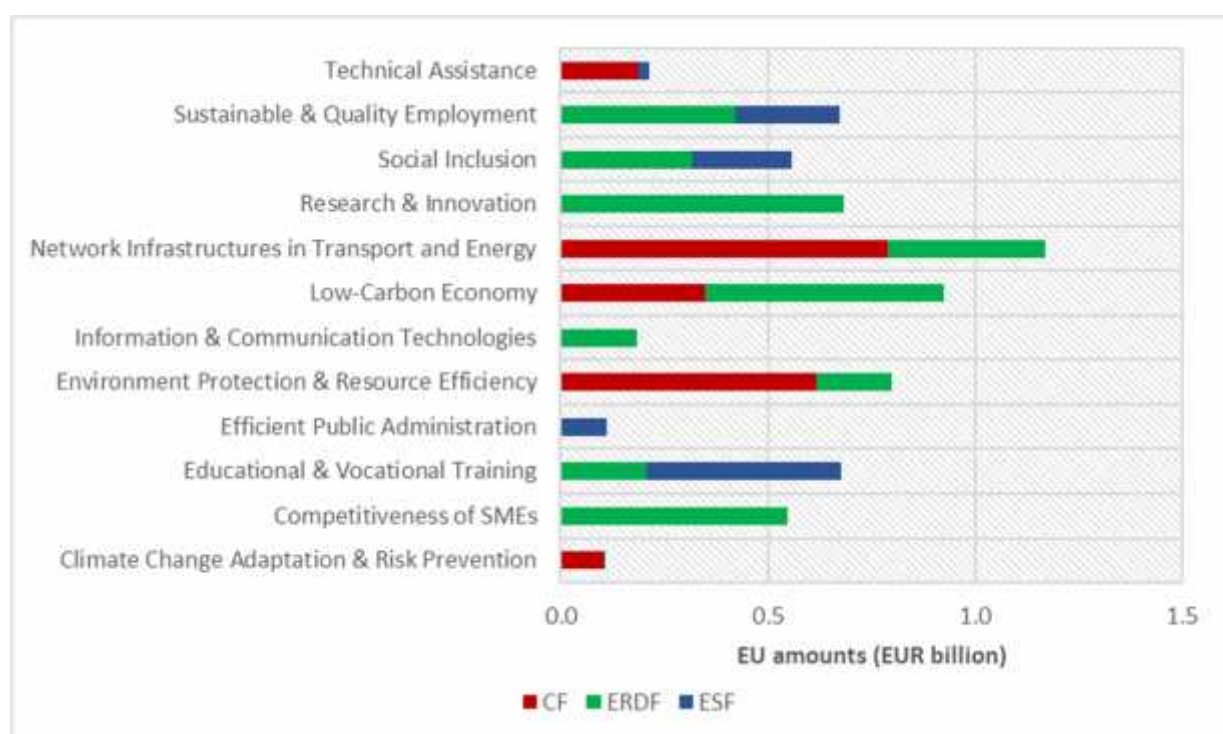
A.5.4.1 Background information

Overview of Cohesion Policy in Lithuania

The Cohesion Policy, in terms of budget, is the **most important investment policy in Lithuania**. The State Investment Programme is mostly financed from the funds of CP. For example, in State Investment Programme for 2018-2020 in total EUR 3.8 billion is allocated for various investment projects, out of which EUR 2.6 billion is from the CP (Government of the Republic of Lithuania, 2018).

In total for 2014–2020 programming period EUR 6.7 billion are allocated (including the reserve), out of which EUR 3.5 billion from ERDF, EUR 1.1 billion from ESF and EUR 2.1 from CF.

Figure A.21 EU funding in Lithuania by fund and priority theme



Source: European Commission, 2019.

The **priorities in Lithuania are somehow similar to the priorities at the EU level**, except that in Lithuania relatively **more funds are allocated to Priority of Low-Carbon Economy**, but less to Priority of Social Inclusion and Competitiveness of SMEs. According to the state of the economy and overall political agenda of the country, this is somehow counterintuitive. Notably, the Technical Assistance in Lithuania is financed almost exclusively from the CF and not funded from ERDF at all, while this is opposite at the EU level.

Evaluation culture in Lithuania

Evaluation culture in Lithuania has started to develop as a direct result of the EU regulations and need to evaluate the relevance, efficiency effectiveness and impact of the EU funds. The first evaluation of CP was the ex-ante evaluation of the 2004–2006 financing period for Lithuania and conducted in 2003. The 2004-2006 programming period was a valuable learning process for all involved parties, including MA, evaluation commissioners and evaluators themselves (Elgars Felcis,

2012). During this programming period, the evaluation unit at the MA (Ministry of Finance) was established with 3 employees at the beginning.

During the 2007-2013 programming period, the institutional structure and evaluation practices were refined, and evaluations started to be conducted more systematically compared to the 2004-2006 period. **The evaluation system in 2014-2020 programming period does not differ that much compared to the 2007-2013 programming period**, except nowadays there is much more emphasis by both evaluation unit and evaluators on using robust evaluation methods (especially on counterfactual impact evaluation) to arrive at more robust conclusions. The experience gained in conducting evaluations of Cohesion policy in the last 15 years significantly accelerated the development of evaluation culture in Lithuania.

Currently, the evaluation of Cohesion policy is conducted on a **systematic basis** mostly by external evaluators. Evaluation of Cohesion policy is coordinated by the Ministry of Finance and is planned based on evaluation plans that cover the whole programming period (the so-called “evaluation strategy”) and every financial year (annual evaluation plans that include evaluation foreseen in the evaluation strategy and some other evaluation based on ad hoc needs).

The requirements set in the EU regulations to conduct these evaluations has **developed a market for it**. Although there are initiatives to apply evaluation tools to analyse other national policy instruments, currently such evaluations are rarely conducted. Public institutions often fail to see the need to conduct policy evaluations and more importantly fail to use results to improve policymaking. Due to lack of experience, adequate human and financial resources, the evaluation practice in Lithuania would almost cease to exist if there would be no need to conduct CP evaluations. These evaluations often cover broader questions related to the policy context, which influences the results of the CP. The need to analyse the success conditions for the CP investment is well understood and is being covered by the CP evaluation better and better.

The attempts to involve academia in evaluation research have not been successful, as no academic research institutions or universities have won contracts to conduct evaluations (Elgars Felcis, 2012, MoF, 2019). Academic research institutions have not even tried to win the contracts directly because of the lack of experience with public procurement and lack of interest in such kind of research. However, private consultancy companies often contract members of academia to help to design evaluations’ methodology or to provide a broader perspective on a problem. One limiting factor is that academics (without the institutional help) have limited financial and administrative resources to participate in evaluation tenders. Moreover, the evaluation of CP is not considered a scientific study according to academia rules; therefore, it limits the incentives to participate as well.

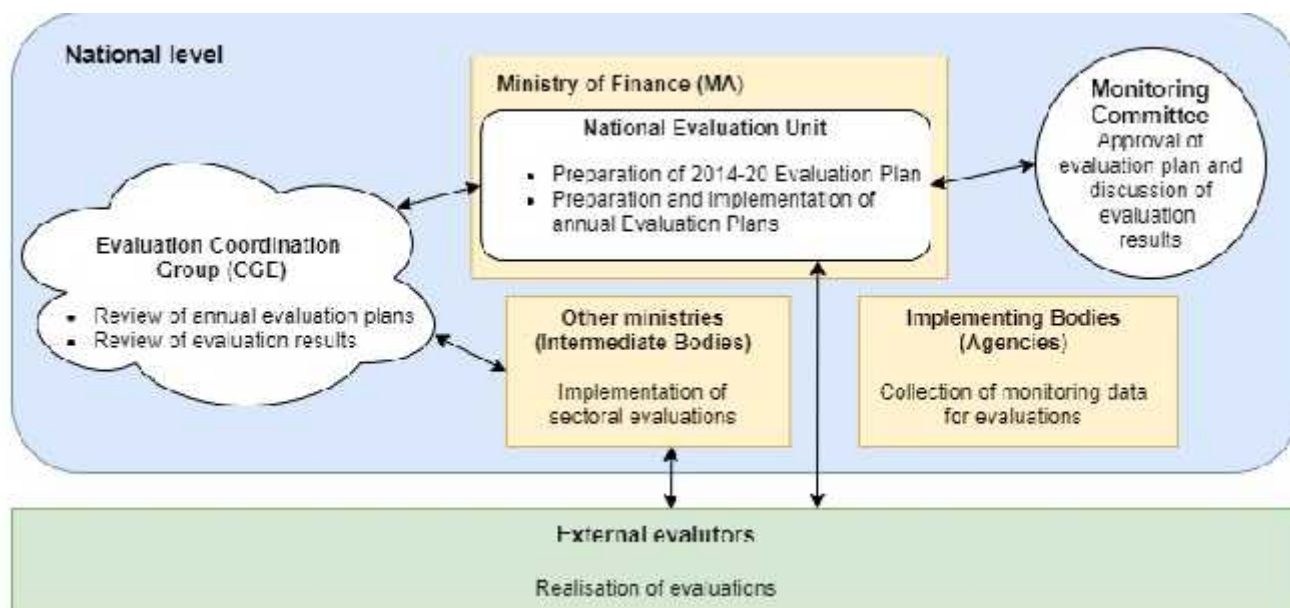
A.5.4.2 The organisation of Cohesion Policy evaluation in Lithuania

Governance of Cohesion Policy evaluation in 2014-2020: roles and responsibilities

The main players of the evaluation system in Lithuania are **the MA** (the evaluation unit within the MA), **other ministries** (intermediate bodies), which are responsible for implementation of sectoral evaluations, **the implementing bodies** (agencies), which administer CP projects and collect monitoring data for evaluations, **Evaluations Coordination Group** (CGE), **Monitoring Committee** (MC) and **external evaluators**. The CGE is composed of expert-level representatives from the MA, other ministries, the implementing bodies and government think-tank, while the MC is composed of high-level representatives (political and or management level) from MA, other ministries, implementing bodies, NGOs and experts.

The specific functions of these institutions are described in Governance of Cohesion Policy evaluation in Lithuania for 2014-2020, while the relations are reflected in Figure A.22.

Figure A.22 Governance of Cohesion Policy evaluation in Lithuania



Source: Authors.

Table A.12. Governance of Cohesion Policy evaluation in Lithuania for 2014-2020

Name of the Stakeholder	Level of Governance	Number/ Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
Managing Authority (National evaluation unit) – Ministry of Finance, Economic analysis and evaluation unit	National	1	<p>Draws up (prepares drafts) and submits to the MC for approval the EP and its amendments, annual EPs, ensures their implementation;</p> <p>Organises and coordinates CP and other evaluation projects;</p> <p>Monitors the implementation of evaluations recommendations;</p> <p>Informs the MC and the EC about the results of evaluations, prepares summaries;</p> <p>Organises the CGE activities;</p> <p>Implements evaluation capacity-building measures;</p> <p>Disseminates information about best practices on how to prepare for evaluations and conduct them.</p>	<p>While the Ministry of Finance itself is the Managing Authority, activities related to CP evaluations (organisation of horizontal evaluations, evaluation capacity building) are conducted by the National evaluation unit, which is a unit within the MoF. The main responsibility of the MA is to ensure evaluation of CP, evaluation capacity building, dissemination and use of evaluation results and reporting back to society and the EC. Due to reorganisation of the MA, the National evaluation unit was also reorganised and the number of employees decreased from 5 to 4. The unit provides civil servants from other ministries information about methodological guidelines and organises training to improve evaluation capacity in other ministries.</p>

Name of the Stakeholder	Level of Governance	Number/ Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
Other ministries (intermediate bodies), responsible for sectoral policies and selection of interventions to be financed by CP	National	9	Participate in preparation and amendment of the EP and annual EPs; Submit proposals to the MA for sectoral evaluations and organise them; Submit information to the MA on the results of evaluations conducted by the other (line) ministries, recommendations received and their implementation; Participate in the CGE activities; Organise the obtaining of the data needed for evaluations.	The line ministries have a deeper understanding of the needs and problems of their respective policy areas compared to MoF. Therefore, they have better capacity to conduct sectoral evaluations.
Implementing bodies (agencies), responsible for selection and administration of CP projects, collection of monitoring data	National	6 – national	Collection of monitoring data which are used in evaluations; Participates in the CGE activities; Ensures the quality and availability of data on common, OP specific and complementary (national) indicators.	They supply the MA, intermediate bodies and external evaluators with data about implementation of CP projects.
Monitoring Committee	National	1	Approves the Evaluation Plan (EP) and all amendments to the EP; Approves annual EPs; Considers the progress in implementation of the EP and the implementation of evaluation recommendations; The composition is the following: 33% representatives are from MA or other ministries, 41% from NGOs, 7% from academia, 15% from implementing bodies, 4% from regional and municipal institutions.	The MC has some influence on the EP, annual EPs, but mostly acts as a platform to raise the priorities, which policy areas to analyse. It promotes evaluation culture in society and at high-level. It also acts as a channel to disseminate information about the main findings of the evaluations through its members.
The Evaluation Coordination Group (CGE)	National	1	Discusses draft annual EPs; Analyses the progress in implementation of the annual EPs; Considers the results of evaluations (acts as monitoring committee for horizontal, systemic and cross-sectoral evaluations); Submits proposals for evaluation to the MA and ministries.	All intermediate bodies are represented in the CGE and meet regularly to review annual EPs and monitor the implementation of evaluations. It is a platform to encourage evaluation culture at expert-level and to increase the quality of evaluations. Currently, it is being transformed to incorporate new functions – to facilitate evaluations of non-EU interventions.

Name of the Stakeholder	Level of Governance	Number/ Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
			The composition is the following: 63,5% representatives are from MA or other ministries, 27,5% from implementing bodies, 9% from academia or government think-tank.	
Ad hoc working groups to ensure quality of every single (sectoral) evaluation	National	Ad hoc	To ensure quality control of every single evaluation, the ministry responsible for that evaluation forms an ad hoc working group, which usually supervises the evaluation process and discusses evaluation results.	Increases quality of evaluation. The ministry implementing the evaluation might request that this task would be conducted by the CGE (in case of cross-sectoral evaluations).
External evaluators (private sector)	National	13 different companies were contracted to evaluate the 2014–2020 OP. However, the market is dominated by 4 companies.	Responsible for collecting data and conducting evaluations.	In general, there are two types of contractors: consultancies and audit companies. Both follow the same approach while conducting evaluations, but consultancies are more active and advanced in terms of number evaluations conducted and methodological approach. All of them are based in Lithuania, but audit companies are branches of international corporations. Sometimes foreign experts are engaged based on the actual evaluation needs. Almost all contracts are for single evaluation (framework contracts are not used).

Source: Authors.

Main evaluation arrangements in Lithuania for 2014–2020

The main evaluation arrangements are specified in the **four main legal acts** and other documents:

1. the decision on the responsibilities and functions of institutions in implementing the 2014–2020 OP (LRV, 2014);
2. the rules for administrating the 2014–2020 OP (LRV, 2014);
3. the rules for administrating technical assistance (MoF, 2014) and
4. the Evaluation Plan for the 2014–2020 or the so-called evaluation “strategy” which covers the whole programming period (MoF, 2014).

These documents state who, how, when, and what does to ensure systematic CP evaluation in Lithuania. The EP in Lithuania has been created to ensure systemic evaluation of the implementation of the OP, its efficiency, effectiveness and impact. There is only **one centralised EP at the national level**. In the EP, it is noted what kinds of evaluations should be conducted by 2023, including **progress, implementation, impact evaluations**, and what are the national evaluation needs. Moreover, evaluation goals, objectives, types are identified, as well as evaluation principles, approaches, recommended methods and data needs are discussed. In Annex 2 of EP, an **extensive list of all planned evaluations is provided**, which includes institution responsible for specific evaluation (specific ministry), planned timeline, purpose and possible approaches and methods to conduct it. The MA believes that a **centralised evaluation system** leads to better planning and higher quality of

evaluations and overall is more efficient compared to a more decentralised approach (Ramūnas Dilba, 2017).

The EP (mainly the Annex 2) is reviewed and amended at least once a year mostly because new evaluations are added, or the ones that are no longer relevant any more are repealed (MC, 2016, 2017, 2018, 2019). Since 2016 14 evaluations had been repealed and 21 had been added. The protocols of the MC revealed that evaluations are being repealed usually as a result of other evaluations answering the same questions or lengthy public procurement procedures during which the evaluation becomes irrelevant. New evaluations are added as a result of the ad hoc needs of intermediate bodies or the MA.

The **data** on most financial, output and result indicators for the OP (the monitoring data) are stored in the unified national information system called European Union Structural Assistance Computer-Based Information Management and Monitoring System (hereinafter – SFMIS). The implementing bodies are responsible for the quality and accessibility of monitoring data. The data stored in the system provide basic information about EU projects (location, finances, basic description) and is useful for descriptive analysis. The SFMIS data usually is used for progress and implementation evaluations, less for impact evaluations, except when econometric modelling is applied. The latter evaluation approach requires detailed data about the projects' expenditure (amounts, type of expenditure, sector, location). The SFMIS is less useful for applying counterfactual impact evaluation methods because data for the creation of a proper control group are not available in the database. Overall, the SFMIS is a useful tool for tracking implementation of the OP and conducting basic descriptive analyses, but it is insufficient for more complex analyses.

Evaluations are planned rather well **in terms of timing**. Although the timing of impact evaluations could be improved as they are conducted shortly after the implementation of the interventions. Some interventions are aimed at long-term change, and the impact of such interventions should be evaluated sometime after the intervention (at least 3-5 years). However, after the start of a new programming period, the impact of previously implemented measures is rarely evaluated as the MA, and other ministries are focusing on the new programming period. The MA uses two main instruments to prevent the issue of time lag. Firstly, by preparing the EP in which all evaluations for the 2014-2020 programming period are planned. The MA with approval of the MC can include new evaluations to the EP according to the ad hoc needs. Despite these measures, the actual implementation of some evaluations sometimes lags mostly due to the dragged-out public procurement procedures. The MA could use longer-term framework contracts instead of short-term single contracts for every evaluation.

The MA manages the **website called "EU Investments"** (www.esinvesticijos.lt) which has a special section dedicated to evaluation. Here all the evaluation reports and other relevant information (guidance document, material from evaluation conferences, legal acts, etc.) is stored and made available to the public. It could be more user-friendly, but in general, it is clear and useful.

The MA has established a system for monitoring the implementation of evaluation recommendations. It also conducts meta-evaluations on implementation of recommendations and use of evaluation results. More details about this are given in Chapter A.5.4.3.

Comparative analysis with the 2007-13 programming period and main factors underlying current arrangements

The current evaluation arrangements are the continuation of the ones used in the 2007–2013 programming period with some minor adjustments. According to the EU framework, the EP in the previous programming period for Member States (henceforth – MS) was optional, while in the current – it is mandatory. Lithuania had prepared the EP during both programming periods. Therefore, the

experience gained during the preparation of it in the 2007-2013 programming period increased the quality of the current one. **The only significant change to the annual EPs was the timing.** During 2007-2013 programming period the annual EPs were prepared at the end of the year for the upcoming year. Currently, the annual EPs are prepared at the beginning of the year for the upcoming year. The timetable of CP evaluation planning corresponds to the time table of budgeting. There are efforts to use evaluation results in budget negotiations between the Prime Minister, the finance minister and the other ministers and to plan necessary evaluations based on new needs for evidence on the results of investment (CP funds are the main source of finance for public investment in many sectors).

The roles of stakeholders did not change much (LRV, 2014; LRV, 2007). The Ministry of Finance remains the main institution responsible for CP evaluations. All evaluations first must be discussed and approved by the MA and the CGE, then by MC, and only then they can be implemented by intermediate bodies. However, **the role of MC has been increased**, compared to the 2007-2013 programming period. It now approves the EP as well as discusses the results of the evaluations. The MA believes that the MC should act as an information hub to disseminate the main results of evaluations to various stakeholders (not only public institutions but also NGOs and other relevant parties) through its members.

There also was a change in the **role and composition of the CGE**. The CGE now consists not only of expert-level actors involved in the management of CP funds but also of the people representing strategic planning divisions of the respective ministries (10 out of 14 ministries are represented in the CGE). The MA argues that evaluations should have a broader impact on strategic decisions of the ministries. Therefore, by incorporating employees of ministries strategic planning divisions, the results of evaluations can be applied more broadly and should have a higher impact on policy decisions. These changes were influenced by the experience from the 2007-2013 programming period.

The organisation of **the data collection system** has not changed significantly; only some minor adjustments to the SFMIS were made. Compared to the previous period, **the MA put more focus on using rigorous evaluation methods** (statistical analysis, econometric models, counterfactual impact evaluation, etc.) to increase quality and robustness of the evaluations. The MoF notes that administrative databases and other information systems (not only SFMIS which is used for monitoring of CP investments) should be improved to increase the accessibility of administrative and statistical data, which could allow applying more sophisticated quantitative and qualitative methods to produce more robust results. Compared to the previous period, the MA provides more information via the CGE, various training and evaluation conferences to the other ministries about possibilities to use such methods in evaluations. The usage of more robust methods was influenced by both supply and demand sides. On the supply side, the further development of evaluation culture increased the competences of evaluators in applying such methods. At the same time, the demand side was influenced by EU guidance and soft measures about the usefulness of these methods and the fact some studies revealed that quality of evaluations could be improved (Visionary Analytics, 2017). Overall, there is a greater tendency to conduct more intervention- or priority-specific (not OP level) ex-post evaluations and apply more sophisticated methods in them.

There are **no significant differences in evaluation of ERDF/CF and ESF**, including the additional evaluation requirement for YEI/Youth Guarantee evaluations. Indeed, according to the EU regulation two evaluation of the YEI/Youth Guarantee was completed in Lithuania. In both of them, no sophisticated analysis methods were used.

In the current programming period, there is more emphasis by the MA and other intermediate bodies on the management of evaluation recommendations implementation, compared to only monitoring

in the previous period. Moreover, results of evaluations are being used as a basis for discussions with the decision-makers at the highest (political) level, even though the progress in this area could be considerably more significant (Ramūnas Dilba, 2017). At specialist and intermediate management level, there is a clear understanding of the usefulness of the evaluations; however, it is not always the case at the highest political level.

The **guidance and other soft measures** (networks, training) at the EU level differ in their usefulness, according to the MA. The MA argues that various networks (DG REGIO Evaluation Network, ESF Evaluation Partnership managed by DG EMPL) are good platforms to exchange the information and good practices with partners from other MS. However, due to differences in experiences and capacity at the MS level, not all EU level guidance documents are equally relevant and useful as some of them are too general compared to the extensive experience the MS have. One of the most useful instruments were the summer schools organised by the DG REGIO Evaluation Helpdesk, where practical issues of evaluations were tackled.

The primary determinant of current evaluation arrangements is **historical** practice. During the previous period, the evaluation arrangements were developed and they worked rather well. Therefore, only minor adjustments (more robust methods, emphasis on ex-post evaluations, better involvement of different stakeholders, and more emphasis on the dissemination and use of evaluation results) were made.

Overall assessment of the organisation of Cohesion Policy evaluation in Lithuania

Overall, the evaluation of CP in Lithuania works rather well. The **centralised approach** allows the MA to coordinate better with other ministries taking into account the need for specific evaluations, plan and implement them. The overall evaluation system had not changed significantly compared to the previous programming period (2007-2013). However, the experience gained in conjunction with the EU guidance and soft measures encouraged applying more robust evaluation methods, focus on ex-post evaluations and better use the evaluation findings. The MA understands the need to foster an evaluation culture and strengthen its capacity, which in turn increases the quality of evaluations.

The **recent trends in the public procurement system** can have a negative effect on the quality of evaluations. There is growing pressure on the MA to apply more “objective” tender evaluation criteria, i.e. increase the weight of price instead of other more quality-related criteria in determining a winner of a tender. The national Public Procurement Office and employees responsible for public procurement in ministries argue that assessment of tender quality should be made more transparent by including such criteria as number of evaluation methods used, number of experts and similar projects conducted instead of criteria related to the appropriateness of evaluation methods and evaluation approach. However, there is no proven causality between the number of experts or methods used and the actual usefulness and quality of evaluation.

The other issue is the **capacity and experience of employees at the line ministries** who are responsible for coordinating evaluations. The MA argues that employees of other ministries lack skills to properly prepare a tender and ensure that the quality of evaluations is sufficient. Many ministries tend only to have 1 or 2 evaluations per programming period. Therefore, the irregularity of this process and the high turnover of employees prevent them from developing the skills needed for it. The MA is thinking of adapting the more centralised CP evaluation model, which currently is used in Latvia, that all evaluations should be tendered through the MA.

However, **evaluation culture in Lithuania is still underdeveloped**. The CP is the primary driver of evaluation culture, but the usefulness of evidence-based policy is not always understood at the highest

decision-maker level. However, the good practices and capacity developed in the field of CP evaluation had led to the fact that government is trying to develop similar evaluation system (or extend evaluation practice) to evaluate all public investments (not only the ESIF) and other types of government intervention (regulatory, taxation, etc.). However, it is still not clear if and how this system will be implemented. The recently established think-tank – Governmental centre for strategic analysis (STRATA) should deal with that. This decision might be taken as part of the ongoing reform of strategic planning and budgeting (including the multiannual financial framework) at the national level.

A.5.4.3 Analysis of planned and conducted evaluations and their contribution to policy-making

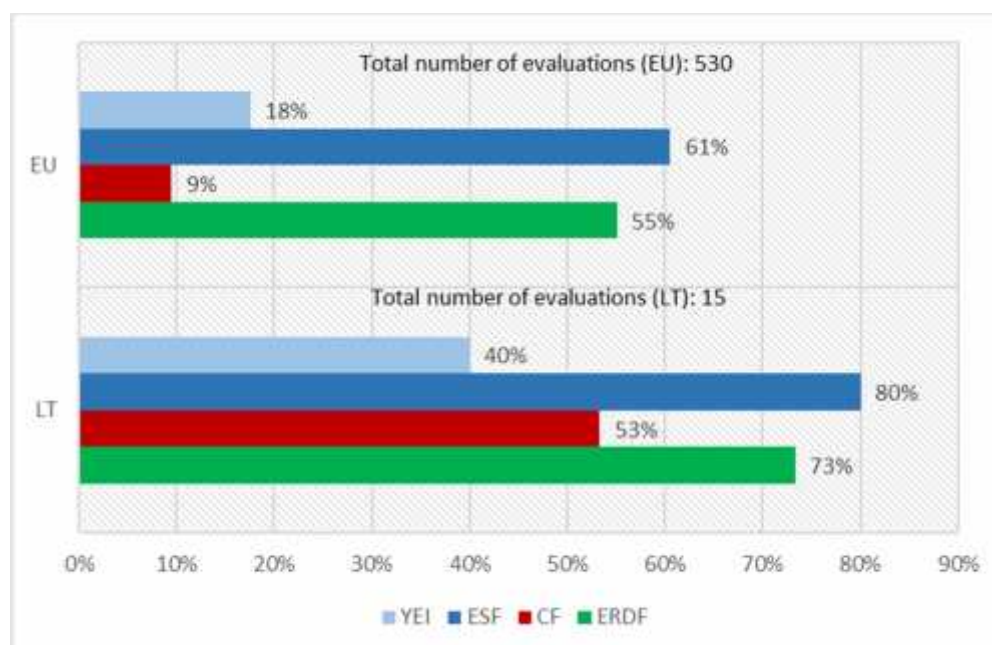
Main characteristics of the evaluations carried out in Lithuania

Scope of evaluations

In the original EP for 2014-2020 which was adopted in 2014, 65 evaluations were planned. However, since evaluation needs change over time, the EP is also reviewed and amended annually after the annual EP is adopted. The MC approved the last EP amendment on 12th of December 2019 and according to it, the **total number of planned evaluations is 78**. Currently, 38 evaluations are already completed, 4 are in progress and another 11 are planned in the annual EPs, but their implementations have not started, while the rest (25) will be planned in the upcoming annual EPs.

The scope of evaluations varies greatly. On average Lithuania conducts more evaluations as the total number of evaluations per capita compared to the EU average is high. “**Lithuania carries out more evaluations per capita** than other Baltic States, but less than Poland or the Czech Republic, both of which are leaders in Central and Eastern Europe” (Visionary Analytics, 2017). More than half of evaluations are contracted by the MA, while other ministries except (Ministry of Interior, which contracts around 7) tend to contract around 2-3 evaluations per programming period.

Figure A.23 Evaluations already executed in Lithuania during the 2014-2020 programming period by Fund (excluding ex-ante ones)



Source: Authors based on European Commission, 2019.

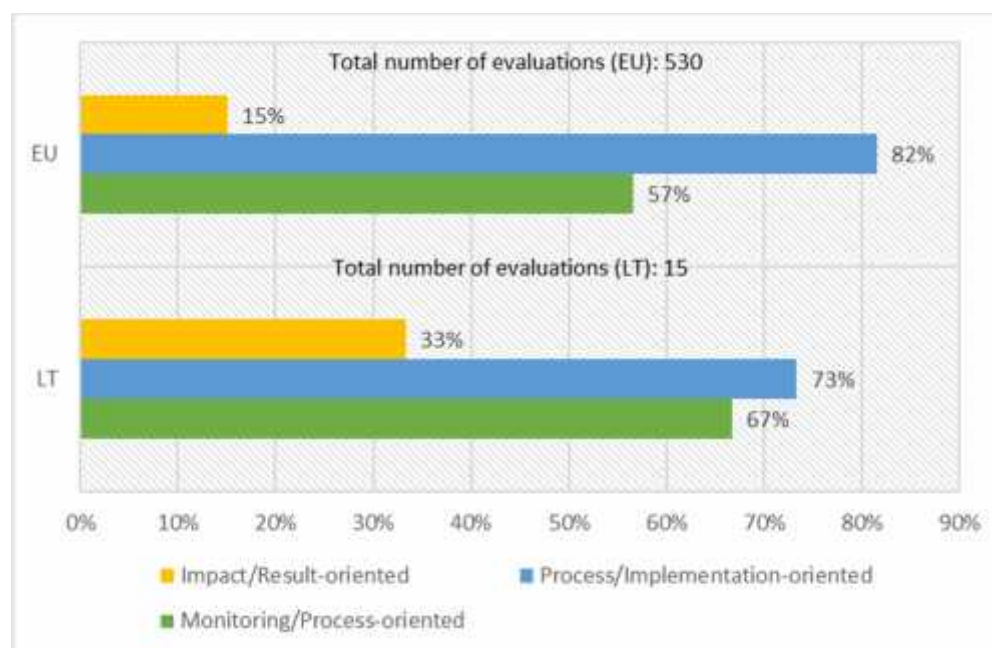
Types of evaluations

It is possible to distinguish three types of evaluations based on their timing (Visionary Analytics, 2017): ex-ante, ongoing and ex-post. Ex-ante evaluations are carried out before the implementation of programmes, and thus focus on the assessment of their relevance. Ongoing evaluations question the implementation of programmes and propose changes to improve it. Finally, ex-post evaluations aim at measuring the impacts of programmes.

In the latest available version of the EP (the above-mentioned Annex 2) there are three types of evaluations:

-)] **Impact.** In total, 49 impact evaluations are planned. 12 of them are related to the impact of 2007-2013 programming period OPs, 37 – to the impact of 2014-2020 OP, out of which 13 are analysing impact of the OP on strategic aims and horizontal priorities, 13 – on priorities of the OP, 11 – related to the lessons of the current programming period and preparation for 2021-2027.
-)] **Implementation.** This type includes both monitoring/progress-oriented evaluations as well as process/implementation-oriented evaluations. This distinction is not made in Lithuania, and implementation evaluations usually are both types at the same time. In total, 24 implementation evaluations are planned, out of which 18 are implementation progress evaluations (mid-term), 3 – monitoring indicators and data evaluations and 3 – administrative and management evaluations.
-)] **Other evaluations/ activities.** In total there are 5 projects which are classified as *other* in the EP. 2 of them are sort of meta-evaluation (mid-term and final), where other evaluations are reviewed, and 3 of them are capacity-building projects.

It is essential to understand properly data from Figure A.23. Most of the impact evaluations tend to aim not only at measuring the impact of the OP's measures but also at examining the way funding is managed or projects are selected (process/implementation evaluations) and at assessing progress towards achieving the set targets or policy objectives (monitoring/progress evaluations). Therefore, the impact of OP is analysed only in some of the evaluations, but the implementation and progress tracking is almost in all of them.

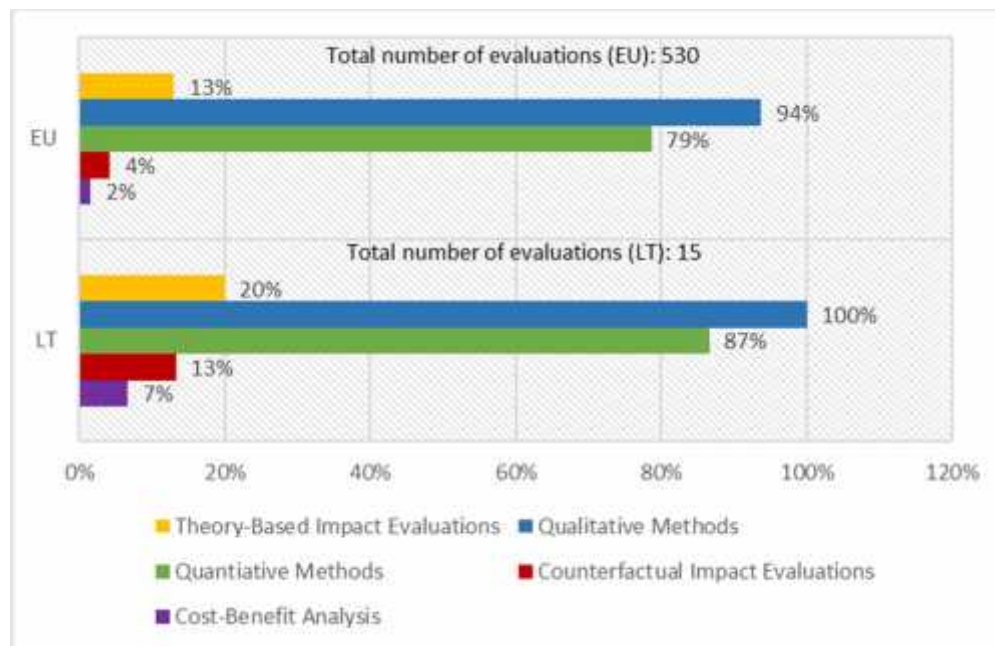
Figure A.24 Types of evaluations already executed in Lithuania during the 2014-2020 programming period (excluding ex-ante ones)

Source: Authors based on European Commission, 2019.

Methodological approach

The first study on the evaluation capacity building revealed that the quality of evaluations could be improved (ESTEP, 2009). One of the reasons why the quality of evaluations is deemed not so high was a relatively low number of rigorous evaluation methods used in evaluations. The push for more impact-oriented and more robust evaluations at the EU level is also felt in Lithuania. Significantly higher numbers of impact evaluations are planned. The evaluation capacity-building measures such as drafting methodological guidelines, organising training for civil servants, organising international evaluation conferences (these high-level conferences in Lithuania are organised bi-annually since 2005) and improving evaluation standards have indeed affected the quality of evaluations. A survey conducted in 2017 revealed that according to authorities, the quality of evaluations has improved (Visionary Analytics, 2017). In Lithuania compared to the EU average, the theory-based impact evaluation and counterfactual impact evaluation methods are applied more often, which is a positive sign for the quality of evaluations. The MA also pushes to **apply rigorous evaluation methods more often**. To apply more sophisticated analysis methods, more data are needed. Though, the availability and accessibility of micro-level data after the introduction of GDPR is even more complicated as it used to be before it.

Figure A.25 Types of evaluations already executed in Lithuania during the 2014-2020 programming period (excluding ex-ante ones)



Source: Authors based on European Commission, 2019.

Overall assessment of conducted evaluations in Lithuania

The MA invests a lot of time, money and effort to **evaluation capacity building**, and this is giving dividends. The overall quality of evaluation has improved compared to the 2007–2013 programming period. The increase in quality is expected due to the continuous development of evaluation culture. Given the continuous development of evaluation culture, an increase in quality is expected. Although at the EU level the mono-fund (e.g. ERDF, ESF, and CF) evaluations are promoted, at the MS level multi-fund evaluations have more sense, but there are still no examples of such evaluations. More emphasis on that could also be given at the EU level, as evaluations should include not only Cohesion policy funding but also other policies/ sources of funding (e. g. CAP, EAFRD).

According to the MA firstly it is important to analyse the change (or lack of it) in a specific field or territory and only then evaluate how that change (or lack of it) was influenced by the ESIF and by which fund specifically. Therefore, ideally, the scope of evaluations should be broader than just the ESIF.

Lithuania is one of the leaders in terms of the number of evaluations per capita compared to other Central and Eastern Europe states, which is a positive sign that the **usefulness of evidence-based policy is understood**. The recent push by the MA and external evaluators to apply more robust and sophisticated evaluation methods should also be noted.

Evidence on the use of evaluation findings in Lithuania

The extent to which the findings of the CP evaluations are used in policy-making decisions could be quantitatively measured by the number of implemented recommendations. Lithuania in the current OP (as well as in the previous programming period) has set a result indicator “Implemented recommendations of evaluations”. Therefore, the MA is **tracking the percentage of implemented recommendations**. However, it is difficult to calculate the indicator properly, because some recommendations (especially strategic ones) could be implemented only partially, so there is a high subjective element to include (or not) such recommendations when calculating the estimate of the

indicator. During 2015-2018 in total 175 recommendations were submitted, out of which 120 were reported as implemented (69%).

Another way to tackle the use of evaluation findings is to conduct **meta-evaluations** on that. In Lithuania in total 3 evaluations of such kind were conducted and the impact of CP evaluations on the public policy was analysed not only by counting the implemented recommendations but also by analysing the impact of evaluation in broader terms. But all of the above-mentioned meta-evaluations were related to the evaluations of the previous programming period (PPMI, 2011; ESTEP, 2013; Visionary Analytics, 2015). The main conclusion of these evaluations is that to improve the quality of EU funds investment institutions generally tend to implement recommendations of the CP evaluations. But most of the recommendations are of administrative nature. Strategic proposals⁵⁵, due to their nature, are implemented to a lesser degree (around 40% of them are implemented).

Moreover, one of the above-mentioned meta-evaluations concluded that public institutions which organize an evaluation tend to implement better their recommendations because they feel “the ownership of an evaluation” (ESTEP, 2013). There is an initiative by the MA to create a publicly available database of all the evaluation recommendations with the information on their implementation (the so-called “bank of evaluation recommendation”). A platform where all interested parties could see all recommendations suggested in the CP evaluations. The MA believes that better dissemination of the results and recommendations would improve the overall use of the findings and the positive impact of the evaluations.

A.5.4.4 Conclusions, lessons learnt and recommendations

In general, the Cohesion Policy evaluation is planned and managed relatively well in Lithuania. The **centralised approach to the planning** of CP evaluations allows for better coordination of activities, development of evaluation capacity and dissemination of good practices. However, further centralisation of evaluation activities to the MA to include not only the coordination of planning but also the implementation of sectoral evaluation is being considered. The use of two-tier committees (experts from the CGE and high-level decision-makers from the MC) ensures proper coordination of CP evaluation activities and dissemination of results.

However, the **evaluation culture of other public policies in Lithuania is rather limited**. Hence, its success mostly depends on the CP evaluation system. The further development of the evaluation system (to include not only the ESIF) and additional evaluation capacity-building measures could be the key to developing and spreading evaluation culture. This progress includes both: further investments in the development of employees’ capacities in the ministries (demand side) and measures to attract external evaluators (supply side) such as proper evaluation budgets, stable evaluation demand, efforts to improve data availability and accessibility. The MA argues that currently, evaluation culture starts to “spill-over” to include more than CP interventions. There is a policy window to foster evidence-based decision-making in Lithuania even without further EU regulation on the need for CP evaluation. According to the MA, this differs from some other Members States who argue that more EU regulation is needed to improve the usefulness and necessity of evaluations in their countries.

Box A.8 SWOT analysis of Cohesion Policy evaluation in Lithuania

STRENGTHS	WEAKNESSES
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⁵⁵ Most of the CP evaluations reports during 2014-2020 include two types of proposals: recommendations that are more technical and strategic proposals that are broader (e.g., policy priorities) and harder to implement.

<p>Centralised approach to evaluation planning; Involvement of relevant stakeholders; High number of evaluations per capita; Recommendations of evaluations are being implemented, and the implementation tracked; Unified monitoring system and single website in which all evaluations are published; Centralised implementation of different evaluation capacity-building measures; Competitive evaluation market (supply side); Flexibility of the EP to include new evaluations based on ad hoc needs.</p>	<p>Underdeveloped evaluation culture outside the CP evaluation due to lack of experience, human and financial resources and the demand for evidence while taking decisions at the highest political level. Low level of competences of intermediate bodies (other ministries) leads to lower quality of terms of reference, evaluation process and as a result of that to lower quality evaluations; Wider dissemination of results and recommendations could increase the usefulness of the CP evaluation.</p>
<p>OPPORTUNITIES</p> <p>Further consolidation on evaluation activities (not only planning but also public procurement and implementation) to the MA could increase the quality of evaluations; Digitalisation provides access to a vast amount of data at a low cost (big data). The increase of availability of data allows using new methods to analyse the data and arrive at conclusions; Policy window is open to implementing more extensive evaluation system covering not only the CP but also other government interventions.</p>	<p>THREATS</p> <p>The recent trend in public procurement indicates that the criteria on which the external evaluator is chosen might negatively impact the quality of evaluations (more emphasis on price and quantifiable “quality” criteria); Limited accessibility of micro-level data to apply more robust evaluation methods; The evaluation culture in Lithuania would almost cease to exist if there would be no need and resources to conduct CP evaluations.</p>

Based on this analysis, the following recommendations are made:

-)] To consider a further centralisation of evaluation activities to the MA (not only planning but also an implementation of evaluations);
-)] To use framework contracts to procure evaluation services instead of single contracts for every evaluation;
-)] To prioritise the quality over the price in public procurement of evaluation services and selection of tenders;
-)] To ensure further evaluation capacity building to increase the competences of civil servants (demand side) to improve quality of terms of reference, to ensure proper quality control during the evaluation process, to better plan evaluations (including the competencies to decide on the data, methods, time and financial resources necessary to answer evaluation questions) and ensure proper use of evaluation findings;
-)] To further promote the usage of more robust evaluation methods (counterfactual impact evaluation, economic modelling, etc.);
-)] To further improve the dissemination of evaluation results and the availability of evaluation findings to the public.

A.5.4.5 Annexes

Summary of the characteristics of the Lithuania case

Table A.13. Checklist summarising the Lithuanian case study

Item	Check (Yes/No)
Are there national legal requirements on evaluation to which CP evaluation is subject?	Yes

Item	Check (Yes/No)
Is(Are) there autonomous national/regional agency(ies) dedicated to evaluation?	No
Are there independent Evaluation Units outside the Managing Authorities? (Yes: outside the MA, No: evaluation units are within the MA)	No
Are academic evaluators involved in CP evaluations?	Yes
Does a permanent and open list of evaluation experts exist?	No
Are Framework contracts used to conduct evaluations (externalised to private or academic consultants)?	No
Has the role of Monitoring Committees been strengthened in the country between 2007-13 and 2014-20?	Yes
Is there a unified national data collection system to Monitoring CP? (VS: different monitoring systems depending on regions)	Yes
Is there systematic support to evaluation provided by the authorities at the national/regional level?	No
Is there a national database of CP evaluations?	Yes
Is there a formal system to track whether evaluation findings are followed up?	Yes
Is there a single national evaluation plan?	Yes
Are there regional evaluation plans?	No
Are there major differences between regions for the organisation of CP evaluations? (governance, practices)	Not relevant
Are there major differences by fund for the organisation of CP evaluations? (governance, practices)	No
Are evaluations typically large-scale and few in number?	No
Are evaluations typically small-scale and high in number?	High in number but most of the evaluations are not small-scale as they cover the whole sector or programme
Are specific methods of evaluation promoted by regional or national authorities?	Not really
Has the methodological quality of evaluations improved between 2007-13 and 2014-20?	Yes
Are there major differences in the scope and methods of evaluations by region?	Not relevant
Are there major differences in the scope and methods of evaluations by fund?	No
Are evaluations typically carried out with timing that allows them to inform policy-making decisions?	Yes, but the timing of impact evaluations could be improved
Are evaluation reports from 2007-13 cited in national/regional policy documents for 2014-20?	Yes
Overall, are CP evaluations an important influence on policy-making decisions in the country?	Yes
Are there major differences in the use of evaluations by region?	Not relevant
Are there major differences in the use of evaluations by fund?	No

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List of interviews

-)] Advisor in Economic Analysis and Evaluation Unit
-)] Head of Economic Analysis and Evaluation Unit
-)] Chairman of the Board at ESTEP

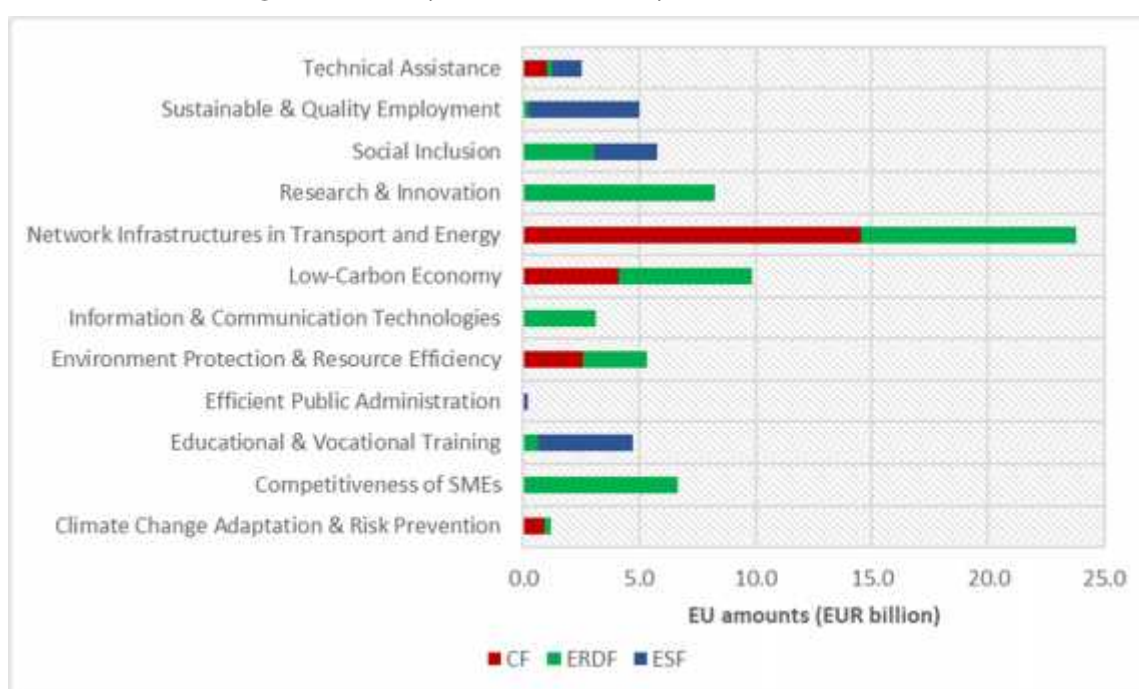
A.5.5 Poland

A.5.5.1 Background information

Overview of Cohesion Policy in Poland

Poland has been the **largest national recipient of Cohesion Policy** (CP) funds from 2007 onwards. CP plays an important role in the Polish development policy mix. European Regional Development Fund (ERDF) and Cohesion Fund (CF) going to Poland for the period 2007-2013 amounted to EUR 57.2 billion, equivalent to 2.3% of GDP and also 41% of Government capital expenditure, which is the sixth result among European Union (EU) Member States (MS). The investment supported by CP and rural development policy in Poland was estimated to have increased GDP in 2015 by over 4% above the level it would have been in the absence of the funding provided (European Commission, 2016). The overall economic effect of the CP implementation in Poland in 2007-2015 years is estimated at EUR 51 billion. GDP in V4 countries is estimated to be 6% above the baseline scenario (without European Structural and Investment Funds - ESIF) (Antosiewicz et al., 2017).

Figure A.26 EU funding in Poland by fund and priority theme



Source: European Commission, 2019.

The overall budget of CP from the CF, the ERDF and the European Social Fund (ESF) funds exceeds EUR 76.3 billion, which makes up 22% of the total allocation to all eligible regions in the MS. Among 11 CP thematic objectives for the period 2014-2020, **promoting sustainable transport and improving network infrastructures is (traditionally) the most important one**, as it sets for 31.2% of the total allocation for Poland. The second important objective is supporting the shift towards a low-carbon economy in all sectors. The share of CP allocation on that objective equals 12.9%.

Furthermore, 10.8% of CP funds supports measures strengthening research technological development and innovation. The funds related to other CP priorities do not surpass 10% of total allocation: 8.7% of total allocation supports the competitiveness of SMEs, 7.6% - social inclusion, 6.9% - environment protection and resource efficiency and 6.6% - sustainable and quality employment. The least amount of funds goes to priorities such as information and communication technologies and

efficient public administration. The structure of the allocation of CP funds differs from the average structure of allocation in the EU. On the one hand, less importance is given to priorities related to education and vocational training and environment protection (by ca 3.5 percentage points each), as well as social inclusion and sustainable and quality employment (by ca 2.4 percentage points each). On the other hand, network infrastructures, transport and energy receive more funds in comparison to the average EU values (by 14.5 percentage points).

CP 2014-20 implementation system includes both: national and regional operational programmes (OPs). In terms of the budget, the main national OPs are Infrastructure and Environment (OPIE) – co-financed from ERDF and CF, Smart Growth (OPSG) – ERDF, and Knowledge Education Development (OPKED) – ESF. Managing Authorities (MAs) for all of them are in the structures of the Ministry of Development Funds and Regional Policy (MDFRP). Sixteen Regional Operational Programmes (ROPs) – ERDF, ESF – are managed by the Voivodeship Boards.

Evaluation culture in Poland

As all MS joining EU in 2004 and later, Poland adopted evaluation practice due to external pressure – European Parliament (EP) regulation laying down provisions concerning implementation of CP – with no prior domestic tradition (Żuber, Bienias, 2008; Olejniczak, 2009). It is then only since 2004 that evaluation has been practised systematically in Poland (NEU and Skórska, 2012). From that moment, however, quoting J. Bachtler (2011), ***evaluation in Poland has evolved quicker and more substantively than elsewhere among the new MS***. The number of evaluation studies conducted a year has exceeded 150 in 2010. There are 35-50 institutions regularly commissioning evaluation studies and over 50 contractors active in the last three years (NEU, 2019). Polish Evaluation Society was established in 2000 and gathers over 100 members⁵⁶. There are several postgraduate courses devoted to evaluation (five in 2009, eleven in 2015), publications, and thematic conferences (even 5 a year) (EGO, 2011).

This generally positive picture is spoiled by the fact that evaluation practice in the public sector to a large extent is still limited to the field of cohesion policy. Dissemination to other domestic policies has been considered a challenge (Bienias et al., 2009) and waited for more than 10 years (Olejniczak, 2008). Yet it still did not happen, raising concerns whether what is observed is a systemic reform and developing evaluation culture, or just a mere compliance adaptation, existing as long as the external stimulus persists (Kupiec et al., in press; Olejniczak et al., 2017a).

A.5.5.2 The organisation of Cohesion Policy evaluation in Poland

Governance of Cohesion Policy evaluation in 2014-2020: roles and responsibilities

The Polish evaluation system is highly decentralised. More than 35 evaluation units operate in it. They are located in the structure of every MA. In the case of national OPs, it means different departments of MDFRP. ROP evaluation units are located in the Marshal Offices, which serve the Regional Boards. Additionally, there are up to 15 evaluation units in the Intermediate Bodies (IBs) of national OPs – ministries, government agencies, regional labour offices. The system is coordinated by the National Evaluation Unit (NEU) (also located in MDFRP).

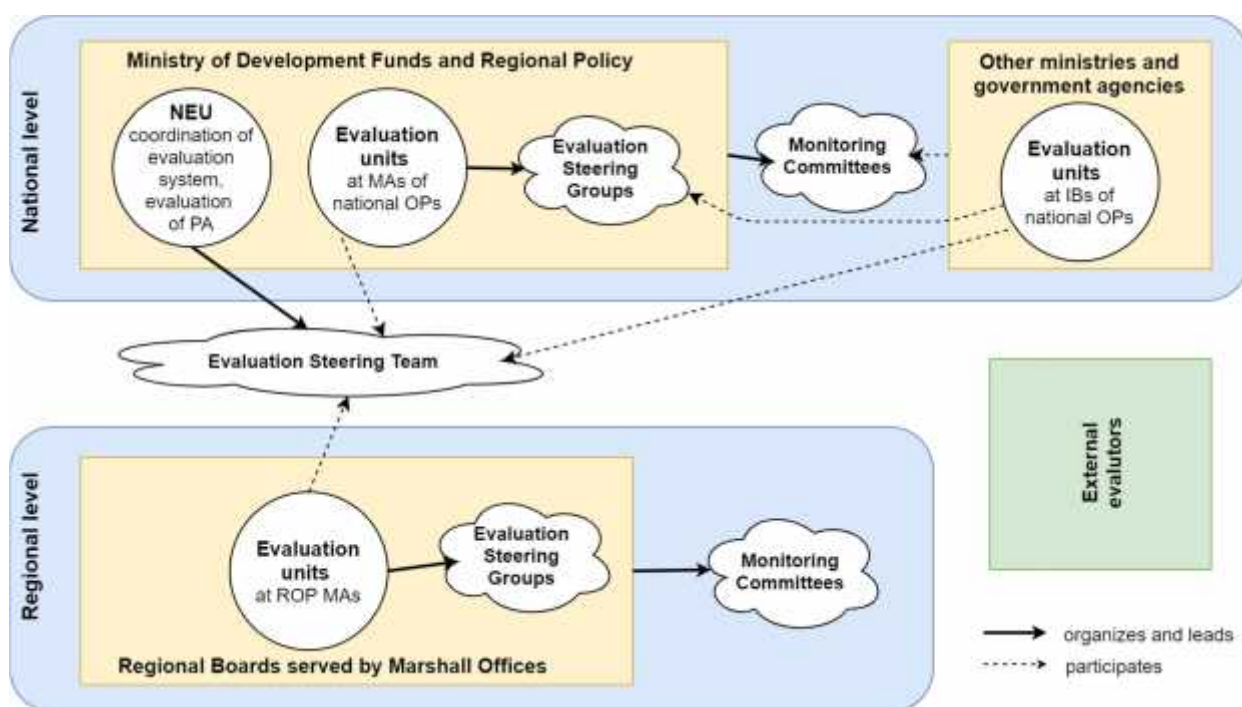
There are several types of coordination/discussion platforms in the system.

⁵⁶ It is very active in popularising the idea of evaluation outside the CP implementation system and outside public policy sector by organising cyclical training, workshops and congresses.

-)] Evaluation Steering Team (EST) led by NEU and gathering representatives of all evaluation units.
-)] Evaluation Steering Groups (ESGs) operating in most MA, led by evaluation units located there and oriented on communication inside MA office.
-)] Monitoring Committees (MCs) organised for every OP, serves as a communication platform between MA and external stakeholders.

Figure A.27 depicts the structure of the evaluation system, and Table A.14 presents a detailed description of stakeholders.

Figure A.27 Governance of Cohesion Policy evaluation in Poland



Source: Authors.

Table A.14. Governance of Cohesion Policy evaluation in Poland for 2014-2020

Name of the Stakeholder	Level of Governance	Number/Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
National Evaluation Unit (in MDFRP)	National	1	Regulating and coordinating evaluation system of CP (activities of evaluation units); conducting a horizontal evaluation of Partnership Agreement (PA); building evaluation culture (biannual conference, training, publications, postgraduate studies devoted to evaluation); coordinating Evaluation Steering Team (EST), evaluating domestic development strategies (also beyond CP)	Key player, active leader that established CP evaluation system, have regulated and shaped it since 2004

Name of the Stakeholder	Level of Governance	Number/Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
Evaluation units in MAs of national OPs (in MDFRP)	National	6	Conducting evaluation of national-level Operational Programmes (OPs) (large majority of studies commissioned to external contractors), establishing and coordinating Evaluation Steering Group (ESG), supplying Monitoring Committee (MC) with evaluation insights	Permanence of evaluation practice, quality of studies and use of evaluation findings at OP level depends on them. Actual capacity and activity vary greatly (with the highest in MA OPKED).
Evaluation units in ROP MAs	Regional	16	Conducting evaluation of ROP (large majority of studies commissioned to external contractors), establishing and coordinating ESG, supplying MC with evaluation insights	Permanence of evaluation practice, quality of studies and use of evaluation findings at ROP level depends on them; some contribute to the development of evaluation capacity and culture beyond their ROP system, e.g. by organising supranational evaluation conferences.
Evaluation units in IBs of national OPs (ministries, government agencies, regional labour offices)	National/regional	approx. 10-15	Evaluating part of OP (priority, measure, effects of priority/measure in particular region) (large majority of studies commissioned to external contractors)	Their activity and contribution vary from almost non-existing to leaders of evaluation practice, e.g. unit in The Polish Agency for Enterprise Development (PAED) - apart from evaluating 3 OPs is involved in capacity building – co-organising (with MDFRP) evaluation conference, publishing numerous books on evaluation organisation, methodology, and practice.
Evaluation Steering Team EST	National	1	Led by NEU, gathering representatives of all evaluation units, meeting at least twice a year	Serves as an efficient platform for sharing experience and good practices. Also contribute to capacity building (training are often organised as part of 2-day meeting)
Evaluation Steering Groups	One per OP ⁵⁷	19	Operating at OP level. They are composed of representatives of IBs, MA departments, external experts, MC members. Responsibilities include consultation of evaluation plan, TORs, evaluation reports, recommendations, and recommending evaluation subjects.	Actual contribution varies, but usually, it is a useful platform for engaging potential users in the evaluation process, disseminating findings and discussing how they should be used.

⁵⁷ With few exceptions – OPs with no ESG.

Name of the Stakeholder	Level of Governance	Number/Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
Monitoring Committees (MC)	One per OP + one for PA	23	Typical composition includes: representatives of central and regional authorities, economic & social partners, academics, EC, IB – usually 30-40 ppl.). Responsibilities include: approving evaluation plan, recommending fields and topics for evaluation, being informed about evaluation findings, and monitoring their use.	Actual contribution varies in formal and practical terms. MAs may, and some do grant additional competences to MC, e.g. formal approval/rejection of recommendations (e.g. MC OPKED). In most cases, however, the influence of MCs on evaluation subjects, and interest in findings and their use is unsatisfactory.
National & regional territorial observatories (NTOs/RTOs)	One central and one per region	17	Analytical units established to provide central and regional authorities with analyses on socio-economic development and use of EU funds.	Network of complementary to evaluation analytical units. Their analyses inform decisions regarding OPs. Impact of RTO depends on various factors, including structural ones. Some RTOs are merged into one with evaluation unit, some work separately, and then cooperation, and impact on CP is less apparent.
External evaluators (private sector)	One market of national and regional evaluation	Relatively dispersed market – over 50 companies involved in evaluation in the last 3 years	Conduct evaluations	Since large majority of studies are commissioned supply of contractors and their capacity is crucial.

Source: Authors

Main evaluation arrangements in Poland for 2014-2020

- J Evaluation planning in Poland has been organised in a decentralised manner, just like the whole CP implementation system. National evaluation guidelines (*Minister Infrastruktury i Rozwoju*, 2015) required an **evaluation plan to be prepared separately for each OP plus a plan for PA. That resulted in 25 evaluation plans**. The average number of planned studies per OP exceeds 23⁵⁸, and ranges from 2 (Territorial Cooperation Programme Poland-Slovakia) to 79 (OPKED). In the case of all ROP, there is a single evaluation unit in the structure of MA responsible for conducting planned studies. Plans for central OPs combine evaluations to be conducted by MA & IB evaluation units. Since some institutions act as IB for several OPs (e.g. The Polish Agency for Enterprise Development, The National Centre for Research and Development), their evaluation studies are dispersed amongst several plans.
- J **Data collection and monitoring are served mainly by the Central Information System.** They are used and fed by a total of 113 institutions constituting the CP implementation system. It supports implementation and certification of all projects from the moment they are contracted and collects detailed data for that period. Under the national monitoring guidelines (*Minister Inwestycji i Rozwoju*, 2018) ROP MAs were granted the right to establish their own additional local information system, provided it is compatible with Central Information System

⁵⁸ It does not include ad-hoc evaluations.

(CIS). Nine out of 16 ROP MAs decided to do it⁵⁹. Some Local Information System (LIS) allow collecting additional data, e.g. on unsuccessful applicants.

-) There are at least a few distinctive features of the Polish CP evaluation system. **The evaluation studies database is one of them. It collects all studies completed since EU accession in 2004** (and some previous ones)⁶⁰, together with information on type, scope, timing, cost and contractor. All evaluation units are formally required to supply it with reports under the national guidelines. The database is accompanied by the (also formal and obligatory) procedure of standardised assessment of evaluation process and products. Upon completion of each study, the assessment form is filled by evaluation units, collected by NEU, and also provided, as feedback, to contractors.
-) A formal system for implementing evaluation recommendation is also in force. It is organised around an electronic database managed by NEU, which collects all recommendations and conclusions leading to them from completed evaluation studies. Again, there is a formal obligation binding all evaluation units to supply the database. There is a standardised typology of recommendations (e.g. strategic/operational, programme/horizontal/outside the CP system), and implementation statuses (e.g. approved/rejected, awaiting/partially or fully implemented). The described tool allows for tracking the degree of recommendation use at the programme, organisation, or whole system level. Together with other provisions from the guidelines, it may support the process of working out the way to use findings of a particular evaluation study in a particular organisation.

Comparative analysis with the 2007-13 programming period and main factors underlying current arrangements

Main changes compared to 2007-13

-) Probably the most apparent change compared to 2007-13 is the **drop in the number of active evaluation units – from over 50 to around 35**. It is mostly a result of a modification of the CP implementation system at regional level. ERDF funded ROP and regional components of ESF funded OPHC from 2007-13 got replaced by single programme financed from ERDF and ESF. As a consequence, in most regions, two separate evaluation units were merged into one.
-) Another development of the present programming period is the establishment of NTO/RTO network. These analytical units complement and support evaluation units in informing decisions concerning CP programmes. Activities of both networks are coordinated to some extent. At national level, NTO and EST organise joint meetings. In some regions evaluation unit and RTO are merged into one team.
-) Regarding the monitoring data collection system, *KSI SIMIK 07-13* was replaced by SL2014. Opinion on this modification ranges from *no difference* to *moderate improvement* because of combining data that were previously dispersed between several systems. What all evaluation units complain about is limited access to data because of tightening provisions on personal data protection.

⁵⁹ According to declarations in evaluation plans.

⁶⁰ Around 1400 at the moment.

- J In a shared view of authors and respondents, **the current evaluation system is more regulated**. National evaluation guidelines grew from 4000 words to over 11 200⁶¹. **There are additional arrangements, and they are more detailed**. That includes the list of obligatory evaluation studies, description of the role and competence of MC, the scope and proceeding with evaluation plans, requirements concerning evaluation database or recommendation follow-up system.
- J The impact of those regulations on modification of practice is mixed. Some of those provisions, although not formalised, were practised by at least some evaluation unit in the previous programming period. That includes evaluation plans (they were obligatory in Poland in 2007-13, however less detailed⁶²), the right of MC to approve evaluation plan⁶³, systematic follow up of recommendations⁶⁴.
- J Not part of the arrangements, but a worth mentioning trend observed by all respondents is a **shrinking of the supply side of evaluation market**. The number of active contractors, although still impressive, especially when compared to other Central and Eastern European Countries (CEEC) (Olejniczak et al., 2017a), has visibly decreased. Representatives of evaluation units complain that they receive less offers when announcing a tender. It is even more worrying when one considers that among those abandoning the market are often experienced companies ensuring high-quality standards.

Potential causes of the observed changes and main determinant of current arrangements

- J The shape of the Polish CP evaluation system was influenced by a combination of several factors both from EU and national level, both legal and political⁶⁵. The drop in number and consolidation of evaluation units were a consequence of ROPs supported jointly from ESF & ERDF under article 93 (Common Provisions Regulation - CPR). Establishment of NTO/RTO network is an expression of political will resulting from the weakness of strategic thinking identified during the formulation of the National Regional Development Strategy (MRD, 2010).
- J If the direct impact of CPR on Polish CP evaluation practice was moderate⁶⁶, then the impact of EC guidance documents – triggered by CPR – is visible. It can be seen in the structure and scope of evaluation plans, e.g. focus on counterfactual impact evaluations, and attention given to identification and collection necessary data.
- J National guidelines play a crucial role in transposing and implementing EU provisions and guidelines into Polish evaluation system, providing detailed explanations. They also include provisions with no equivalent at EU level, e.g. evaluation database, assessment of evaluation process and products, recommendations follow-up system. Those country-specific provisions

⁶¹ Not only the scope, but the number of national guidelines increased. Unlike the previous perspective, evaluation guidelines are accompanied by separate instructions on monitoring implementation progress as well as collecting and transmitting data in electronic form. It is not difficult to notice that the increase of guidelines at national level mirrors the same process at EU level.

⁶² The 2007-2013 evaluation plans were mostly concerned with the organisation of the evaluation system, method and capacity-building activities. List of planned studies was agreed and approved on a yearly basis.

⁶³ In some cases, MC were also formally approving recommendations to be implemented following evaluation study.

⁶⁴ Although in less automated form, the system was launched in June 2009.

⁶⁵ Authors indicate that it is impossible to distinguish these sources. Every "legal factor" – a piece of legislation – is preceded with discussions in the political or administrative sphere. Research findings at the national level are often closely related to debate, and follow regulation guidelines at EU level.

⁶⁶ Evaluation plans were obligation already in 2007-2013, under national guidelines. Most MC approved those plans in the previous perspective, and some also formally approved recommendations from evaluation studies.

are usually informed by the evaluation studies concerning CP implementation system and specifically evaluation system, which are regularly conducted⁶⁷.

Overall assessment of the organisation of Cohesion Policy evaluation in Poland

The primary strength of Polish CP evaluation system is in the constant activity of NEU in shaping, regulating, coordinating, building the capacity of the system, which is not the case in many other MS (Wojtowicz, Kupiec, 2018; Kupiec, Wojtowicz, 2019). NEU is responsible for the other distinctive feature of the system – decentralisation. Depending on the perspective it is considered either the strength (vicinity of producers and potential users which facilitates dialogue and learning, stability of the system) or the weakness (dispersion of capacity – some units are too small to conduct high-quality evaluations; periodic accumulation of tenders, which cannot be served by the supply side of the market and lower the quality). **Finding the right balance between concentration, accumulation of capacity, ensuring independence by keeping evaluation units at arm's length from MA on one side, and the possibility to detect and address real needs, enhance learning by the vicinity of evaluators and knowledge users on the other, is one of the challenges for the future.**

Although some smaller units still have difficulties, **the average capacity to conduct evaluation increases**. The same applies to contractors; however, in quantitative terms, the market is shrinking. Diagnosing and stopping this process is the next challenge to be faced.

Another advantage of Polish evaluation is that it is still given a relatively high priority in administration. Evaluation units are usually organizationally separated. The majority of stakeholders considers additional provisions (e.g. recommendation follow-up system, evaluation base) not as an administrative burden, but as useful tools facilitating evaluation practice, coordination, use of findings, learning.

A.5.5.3 Analysis of planned and conducted evaluations and their contribution to policy-making

Main characteristics of the evaluations carried out in Poland

Scope of evaluations

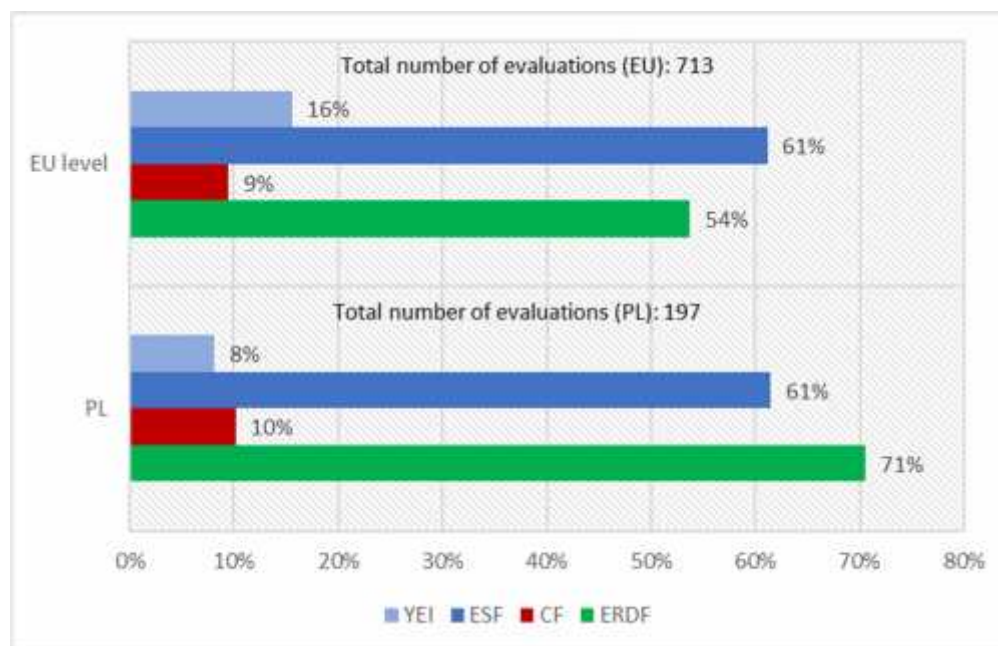
Poland is by far the leader in terms of the number of produced evaluation studies concerning CP. Polish evaluation units have submitted so far 197 reports to the EC database, which constitutes 28% of all studies, more than twice the share of the next MS in the ranking (Spain), and more than 22 least active MS combined. **The total number of studies in the 2014-20 programming period might reach 650 or 875**, depending on the calculation method⁶⁸. The budget for evaluation plans ranges from less than EUR 0.5 million to over EUR 1.5 million in the case of ROP and from EUR 3.0 million to EUR 9.3 million in the case of the large central OPs.

⁶⁷ Examples of those studies are: EGO (2008), *Ocena potencjału oraz stanu dotychczasowych prac w ramach jednostek ewaluacyjnych funkcjonujących w Instytucjach Zarządzających oraz Instytucjach Pośredniczących I i II stopnia w ramach NPR 2004-2006 i NSRO 2007-2013*, Warszawa, Ministerstwo Rozwoju Regionalnego; EGO (2010), *Ocena systemu realizacji polityki spójności w Polsce w ramach perspektywy 2004-2006*, Warszawa, Ministerstwo Rozwoju Regionalnego; EGO (2011), *Badanie potencjału oraz stanu dotychczasowych prac w ramach jednostek ewaluacyjnych funkcjonujących w Instytucjach Zarządzających oraz Instytucjach Pośredniczących I i II stopnia w ramach NSRO 2007-2013*, Warszawa, Ministerstwo Rozwoju Regionalnego; EGO (2013), *Ocena systemu realizacji polityki spójności w Polsce w ramach perspektywy 2007-2013*, Warszawa, Ministerstwo Rozwoju Regionalnego.

⁶⁸ The evaluation plans contain 575 studies. Each evaluation unit also conducts an ad-hoc evaluation, which, based on budget calculation, would constitute above 15% of the planned evaluations, thus adding 75 studies (and a sum of 650 evaluations). Including ex-ante evaluations, the total amount would exceed 675 evaluations. Also, ESF evaluations are conducted in stages in 2-7 years. Calculating each step summed up with a report as a separate study would add another 200 studies and give a total amount of 875 evaluations.

The median budget for a single ROP evaluation amounts to EUR 35 thousand with 1st quartile at EUR 26 thousand, and 3rd at EUR 50 thousand. Evaluations of central OPs are valued higher – EUR 70 thousand is a typical price, EUR 100 thousand is also not an exceptional price, sometimes the budget reaches over EUR 250 thousand⁶⁹. Still, considering the number of conducted studies and their median/average value, one may say that **multiple small-scale evaluations are characteristic for Poland**. It is different, however, from the perspective of the interviewed contractors. They claim that the scope of the studies is considerable while the budgets are often underestimated.

Figure A.28 Evaluations already executed in Poland during the 2014-2020 programming period by Fund (excluding ex-ante ones)



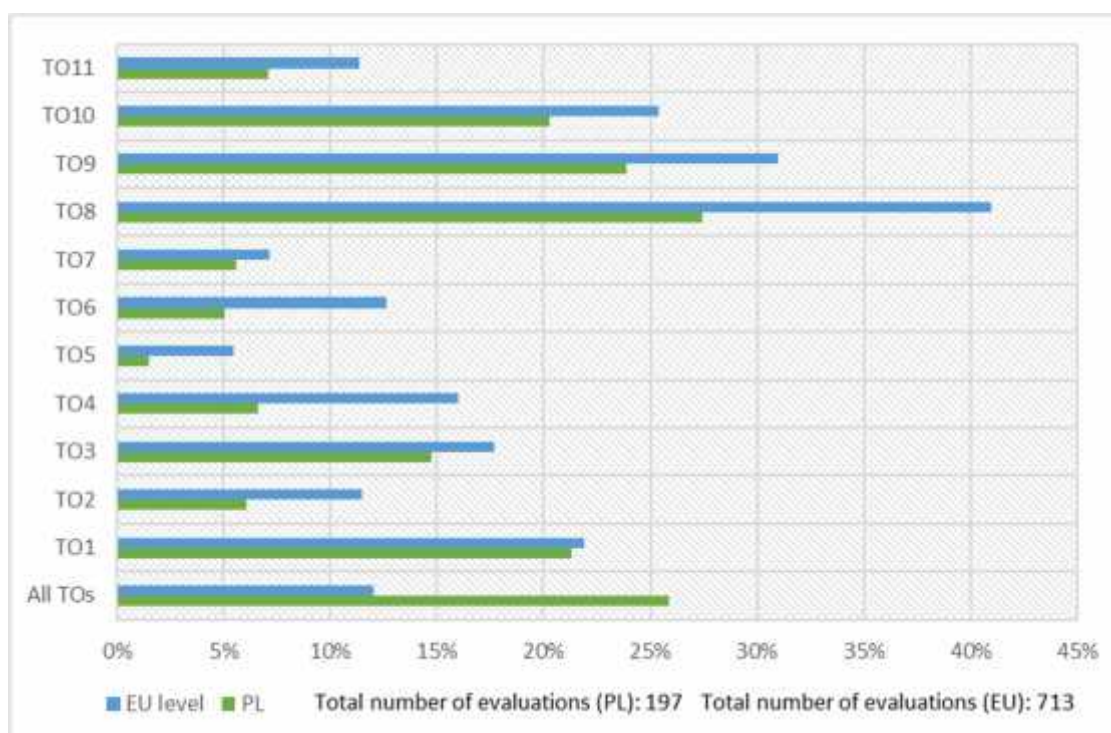
Source: Authors based on European Commission, 2019.

The structure of completed evaluation studies by fund closely resembles that of total EU funds. ESF and ERDF studies dominate. The slightly lower share of ESF studies is easily explained by the correspondingly lower share of ESF in total funding (17% in PL compared to 24% in total CP budget). The visible disproportion between the share of CF in CP budget and the number of evaluation studies is also not characteristic for Poland⁷⁰. The structure of evaluation studies reflects the organisation of CP implementation system. There is only one OP co-financed from CF, while 17 are supplied by ESF and over 20 by ERDF.

⁶⁹ One has to remember that all those figures are estimated values from evaluation plans. Previous studies show that the actual cost of the contract is usually lower and amounts on average to 78% of the estimated value (Kupiec, 2015b).

⁷⁰ This disproportion is even more apparent in terms of financial commitment to evaluation of particular funds. EUR 9.3 million is committed to evaluation of ESF intervention from OPKED - worth EUR 4.7 billion. CF intervention under OPIE exceeds EUR 22.5 billion and only an estimate of EUR 1.5 million is committed to evaluation. Therefore, spending on evaluation of EUR 1 from ESF are almost 30 times higher than EUR 1 from CF. This might indicate (at least to some extent) that the proportions are wrong, and efforts to measure CF impact are underfinanced. It could be caused by the fact that evaluation units in the ESF programmes, which are more numerous and more active, managed to secure higher budget regardless of whether it was justified or not. On the other hand, one must not forget that ESF projects are relatively smaller, dispersed and numerous (CF project costs on average 26 times more than ESF project from OPKED), thus evaluating them is more expensive.

Figure A.29 Evaluations already executed in Poland during the 2014-2020 programming period by Thematic Objective (excluding ex-ante ones)



Source: Authors based on European Commission, 2019.

Figure A.29 presents an interesting situation where the share of studies on every TO is lower in PL than in the EU total. Before interpreting this chart, the authors would like to suggest one explanatory remark. Since there is a large number of the small-scale evaluations in Poland, they might more frequently cover one (or two) TO, while in the EU on average more often studies are marked as covering multiple TOs. If this is true, most of the differences might be explained by the different *accounting method*.

The large number of *ALL TOs* studies results from the number of OPs and formal requirements included by NEU in the national guidelines. That includes evaluations of selection criteria, horizontal policies and mid-term evaluation of OP progress. Those 3 obligatory studies multiplied by 24 OPs result alone in 72 *ALL TOs* evaluations. Another set of studies with such a broad scope are those conducted by NEU and concerning all OPs or PA.

Poland is falling behind in the number of evaluations focusing on environmental goals (TO 4,5,6). Authors would refrain from drawing conclusions from this observation. There are at least three reasons to be cautious about that. First, one needs to remember about the scale of the Polish evaluation system. Despite the low share, the actual number of evaluations of these TOs is decent (19, 5, and 26 respectively)⁷¹. Second, these TOs were covered by mid-term and selection criteria studies – so they were evaluated at least twice more per OP than the EC database indicates. Third, and most important, ex-post impact evaluations of all these TOs are planned in every ROP and selected central OPs, which will result in 16 to 20 additional studies per each TO.

It seems that **the most critical factor shaping the range of topics encompassed by evaluation plans was probably CPR Article 56.3 requiring evaluation of EFSI impact on every priority**. Most MAs interpreted it as the obligation to conduct the separate impact evaluation for each priority, which

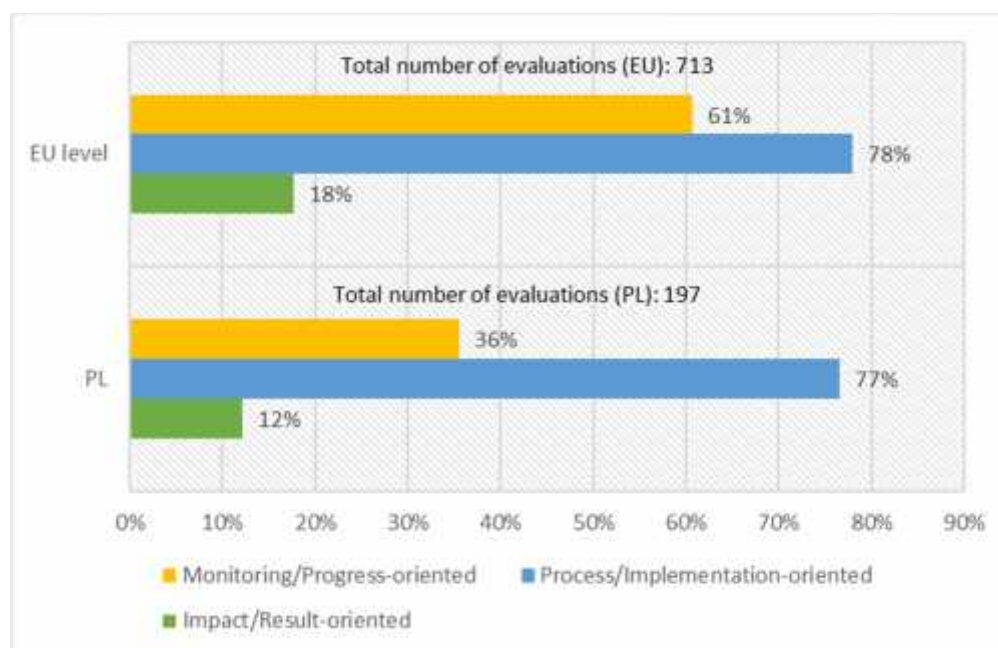
⁷¹ That means more than in any other MS.

resulted in an enormous number of planned evaluations covering all EFSI intervention. The obligation to measure common longer-term result indicators for participants was also determining for the evaluation of ESF (No 1304/2013). It resulted in dozens of studies conducted for ROP and OP KED and strong orientation of ESF evaluation on monitoring.

Types of evaluations

According to the EU database, compared to the EU average, Poland is distinguished by the low share of monitoring/progress-oriented evaluations. Again, authors believe, that the data needs a comment before interpretation. Closer insight reveals that at least several out of 116 studies classified as a process only focus on effects, and therefore are monitoring oriented. Moreover, the large number of studies is oriented on needs, capacity, specialisation, demand for support of specific sectors and/or geographical areas. They should not be classified as process-oriented. Most of them are not evaluations at all, but a sort of diagnoses. However, at least in the Polish context, this **diagnostic (not evaluation) inquiry have more impact on policy/programme decisions than monitoring/progress-oriented evaluations.**

Figure A.30 Types of evaluations already executed in Poland during the 2014-2020 programming period (excluding ex-ante ones)



Source: Authors based on European Commission, 2019.

The difference in the number of progress/result oriented studies and implementation studies may be explained by at least two factors. The first factor is the decentralisation degree of the evaluation system.

The more evaluation system is decentralised, the more it is oriented on inward learning, which increases the share of operational studies. At the same time, more centralised systems tend to produce relatively more strategic knowledge but usually for the accountability purpose (Kupiec, Wojtowicz, 2019). Poland is the example decentralised system, which determines the higher share of implementation studies. Since both types of structures have strengths and weaknesses, it is impossible to state whether the observed proportions of evaluation studies by type is an advantage or flaw.

The second factor is the stage of policy/program cycle. The majority of impact evaluations are to be conducted ex-post, and – based on the analysis of evaluation plans – it is expected that their number will rise substantially by the end of intervention cycle (+ 2 years). The **declared share of impact**

evaluations of ROPs in the 2014-20 period is 78%, while process evaluations amount to 38%. For central OPs, it is 51% and 59% respectively⁷². The share of ex-post evaluation in the whole system has increased from 13% in the 2007-13 period (actual number) to over 50% in 2014-20 (planned).

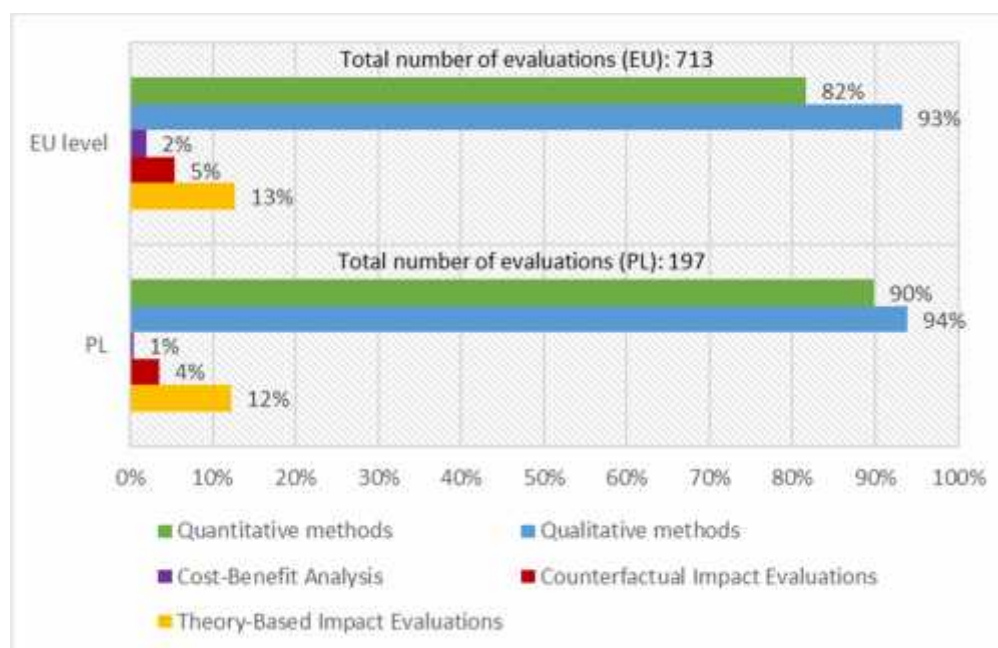
While at first, the increase in the number of ex-post evaluations seems like a positive tendency, one may argue it is not necessarily so. As it was already mentioned, such a shift is accompanied by the change in evaluation function from learning to accountability. It was confirmed by respondents from evaluation units, who reported **that it was more challenging to learn with so many studies planned as impact ex-post, to be done at a later stage of intervention. They also complained about the number of compulsory studies, which they needed to conduct at the expense of others, perceived as potentially more useful.** Similar observations about the increase of studies providing strategic knowledge accompanied by reorienting on accountability (at the expense of learning), and drastic increase in the share of compulsory studies, were reported in recent studies concerning ROPs' evaluation systems (Kupiec, in press).

The positive tendency, mentioned by NEU, is **the increase in the number of evaluations that go beyond the frames of one OP and especially go beyond CP intervention.** More studies with such broader scope are planned for the future. Although important, CP funding is just a drop in the ocean of domestic interventions and regulations, at least in some sectors. Including this context makes evaluation much more useful for understanding CP impact and designing it for the future. However, **the issue of eligibility of such studies under CP financing is unclear.**

Methodological approach

-) The overwhelming majority of the Polish evaluation studies – 84% – is based on a mix of quantitative and qualitative methods. This value is 8 percentage points higher than the EU average, yet the general picture of methodologies applied in Poland and the EU as a whole is very similar.

⁷² In Polish evaluation plans, studies are classified into two broad categories – impact and process. Monitoring/progress studies are not distinguished, and we might assume that most of them fell into impact category. Estimates for central OP exclude evaluation plan of OPKED, which does not indicate the type of study.

Figure A.31 Types of evaluations already executed in Poland during the 2014-2020 programming period (excluding ex-ante ones)

Source: Authors based on European Commission, 2019.

- The Theory-Based Evaluation (TBE) and counterfactual approaches are relatively rare; however this again might be explained by the specific point within the intervention cycle. Including studies planned for coming years, based on the analysis of evaluation plans, **the share of counterfactual should exceed 20% for ROPs and 8% for central OPs⁷³. The numbers for TBE are 37% and 10% respectively⁷⁴.**
- Use of counterfactual methods is higher than in the previous programming period, and it is a visible result of them being promoted at EU level (e.g. DG REGIO impact evaluation centre). This trend was picked up by national authorities. **Counterfactual and TBE approaches are advised in national guidelines. NEU provided training for evaluation units to build capacity to conduct this type of studies⁷⁵.** The textbook on macroeconomic modelling and counterfactual analyses is about to be published by PAED, and the one on TBE was published in 2017⁷⁶. A panel on the counterfactual approach is often organised as a part of the biannual evaluation conference.
- In a shared opinion of respondents, the quality of methods gradually increases also as a result of the growing capacity of evaluation units. However, the methodological sophistication of evaluation studies is uneven. There is a group of central evaluation units developing advanced

⁷³ Authors believe that this substantial difference is due to the fact that ROP evaluation units were less rigorous in determining what is and what is not a counterfactual approach. At regional level, even simple comparison based on a survey of beneficiaries and unsuccessful applicants (paired directly or by PSM but with limited variables) might be labelled as counterfactual. It is probably not the case at national level, where more sophisticated methodologies are applied. However, this remark is not based on the analysis of evaluation reports, but on evaluation plans containing just short fiches of planned evaluation, which is not sufficient basis for conclusions.

⁷⁴ Especially in the case of TBE, estimates are rough. Apart from TBE named explicitly in methodology, there are many studies in evaluation plans with description mentioning that intervention logic will be restored/identified, and other even vaguer but suggesting that TBE might be in use.

⁷⁵ Other means of promotion are TORs formulated by NEU and including counterfactual design – they are considered model examples and often imitated by other evaluation units.

⁷⁶ It is worth mentioning that different PAED books on ex-post evaluation and specifically propensity score matching in CP evaluation were published as early as in 2007 and 2009, respectively.

approaches, e.g. enhancing matching between experimental and control group with the use of several cross-validating techniques, or combining micro- and macro- perspectives in quasi-experimental designs searching for effects not only at basic unit level (supported individual, SME, or municipality) but also examining the situation in their environment relevant local market. There is also a significant advancement in the use of administrative data covering the whole population and the long time series instead of sampling with surveys⁷⁷. Some units experiment with other approaches like QCA. On the other end of the spectrum, there are studies, which are named counterfactual, despite employing surveys and simple matching between applicants (successful and not) based on a handful of variables.

- J The interesting example of advanced counterfactual studies are those dealing with state aid under CP programmes. These studies are conducted by the central evaluation units. They do not result from DG Regio or DG Employment requirements, but those of DG Competition (European Commission, 2014). They are regarded as the most rigorous evaluations in Poland.

Overall assessment of conducted evaluations in Poland

- J In general, there is a visible improvement in the quality of evaluation reports compared to the 2007-13 period. The number of impact evaluations is increasing, and advanced counterfactual studies become more popular than before. However, the capacity of evaluation units and consequently, the methodological advancement are uneven in the system. Moreover, some evaluations, although called counterfactual, might not be rigorous enough to establish an actual impact of the intervention. Another concern is that sometimes methodologically rigorous analyses are followed by shallow conclusions and recommendations, reducing the quality of evaluation and possibility of use of the findings. It also seems that current (national and EU) provisions orient the system more on accountability hindering the use of the evaluation findings and generally learning from the evaluation.

Evidence on the use of evaluation findings in Poland

Evaluation units in the Polish evaluation system seem to agree with the views of Patton (1997) or Henry and Mark (2003) that the efficiency of their job is judged by the utility of evaluation studies and their actual use. The most apparent manifestation of the commitment to use of evaluation was the introduction of recommendation follow-up system (see section 0). It doesn't tell us much about actual impact on policy decisions, but it gives the basic overview of the recommendations from evaluation and their implementation status (over 1 800 recommendations from the period 2014-20, 40% of them implemented as of December 2019), which makes it a coordination and motivational tool, as well as the basis for further analyses.

Uptake of evaluation is difficult to detect and measure. What may be presented are some proxies of instrumental and conceptual use. Our respondents declared that, **at the outset of formulating 2021-27 OPs, there was considerable demand from programming units for evaluation evidence. Findings from evaluation frequently inform debates during conferences on the future of CP.** However, some respondents reported that the relevance of evaluation of present OPs for the planned ones is sometimes perceived as weak, by the programming units, because of outdated data and substantial differences between programming frameworks⁷⁸.

⁷⁷ Fruitful cooperation was established, for example, between the evaluation unit in the MA OPKED and the Social Insurance Institution. National Health Fund and Central Statistical Office are also involved in counterfactual evaluations.

⁷⁸ This argument is against counterfactual impact evaluation (focusing on establishing effects) and in favour of studies exploring mechanisms of change, as the latter do not outdate quickly.

As for the impact of 2007-13 evaluation on present OPs, it is at least moderate. **Around half of OPs contains references to evaluation studies, which enrich the diagnosis part or support particular intervention choices.** The average number of references is 6⁷⁹. As most respondents argued that the participatory design of ex-ante evaluation made it useful and impactful for the OPs, authors assessed also references to 2007-13 evaluations in ex-ante reports for present OPs. The average ex-ante report contains 12 references to the previous evaluations, and as many references to the other diagnostic, analytical enquiries concerning CP and its context⁸⁰. The results show that ex-ante evaluation is an important channel for the uptake of the evidence from ongoing studies.

The single most influential evaluation study conducted in Poland is the *Evaluation of benefits to the EU-15 resulting from the implementation of CP in the Visegrad countries*. It provided reliable evidence of socio-economic benefits of CP for the entire EU. **It played the role of political ammunition during negotiations of the 2014-2020 EU budget.** Findings from this study were referred to in debates with the representatives of net payers by Polish Minister of Regional Development. It was quoted by representatives of EC, EP members, and commented by media outside Poland. It may serve as a positive case of substantiating and possibly conceptual use of evaluation.

Numerous **examples of the direct impact of evaluation on the directions of intervention under CP 2007-2020** can be found in the overview publication of NEU (2014)⁸¹. They include:

-)] refocusing of the support for preschool education on different groups (e.g. 3-4 years old children, or children with special educational needs) (OPHC);
-)] formulation of health care programme which directed focus on region-specific areas (like pulmonology) (ROP dolnośląskie);
-)] the establishment of the Register of Development Services – the nationwide database of education and training service providers, which was a pivotal step to the improvement of SMEs staff training quality (OPHC);
-)] inclusion of individual sewage treatment plants in a scattered development area as a more economically viable option in a water and sewage management measure (ROP podkarpackie);
-)] application of the principle „the greater the project’s innovation, the greater the non-refundable nature of the support” (ROP zachodniopomorskie);
-)] adoption of so-called smart specialisations approach (OP Innovative Economy).

Asked about **decision-makers’ receptiveness to evaluation findings**, respondents declared that it is **sufficient and reaching the level of department directors**. The directors know how and why to use evaluation and they build pressure on the quality and the relevance of the evaluation studies. This assertion is also because, before promotion, some of these people were working in evaluation units. **The situation in this respect at the higher level (e.g. ministers, regional board members) is less favourable.** There are some examples of the demands for specific data, or evaluation findings being used in media interviews. However, in general, there is a barrier to inform political debates and decisions with evaluation. One of the respondents argued that the situation was even getting worse as

⁷⁹ This figure only takes into account OPs with at least one reference. Authors believe, however, that other OPs are on average supported by evaluation in the same manner. It is just not noted, as there is no formal obligation or a common custom to reference evaluation studies.

⁸⁰ Authors counted only specific references in the main body of report ignoring long lists of studies indicated in the source list of most ex-ante reports.

⁸¹ Examples of direct evaluation impact on 2021-2027 intervention are difficult to point as – according to our respondents – next-generation OPs are at a very early stage of formulation.

a result of the **general reduction in tolerance for open discussion and a growing reluctance to the critique (even if) based on the evidence.**

There are at least three determinants that reduce the impact of national evaluation on CP intervention. The first determinant is ingrained in the logic of the CP management system. **Detailed support framework imposed by the EU regulations reduces the role of the national and regional actors to guardians of effective implementation** of the previously imposed provisions, entitled to introduce only minor technical adjustments (Kupiec et al., in press)⁸². At the same time, **ex-post impact evaluations conducted at MS level are not sufficiently appreciated by EU institutions when CP is formulated** (Olejniczak et al., 2017a)⁸³. The second factor is related to the fact that *evaluation is but one source of evidence*⁸⁴. Studies of a large sample of representatives of public administration institutions revealed that **there are other more appreciated (than evaluation) sources of information** (e.g. contact with beneficiaries, “own experience” and discussion with colleagues, monitoring, project controls) (Olejniczak et al., 2017b). This phenomenon is not characteristic for Poland, but it is found in all CEEC, and most likely in other MS. More advanced evaluation units, informed by relevant studies (Olejniczak et al. 2016), try to deal with that phenomenon by **engaging in “knowledge brokering” activities, e.g. combining evidence from different sources into a short easily digestible form for potential users**. The third factor diminishing the impact of national evaluation on CP intervention is the **orientation on the ex-post impact evaluation, promoted by current provisions** (see CPR). According to respondents, it **reduces opportunities to learn at an appropriate time** (during the implementation phase, and when the programmes for the forthcoming programming period are formulated). Since most impact evaluations are to come at a later stage, there is a lack of evidence to inform the implementation of 2014-2020 OPs and formulation of 2021-27 programme

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⁸² The other complementary limitation is that the formal procedure of “major” OP modification as designed in EU regulations is relatively tedious and time-consuming. It discourages MAs from initiating the process even when they believe that it could improve programme effectiveness. Since strategic modification of OP requires formal approval by the EC, it protracts the absorption process and poses a threat of losing funds in line with so-called “n+2 principle”.

⁸³ This opinion was shared by respondents from national administrations of more than one Visegrad Group countries interviewed during the Olejniczak et al. (2017a) study

⁸⁴ The full quote from C. Weiss et al. (2005) intended to build a sense of humility among evaluators is “Evaluation is fallible. Evaluation is but one source of evidence. Evidence is but one input into policy. Policy is but one influence on practice. Practice is but one influence on outcomes”.

A.5.5.4 Conclusions, lessons learnt and recommendations

This section of the report summarises and reflects on findings presented above combined with views of our respondents on key strengths and weaknesses of the Polish CP evaluation system

Box A.9 SWOT analysis of Cohesion Policy evaluation in Poland

STRENGTHS	WEAKNESSES
<p>Decentralisation, large horizontal structure with number of contracting entities – (1) it ensures stability, potential changes or even abandoning evaluation function in one or two institutions would not compromise the system stability ; (2) large number of institutions involved facilitates debate on evaluation and build it perceived importance especially in a country where there was no evaluation culture.</p> <p>High priority of evaluation for domestic CP administration – expressed for example, in the large total budget, acceptance of rules, and tools (e.g. evaluation database, recommendation follow-up system).</p> <p>Activities and involvement of NEU regarding orientation, coordination and capacity building of the system, including working groups, conferences facilitating the process of experience sharing.</p> <p>Integration of administrative data into evaluation studies – established cooperation at institutional level with The Social Insurance Institution. National Health Fund and Central Statistical Office facilitates counterfactual evaluation</p> <p>Detailed national guidelines transposing EU provisions into national context, coordinating and stimulating practice.</p> <p>Growing capacity of institutions and quality of evaluation studies. Reorientation from process to impact evaluations.</p>	<p>Decentralisation – results in dispersion of capacity. Although total number of people involved in contracting evaluation in the system is considerable some smaller units consist of as few as one person or two. That limits opportunities to learn and result in the uneven quality of evaluation studies in the system.</p> <p>Large number of small-scale studies that poses a threat to quality especially when combined with periodic accumulation of tenders that cannot be properly</p> <p>Insufficient interest and receptiveness to evaluation evidence at the higher level of administrative and political level limiting impact of evaluation on decision-making (partly due to insufficient effort put into tailoring the feeding methods, mostly due to inflexibility of CP management).</p> <p>Lack of involvement of academia and NGOs, deliberation around evaluation in wider circles. This is probably an indication of evaluation being more autocratic or bureaucratic than democratic (MacDonald, 1976).</p>
OPPORTUNITIES	THREATS
<p>Perspective of spreading evaluation practice, capacity and debate beyond CP context, both within and outside the public sector. This could be the positive impulse for CP evaluation system facilitating debate on methods and use, leading to the establishment of additional analytical units, securing additional demand on the research market, building a common culture of evidence use.</p>	<p>Weakening impetus of EC as a stimulator of evaluation practice. Compared to 2007-13, there is no debate and promotion of particular methods. Ex-ante obligation has been abandoned. There is uncertainty about financial support for evaluation. The focus is on monitoring indicators and not evaluation, which is especially threatening for MS without firmly established self-sustained evaluation culture like Poland. Development of domestic evaluation system within CP might have reached its limits and also loses some impetus. Although high, the number of contractors decreased. The same happened to some evaluation units, which reduces involvement in other tasks than commissioning studies. Evaluation tasks are combined with monitoring on one hand and programming on the other. That raises the dilemma between independence on one side and utility/learning on the other.</p> <p>Evaluation system might have also been reaching the limits of small technical improvements within CP implementation system and programmes. Maintaining its utility and potential to support learning process would require evaluation culture and receptiveness to evaluation evidence to be disseminated to other domestic policy fields. This process although expected for many years is not progressing at a satisfactory pace</p>

From the perspective of the presented findings, a proper response to the identified opportunities and threats should include:

- Greater involvement by the EC in the promotion and orienting evaluation practice. Renewing debate on evaluation methods including the utility of counterfactuals from the perspective of

policy-learning, setting clear boundaries between monitoring and evaluation to prevent the risk of the former inquiry type to suppress or consume the latter.

- J Careful overview of the list of obligatory studies (resulting both from the EU and the domestic provisions), resulting in a reduced number of studies. This action should help to tailor evaluation subject to actual information needs, to reduce the number of studies (and possibly to expand their scale), to allow evaluation units to get involved more intensively in other knowledge brokering activities.
- J Expanding the possibility of funding under CP budget other enquiries of diagnostic, or analytical character, not concerning CP programmes strictly but other interventions forming a context for CP, determining its effects, enriching knowledge about the mechanisms of change.
- J Reconsidering the structure of the evaluation system and the roles of particular evaluation units. Since the decentralisation is both a strength and a weakness, there is no obvious solution to be proposed. Possibly some smaller evaluation units in the MAs/IBs of central OPs could be merged into one unit with higher capacity. Apart from the capacity, there is the issue of location and independence of evaluation units. There is evidence (from respondents, and earlier studies (Kupiec, 2015a)) that moving evaluation units further away from programming/implementation units (e.g. to a different department), to ensure evaluation independence, resulted in severe difficulties with identifying users' needs and reduced capacity for learning. A possible solution to that might be separation of accountability and learning function between different evaluation units. Learning units would be numerous and close to (or even part of) programming and implementation units. Accountability-evaluation units would be fewer, concentrated, large ones with higher potential for robust impact studies, and at arm's length from OP programming and implementation – possibly in a different organisation and with distinct budget (so that the evaluated would not pay for evaluation).
- J Accepting the fact that evaluation is but one source of evidence should lead to more considerable attention to building a critical mass of evidence from other sources. Promotion other activities of evaluation units as knowledge brokers in EU guidelines and structure of eligible expenditure are needed.
- J There is a need for more considerable attention by EC staff to the ex-post evaluations conducted in the MS. They should be carefully read, considered, and regarded as a part of the evidence base informing the process of formulating frameworks for a subsequent financial perspective. Possibly to make this MS ex-post effort more useful, some coordination from the EC would be needed, as well as engagement in the formulating of TOR.
- J Since the presence of evaluation practice and receptiveness to evidence in domestic policies determines the efficiency of the CP evaluation system, one can imagine some EU level initiatives to promote dissemination of evaluation culture to domestic policies in MS, as without such encouragement this process has not occurred yet, and will probably not happen in the near future (not only Poland but also other CEEC).

A.5.5.5 Annexes

Summary of the characteristics of the Polish case**Table A.15. Checklist summarising the Polish case study**

Item	Check (Yes/No)
Are there national legal requirements on evaluation to which CP evaluation is subject?	YES
Is(Are) there autonomous national/regional agency(ies) dedicated to evaluation?	N/A
Are there independent Evaluation Units outside the Managing Authorities? (Yes: outside the MA, No: evaluation units are within the MA)	N/A
Are academic evaluators involved in CP evaluations?	N/A
Does a permanent and open list of evaluation experts exist?	N/A
Are Framework contracts used to conduct evaluations (externalised to private or academic consultants)?	N/A
Has the role of Monitoring Committees been strengthened in the country between 2007-13 and 2014-20?	N/A
Is there a unified national data collection system to Monitoring CP? (VS: different monitoring systems depending on regions)	YES
Is there systematic support to evaluation provided by the authorities at the national/regional level?	N/A
Is there a national database of CP evaluations?	YES
Is there a formal system to track whether evaluation findings are followed up?	YES
Is there a single national evaluation plan?	NO
Are there regional evaluation plans?	YES
Are there major differences between regions for the organisation of CP evaluations? (governance, practices)	NO
Are there major differences by fund for the organisation of CP evaluations? (governance, practices)	NO
Are evaluations typically large-scale and few in number?	NO
Are evaluations typically small-scale and high in number?	YES
Are specific methods of evaluation promoted by regional or national authorities?	N/A
Has the methodological quality of evaluations improved between 2007-13 and 2014-20?	N/A
Are there major differences in the scope and methods of evaluations by region?	NO
Are there major differences in the scope and methods of evaluations by fund?	NO
Are evaluations typically carried out with timing that allows them to inform policy-making decisions?	N/A
Are evaluation reports from 2007-13 cited in national/regional policy documents for 2014-20?	YES
Overall, are CP evaluations an important influence on policy-making decisions in the country?	N/A
Are there major differences in the use of evaluations by region?	NO
Are there major differences in the use of evaluations by fund?	NO

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List of interviews

-)] Head of National Evaluation Unit, Department of Development Strategy in the Ministry of Development Funds and Regional Policy - coordinating body for the CP evaluation system, and evaluation unit for Partnership Agreement & horizontal issues.
-)] Head of Evaluation Unit, Department of European Social Fund in the Ministry of Development Funds and Regional Policy - MA OP Knowledge-Education-Development, and coordinating body for ESF evaluation.
-)] Head of Evaluation Unit, The Polish Agency for Enterprise Development, IB for OP Knowledge-Education-Development, OP Eastern Poland, OP Smart Growth.
-)] Head of Evaluation Unit, Marshal Office of Opolskie, MA ROP.
-)] Head of Evaluation Unit, Marshal Office of Kujawsko-Pomorskie, MA ROP.
-)] President of IDEA Institute Ltd – leading evaluation company, and former head of the National Evaluation Unit.
-)] A representative of a leading evaluation company.

A.5.6 Romania

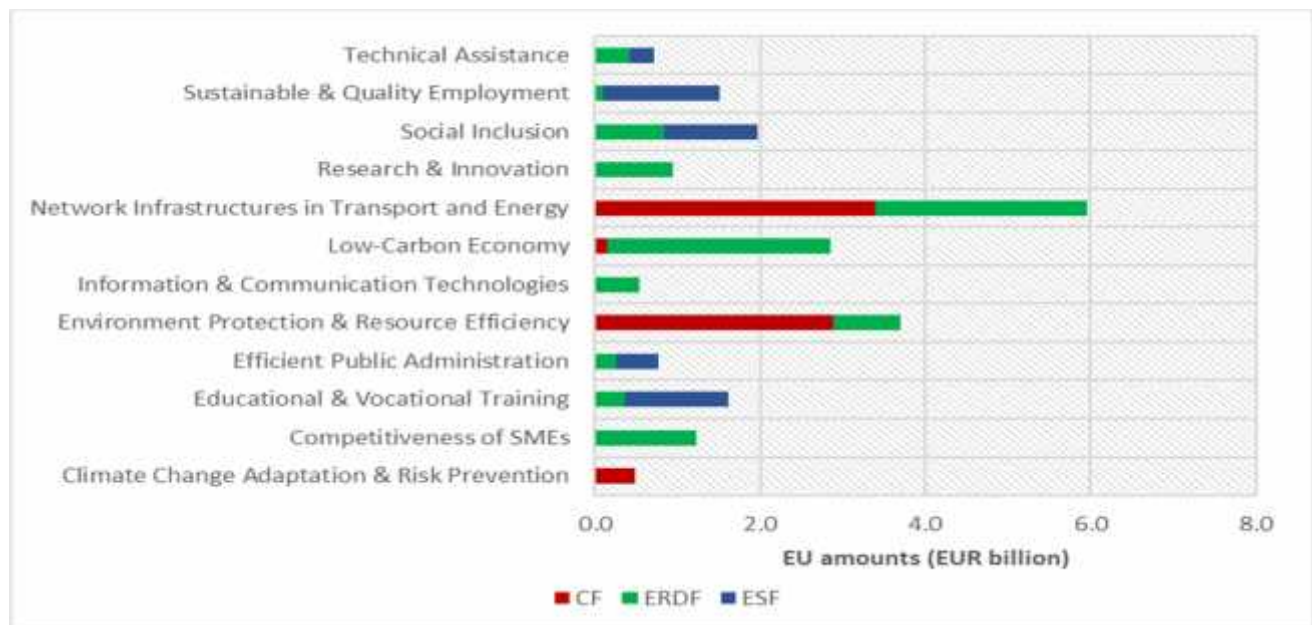
A.5.6.1 Background information

Overview of Cohesion Policy in Romania

Romania is managing EUR 23 billion to implement Cohesion Policy (CP) during the 2014-2020 period, including European Territorial Cooperation (ETC)⁸⁵. This amount is split between 8 OPs, the main OPs, in terms of share of funding and contribution to socio-economic development, are presented below:

-)] **OPLI** – Operational Programme Large Infrastructure, with a total funding of **EUR 9,218million**, 40% of the total CP funding, Eur 6 930 million from the Cohesion Fund (CF) and EUR 2 280million from the European Regional Development Fund (ERDF), addressing Thematic Objectives (TO) 4, 5, 6 & 7;
-)] **ROP** – Regional Operational Programme, with an allocation of **EUR 6,860 million** from the ERDF, 29.82% of the total CP funding, addressing TOs 1, 3, 4, 6, 7, 8, 9, 10 & 11;
-)] **OPHC** – Operational Programme Human Capital, with total funding of **EUR 4,372 million**, 19% of the total CP funding, Eur 4 070million from the European Social Fund (ESF) and Eur 302 million from Youth Employment Initiative (YEI), addressing TOs 8, 9 & 10;
-)] **OPC** – Operational Programme Competitiveness, with total funding of **EUR 1,329 million** from ERDF, 5.08% of the CP funding, addressing TOs 1 & 2.
-)] The rest of the CP funds are allocated to OPAC - Operational Programme Administrative Capacity (ESF), OPTA – Operational Programme Technical Assistance and OPs ETC Interreg Va-Ro-Bg and Interreg Va – Ro Hu (ERDF).

Figure A.32 EU funding in Romania by fund and priority theme



Source: European Commission, 2019.

⁸⁵ <http://mfe.gov.ro/>; <https://www.mdrap.ro/dezvoltare-regionala/-4970/-7572>; <http://www.inforegio.ro/ro/>

As it results from Figure A.32, infrastructures, especially transport-related ones, benefit from the highest level of funding of all investments priorities. This figure is in accordance with the latest data, placing Romania on the lowest position among the EU Member States (MS), regarding the quality of general infrastructure, roads and railways⁸⁶. The underdeveloped and outdated infrastructure is hampering the socio-economic development of Romania, which justifies the high allocation of CP funds for this type of interventions.

The Second priority is represented by the investments in resource efficiency and low-carbon economy. For a change, Romania is endowed with good energy potential, a significant proportion of it coming from renewable energy sources, exceeding the national target of Europe 2020 Strategy, respectively 24% of the gross final energy consumption from renewable sources⁸⁷.

Romania is still receiving funding, during 2014-2020 period, for improving the efficiency of its Public Administration, as it has been characterised by a weak administrative capacity of public institutions and a predisposition to bureaucracy and exaggerated regulations that have a strong influence on the competitiveness of its business environment⁸⁸.

Evaluation culture in Romania

Following the interviews with the stakeholders involved in the evaluation of Cohesion Policy in Romania, resulted in a unanimous agreement that the **evaluation culture in Romania is underdeveloped**.

The evaluations taking place in Romania are related to the European funds, where there is the obligation, through CPR 1303⁸⁹ to perform ex-ante, during implementation and ex-post evaluations of the programmes funded, *‘to improve the quality of the design and implementation of programmes, as well as to assess their effectiveness, efficiency and impact’*. Results of the evaluations performed, and other events related to the evaluation of Cohesion Policy in Romania may be found on the Evaluation Library website – *Biblioteca de evaluare*.⁹⁰

There are also evaluations of the programmes funded by international donors (e.g., UNICEF, Norwegian and EEA funds, Swiss fund) that also add to the evaluation market in Romania.

Regarding **other domestic public policies, no evaluation is taking place during or after their implementation, although** a Government Decision⁹¹ states that *“Monitoring and evaluation of public policies are activities that take place during and after the implementation of public policies, with the aim of establishing the degree of achievement of public policy objectives”*. The only form of evaluation sometimes implemented for Romania public policies is an impact assessment (ex-ante). However, it is not always performed.

This low development of an evaluation culture in Romania is reflected in a small evaluation market, with a few companies competing for the evaluation tenders, and a small group of evaluators sharing the evaluation contracts.

⁸⁶ Romania Progress report 2019, Progress Report Snapshot of data before send_2014RO16M8PA001_2019_0_ro, page 8.

⁸⁷ Romania Progress report 2019.

⁸⁸ idem.

⁸⁹ Chapter II Evaluation, art. 54 - 57.

⁹⁰ <http://www.evaluare-structurale.ro/>

⁹¹ Government Decision no. 775 of July 14, 2005 for the approval of the Regulation on the elaboration, monitoring and evaluation of public policies at central level (updated until July 28, 2016), article 17 <http://legislatie.just.ro/Public/DetaliuDocument/63743>

Little has changed since the findings of the study Evaluation of Cohesion Policy, Overview of Practices⁹², published in 2012, which states: “The evaluation practices in Romania are still limited to the operational programmes and its results haven’t been used for public debates”.

On the other hand, persistent changes in the ESIF institutional framework, also affecting the evaluation management and responsibilities, have contributed to a loss in expertise in evaluation policies and practices and in lessening the confidence in the utility of evaluations and their results.

A Master’s Degree programme on Evaluation of Public Policies and European Programmes, started in the National School for Political Studies and Administration (NSPSA) in 2011 with the support of an SOP HRD project, did not do much in creating a better supply, nor in developing the demand for evaluations and evaluators. Academics have been involved in evaluations on an individual basis. Starting with 2014-2020 programming period, the setting up of Scientific Committees, to help in verification of the Terms of Reference (ToRs) and the reports of OPs evaluations, resulted in a surge of academics’ involvement. More, the push to evaluate OPs interventions impacts also increased the participation of academics trained in econometrics and counterfactual methods.

A.5.6.2 The organisation of Cohesion Policy evaluation in Romania

Governance of Cohesion Policy evaluation in 2014-2020: roles and responsibilities

In Romania, evaluation of Cohesion Policy is organised based on CPR 1303, the respective Regulation 1304 for ESF and the Guidance document of Monitoring and Evaluation for the European Cohesion Fund and the ERDF. The national legislation is only defining the incumbent responsibilities regarding the OPs evaluations

Two ministries are involved in the implementation and the evaluation of the 8 OPs implemented through the Cohesion Policy – Ministry of European Funds – MEF and Ministry for Public Works, Development and Public Administration – **MPWDA**.

The Ministry of European Funds (MEF), organised based on the Government Decision no. 52/February 2018⁹³, is in charge with the coordination of structural instruments 2007-2013, the coordination of European Structural and Investment Funds (ESIF) 2014-2020, the coordination of European post-2020 structural and investment funds, and other external funds. Regarding ESIF, MEF is acting as Managing Authority (MA) for the Operational Programme Human Capital (OPHC), Operational Programme Competitiveness (OPC), the Operational Programme Large Investments (OPLI), and the Operational Programme Technical Assistance (OPTA). MEF is also hosting the *Office for Programmes Evaluation*, which is a structure fully independent of the MAs inside MEF. The *Office for Programmes Evaluation* in MEF is organised inside the General Directorate for Programming and System Coordination, under the responsibility of the Department for Evaluation of Programmes and Social Cohesion Policies, with 8 full-time persons, including one Head of office⁹⁴. Its main responsibilities, including management of the evaluations of the 4 OPs, are detailed in Table A.16.

The Ministry of Public Works, Development and Administration (MPWDA), recently renamed⁹⁵, is managing ERDF funding allocated for regional development and European Territorial Cooperation. MPWDA is acting as MA for the Regional Operational Programme (ROP), the Operational Programme

⁹² Evaluation of Cohesion Policy, Overview of Practices, page 222, Ministry of Regional Development, Warsaw 2012, Edited by: Karol Olejniczak, Piotr Strzęboszewski, Stanisław Bienias.

⁹³ <http://legislatie.just.ro/Public/DetaliuDocument/197958>

⁹⁴ <http://mfe.gov.ro/minister/organizare/regulament-de-organizare-si-functionare/>

⁹⁵ EGO no. 68 of November 6, 2019 regarding the establishment of measures at the level of central public administration and for the modification and completion of certain normative acts, <http://legislatie.just.ro/Public/DetaliuDocument/219553>

Administrative Capacity (OPAC) and the Operational Programmes European Territorial Cooperation (OPs ETC) for 2013-2017 & 2014-2020 programming period. Each of the MAs is also hosting its own Evaluation office. Thus, inside MPWDA are located *the evaluation office for ROP – BEPOR* with 6 full-time persons, including the head of the office, *the evaluation unit for OPAC* – 2 full-time persons and *the evaluation unit for all cross-border OPs*, 2 full-time persons.

Although the *Office for Programmes Evaluation* in MEF has a coordinating role in the ESIF evaluations, including building evaluation capacity for all evaluation offices, there is poor perceived collaboration between the evaluation office in MEF and the 3 evaluation offices in MPWDA, which leads to differences in the approach and management of the evaluations. More, the 3 evaluation offices in MPWDA do not communicate or coordinate among themselves either.

The other structures involved in the OPs evaluation and their key responsibilities are described in detail in Table A.16.

Table A.16. Governance of Cohesion Policy evaluation in Romania for 2014-2020

Name of the Stakeholder	Level of Governance	Number/ Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
Ministry of European Funds - MEF	National	Hosts MA for OPHC, OPLI, OPC, OPTA and - Office for Programmes Evaluations	- establishing the institutional framework for coordination and management of the European structural and investment funds, including ESIF evaluation - Hosting the Office for Programmes Evaluation	No major contribution May have responsibilities in the Action Plan for implementing the evaluations' recommendations
Ministry of Public Works, Development and Administration - MPWDA	National	Hosts MA for ROP, OPAC and OPs ETC Hosts Office for ROP evaluation – BEPOR; office for OPAC evaluation; office for OPs ETC evaluation	- Institutional coordination of the offices for evaluation	No major contribution May have responsibilities in the Action Plan for implementing the evaluations' recommendations
Office for programmes evaluation in MEF	National	Responsible for evaluations for OPHC, OPLI, OPC, OPTA Methodological coordination of ESIF evaluation	- Coordination of the evaluation process for ESI funds through the Working Group for Performance Evaluation - building evaluation capacity for all evaluation offices - Development and implementation of the National Multiannual Evaluation Plan; - Coordination of development and implementation of Multiannual evaluation plans for OPHC, OPLI, OPC, OPTA; - Participation in MCs for OPHC, OPLI, OPC with info on the results of the OPs evaluations	Manages the evaluations of the 4 OPs Disseminates evaluations results Holds training and information sessions for all evaluation units

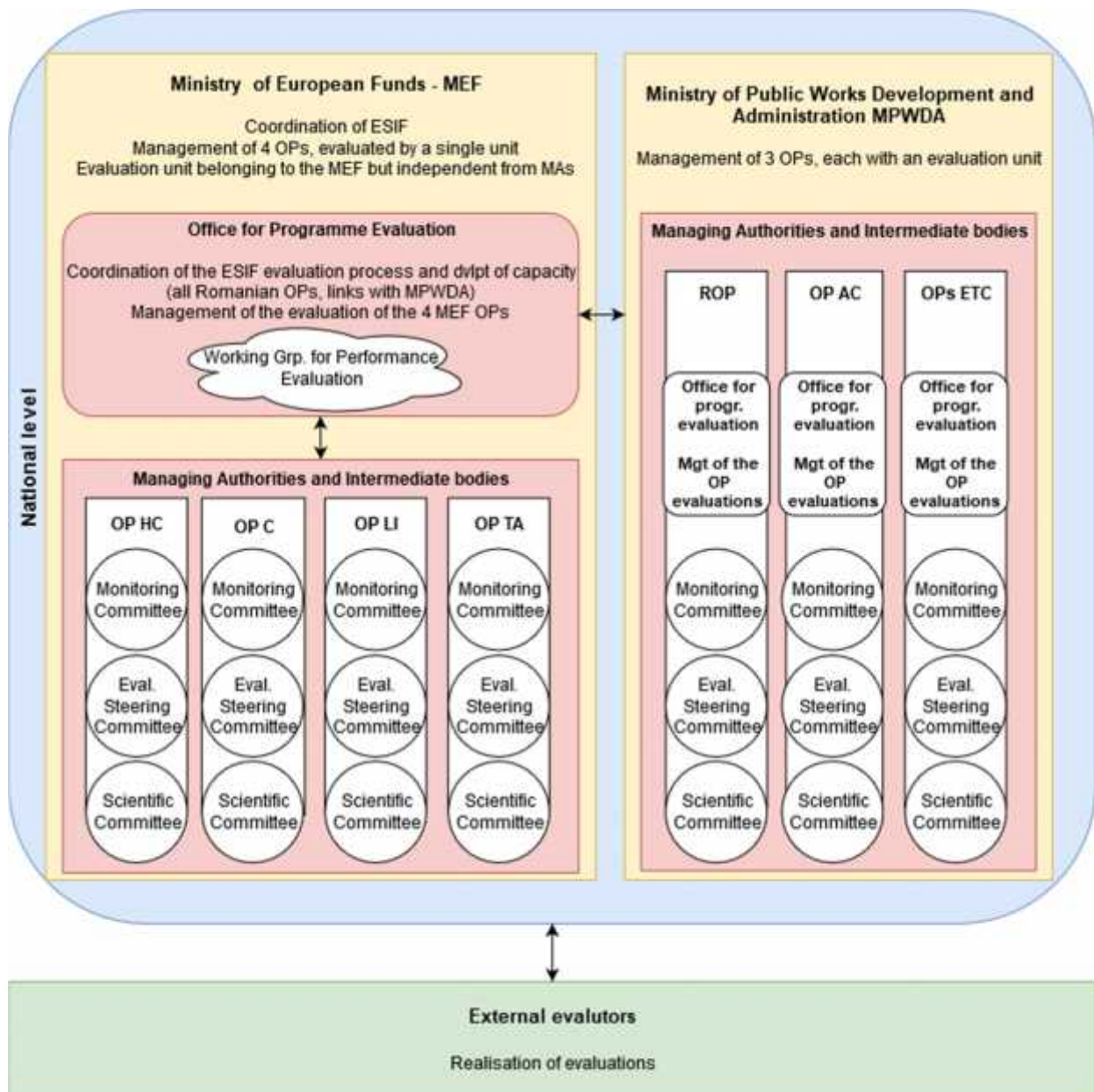
Name of the Stakeholder	Level of Governance	Number/ Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
Functional Working Group for Performance Evaluation	National	Part of the Coordination Committee for the Management of the Partnership Agreement (CCMPA)	Analysis and decision on: - Performance framework; - evaluation; - reporting; - statistics and indicators; - management and financial forecasts	Strategic management
BEPOR - Office for ROP Evaluation in MPWDA	National	Responsible for ROP evaluation	- Development, updating and implementation of the multiannual evaluation plan of Regional Operational Programme (ROP); - preparation of evaluation reports on various topics related to ROP; - Participation in ROP MC with info on the results of the OP evaluations; - Supporting MA ROP contribution to ROP evaluations and the ex-post evaluation	Manages the ROP evaluations Disseminates evaluation results
Evaluation office for OPAC in MPWDA	National	Responsible for OPAC evaluation	- Development, updating and implementation of the OPAC evaluation plan; - Development of Action Plans for the implementation of evaluation recommendations and monitoring progress; - Supports the OPAC ESC activity	Manages OPAC evaluations Disseminates evaluation results
Evaluation office for OPETC in MPWDA	National	Responsible for OPs ETC evaluation	- Coordination of evaluation activities of the cooperation programs; - Development, updating and implementation of the evaluation plans; - Convening and conducting the activities of ESC; - Participation in the Evaluation Working Group	Manages OPs ETC evaluations Disseminates evaluation results
Managing Authorities	National	7 Inside MEF: MA OPHC - MA OPLI - MA OPC - MA OPTA - Inside MPWDA: MA ROP - MA OPAC - MA - ETCP	- Provide data re OP implementation & administrative data for evaluation purposes - Give feed-back on evaluation reports - Participate in ESCs	Have responsibilities in the Action Plan for implementing the evaluations' recommendations
Intermediate Bodies	Regional/National	OPHC – 8 Regional IBs + 1 National IB ROP – 8 Regional IBs OPLI – 1 National IB OPC – 2 National IBs	- Provide data for the evaluations - Give feedback on the evaluation reports findings - Members of the ESC - Members of the MCs	Main providers of data for the evaluations, re OP implementation, both quantitative and qualitative Main connection with beneficiaries of funding (project promoters)

Name of the Stakeholder	Level of Governance	Number/ Scope	Key Responsibilities and Actions	Perceived Effective Contribution to the Evaluation Process
Regional evaluation units	N/A	N/A	N/A	N/A
Monitoring Committees	National/ One per OP	8/ One per OP	<ul style="list-style-type: none"> - an MC is composed of the president-minister or secretary of state, coordinating the OP MA, members (holders or substitutes), and observers. Members and observers represent public authorities, institutions, organisations with interest in the respective OP - Examine all aspects that affect the evolution of the OP, including the conclusions of the performance reviews. - Can address comments regarding OPs evaluations 	Approve the Evaluation Plans Examine progress in the implementation of the Evaluation Plan, and the application of the recommendations of the evaluations Do not undertake a prominent role in evaluations
Evaluation Steering Committee (ESC)	National/ One per OP	8/main stakeholders, including main data providers	<ul style="list-style-type: none"> - Approve the evaluation ToRs - Approve evaluation reports and recommendations - Provide data for the evaluations 	Participate in all stages of an evaluation, approving all related documents
Scientific Evaluation Committees	One per Operational Programme/evaluation	One per evaluation/ theme Members: academics and evaluation specialists in the field	Checking: <ul style="list-style-type: none"> - Evaluability of evaluation themes - Adequacy of methodology - data robustness used in evaluation - quality of analysis - impartiality of conclusions 	Support the evaluation offices and ESC in quality assurance of: <ul style="list-style-type: none"> - evaluation ToRs, - proposed evaluation methodology, - evaluation reports at various stages
External evaluators (private sector)	National/external	Concentrated market (4-5 companies)	<ul style="list-style-type: none"> - Bidding for evaluation contracts - Data collection - Interaction with main stakeholders - Developing evaluation reports 	Perform evaluations (Collect and interpret data collected, according to an agreed methodology Develop Evaluation Reports)

Source: Authors.

All Romanian OPs are developed and managed at national level. Although implemented at regional level, this is done through Intermediate Bodies (IB), based on Delegation Agreements, while the final responsibility remains with the respective Managing Authority. The **evaluation is done at national level**, fully centralised. The IBs are participating in the evaluation as main data providers. Their representatives also participate in the ESC – Evaluation Steering Committees, with veto rights (ROP), making comments and recommendations for the evaluation reports.

Starting with the next programming period, there is a proposal to set up decentralised Managing Authorities for the implementation of 8 Regional Operational Programmes.

Figure A.33 Governance of Cohesion Policy evaluation in Romania

Source: Authors.

Main evaluation arrangements in Romania for 2014-2020

Evaluation of Cohesion Policy in Romania is structured in two tiers:

- ┌ The evaluation of the Partnership Agreement (PA) and
- ┌ The evaluation of the OPs funded by ESIF.

The evaluations are based on **Multannual Evaluation Plans** developed during the ex-ante evaluations of the PA and the OPs. While the PA Evaluation Plan includes evaluation themes regarding the effects at the macro level and the system horizontal aspects, the evaluation plans at OP level address issues related to the specific objectives of the programmes. An Evaluation Plan covers several topics: the organisation of the evaluation function for the respective PA/OP, a needs analysis in terms of evaluation expertise, the proposed evaluation budget for each of the evaluation themes, a

dissemination plan, a monitoring plan of the implementation of the evaluation recommendations, the logic of intervention of the PA/OP, a proposed evaluation methodology.

The evaluation plan for PA was developed and approved within the Coordination Committee for the Management of the Partnership Agreement (CCMPA). Five evaluation themes are included in the PA Evaluation Plan: A - contribution to economic, social and territorial cohesion; B - relevance of development needs, the achievement of the TOs and country-specific recommendations; C – horizontal principles enforcement; D – ESIF mechanisms and implementation capacity; E – progress of Performance framework indicators.

The evaluations of the OPs, based on Multiannual Evaluation Plans, are organised on evaluation themes that cover the specific objectives of the programmes, plus a summary of the evaluations. In some cases, several specific objectives are grouped within an evaluation theme, based on the similarity of interventions, target groups or expected outcomes. The evaluation plans for the OPs were developed by the responsible evaluation offices and approved in the Monitoring Committee (MC) of the respective operational programme.

A Functional Working Group (FWG) for Performance Evaluation, established inside the CCMPA and coordinated by the Office for Programmes Evaluation inside MEF covers topics related to the evaluation of Cohesion Policy, undertaking a strategic management role.

Starting from the 2014-2020 programming period, a **national centralised, unified IT system for data collection and monitoring** has been put into place: SMIS2014+/MySmis2014⁹⁶. The system is still under development; not all modules are fully functional. SMIS2014+ is the management system for the authorities, while MySmis2014 is the system for the beneficiaries of funds. SMIS2014+ covers all OPs funded from ERDF, ESF and Cohesion fund, except for the OPs for European Territorial Cooperation, which have their management system e-Ms, allowing fully online operations.

When fully operational, SMIS2014+ will be extremely useful for evaluations, in providing quantitative data from monitoring for the OPs under evaluation: financial data, indicators achieved, target groups data.

Evaluations are launched according to the calendar set in the respective evaluation plans. Usually, there are big contracts for amounts that require complex procurement procedures. Generally, the evaluation procedures are delayed compared to the schedule in the evaluation plans, mainly as a result of procurement issues: need to adjust the Terms of Reference according to recommendations of the National Agency for Procurement; extended assessments of the received offers, due to complex requirements in the ToRs; frequent complaints of the rejected tenderers. Delays can take up to one year and even more if the tenderers go to court. These huge postponements may cause problems due to availability of evaluation experts; availability of data providers, since sometimes, several evaluations take place at the same time; relevance of evaluation results, as some of the issues revealed by the evaluations may have already been solved, or the need for the results is not so sharp/important any longer if certain decision time moments have been exceeded.

These comments are valid for all evaluations and all offices for evaluations, as they all have to observe the same complex procurement rules. As the evaluation planning is following an implementation calendar, which is rather similar for all OPs in terms of timing, usually several important evaluation contracts are launched at about the same time, which puts high pressure on the supply side. Later, during the implementation phase, several somewhat similar requests for data provision will be

⁹⁶ SMIS - Single Management Information System.

launched for the various data providers – authorities involved in the implementation, project beneficiaries, final beneficiaries, which will put more pressure on the evaluations' deadlines.

Usually, an evaluation report should⁹⁷ be accompanied by an Implementation plan, where, for each recommendation, a priority, a deadline and an assigned responsibility will be indicated and agreed upon with the evaluation contractor. These will be followed up by the respective MAs, during the annual meetings of the Evaluation Steering Committees and in the Functional Working Group for Performance Evaluation.

Comparative analysis with the 2007-13 programming period and main factors underlying current arrangements

Main changes compared to 2007-13

During the 2007-2013 programming period, the evaluation arrangements were slightly different compared to 2014-2020, as all the OPs evaluations were planned, contracted, managed and implemented by evaluation units established inside the respective MAs. Although not explicitly requested by the legal framework on structural instruments, the evaluation units were also developing evaluation plans approved by the respective MCs. Evaluation plans have been developed both for the National Strategic Reference Framework (NSRF) and for the OPs 2007-2013, as guidelines for the evaluation activities during the programming period. As planning ahead of evaluations was considered difficult, the evaluation plans allowed for ad-hoc evaluations, when an evaluation was asked for by the MC due to poor performance of programme indicators, or when the OP modification was needed.

A Central Evaluation Unit, established in the Authority for Coordination of Structural Instruments (ACIS) in the Ministry of Finance, had responsibilities in the evaluation of the NSRF and the OPTA and in coordinating the evaluation of Structural Instruments and the development of evaluation capacity in the system. Under the current programming period, these responsibilities have been transferred to the Programme Evaluation Office in the MEF, together with part of the staff.

Several institutional changes, including establishing a Ministry for European Funds, also generated changes in the evaluation approach. The current institutional arrangement for Cohesion funds evaluation has been established starting with the 2014-2020 programming period. The newly established Programme Evaluation Office took over the evaluation responsibilities of some of the evaluation units of the OPs whose MAs have been moved under MEF. Not all persons involved in programme evaluation from the OPs evaluation units continued to work in the newly established evaluation office, although they participated in various training programmes and managed to gain knowledge and expertise in programme evaluation.

The difference in evaluations approach between 2007-2013 and 2014-2020 consists mainly **in the number of evaluations planned and in a more focused approach on results and impacts**, compared to the process evaluations performed during the previous period, focussed on implementation⁹⁸.

Another difference is the **financial allocation for evaluations**, more realistic and adequate to the expected results. Taking into account the experience of 2007-2013 related to the high level of administrative burden in the management of evaluation contracts, it was recommended to use lump-sum contracts, based on deliverables, and not fee-based contracts which needed Timesheet-based

⁹⁷ The evaluation reports for ROP did not request for an Implementation plan of the recommendations.

⁹⁸ Guidance Document on Evaluation Plans, Monitoring and evaluation of European Cohesion Policy, The programming period 2014-2020, page 3.

reporting. In addition, to reducing the administrative burden, the first variant of contract offers greater flexibility in implementation, and it reduces the amount of paperwork related to the administration of experts input.

A **national centralised, unified IT system for data collection and monitoring** - SMIS, was functional during 2007-2013 programming period, but it had limited functions, serving mainly as a storage and tracking system, used by the authorities, with no link with the project promoters. The OP for Human Resources Development had its management information system – ActionWeb, which also communicated with the project promoters. These systems were totally replaced with the new SMIS2014+/MySmis 2014, which is meant to be fully integrated and covering all OPs funded from ERDF, CF and SF, except for the CTE OPs, which have their own management system: e-MS.

- J There are **no obvious differences in evaluating ERDF/CF and ESF**, especially since the Programmes Evaluation Office in MEF is managing evaluations for OPs funded from all 3 funds. During 2007-2013⁹⁹ and for almost one year in the 2014-2020 period¹⁰⁰, all evaluations were coordinated by the same ministry/evaluation unit for all types of funds.
- J As regards **YEI/Youth Guarantee evaluations**, the only difference was in the requirement of Article 19(6) of the ESF Regulation which obligates Member States to conduct at least two evaluations which will assess the effectiveness, efficiency and impact of Youth Employment Initiative: *The first evaluation to be completed by 31 December 2015 and the second evaluation by 31 December 2018*¹⁰¹. Both evaluations have been completed for Romania.

Potential causes of the observed changes and main determinant of current arrangements

- J **Main changes regarding evaluations in Romania** between 2007-2013 and 2014-2020 programming periods were **generated by the changes of EU regulations** in the field and the national institutional changes regarding the management of ESI funds, as highlighted at 1.3.a.
- J Representatives of the Evaluation offices in Romania have participated in the European evaluation network, which they find useful as a forum for sharing the latest news in the field. They have also benefited from the Evaluation Helpdesk training. They have asked for support regarding the impact evaluations, but the reply came slow, after 6 months.
- J **No perceived changes have been registered in the use of the evaluation findings either.** The results of the 2007-2013 evaluations have been used mainly in subsequent evaluations and for programming purposes. The changes in the institutional framework and organisation of management structures of ESIF (useful or less useful) cannot be attributed to the evaluations, as the said changes were driven mainly by political reasons. On the other hand, as the 2007-2013 evaluations were mainly focused on processes and implementation issues, the changing needs were already perceived by the MAs and were implemented due to pressure from the project promoters to speed up the implementation and the need for higher absorption of EU funds.

Overall assessment of the organisation of Cohesion Policy evaluation in Romania

Since its joining of the EU in 2007, Romania evaluation of Cohesion Funds has followed the guidelines of the European Commission and the provisions in the regulations for the respective funds.

⁹⁹ MEF has been established as coordinator of the implementation and management of structural instruments 2007-2013 starting with July 2015, GD 398/2015.

¹⁰⁰ Between January 2017 – GEO 1/2017 and January 2018 – GEO 1/2018, MEF was merged with MRDPA.

¹⁰¹ Guidance on evaluation of the youth employment initiative.

The only **perceived change in the organisation, compared to 2007-2013**, was the **move of the Central Evaluation Unit inside the MEF with responsibilities in the evaluation of the OPs managed by MEF and in coordinating the ESIF evaluations**. This move led to less influence towards the other office evaluation units inside the MPWAD. This change also resulted in less involvement and interest in the evaluations from the MAs in the MEF, which participate in the evaluations only as data providers and, eventually, beneficiaries of the evaluation reports recommendations.

Although the office for programmes evaluation in MEF has been assigned a **coordinating role**, in the current arrangements, **this role is not fully operational**. The offices for evaluation in MPWDA have no responsibility towards the office in MEF, and they organise and manage their evaluations according to their internal regulations.

The current organisation is far from being ideal and, due to the last changes in the institutional framework, it is **prone to further modifications**.

The use of the evaluation findings is limited to the subsequent evaluations and programming purposes.

A.5.6.3 Analysis of planned and conducted evaluations and their contribution to policy-making

Main characteristics of the evaluations carried out in Romania

Scope of evaluations

Evaluations planned for the 2014-2020 programming period are performed according to the Evaluation plans developed and approved for each OP, including the Evaluation of the PA 2014-2020. In total, 9 Evaluation plans have been developed in Romania, 8 for the 8 OPs funded from CP funds: OPHC, OPC, OPLI, OPTA, ROP, OPAC, Interreg Va Ro-Bg and Interreg Va Ro-Hu and 1 Evaluation plan for the PA.

Each Evaluation plan recommends a variable number and type of evaluation reports, taking into consideration the complexity of the respective OP and the number of Specific objectives (SO), as stated by Art. 56 of the CPR, according to which *"at least once during the programming period, an evaluation shall assess how support from the ESI Funds has contributed to the objectives for each priority"*. The ex-ante evaluations have not been included in the Evaluation plans. A synthetic situation of the OPs evaluations is presented in Table A.17.

Table A.17. The situation of Romanian OPs' evaluations in December 2019

OP	Fund	Evaluation Themes	Evaluation Reports	N°. of Evaluations Planned	Timing	State of Play
OPHC	ESF	21+ synthesis	25	4 restricted tenders for each sector: Employment; Social inclusion; Education; Technical support	2018-2019 & 2022-2023	2 finalised 7 evaluation reports in implementation 8 evaluation reports in the procurement process
OPC	ERDF	8+ synthesis	7	2	2019 & 2023	0 finalised

OP	Fund	Evaluation Themes	Evaluation Reports	N°. of Evaluations Planned	Timing	State of Play
						the reports planned for 2019 are delayed ¹⁰² 4 evaluation reports in procurement process
OPLI	ERDF/CF	14+ synthesis	8 3 transport, 3 environment 2 energy	3 procedures	2017, 2019 & 2023	1 evaluation finalised with 6 evaluation themes/reports <i>2 evaluation reports in implementation</i> 6 evaluation reports in procurement process
OPTA	ERDF	6 (grouped in 3 evaluations)	16 4 reports themes 1 & 2, 12 evaluation reports themes 3-6	1 contract	Theme 1&2 2017, 2019, 2021, 2023 Theme 3-6 2017, 2019	0 finalised No evaluation has been performed so far due to difficulties in procurement <i>4 evaluation reports in implementation</i>
ROP	ERDF	16 including ex-ante for 2021-2027	47	Several framework contracts	11 themes 2019, 2021 & 2022	17 evaluations 11 evaluation studies corresponding to 11 themes of ROP 2014-2020 1 evaluation of implementation system 6 impact evaluation reports of ROP 2007-2013 <i>1 evaluation report in implementation</i>
OPAC	ERDF	10+ synthesis	30	N/A	10 themes 2019, 2020 & 2022 Synthesis 2020 & 2022	0 finalised <i>9 evaluation reports in implementation</i>
Interreg Va Ro-Bg	ERDF	4	4	1	October 2018 – April 2019 April – October 2019	0 finalised <i>1 evaluation with 4 evaluation reports in implementation</i>
Interreg Va Ro-Hu	ERDF	4	4	4		1 finalised On communication strategy
PA	ERDF	5	14			0 finalised <i>1 report in implementation</i> 9 reports in procurement process
Total	ERDF, CF and ESF	N/A	143 evaluation reports	N/A	N/A	21 evaluation reports finalised 28 evaluation reports in implementation 27 evaluation reports in procurement process

¹⁰² OPC Annual Implementation Report for 2018.

- J The low number of evaluations recorded for Romania in the EC database does not include the latest data available¹⁰³. As highlighted in Table A.17, **21 evaluations have been finalised until December 2019**, while another 28 evaluation reports are under implementation. Out of the 28 reports in implementation, 8 reports are finalised (7 for OPHC – ESF and 1 for ROP – ERDF), waiting for the final approval of the respective ESCs. Another issue in counting the evaluation reports is related to the organisation of evaluation contracts. Thus, an evaluation contract may cover several evaluation reports, each report evaluating a SO or of a group of SOs, based on the similarity of interventions, target groups or intended results. This choice is up to the evaluation offices in each ministry – MEF/MPWDA on how to report accomplished evaluations.
- J Regarding the themes of evaluations, they notably covered TO 1, 3, 4, 6, 7, 8, 9, 10 and 11.

Types of evaluations

- J The evaluations during the 2007-2013 period have been focused more on implementation and processes.
- J The types of evaluations in Romania in the **2014-2020 programming period are described in the evaluation plans and follow the recommendations in the CPR**. The evaluation plans for 2014-2020 period include evaluations aiming at improving the quality of the design and implementation of programmes, as well as evaluations that will assess the effectiveness, efficiency and impact (CPR art. 54 (1)). Evaluations planned for 2014-2020 contain a **mix of assessment types, focusing on monitoring of performance indicators** (e.g. PA, OPs ETC), on **processes and on how the interventions are implemented on the ground**. There are also **planned result/impact-oriented evaluations**, looking for the effects that can be linked to the intervention – e.g. OPHC, OPC, OPAC, OP ETC evaluations. The main 11 evaluation themes of ROP evaluation plan are all impact evaluations.
- J Evaluation plans for 2014-2020 are intended to determine if the changes registered in the target groups are due to the OP intervention if the results are sustainable (e.g. OPHC, OPC, ROP), what other intended or unintended effects have been registered. There are also evaluation questions directed to the implementation mechanisms and context and the subsequent influence on the interventions - e.g. OPHC, OPC, OPLI, ROP, OPAC evaluations. The evaluation questions are also looking to identify best practices and ways to improve the OPs implementation – OPC, OPTA.

Methodological approach

- J The Methodological approach of the planned evaluations is correlated with the type of evaluations and the evaluation questions in the evaluation plans. **Methodology is based on quantitative and qualitative methods**, according to the availability of data and intended results.
- J As regards quantitative methods, surveys and counterfactual evaluations are the most common methods, also recommended in the evaluation plans.
- J When the evaluation proposed is an impact evaluation, the suggested evaluation methods are either Counterfactual Impact Evaluation (CIE) or Theory-Based Impact Evaluation (TBIE). For a

¹⁰³ Hence figures available for other case studies are not included for Romania. Indeed, only 3 evaluations have been recorded in the European Commission/Evaluation Helpdesk by December 2019, leading to statistics that cannot be interpreted.

CIE, there is always the difficulty in finding a control group. CIE is indicated as an impact evaluation methodology for evaluations in ROP, OPLI, OPHC, OPC.

- J For the more complex OPs (e.g. OPLI), meta-evaluation and modelling techniques may be required. GIS may be requested to allow for spatial representativity of interventions. Cost-benefit analysis is used if considered necessary.
- J As regards the qualitative methods, interviews, focus groups, case studies, Expert panels and Delphi surveys are the most common instruments suggested and used in the evaluations, sometimes based on sampling methods to allow for representativity. Validation workshops may be used to present the findings to the main stakeholders before developing the conclusions and recommendations of the evaluation reports.

Generally, there is a pre-requisite methodological approach in the ToRs of the evaluations and a methodology with recommended tools and methods for data collection and processing. The evaluators may propose new evaluation methods in their offers if they consider necessary, but these add up to the methods already recommended in the ToRs. There is a tendency to propose many evaluation methods to score higher in the proposal assessment. Sometimes, additional points are awarded for “innovative” or supplementary evaluations methods. One evaluation had as assessment factors for the offers the number of proposed evaluation methods, so the more instruments were proposed, the higher the score received. This proved to be most inappropriate in implementation, as it added up bulk to the evaluation reports, without any value-added.

Overall assessment of conducted evaluations in Romania

For the time being, there is **not much difference between the evaluations performed during 2007-2013 and the evaluations for the 2014-2020 financial period**, mainly because the evaluations for 2014-2020 have just started and factors affecting the evaluations for the previous programming period are still valid.

Delays due to procurement issues generated by the complexity of ToRs for evaluations; big contracts for high amounts of money and covering long periods (5-6 years), attracting many competing companies and/or consortia. These are generating lengthy periods between launching the tender and awarding and signing the contracts, at least over one year.

The inflexibility of the evaluations ToRs is generating frustration with the evaluators and sometimes leads to low-quality reports due to unavailability of data and/or to inappropriate research methods/tools. . Despite Terms of References allow for so-called innovative methods, these may only be added to the methods already imposed, inside the same timing and financial conditions.

On the other hand, once the evaluation starts and the Inception Report is approved, the evaluators are faced with the lack of interest, both from the MAs, IBs and line ministries, and from the project beneficiaries, in participating in the interviews, focus groups, surveys and other types of data collection instruments, and in providing data for the evaluations.

The **inadequate evaluation capacity, both at the level of authorities involved in evaluations and at the level of evaluators adds up to the lack of interest in evaluations** and a rather low level of the evaluation reports.

Insufficient or inadequate dissemination of evaluations’ results contributes to the lack of interest of all stakeholders involved in the evaluation process.

Evidence on the use of evaluation findings in Romania

There is **limited evidence on the use of the evaluation findings in Romania**. Usually, every new evaluation will make reference to the previous evaluations of the respective OP, either to further justify its findings or to comment on any actions which have been taken/or not as a consequence of the recommendations in the cited evaluation. One of the reasons for the poor use of the evaluation results was considered to be the timing of the evaluations, which caused the results to arrive too late for the intended purposes. Also, for the evaluation to be useful, these should be linked to the various stages of the programming period, so that the recommendations may be adopted and serve to the required adjustment of the programme evaluated.

Other than that, the results of the evaluations are not followed up, nor used in the decision-making process. This statement is a general opinion, shared by both the evaluation offices and the evaluators. There is also a predisposition not to give attention to evaluating past interventions and derive lessons learned, but to focus on what is coming up next.

-) The **results of the 2007-2013 evaluations have been used mainly in subsequent evaluations** and for **programming purposes**. The changes in the institutional framework and organisation of management structures of ESIF (useful or less useful) cannot be attributed to the evaluations, as the said changes were driven mainly by political reasons. On the other hand, as the 2007-2013 evaluations were mainly focused on **processes and implementation issues**, the changing needs were already perceived by the MAs, and these were nevertheless implemented, due to pressure from the project promoters to streamline the implementation and the need for higher absorption of EU funds

A.5.6.4 Conclusions, lessons learnt and recommendations

Box A.10 SWOT analysis of Cohesion Policy evaluation in Romania

STRENGTHS	WEAKNESSES
<p>Good history of evaluation process, starting with the Phare programme</p> <p>A small core of private companies participating in CP evaluations, ensuring continuity</p> <p>Academics participate in evaluations, as evaluators and/or members of Scientific Committees</p> <p>Small number of Evaluation Units, allowing for a standardised approach</p> <p>Independent evaluation unit in MEF, outside of the MAs influence</p> <p>Independent evaluation unit in MEF coordinating the National multiannual evaluation plan</p> <p>A broad palette of evaluation methods applied in CP evaluations</p> <p>An online public library of CP evaluations</p> <p>A unified national data collection system for Monitoring CP</p> <p>Evaluations are based on Multiannual evaluation plans</p>	<p>No national evaluation culture</p> <p>No national policy on evaluation</p> <p>No national evaluation network</p> <p>No established group of evaluators</p> <p>Monitoring Committees not very interested in evaluations and follow-up of the recommendations</p> <p>Rigid, centralised evaluation process</p> <p>No regional evaluation units</p> <p>Low no. of independent experts specialised in evaluations</p> <p>The unified national data collection system for Monitoring CP not fully operational</p> <p>Not enough expertise regarding evaluation inside main decision-makers for evaluation: MEF, MPWPA, MAs</p>
OPPORTUNITIES	THREATS
<p>EU Policy on the evaluation of Cohesion Policy</p> <p>The end of the current funding period, the beginning of the new funding period, generating a high demand for ex-post, impact, ex-ante evaluations</p> <p>Technical Assistance funds for Programme evaluation</p> <p>A Master's Degree programme on Evaluation of EU Programmes and Policies – NSPSA</p> <p>Demand for expertise in Programme Evaluation</p>	<p>Policy Decision making is not based on results of CP evaluations, lessening the value of the recommendations</p> <p>The institutional framework governing the evaluation of CP is continuously changing, creating instability, loss of institutional memory and lack of confidence</p> <p>The procurement law is creating big delays in awarding contracts, affecting the value of the CP evaluations results</p> <p>Not enough expertise regarding evaluation inside ANAP, generating delays in contracting</p> <p>Due to problems in contracting and implementation, some companies do not participate any more in evaluation contracts</p>

Following the discussions with the stakeholders – members of the evaluation offices, evaluators proposed several conclusions and recommendations which were disclosed, with the purpose of improving the evaluation of Cohesion Policy in Romania and to lend more weight to the evaluation findings and results. For more clarity, these have been summarised according to several issues.

The institutional framework and evaluation capacity

There is still a **debate on institutional arrangements**, on what model serves best: several evaluation units inside MAs vs one Central evaluation unit.

During the discussions with representatives of the authorities and of the evaluators, it transpired that it would be **more efficient and effective to have separate evaluation units** (one for each OP), for several reasons: improved evaluation capacity, better knowledge of the evaluated OP and implementation issues, better involvement and ownership of the MAs and, finally, higher-quality evaluations. There is still a need for a **Central Evaluation Unit** (CEU) with more of a coordination role, to guide the development of the Evaluation plans and TORs for evaluations, to provide a framework for a quality check and for the dissemination of evaluation findings. The same CEU may be also in charge with the assessment of training needs and capacity development for the members of the evaluation units and some of the main stakeholders and with the design and coordination of a national evaluation network, which could put together authorities, practitioners, academics and other entities with an interest in the use of evaluations results.

Capacity development of the evaluation units is still needed, especially if there will be more evaluation units established, e.g. for the evaluation of the Regional OPs in the next Programming period.

The evaluation units should be in close contact with the respective MAs, where there is a need for understanding the evaluation needs and benefits, for support during the data collection and later on when disseminating the results and following up on the implementation of the recommendations.

There is a **strong perceived need for an Evaluators Network (RER) to be established**, consolidated and ensured sustainability.

Evaluation capacity needs to be developed not only at the level of the units responsible with the evaluation in the respective authorities/MAs but also at the level of the rest of the stakeholders involved in various stages of the evaluation process: Evaluation Steering Committees, Monitoring Committees, social partners, political decision-makers. Even the project promoters need to be informed on the benefits of the evaluations and encouraged to perform evaluations of their projects, especially for big, strategic ones. Doing so may also improve their participation and willingness in the data collection process during the implementation of the evaluations.

A.5.6.5 Calendar and type of evaluations

All stakeholders interviewed were **supporting the idea of having several smaller evaluations compared to few big evaluations**. This idea could allow for evaluation capacity development and for building an evaluation culture. Smaller and more frequent evaluations would encourage smaller companies to tender and would considerably reduce the number of complaints. Another benefit of smaller and more frequent evaluations would be an increase in the number and professional expertise of evaluators.

Timing of evaluations, linked to various stages in the Programme Cycle Management, would increase the relevance of the evaluation findings and improve the use of evaluations and, ultimately, contribute to the culture enhancement of evaluation.

During the interviews, both with evaluators and their contracting side, it came up the necessity for more diverse and flexible evaluation requirements, to allow for innovation and creativity from the evaluation team. Rigid ToRs with an imposed methodological approach are not always feasible or compatible with reality in the field and may lead to unrealistic results.

Data collection for the evaluations

Preparation of data for the evaluations needs to start with the programming of the OP and development of indicators which will allow for monitoring and evaluating the OP.

There is a need for the authorities (MEF/MPWDA) to arrange for Agreements with the national data providers (national statistics, line ministries, R&D institutes) to allow for data providing according to the evaluation needs, in terms of timing and level of detail.

Use of evaluation results and awareness of evaluations benefits

There is a **need for more attention being paid to the format of the evaluation reports**: shorter, clearer, to the point, accessible for all stakeholders. Clear links between findings, conclusions and recommendations may help in understanding and justifying the final recommendations and the deadlines and responsibilities.

For a better understanding and appropriation, **the results of the evaluation need to be publicised according to the target audience**:

-)] MAs – very technical and precise.
-)] MCs – according to social partners interests.
-)] Policy decision level – concise, precise and linked to impacts
-)] Academics and research institutes – technical and results-oriented.
-)] General Public – focus on impacts, visual.

Last, but most important, there is a strong need to enforce a tracking mechanism of the implementation of recommendations. This action would help not only follow which recommendations have been undertaken but also to understand why some have not been implemented. Lessons learned could be derived, which could help with a better formulation of the recommendations or with the need for previous rounds of discussions on opportunity, responsibilities and realistic deadlines.

A.5.6.6 ANNEX

*Summary of the characteristics of the Romanian case***Table A.18. Checklist summarising the Romanian case study**

Item	Check (Yes/No)
Are there national legal requirements on evaluation to which CP evaluation is subject?	NO
Is(Are) there autonomous national/regional agency(ies) dedicated to evaluation?	NO
Are there independent Evaluation Units outside the Managing Authorities? (Yes: outside the MA, No: evaluation units are within the MA)	YES/NO ¹⁰⁴
Are academic evaluators involved in CP evaluations?	YES
Does a permanent and open list of evaluation experts exist?	NO
Are Framework contracts used to conduct evaluations (externalised to private or academic consultants)?	YES
Has the role of Monitoring Committees been strengthened in the country between 2007-13 and 2014-20?	YES
Is there a unified national data collection system to Monitoring CP? (VS: different monitoring systems depending on regions)	YES ¹⁰⁵
Is there systematic support to evaluation provided by the authorities at the national/regional level?	YES ¹⁰⁶
Is there a national database of CP evaluations?	YES
Is there a formal system to track whether evaluation findings are followed up?	YES ¹⁰⁷
Is there a single national evaluation plan?	NO
Are there regional evaluation plans?	NO
Are there major differences between regions for the organisation of CP evaluations? (governance, practices)	N/A
Are there major differences by fund for the organisation of CP evaluations? (governance, practices)	NO
Are evaluations typically large-scale and few in number?	YES
Are evaluations typically small-scale and high in number?	NO
Are specific methods of evaluation promoted by regional or national authorities?	YES ¹⁰⁸
Has the methodological quality of evaluations improved between 2007-13 and 2014-20?	YES
Are there major differences in the scope and methods of evaluations by region?	N/A
Are there major differences in the scope and methods of evaluations by fund?	NO
Are evaluations typically carried out with timing that allows them to inform policy-making decisions?	NO
Are evaluation reports from 2007-13 cited in national/regional policy documents for 2014-20?	YES ¹⁰⁹
Overall, are CP evaluations an important influence on policy-making decisions in the country?	NO ¹¹⁰
Are there major differences in the use of evaluations by region?	N/A
Are there major differences in the use of evaluations by fund?	NO

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¹⁰⁴ One evaluation unit is set outside the MAs, but not fully independent, as this is a structure inside a Ministry – MEF, which is also hosting the MAs; other evaluation units are set inside of the respective MAs (ROP and OP ETC).

¹⁰⁵ Except for OP ETC, which have their own management system: e-MS.

¹⁰⁶ There is support provided by the authorities, but it is not “systematic”, it is “by demand”.

¹⁰⁷ There is a system, but not formalised; MCs and ESCs are following up on recommendations from evaluations.

¹⁰⁸ In line with EU Evaluation guidance.

¹⁰⁹ Mainly for decisions related to ESIF management and allocation.

¹¹⁰ Only if related to ESIF management & allocation.

¹¹¹ All websites for the 2014-2020 OP have been consulted during December 2019.

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List of interviews

-) Head of Office for Programme evaluation, Compartment for Evaluation of Social Cohesion Programs and Policies, MEF.
-) BEPOR, Office for ROP evaluation, in MPWPA.
-) BEPOR, Office for ROP evaluation, in MPWPA.
-) Evaluator & manager of Qures Quality Research and Support SRL, a Romanian company with a long history in programme evaluation.
-) Senior manager Ernst & Young Romania, Team leader for OPTA evaluation, Key expert for OPHC evaluation of Employment interventions, Key expert for the TA project for evaluation capacity building, where RER is part of the project.

- J Directorate for Coordinating Policies and Priorities. The Directorate is part of the Secretary General of Romanian Government, with a mission to improve the system of policy development, coordination and planning at central public administration.

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This study analyses the role of evaluation in Cohesion Policy, with a focus on the 2014–2020 programming period. It presents and assesses the EU rules shaping evaluations and their implementation at the EU and Member State levels. Based on this evidence, it discusses possible options for the post–2020 period.

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