Ex ante evaluations of Operational Programmes 2014-2020 (ERDF and Cohesion Fund): how to improve their contribution to programme quality?

This note is based on the analysis of a sample of 44 ex ante evaluation reports selected in 10 Member States (AT, BG, FR, GR, HU, IT, NL, PL, SL, UK), feedbacks from desk officers in DG Regional and Urban Policy and interviews with evaluators in charge of the ex ante evaluation, as well as a research paper prepared by Ernst & Young for the Ministry of European Funds in Romania.

Overall, it appears that the ex ante evaluations provided useful support to enhance the internal coherence of programmes and in particular to set up indicators and targets. However, there is room to improve their utility for the next programming period.

The analysis of a sample of evaluation reports reveals that some concepts were not fully understood by the evaluators. It also appeared that the evaluators could have been more helpful in the negotiation process if better informed on the requirements of the regulatory requirements and better associated in the programmes design process. In particular, the consistency of the allocations with the quantified targets, the role of the Funds in reaching the results, the rationale for the form of support proposed, the use of the common indicators were not sufficiently analysed. In order to improve this process in the future round of negotiation for the next programming period, the following actions are proposed:

1. Rationale of the form of support

One of the issues to be appraised by the ex ante evaluator was the rationale of the form of support proposed. The Regulation requires Managing Authorities to provide ex ante assessments prior to setting up Financial Instruments however these ex ante assessments were not ready when the programme was adopted. As concerns the use of grants, their rationale was not analysed for most programmes by the ex ante evaluators and many Managing Authorities listed a variety of supports in their programme to leave different options open at this early stage of the programming period.
The question that arises is whether the selection of the form of support should be required in the programme, or should it be required later, e.g. by the end of the first year after the programme adoption. An alternative would be that the ex ante evaluator appraises different options concerning the form of support.

2. Information of ex ante evaluators

In a number of cases, the evaluators had to help the Managing Authorities with the interpretation of the regulation. However, some evaluators did not fully understand the Regulation and in particular the requirements concerning the indicators. Furthermore, only rarely did they analyse the role of the ERDF and the CF in the fulfilment of the expected results which would have helped the Managing Authorities to prepare the ground for future impact evaluations.

The Commission could organise information meetings with ex ante evaluators at least one year before the evaluations are launched and repeat these meetings for already appointed ex ante evaluators if necessary. These meetings could be organised either in Brussels (for example in the framework of the Open Days, or a dedicated conference), or in each Member State according to the needs. An on going guidance on regulatory requirements could be provided through a functional mailbox or a website providing answers to frequently asked questions (some Member States organised such a central information point).

3. Role of ex ante evaluators

The role of ex ante evaluators was not always sufficiently separated from the drafting of the programmes: while some Managing Authorities did not need a specific support to draft the programme or hired a consultant dedicated to this task, others asked the ex ante evaluator to draft the programme whilst the latter should keep a critical distance. In some cases Managing Authorities did not fully take advantage of the ex ante evaluation to improve the content of the programme considering this exercise a mere formality.

The ex ante evaluation is a tool to support both Managing Authorities to design the programmes and the European Commission to analyse them. To fulfil this dual role, the ex ante evaluator should be supported by the service in charge of drafting the programme and not only by the service in charge of evaluations. The programming service should be involved in the design of the future ex ante evaluation contracts in order to define the expertise needed and to better understand the process of an ex ante evaluation. The evaluator should be able to meet decision makers and the Commission services on selected occasions in order to understand better the regulatory requirements and express his/her views notably at the beginning of the exercise.
Future guidance provided by the Commission should become more precise about the role of the ex ante evaluator: for the Managing Authorities, give advice to improve the quality of the programme to fulfil the regulatory requirements; for the Commission, highlight improvements and possible difficulties and report on the way the advice was used. All services involved in the programme design should be informed on the specific role of this evaluation.

The ex ante evaluator should work closely with those in charge of designing the programme. Good practices would be to involve programmers in the design of the ex ante evaluation contract, to plan a minimum number of meetings between the programmers and the evaluators at the start of programming process, to associate the ex-ante evaluator (as an observer) to some of the meetings with the Commission and to allow him to present his/her findings in meeting involving policy makers.

4. Timing and budget

The ex ante evaluation should accompany the whole process from designing the programme to its adoption. This also means that a proper budget must be allocated. However, not all Managing Authorities succeeded in finding an optimal timing for the evaluation ex ante. Some contracts were launched before any drafting of programme, leaving little for the evaluators to analyse for several months. On the other hand some contracts ended too early for the ex ante evaluation to analyse the last draft proposed to the Commission and sometimes the selection of indicators. The ex ante evaluator should be able to examine the elements of the intervention logic, including indicators and target setting with baselines regarding target groups and actions.

The Regulation should make clear that the ex ante evaluation sent to the Commission must analyse the final version of the programme i.e. including all the elements required by the Regulation. Each draft programme should be analysed by the ex ante evaluator and should take into account his/her recommendations before being sent to the Commission. The intermediary reports of the ex ante evaluations should be sent with the draft programme to support desk officers in their analysis. The guidance should insist on a proper timing of ex ante evaluations.

5. Availability of people involved in the design of programmes

The ex ante evaluation adds a real value to the programme design where the different services involved are briefed about the objective of this evaluation, past experience of this process, its value added and its limits. These services should be requested to devote time to work in cooperation with the evaluators. In many cases the ex ante evaluators organised trainings and workshops with the technical services in order to help them designing intervention logics in line with the theory of change or selecting relevant indicators. In doing so, they were able to facilitate the reconciliation of conflicting interests of stakeholders.
The guidance should include a section on good practices, highlighting the need to inform people involved in programming on the role of the evaluator, and the necessary time to be dedicated to this evaluation. Ex ante evaluations are not only about reporting: they also proved useful to frame the work of services, build consensus on priorities and support the selection of indicators.