

# Simplifying European Structural and Investment Funds for Social Service Providers

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This publication has been commissioned by EASPD.



This publication has been produced with the financial support of the Progress Programme of the European Union. The contents of this publication are the sole responsibility of EASPD and can in no way be taken to reflect the views of the European Commission.

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## **Table of Content**

Abstract

Chapter 1. Introduction ----- Pp 5

Chapter 2. Findings ----- Pp 7

A. Operational Programmes ----- Pp 8

B. Information and Communication ----- Pp 11

C. Funding Opportunities ----- Pp 13

D. Implementation and Reporting ----- Pp 16

Chapter 3. Recommendations ----- Pp 19

Annex – List of contributors ----- Pp 21

## **Abstract**

Social service providers and other civil society stakeholders throughout Europe are important beneficiaries of the European Structural and Investment Funds (ESIF). Yet in many countries, due to the somewhat complex nature of its procedures, these funds do not get sufficiently picked up by the sector. The European Association of Service providers for Persons with Disabilities (EASPD) has commissioned a study to examine the main barriers for social service providers to access ESIF and to develop an overall better understanding of the administrative burden for beneficiaries of ESIF.

The study has collated input from social / disability service providers in Austria, Bulgaria, Finland, France, Greece, Hungary, Malta, Romania, Slovakia and Spain (Basque Country and Catalonia). A first outcome of the research is that significant progress in terms of simplification is already visible in several countries. Good practices have been identified with regard to the involvement of stakeholders in Operational Programme (OP) design, the quality of information on ESIF, the accessibility and support of managing authorities to (potential) applicants, and the clarity of procedures regarding concrete funding opportunities.

A second outcome is that all interlocutors identify one common challenge: the current set-up of the ESIF does not facilitate (sufficiently) the involvement of smaller organisations as (potential) applicants and (potential) beneficiaries of Structural Funding. Their participation was not easy in the previous programming period 2007-2013 and again the current programming period 2014-2020 seems to maintain a focus on bigger projects run by sizeable organisations with previous experience in EU funded projects.

In terms of ESIF uptake, the social service providers therefore have one key recommendation: enhance access of small private not-for-profit organisations to structural and investment funds. This recommendation can be broken down in ten specific action points covering different phases of the programme cycle and contributing to an overall simplification of ESIF procedures. Realising these suggestions seems feasible, as several elements are already implemented in some countries, and will contribute to a more equal participation of smaller organisations in ESIF.

# Chapter 1. Introduction

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Social service providers and other civil society stakeholders throughout Europe are important beneficiaries of the European Structural and Investment Funds (ESIF). Yet in many countries, due to the somewhat complex nature of its procedures, these funds do not get sufficiently picked up by the sector. The European Association of Service providers for Persons with Disabilities (EASPD) is a non-profit European umbrella organization representing over 11.000 social and health services for persons with disabilities. It advocates effective and high-quality disability-related services in the field of education, employment and individualised support, in line with the UN CRPD principles.

Several members of EASPD have been / are beneficiaries of Structural Fund programmes in their country or region, or intend to apply for project funding under the current ESIF programming period 2014-2020. However, these non-governmental not-for-profit organisations have been signalling to EASPD that access to ESIF and compliance with its requirements are often complex, even to the extent that they consider it discouraging to apply and benefit meaningfully from ESIF.

Following the reported concern and in view of contributing to the High Level Group of Independent Experts on Monitoring Simplification for Beneficiaries of ESIF, EASPD has commissioned a study to examine the main barriers for social service providers to access ESIF and to develop an overall better understanding of the administrative burden for beneficiaries of ESIF. In particular, this study identifies existing good practices of simplification by Member States and regions, analyses the key challenges for social service providers in accessing ESIF, and suggests actions to improve the uptake of ESIF by social service providers throughout Europe.

In this respect, the study very much follows the tasks set by the EC for the above-mentioned High Level Group, which shall: (i) assess the uptake of simplification opportunities by Member States, and their commitments to reduce the administrative burden for beneficiaries; (ii) analyse the implementation of simplification opportunities in Member States; (iii) identify good practice regarding reduction of administrative burden on beneficiaries; and (iv) make recommendations to improve uptake of simplification measures for 2014-2020.

The study has been carried out following a bottom-up approach. After the announcement by EASPD among its network that it envisaged a study on the simplification of ESIF, several members (see the

list in Annex) expressed an interest in contributing to the research. A second step consisted in mapping the specific expertise and involvement of these disability service providers in EU Structural Fund programmes during the current and previous programming period, and led to identifying a dozen respondents with specific expertise and a broad view on ESIF uptake in their country / region.

Together with EASPD, the researcher then designed a questionnaire for structured telephone interviews with the identified respondents. The questionnaire was organised along six phases of the ESIF programme cycle and aimed to identify for each phase good practices, challenges and suggestions for improvement. The outcome of these interviews constitutes the main source of information for the next chapter on Findings.

All interlocutors mentioned one common challenge – the limited involvement of smaller organisations as (potential) applicants and (potential) beneficiaries of Structural Funding. A detailed analysis of the interview feedback, moreover, led to identifying several action points that would enhance access to ESIF funds for social service providers. Finally, these action points have been submitted for comments and validation to all interviewees and other members who had expressed interest in the study. The validated action points are reported in the third and final chapter on Recommendations.

This particular bottom-up approach leads to a specific type of findings and conclusions: concrete elements, both positive and challenging, that belong to the day-to-day reality of non-governmental not-for-profit organisations providing social services to persons with disabilities. The findings moreover concern procedures and requirements that allow social service providers to participate in EU funded programmes under ESIF, not the contents or substance of the interventions undertaken in the framework of Structural Fund programmes.

This report explicitly does not aim to ‘blame and shame’ the system at European, national or regional level nor the services in charge of managing ESIF programmes throughout the EU. On the contrary, it wants to use the opportunity offered by the EU through the creation of the High Level Group to identify challenges and issue suggestions for improvement of the system, whilst at the same time pointing to existing good practices.

Finally, the study is representative for the disability service providing sector within the EU collating input from members in Austria, Bulgaria, Finland, France, Greece, Hungary, Malta, Romania, Slovakia

and Spain (Basque Country and Catalonia): however, it is not entirely comprehensive in terms of geographical coverage or ESIF type. Across Europe, disability service providers are involved in ESIF to a very different extent and their uptake of ESIF so far focuses mainly on the European Social Fund. All interviewees have experience with the European Social Fund, while only a few respondents have been involved in ERDF. The study therefore does not draw conclusions that are valid across all ESIF, member states or Operational Programmes (OP) but rather points to situations that apply to several countries and regions and that either have improved over time or still continue to hinder access to ESIF for beneficiaries.

## Chapter 2. Findings

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In order to develop a better understanding of the key issues that enhance or jeopardise the uptake of ESIF by social service providers, the researcher interviewed a dozen representatives from private not-for-profit disability service provider organisations across Europe who are or have been involved with ESIF programmes and projects. The outcome of the interviews constitutes the main source of information for this chapter, which also takes on board some of the materials provided by interested interlocutors during the preparatory phase of the study.

The interview was structured around six stages of the ESIF programme cycle: (i) OP development; (ii) launch of Calls and requirements for participation; (iii) application and selection of projects; (iv) contracting and implementation; (v) reporting and payment; (vi) OP monitoring & evaluation. For each stage, three types of information have been collected: examples of good practice; problems experienced when (attempting to) working with ESIF; and suggestions to overcome problems and improve access to ESIF.

In this chapter, the findings are presented around four clusters: Operational Programmes; Information and Communication; Funding Opportunities; and Implementation and Reporting.

## **A. Operational Programmes**

*Have you been involved in the discussions at national/regional level setting the priorities of the Operational Programme(s) before these OPs were approved and launched? Have you been involved in the monitoring and evaluation work of the regional/national managing authorities? Do you know if (and which) bodies representing civil society and/or private non-profit social service providers have been asked to contribute to OP development and/or to monitoring and evaluation?*

A first set of questions related to the preparatory stage of the ESIF programme cycle, when member states design, develop and negotiate the respective Operational Programmes (OP) with the EC. In this phase, member states should seek input from several stakeholders, including civil society organisations. According to the Commission delegated Regulation of 7 January 2014 on the European code of conduct on partnership in the framework of ESIF, working in partnership is a long-established principle in the implementation of ESIF. It implies close cooperation between public authorities, economic and social partners and bodies representing civil society at national, regional and local levels. Specific attention should be paid to including groups who may be affected by programmes but who find it difficult to influence them. This applies in particular to the most vulnerable and marginalised communities, which are at highest risk of discrimination or social exclusion, in particular persons with disabilities, migrants and Roma people. Given that the partnership principle is applicable throughout the whole programming cycle (consisting of preparation, implementation, monitoring and evaluation), questions about the involvement of social service providers in monitoring and evaluation of projects are included in this section, too.

### **A1. Models of Good Practice**

The interlocutors from Bulgaria confirmed that their organisation contributed extensively to the development of the OP Human Resource Development and is an official partner in the sense of the abovementioned European code of conduct. As civil society organisation that operates at national level, the National Alliance for Social Responsibility managed to exert some influence in the development of the OP and in designing the specific priorities for funding.

According to several other interlocutors, their organisations have had the opportunity to contribute to the design of the Operational Programmes, either at national or local level. The French interviewee for instance confirmed that she was invited to and attended several hearings at national level to discuss the OP in the run-up to the programming period 2014-2020. In this respect, the good

practice of involving different categories of partners in OP design (as described in the Commission Staff Working Document accompanying the above-mentioned Commission Delegated Regulation) can be confirmed. Nonetheless, the interviewee indicated that the meetings were dominated by representatives of local authorities paying limited attention to an underrepresented group of civil society organisations. The focus of the meetings, moreover, was on administrative issues rather than on access to programmes and projects for beneficiaries.

The Spanish interviewees mentioned they were able to contribute to the development of the respective OPs at regional level. Whilst these two service providers had the impression their input had been acknowledged, their involvement was rather informal and not the result of a structural exercise from the competent authorities to reach a comprehensive sample of civil society organisations. With regard to monitoring and evaluation, however, one interlocutor indicated her organisation is member of the regional OP monitoring committee for the Basque Country.

The Hungarian interlocutor indicated that its input had been requested above all in the previous programming period. Very much in line with the good practice description in the Commission Staff Working Document, ESIF authorities at that time established transparent procedures to identify relevant partners. Moreover, the input from stakeholders, including social service providers, had been taken on board when fine-tuning the OPs and discussing the substance of individual Calls for Proposal. Their involvement had been strong and impactful.

## **A2. Problems**

Compared to the previous programming period, the room for impactful involvement from the side of civil society organisations in Hungary has been perceived as much more limited in preparing the current programming period 2014-2020: civil society has been contacted in the preparatory phase, but their input is less visible in the final product, the agreed OP. In this respect, Hungarian authorities seem to ensure they comply with the requirements of the EC, but at the same time are moving towards more centralisation and more state control leaving little room for effective cooperation and meaningful partnership involving civil society stakeholders. The monitoring committee reportedly is a formal body that fulfils all procedural requirements but has little substantial impact on the development of projects and programmes.

The Finnish interviewee was not aware that there had been opportunities to contribute to OP design in the current programming period. Their organisation had not been invited to this exercise, nor did

it know which civil society organisations were involved in the design or implementation of the respective OPs.

According to the Slovak interviewee, members of the monitoring committee are not allowed to apply for ESIF project funding, hence the very limited interest of civil society organisations in joining this committee.

Several interlocutors pointed to a tendency in their country / region to narrow the array of eligible activities for persons with disabilities in the current programming period. Most funding is available for interventions enhancing the employment opportunities of the beneficiary. This in turn leaves less budget for e.g. personal services or non-employment related training for persons with disabilities. Moreover, interviewees mentioned that in some member states such as Bulgaria, France and Spain there is a tendency to reduce the state budget for certain social services involving persons with disabilities and have these services paid for by European funds.

### **A3. Suggestions**

In order to overcome the above-mentioned challenges, social service providers suggest to make information on the structure, composition and management of the Operational Programmes publicly available and give visibility to this information by disseminating it widely. In this way (potential) beneficiaries see which fellow organisations are represented on managing boards, who has been consulted in the development of operational programmes and which initiatives have been taken to enhance the simplification of ESIF.

Secondly, interviewees are keen to play a more active role in ESIF and therefore urge ESIF authorities to involve social service providers in a structural way in the development, management and evaluation of OPs, in line with the partnership principle stipulated by the European code of conduct. In this respect, ESIF authorities should encourage small civil society organisations to be involved in monitoring committees by seeking solutions for the conflicts of interest that may arise when these organisations are both committee members and ESIF beneficiaries.

Finally, service providers recommend ESIF to ensure that its funds are only used for innovative and sustainable solutions and not to replace government funding for services citizens are / have been entitled to anyway.

## **B. Information and Communication**

*How are you informed about ESIF OPs and their Calls for Proposals? Do you get adequate information and/or support from managing authorities on opportunities to participate in ESIF calls?*

A second set of questions related to the communication and information provided by Managing Authorities on ESIF in general and on Calls for Proposals in particular.

### **B1. Models of Good Practice**

Several interlocutors indicated that the level of communication has improved over time and that sufficient and adequate information is available on OPs. The interviewee from Austria was particularly satisfied with the new central ESF homepage listing options and calls available nationally and regionally. This has made funding opportunities under ESF much more transparent than before.

According to the Bulgarian interviewee, all information on ESIF is available online allowing interested applicants to understand the priorities of the OPs and the requirements of individual Calls.

The French interviewee, who regularly checks the available information on ESIF and passes this on to members across France, indicated that the quality of the information provided differs per region. While information is available centrally but not always easy to retrieve, certain regions are quite good at communication while others are not very clear and consistent in their information.

According to the Spanish respondents, the information provided at both national and regional level is adequate, with the managing authorities at regional level being helpful in providing support and guidance.

### **B2. Problems**

Several interviewees from countries with a considerable regional ESIF component such as France, Spain and Austria indicated that the information is not always integrated across all levels. The involvement of several authorities and agencies in ESIF does not enhance the accessibility of the information for small and non-experienced organisations. The French interviewee mentioned that for instance the website at national level lacks information on regional programmes; moreover,

when a Call for Proposals is announced, it is not always clear when and how this will take place. Again, there is a considerable regional variance in quality, ranging from regions providing adequate, professional and digestible information to regions where the information is practically inaccessible for non-experienced organisations.

The Spanish interviewee reported that sometimes regional Managing Authorities rely on central ESIF authorities for information and clarification, which in turn ask colleagues at the EC in Brussels for confirmation. This cascade model of information provision is not very efficient time-wise.

The Finnish interlocutors indicated that several services are involved in communicating on ESIF. Whilst all services are generally doing a good job, they do not necessarily have the latest information available on the website or during information sessions. This was the case for instance when a technical assistance office who was running a session on a specific Call for Proposals could not answer all questions of the audience and referred back to the managing authorities.

Several respondents mentioned that the level of information may be adequate for organisations and individuals who have experience with EU funding and more or less know where and what to look for. However, the information is not sufficiently user-friendly and accessible for smaller and less-experienced organisations who want to engage for the first time with EU funding programmes through ESIF.

### **B3. Suggestions**

In order to overcome above-mentioned challenges, notably to move towards a more level playing field for (small and unexperienced) not-for-profit organisations, service providers suggest to bring together all information on ESIF programmes, requirements and funding opportunities in one central website per country. In Member States with a considerable regional programming component, the information on regional programmes should be available also from this central 'information hub'.

Secondly, there is room for improvement with regard to the user-friendliness of the information. ESIF documentation should be written in an accessible language that can be understood also by people who are not familiar with EU jargon and have not been involved in EU funding programmes before.

A third recommendation is to organise information and training days on ESIF for potential applicants, targeting in particular an interested but unexperienced audience. It is important that Managing Authorities themselves are running these days and present a knowledgeable and approachable interface between the potential applicant and ESIF.

## **C. Funding Opportunities**

*How is the application and selection process organised? Is it feasible for organisations like yours to participate in ESIF calls? Do you get adequate information and/or support about requirements to apply for and participate in ESIF calls? Once your proposal has been selected, how is the process of getting a contract organised?*

A third set of questions related to funding opportunities, in particular the application, selection and contracting phases following Calls for proposal.

### **C1. Models of Good Practice**

In line with the comments in the previous section, several interlocutors indicated that there is sufficient and adequate support available to guide potential applicants in applying for ESIF funds. The Finnish interviewees for instance were particularly satisfied with the support they had received from the local antenna of the Managing Authorities.

The Slovak interlocutor mentioned that the quality of support depends to some extent on the individual contact: whilst all ESIF service staff is knowledgeable on procedures, they are not always familiar with civil society organisations or disability/social service provision. If they are, then the level of support can be very strong.

Interviewees from Bulgaria and Spain mentioned that the guidelines for applicants and procedures for selection are communicated clearly and are understandable for all applicants. The notification of the selection results is also taking place according to the rules, including proper feedback on the quality of the individual project proposal and the reason for (non) selection. The contracting phase is proceeding smoothly, according to several interlocutors.

The French interviewee again pointed to the perceived variance in service quality across regions. Regions are usually helpful during the application phase and offer training. However, in certain cases one can only benefit from this service when you know in advance what to do and whom to contact.

## **C2. Problems**

Notwithstanding several positive comments with regard to the quality of information on application and selection, a number of interlocutors mentioned that the division of tasks among managing authorities and their technical assistance services is not always straightforward. In France for instance private companies are offering consultancy and training on ESIF but their link with or mandate from the managing authorities is not always clarified sufficiently. In Finland, the service mandated by the authorities to inform and support potential beneficiaries did not always dispose of the most up-to-date information, which created unease among the audience with regard to eligibility issues. The Bulgarian interviewee indicated that specific questions on concrete calls for proposals are not always answered directly, but collected and made available on a platform for all applicants. Whilst appreciating such transparency of information, this delay in clarification may block project development and jeopardise the timely delivery of the proposal.

With regard to the requirements for participation, several interlocutors mentioned that there are relatively few opportunities for service provider organisations to apply as many calls are open only to national, regional and/or local authorities. Moreover, when there are calls for which service providers are eligible, these organisations often have to compete with other and bigger applicants such as (entities linked to) local authorities or regional authorities. In Bulgaria for instance, funding opportunities within OPs are divided in view of the potential beneficiaries: state bodies, local authorities, private bodies. Most Calls are aimed at state and local authorities and only few programmes allow NGOs to act as applicant. However, when NGOs are eligible then they have to compete with and fulfil the same requirements as state and local authorities. In Hungary the 2014-2020 Calls for Proposals so far are targeted mainly at big public / state-backed organisations, which experience hardly any competition. Civil society organisations can be subcontracted in a later phase by these big companies to deliver small components of the programme.

In several countries, including Slovakia, service providers only apply for small projects that do not require bank guarantees. In this way, they miss out on several interesting funding opportunities for bigger projects.

Finally, several interviewees mentioned that the organisation of individual Calls for Proposals can be improved: very often batches of similar calls are organised around the same time, which in turn forces small organisations to apply for only one funding opportunity (as they do not have the capacity to work on several applications simultaneously) and then wait for a very long time before another opportunity arises. Moreover, several interviewees indicated that there is little time between the official notification of the call and its deadline for submitting applications.

### **C3. Suggestions**

In order to overcome the above-mentioned challenges, interviewees suggest that ESIF authorities provide clarity on the role and tasks of the different bodies involved in ESIF within a Member State, and make sure that all bodies are fully knowledgeable on their respective tasks. Especially for non-experienced organisations, it is difficult to grasp the specific responsibilities of national and regional programme authorities, and the role of organisations who operate on behalf of these authorities providing technical assistance, information and training.

Service provider organisations suggest that ESIF authorities inform well in advance and update regularly about forthcoming Calls for Proposals. As several interlocutor have pointed to this problem in particular, it is important that there is sufficient preparation time for applications between the official launch of the Call and the deadline for submitting proposals.

Moreover, social service provider organisations would welcome more opportunities for their involvement in ESIF Calls by opening up more funding programmes for civil society organisations and by spreading calls throughout the entire programming period.

Respondents also made suggestions with regard to enhancing the quality of proposals. If ESIF is really aiming at a broader uptake among a wider range of beneficiaries, then it might be a good idea to organise project development workshops for smaller and unexperienced organisations prior to launching Calls for proposal.

Given the considerable workload preparing a proposal and the often limited chances for selection, one interviewee suggested to split the application process inviting all applicants to submit an outline of the proposal and authorising only those applicants whose proposal has been validated to prepare a full proposal. Another suggestion is to perform a technical eligibility check of the applicant beforehand and only invite full proposals from those organisations that passed the check.

In order to avoid the selection of too ambitious proposals which are doomed to fail, another respondent suggested to pay more attention in the selection of applications to the feasibility and sustainability of the proposal, and to the project results delivered in the report audits. Whilst technical compliance with eligibility criteria is important in both application and reporting stages, in the end it is in the benefit of all taxpayers that the selected projects provide added value to the substance of the issue they address.

## **D. Implementation and Reporting**

*Which 'paperwork' is required during implementation of your project? Do you get adequate information and/or support from managing authorities on contracting / implementation / paperwork? How is the reporting (both on contents and on expenditure) organised? Do you get adequate information and/or support from managing authorities on the financial and technical reporting requirements? How is the payment schedule organised? Can your organisation cope with the provisions of this schedule (in terms of bank guarantees, own contributions, funds to be advanced, delays in reimbursement, etc.)?*

A fourth and final cluster of questions related to the implementation process of selected projects, their financial handling, and the requirements beneficiaries have to comply with in terms of reporting.

### **D1. Models of Good Practice**

According to the Hungarian interviewee, the managing authorities used to be assisted in the previous programming period by an ESF company that was knowledgeable, professional and supportive towards beneficiaries. This set-up has disappeared in the current programming period, with ESIF authorities focusing on the uptake of all funds and on reducing the burden for (big) applicants.

The Finnish interviewees also reported good experiences in 2007-2013 with the managing authorities (Ministry of Social affairs) and their guidance during project preparation and implementation. The contacts are accessible and the quality of the information and guidance with regard to project implementation, reporting and payment procedures is good. Without their support

it would have been much more difficult to obtain this type of information from internet or through written materials. Currently, the introduction of a new online management system EURA will result in making reporting easier.

The Austrian interlocutor is particularly positive about its contacts with ERDF authorities. Whilst reporting remains disproportionately extensive, the quality and transparency of information as well as the speed with which small project proposals are handled is exemplary. In future, reporting on INTERREG contracts might become simpler through lump sum financing. A similar appreciation is given by a Spanish interviewee: the Youth Guarantee programme works very fast but there are a lot of reporting requirements.

In Bulgaria, social service provider organisations can apply for small projects requiring no match funding. Information on implementation and reporting requirements is available and disbursement periods are relatively short.

The Slovak interlocutors mentioned that the ESIF authorities are planning several client-oriented innovations (guidance through manuals and face-to-face information) that should facilitate project implementation (standardised forms), enhance the capacity of the audit staff (training) and reduce the reporting burden (flat rate funding, online reporting) for beneficiaries. Whilst the plans are promising, most of the tools still have to be delivered.

## **D2. Problems**

Several interviewees reported that the new programming period has brought changes causing both beneficiaries and managing authorities to adjust their operations. The new ESIF authorities in Hungary adopt a completely different approach focusing on centralisation and control. In France certain projects were stopped or suspended because the regional authorities did not know how to handle a project that spread across two programming periods. In Slovakia, civil society organisations are increasingly becoming competitors among themselves: the funding opportunities are limited and often allocated to private organisations with strong ties to the public sector. In Austria the situation has deteriorated somewhat given that the reporting load remains big but the funding opportunities are reduced.

The French interviewee mentioned that the reporting requirements and the financial handling of projects remain cumbersome: there is a lot of paperwork and beneficiaries are expected to advance

important sums of EC funds before, during and after the end of the contract. Several organisations who benefitted from ESIF during 2007-2013 have reportedly decided not to apply anymore: the reporting requirements and the financial allocations are such that the cost for the organisation in terms of resources outweighs the possible benefits.

According to the Spanish interlocutors, the rules for co-financing are severe and the disbursement periods are long, which means that only bigger organisations with a solid financial foundation can participate in a viable way. In order to counter the mistrust from the European Commission towards the handling of EU funds in the past, Spanish audit teams are reportedly scrutinizing all financial reports being very severe in accepting incurred project costs. This in turn makes beneficiaries excessively careful in making and reporting costs.

Slovak respondents mentioned a similar situation: NGOs are now having a hard time getting project costs accepted because the audit teams want to be the best pupils in the EU and do away with the bad reputation of the Managing Authorities during the previous programming period.

According to the Finnish interviewees, the financial reporting requirements are extensive. Whilst this is understandable when big amounts are involved, the duties are far too complicated for small expenses. NGOs who are familiar with EU funds know more or less what to expect and can manage such requirements. However, the duties are too complex for small and inexperienced NGOs. Even experienced project coordinators have trouble explaining these requirements to other partners and have them comply with all provisions. Moreover, small organisations are reportedly reluctant to apply because the financial requirements are too strong: whilst they might manage to provide 20% of co-financing, it is not possible to advance - on top of the match funding - parts of the ESIF funds that will be disbursed only after a few months. Recently, organisations have the opportunity to apply for national funds that would cover their own financial contribution; however, the application periods are not synced.

### **D3. Suggestions**

In order to counter the above-mentioned challenges, service provider organisations suggest that ESIF authorities clarify the rules and regulations that apply within an OP, as well as the reporting requirements and the expectations in terms of project accounting. In Member States with a considerable regional programming component, these requirements may differ per region and compared to the national programme.

Moreover, interviewees suggest ESIF reduces the reporting duties, particularly with regard to a possible audit of the financial expenditure for smaller projects. In several Member States, the financial reporting requirements are disproportionate to the size of the funds and the projects. For this reason, organisations who have benefited from ESIF before are now reluctant to apply again in the new programming period.

Several interlocutors welcome the initiatives of their authorities towards online financial reporting and lump-sum payments. Other interviewees suggest their ESIF authorities follow suit.

Finally, interlocutors recommend to enhance the payment schedule of ESIF funds: very often beneficiaries have to advance considerable parts of the funds they are entitled to and/or have to wait very long before the final payment is transferred. In some cases this system jeopardises the viability of (smaller) organisations and makes them refrain from applying for ESIF again.

## Chapter 3. Recommendations

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This study has collated input from social / disability service providers in Austria, Bulgaria, Finland, France, Greece, Hungary, Malta, Romania, Slovakia and Spain (Basque Country and Catalonia), who have been involved to various extents in ESIF. Making abstraction of the country-specific approach to and management of Structural Funds, a first outcome of the research is that significant progress in terms of simplification is already visible in several countries. In the previous chapter, good practice has been identified with regard to the involvement of stakeholders in OP design, the quality of information on ESIF, the accessibility and support of managing authorities to (potential) applicants, and the clarity of procedures regarding concrete funding opportunities.

A second outcome is that all interlocutors identify one common challenge: the current set-up of the ESIF does not facilitate (sufficiently) the involvement of smaller organisations as (potential) applicants and (potential) beneficiaries of Structural Funding. Their participation was not easy in the previous programming period 2007-2013 and again the current programming period 2014-2020

seems to maintain a focus on bigger projects run by sizeable organisations with previous experience in EU funded projects.

In terms of ESIF uptake, social service providers therefore have one key recommendation: enhance access of small private not-for-profit organisations to structural and investment funds. This recommendation can be broken down in 10 specific action points covering different phases of the programme cycle and contributing to an overall simplification of ESIF procedures.

The previous chapter demonstrated that the realisation of these suggestions seems feasible, as several elements are already implemented in some countries, and will contribute to a more equal participation of smaller organisations in ESIF.

In order to enhance access to ESIF for social service providers and civil society organisations, it is recommended to:

1. Bring together all information on ESIF programmes, requirements and funding opportunities on one central website per country (one-stop-shops);
2. Ensure that the information available on ESIF is written in an accessible and non-bureaucratic language, especially for an inexperienced audience;
3. Organise sector-specific information and training days on ESIF for interested yet inexperienced stakeholders;
4. Inform regularly about forthcoming Calls for Proposals and guarantee adequate preparation time for applications;
5. Provide clarity on the role and tasks of different bodies involved in ESIF within a Member State, including the role and composition of the Monitoring Committee;
6. Clarify in accessible language the ESIF rules and regulations that apply within an Operational Programme, as well as the reporting requirements and expectations in terms of project accounting;
7. Reduce the reporting duties, particularly with regard to a possible audit of the financial expenditure, especially for smaller projects to avoid disproportionate red-tape;
8. Speed-up the payment schedule of ESIF funds, through, for instance, pre-payments, earlier last-payment and facilitating the own-contribution process;

9. Pay more attention in the selection of applications to the outcomes, aims and objectives of the proposal and to the project results delivered in the report, rather than on the bureaucratic processes and procedures.
10. Structurally involve civil society stakeholders and not-for-profit service providers – in line with the partnership principle - in the design and implementation of the Operational Programmes, in particular for initiatives taken to enhance the simplification of ESIF.

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