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Deliverable 7 - Annex 2

Regional governance in the context of globalisation

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**Regional governance in the context of globalisation:
reviewing governance mechanisms & administrative costs**

**Annex 2
Methodology**

Annex 2: Methodology

Any attempt to provide a relatively accurate picture of the administrative costs associated with the implementation of EU Cohesion Policy represents a significant challenge. For this reason, different methods and approaches were used in this study in order to achieve a systematic and evidence-based mapping of the administrative workload and costs of the implementation of ERDF and Cohesion Fund for Member State public authorities. The results build on an extensive literature review, a quantitative survey and a qualitative survey.

In order to make it easier for the reader to better understand the results and how they are to be understood, this annex provides basic information on the literature review and how the various pieces of quantitative and qualitative information were collected and treated. We also provide an overview of the various methodologies applied to the data collection task, the development of a range of proxies to fill gaps in the data collection, and the approach used to harmonise and weight the data.

Literature review

A core element of the methodology for this study was a literature review. The aim of the literature review was to give an in-depth overview of relevant theoretical and policy literature in the field of assessing and comparing administrative cost at various territorial levels. Particular attention was paid to the challenge of developing various kinds of benchmarks. Furthermore, the review included an outline of country-specific literature based on surveys carried out by the project's country experts for each of the EU-27 Member States.

The basic objective of the literature review was to deliver a comprehensive assessment of international literature on definitional and methodological issues relating to the analysis and assessment of administrative costs of policy. The study included Cohesion Policy literature (with particular reference to the management and implementation of Cohesion Policy and the implications for administrative costs) as well as country-specific literature in the field. The programme documents and approved compliance assessments were also studied, where available.

The review provided a critical assessment of the key debates and approaches as well as a basis for the development of a contextual framework for assessing and comparing administrative cost at various territorial levels

The literature review showed that the topic of administrative costs cuts across a range of academic disciplines (political science, public administration, audit and financial planning), and policy fields (e.g. agriculture, transport, taxation, business development). The review of this literature, as well as studies dealing specifically with the management and implementation of Cohesion Policy, was helpful in suggesting potential approaches to the assessment of the administrative costs of managing and implementing Cohesion Policy. The literature review also underlined the obstacles and difficulties involved in a pan-European study of this scope and magnitude which compared governance and costs across policy fields and involved 27 national administrative frameworks and settings.

Quantitative survey

This section describes the various methodologies applied to the data collection task, the development of different types of proxies to fill gaps in the data collection, and the approach used to harmonise and weight the data.

Data collection

The level of detail necessary for a comprehensive overview of the cost of EU Cohesion Policy administration in the Member States necessitated that a substantial part of the data would be based on estimates. These included estimations of the division of work and budgets across the individual tasks laid down in the regulations and the work flow over time during the entire programme cycle.

The aim of this study was to collect factual information and estimations on administrative costs from individuals within the administration who have the best overview and work most closely with the relevant areas. For this purpose, six different questionnaires were elaborated addressing the following key administrative functions and were translated into the official language used in the EU Member State in question:

- National policy level (incl. NSRF, NSF and national co-ordination activities)
- Programme preparation
- Programme management
- Programme certification
- Programme audit
- Beneficiaries

To ensure that the questionnaires were forwarded to the right addressees in all the countries and programmes, a key person was identified for each of the functions. Based on this "Who's who of the Structural Funds administration", the data collection process was then launched.

The questionnaires were used as the basis for the interviews and sent to the key individuals by e-mail or via a web-survey. The initial mailing was followed up by phone contact as well as personal meetings. In addition, formal letters from SWECO and DG Regional Policy were sent to all respondents in order to explain the objective of the survey and to improve the response rate.

- The **national coordination** level was primarily addressed through interviews with central stakeholders in each country.
- In terms of information on **programme preparation**, key persons from each Operational Programme were contacted through face-to-face interviews and partly via e-mail.
- Data on the **programme management** function was collected by e-mailed questionnaires to the Managing Authorities of the programmes and followed up by phone calls. In some cases meetings were arranged for further clarification.
- For information on **programme certification**, the questionnaires were sent to the Certifying Authorities.
- For the collection of data on **programme audit**, the questionnaires were sent to each of the Audit Authorities.
- Finally, and in order to address all levels of implementation, 450 **beneficiaries** were also contacted by means of a multi-lingual online survey.

Particular attention was paid to management systems where responsibilities are shared e.g. between the national and regional administration or where a large number of Intermediate Bodies are involved in programme management. In general, an attempt was made to contact the highest level in the implementation hierarchy in order

to request the provision of a complete picture based on their own overview position or on inputs from the other bodies. In some cases, questionnaires had to be sent simultaneously to several bodies within the same programme management structure in order to establish the full picture. All questionnaires clearly asked which organisations were included in the replies and if there were other organisations which were also involved in the administration of the tasks being addressed. This allowed us to identify missing information or overlaps in the replies. In addition other sources, including Compliance Assessments, were consulted in order to obtain the required data.

DG Regional Policy also sent letters to the Permanent Representations of the Member States in Brussels informing them about the study. In addition, DG Regional Policy alerted the COCOF and asked for support. In certain cases where answers were especially difficult to obtain, DG Regional Policy also used informal contacts and wrote formal letters in support of the data collection process.

Towards the end of the study, national overviews were compiled for external plausibility checks in autumn 2009. Key individuals in the ERDF and CF administration in the Member States and members of the geographical unit in DG Regional Policy were very helpful in commenting on these national overviews. This allowed the identification and correction of a number of errors in the quantitative data. In addition, DG Regional Policy sent out one page summaries with the basic national data to national representatives for an additional plausibility check in February 2010. The responses to both rounds of plausibility checks were incorporated into the report and data sets.

While the study has raised interest among various actors, it should be noted that the majority of those addressed by the questionnaires were rather hesitant to provide information. Where those addressed by the questionnaires were hesitant to provide information, this was for one or more of a number of reasons:

- The Structural Funds community is currently the subject of a large number of studies, many of which have been commissioned by DG Regional Policy.
- The information requested by this study is rather sensitive and there was some concern regarding the type of conclusions which might be drawn from such studies.
- Providing solid information on the questions asked by this study is, in some cases, rather time consuming.
- As the questions also cover the future and require a level of detail for which there is no basic data, the answers often entail a high degree of estimation. Not all interviewees felt confident or knowledgeable enough to provide such estimations, a situation exacerbated by the high rate of staff turnover in some administrations.

Due to the obstacles described above, the data collection process accounted for more time and resources than was initially assumed necessary. The reply level was relatively low but satisfactory enough to be able to draw conclusions. A detailed picture of the usable replies, as of the 1st of October 2009, is provided in the table. The analysis of the responses shows that there is a good spreading across countries, incl. different management systems, and different types of programmes (as regards objectives, topics and financial size).

The quality of the information provided was variable in character and not all responses were 'complete'. Considerable effort was made using validity checks to minimize mistakes, fill gaps and develop proxies where no information was available.

Usable responses by category and country

Country and total number of Operational Programmes (OP)	Nat. policy level	Programme preparation	Programme management	Programme certification	Programme audit	Beneficiaries
AT (9 OPs)	✓	2 OPs	9 OPs	9 OPs	9 OPs	2
BE (4 OPs)	(✓)	2 OPs	4 OPs	3 OPs	2 OP	4
BG (5 OPs)	✓	4 OPs	4 OPs	5 OPs	5 OPs	3
CY (1 OP)	✓	1 OP	1 OP	1 OP	1 OP	-
CZ (14 OPs)	✓	14 OPs	14 OPs	14 OPs	14 OPs	3
DE (18 OPs)	✓	16 OPs	16 OPs	17 OPs	17 OPs	5
DK (1 OP)	✓	1 OP	1 OP	1 OP	1 OP	1
EE (2 OPs)	✓	2 OPs	2 OPs	2 OPs	2 OPs	1
ES (23 OPs)	✓	7 OPs	9 OPs	23 OPs	13 OPs	1
FI (5 OPs)	✓	4 OPs	4 OPs	-	5 OPs	5
FR (30 OPs)	-	5 OPs	6 OPs	4 OPs	(1 OP)	8
GR (10 OPs)	✓	6 OPs	6 OPs	10 OPs	10 OPs	-
HU (13 OPs)	✓	5 OPs	11 OPs	13 OPs	13 OPs	-
IR (2 OPs)	-	2 OPs	2 OPs	2 OPs	-	2
IT (28 OPs)	-	8 OPs	8 OPs	17 OPs	17 OPs	1
LT (2 OPs)	✓	2 OPs	2 OPs	2 OPs	2 OPs	5
LU (1 OP)	✓	1 OP	1 OP	1 OP	1 OP	3
LV (2 OPs)	✓	2 OPs	2 OP	2 OPs	2 OPs	3
MT (1 OP)	✓	1 OP	1 OP	1 OP	1 OP	1
NL (4 OPs)	✓	4 OPs	4 OPs	4 OPs	4 OPs	8
PL (20 OPs)	-	10 OPs	15 OPs	20 OPs	10 OPs	4
PT (10 OPs)	✓	9 OPs	10 OPs	10 OPs	10 OPs	7
RO (5 OPs)	✓	5 OPs	5 OPs	5 OPs	5 OPs	12
SE (8 OPs)	✓	8 OPs	8 OPs	8 OPs	8 OPs	5
SI (2 OPs)	✓	2 OPS	2 OPs	2 OPs	2 OPs	2
SK (9 OPs)	✓	9 OPs	9 OPs	9 OPs	9 OPs	11
UK (16 OPs)	✓	6 OPs	8 OPs	3 OPs	3 OPs	5
ETC (71 OPs)	n.a.	28 OPs	29 OPs	19 OPs	16 OPs	17

Filling the gaps

In order to create complete data sets based on the data provided by the respondents, various gaps needed to be filled. The main approach to the filling of such gaps was to develop proxies based on other information provided in the same response and/or based on information from similar programmes. Proxies were developed at three different levels (a) where information was missing within a response (b) where

responses did not cover all the programmes of a country and (c) where there were no responses from a country.

Proxies to complete provided responses

The responses received were checked with regard to their plausibility and completeness. The main fields of missing or implausible information were (a) staff costs and staff figures and (b) overheads.

For some responses, the relationship between the budgets and the staff figures provided were considered unreasonable. This was the case, for example, if figures resulted in annual staff costs of EUR 1,000 or less for a fulltime post or, at the other extreme, in staff costs of more than EUR 1,000,000 per person per year. The main reasons for these problems were either difficulties in the estimation of staff figures in person years and fulltime equivalents per year, or in the inclusion in the budgetary figures of non-staff items or only parts of the staff indicated. Where possible, these figures were corrected using staff costs and figures drawn from other responses from the same country. The same procedure was also used in relation to missing staff figures or figures for staff budgets.

A major gap in the data provided was overhead costs as the majority of replies did not provide any information in this area. Those responses where overhead information was provided show an extreme variation ranging from 1% of the total budget to 160% of the staff costs. It is uncertain whether this variation reflects the reality of overhead costs or illustrates the fact that the respondents do not have a clear picture of them. However, overhead costs which were provided have been retained while, in cases where no information was given, an average rate drawn from respondents in the same country was applied. This usually ranged between 18 and 30% of the total budget.

The estimation of future costs (beyond 2009) was a challenge to many respondents. The distribution of time flows for individual tasks as well as other areas such as the division of work across different tasks, the involvement of Intermediate Bodies or the use of the Technical Assistance budget, have also been adjusted where they were considered to be incoherent. For responses where no information at all was provided on these topics, the gaps have not been filled. Instead these responses have been excluded from the analysis of the particular aspects on which no data was provided.

Proxies to complete the national pictures

In a number of cases, the responses provided did not cover all the programmes of a country. Where this occurred, the information which was provided on programmes in the particular country was used to establish a complete picture for that country. Different approaches were applied to this calculation depending on the type of information missing:

- **Programme preparation:**
Where data on the preparation of programmes was missing, the average figures for the programmes in the same country were used to complete the picture for that country.
- **Programme management, certification and audit:**
In cases where data on the programme management was missing, the available figures were divided by the amount of ERDF & CF funding associated with them and then multiplied by the total amount of ERDF & CF funding in that country. In other words, the management costs per EUR of ERDF and CF funding in a country was the main factor used to establish proxies for missing programmes. In countries with shared administration systems, e.g. where both the national and the regional administration are involved and where each provided data, the above

approach was applied separately to the regional and national programme levels. This was the case for Portugal, Poland and Spain. In the case of Spain, the technical assistance budget was used instead of ERDF & CF funding in calculating missing values.

In this context European Territorial Co-operation were treated separately i.e. the same procedures were applied as if all European Territorial Co-operation programmes would constitute one country.

Based on these approaches, the data provided for each country and Territorial Co-operation was aggregated to produce a full picture for each Member State *plus* Territorial Co-operation. However, for countries where no responses at all were received for a particular function (programme preparation, management, certification and audit etc.), an alternative approach was applied to the development of proxies (see below).

Proxies to complete the European picture

There were some cases where an insufficient amount of information was provided to enable us to establish a national picture for certain functions or countries. These cases included: the programme certification in Finland; the national policy level and audit in France; the national policy level and audit in Ireland; and the national policy level in Italy. Various approaches have been applied to deal with these depending on the type of information missing.

- **National policy level:**
Where no information was provided on the national policy level, the European average figures for the National Strategic Reference Framework and the National Strategic Reports were applied, derived from those countries where information was provided.
- **Programme preparation:**
Where no data was received on programme preparation in a country, the European average total cost and staff figures for this function were applied, based on those countries for which information was provided. In other words, in countries where no data was available on programme preparation, European average figures were multiplied by the number of programmes in that country.
- **Programme management, certification and audit:**
Where no data was available in relation to programme management, audit or certification, the European average costs and staff figures per EUR of ERDF and CF funding for the specific task were applied – again based on those countries for which information was available. In other words, in countries where no data was available in relation to programme management, the average European figures for programme management per EUR of EU funding were multiplied by the EU funding in that country. The same procedure was applied for the certification and audit level, based on their respective averages.

Based on these approaches, the data provided was aggregated to produce a comprehensive picture of the costs of administering EU Cohesion Policy in all Member States. The data collection as well as the two plausibility checks showed that there is no absolute knowledge about the administrative workload and costs. A number of programmes and Member States have adjusted the data provided several times during the case of the study, or even provided incoherent information. To accommodate this uncertainty a correction factor has been introduced for the aggregated European figures. It corresponds to the observed variations of data provided.

Sensitivity of the proxies

When filling the gaps in the database, high importance was given to the transparency of the approach. As the information in the database is highly policy sensitive an approach was chosen which is easy to understand and follow by policy makers.

At the same time attention was paid to the fact that the approach may influence the final result. Therefore the main ambition was to reduce the cases in which proxies need to be developed as much as possible.

Proxies to complete the national picture are the main field for which proxies have been developed. The graphs on the following two pages illustrate the success of this strategy.

The two box plots provide a first picture on the low degree of proxies needed. They show to what degree national data needed to be completed for either national coordination, programme preparation, management, certification or audit. In more than 50% of the cases we managed to collect more than 95% of the data. This figure is the same regardless whether considering administrated number of programmes or total eligible costs. Only in 25% of the cases, less than 74% of the data could be collected with regard to the administrated total eligible costs. With regard to the administrated number of programmes the corresponding figure is 69%.

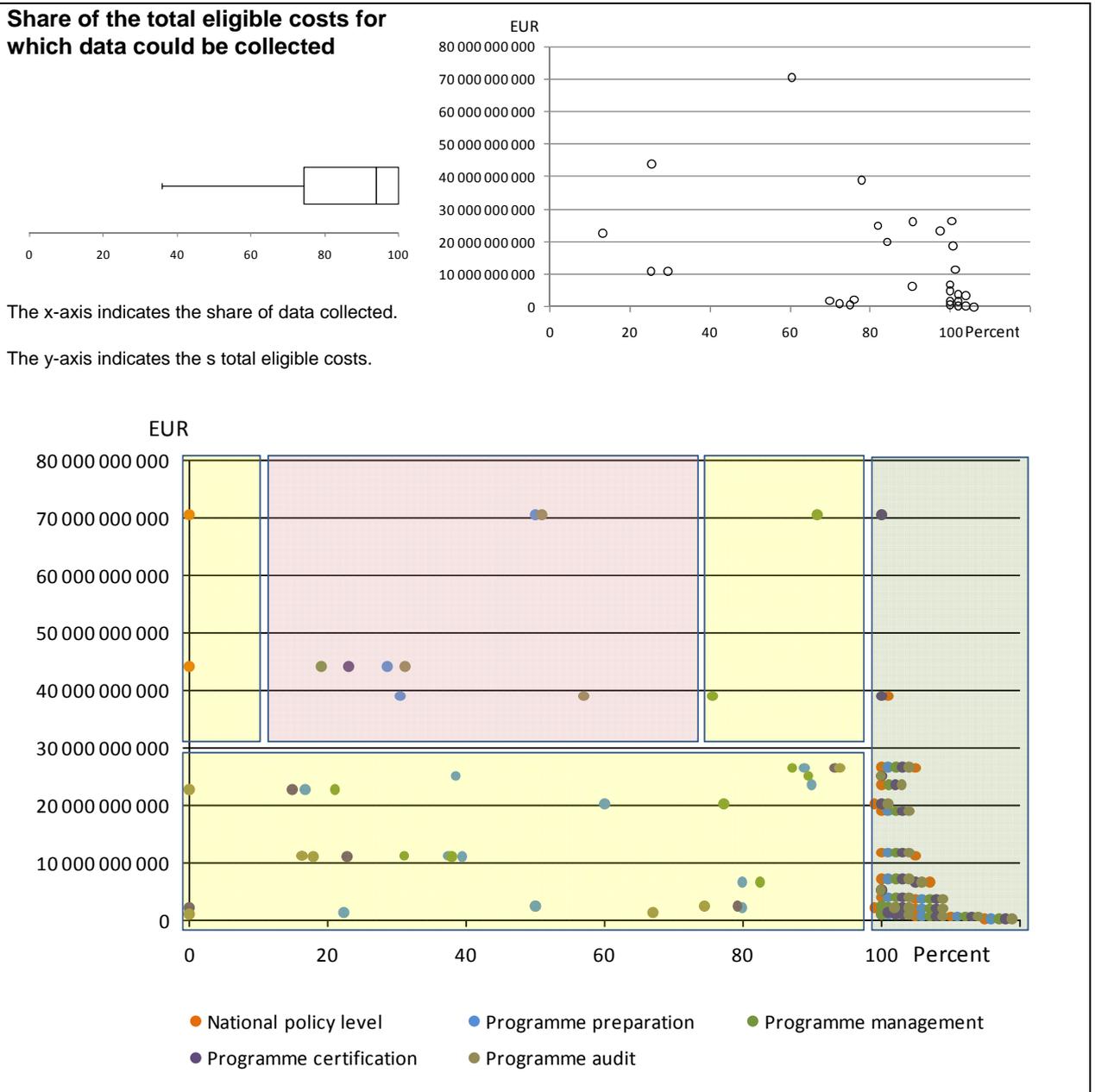
A more nuanced picture on the use of proxies is provided in the small black and white graphs. Here every circle provides the aggregated picture for a country on to what degree proxies have been used considering the different functions covered by the study. To illustrate the weight of these proxies the vertical axis reflects the total eligible costs administrated. First of all the graphs show that the majority is placed at 100% coverage or very close to it. Furthermore there are a number of countries which show a lower coverage but also have comparably small total eligible costs. Consequently, the proxies for these cases have only a limited impact on the overall European picture. Then there are three cases with lower coverage and higher total eligible costs. These are Poland, Italy and Spain. Taking together all functions, the administrative costs for 60% of the total eligible costs administrated respectively 69% of the programmes could be collected. In the case of Italy the corresponding figure are 25% and 45% and for Spain 78% and 57%. Again, these two graphs show that there is a sound basis for the development of proxies.

The coloured graphs provide an even more nuanced picture differentiation between the different functions for each country. They illustrate even more strongly the high number of cases in which 100% of the data could be collected. It shows e.g. in the case of Poland that the programme management is covered for 91% of the total eligible costs (which correspond to 75% of the programmes covered). Similarly in the case of Spain the programme management for 76% of the total eligible costs is covered by the data collection although this corresponds only to 39% of the programmes. In both countries furthermore, 100% of the programme certification is covered by the data collection.

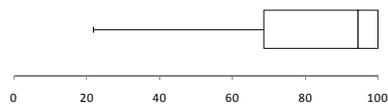
The background colours of the graphs indicate the impact of the proxies on the overall picture. The green background colour shows the cases where 100% of the data could be collected. This is by large the majority of the cases. The yellow background colour shows the cases where the financial volume is so low or the share of the proxies is so low that the development of proxies has only a very limited effect on the total European picture. The red cases are those which are somewhat more severe because of the magnitude of the total eligible costs affected. However, there are only eight such cases and only in the case of Italy it actually concerns the programme management function which has the highest weight with regard to the administrative costs. Three

out of the eight cases concern the programme preparation which has a rather low weight.

Furthermore, throughout the study administrative costs and workload figures are illustrated as box-plots. Focusing on a range in which the administrative costs and workload are located, highlights the variations in the collected data and also reduces the immediate impact of the proxies.

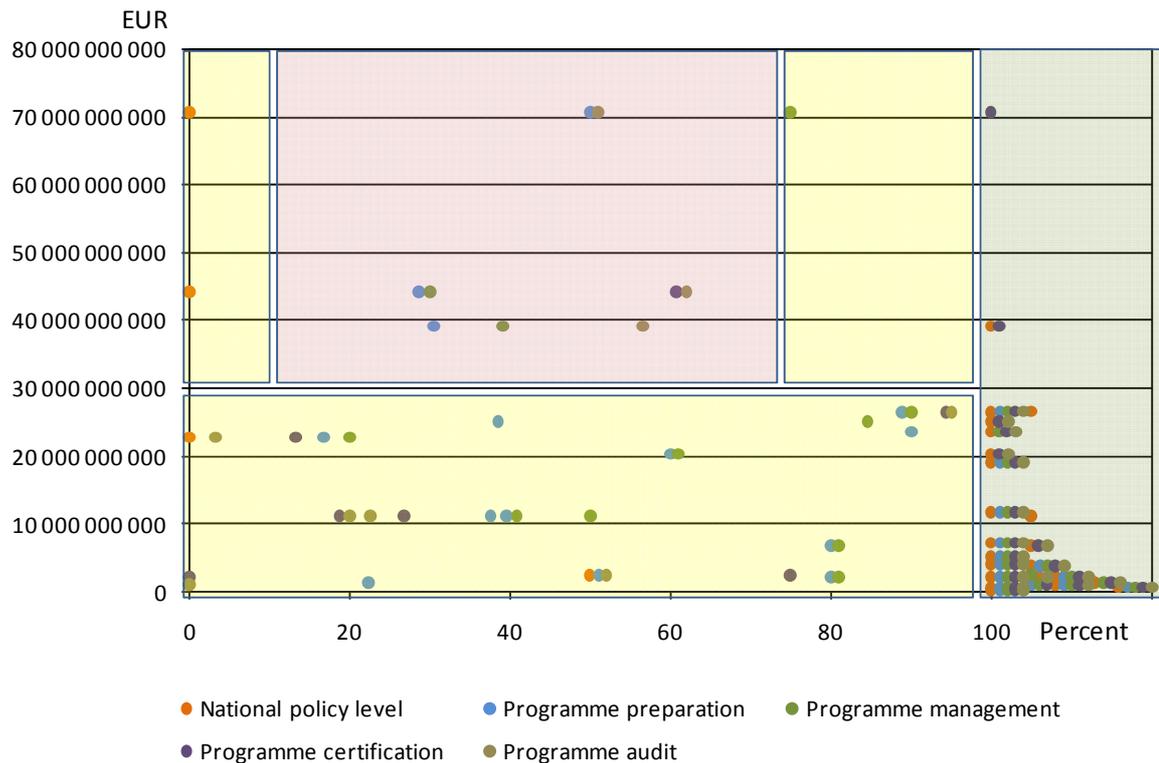
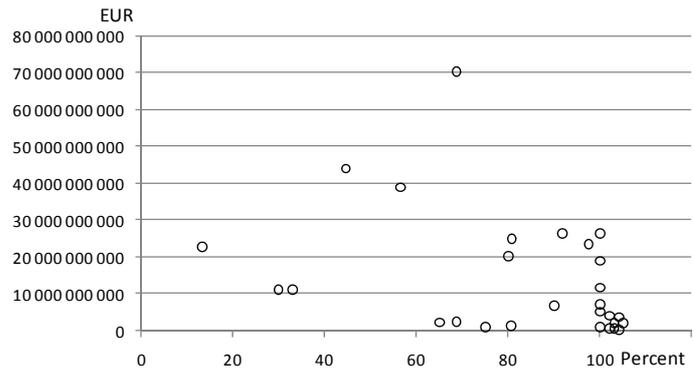


Share of the operational programmes for which data could be collected



The x-axis indicates the share of data collected.

The y-axis indicates the s total eligible costs.



Harmonising the data

In addition to filling gaps, other measures were also taken to harmonise data and make it comparable. This related mainly to the conversion of all values in national currencies into EUR and the calculation of staff figures and budget figures for the individual tasks.

Exchange rates

The monetary figures in this study are in EUR at 2009 prices. This study includes costs incurred over the full programme cycle, i.e. starting with the preparation of the National Strategic Reference Framework in 2005 (partly even in 2004) up to the closure of the programmes in 2015 or later. For countries outside the Euro zone with a floating currency which is not fixed to the Euro, there is no set exchange rate covering the full period. Given the current economic crisis, it is also impossible to predict where

the exchange rates will be by 2015. As there is no specified 'best' exchange rate, it was decided to use the average exchange rate for the period from 03.01.2007 until 17.11.2009.

Euro exchange rates

Country	National currency	Exchange rates		Comments ^{*)}
		EUR / National unit	National unit / EUR	
AT	EUR	1.00	1.00	EUR
BE	EUR	1.00	1.00	EUR
BG	BGN	0.51	1.96	fix exchange rate
CY	EUR	1.00	1.00	EUR
CZ	CZK	0.04	26.39	average rate between Jan 3, 2007 and Nov 17, 2009
DE	EUR	1.00	1.00	EUR
DK	DKK	0.13	7.45	average rate between Jan 3, 2007 and Nov 17, 2009
EE	EEK	0.06	15.65	fix exchange rate
ES	EUR	1.00	1.00	EUR
FI	EUR	1.00	1.00	EUR
FR	EUR	1.00	1.00	EUR
GR	EUR	1.00	1.00	EUR
HU	HUF	0.0038	260.63	average rate between Jan 3, 2007 and Nov 17, 2009
IR	EUR	1.00	1.00	EUR
IT	EUR	1.00	1.00	EUR
LT	LTL	0.29	3.45	fix exchange rate
LU	EUR	1.00	1.00	EUR
LV	LVL	1.42	0.70	average rate between Jan 3, 2007 and Nov 17, 2009
MT	EUR	1.00	1.00	EUR
NL	EUR	1.00	1.00	EUR
PL	PLN	0.26	3.86	average rate between Jan 3, 2007 and Nov 17, 2009
PT	EUR	1.00	1.00	EUR
RO	RON	0.27	3.73	average rate between Jan 3, 2007 and Nov 17, 2009
SE	SEK	0.10	9.81	average rate between Jan 3, 2007 and Nov 17, 2009
SI	EUR	1.00	1.00	EUR
SK	EUR	1.00	1.00	EUR
UK	GBP	1.27	0.79	average rate between Jan 3, 2007 and Nov 17, 2009

*) Source: ECB

We have debated whether the figures in Euro should be adjusted to purchasing power standard (PPS) in order to make the data more comparable with regard to the considerable variations in salary levels across Europe.

As most data is presented in relation to the total eligible expenditure we believe that adjusting all budgetary data to PPS will not increase the level of comparability. Indeed in these cases the expenditure data would also need to be adjusted and thus the relation between expenditure and administrative cost would stay the same. Furthermore, the choice of the year from which the PPS figures will be taken would influence the final results substantially. Instead then we propose to always consider both the staff figures and the administrative costs in Euro for the discussion of the administrative costs.

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Weighing staff and costs per task

In the questionnaires the respondents were asked to indicate the workload distribution over various tasks within programme management, certification and audit. This distribution was illustrated as a percentage of the total workload in relation to programme management, certification or audit.

Respondents were also asked to provide (a) the total budget, (b) the staff costs, and (c) the number of person years (full time equivalents) and their division over four staff categories (director/manager, head of unit/middle management, desk officer/administrator, assistant/secretary), and (d) the overheads for the programme management, certification and/or audit. For each task they were also asked to provide information on the external costs and on the share accounted for by the different staff categories in the work of that task.

Based on this information, the total costs for each task and the staff figures were calculated.

The staff figures, by task, were derived from the total staff figures in person years multiplied by the percentage of the workload indicated for that task.

For the budget figures by task, the total staff budget was multiplied by the percentage of the workload of a task. It was then weighted in relation to the other tasks under that budget according to the composition of the predominant staff types involved. Thus a task which is conducted by managers had a higher budget allocation than a task undertaken by assistants. Thereafter the overhead and the external costs were added.

In detail the staff costs for a task were weighted according to the following principle: Staff cost task = total staff costs x (1 + 40 x share of directors + 30 x share heads of units + 20 x share of desk officers + 10 x share of assistants). Thereafter the sum of the staff costs for all tasks were readjusted to the total staff costs in relation to their new values. Average salary levels for different staff categories in each individual country were obtained during the compilation of the "Who's who of the Structural Funds administration".

Qualitative sample studies

In order to check the quality of the data collected in the quantitative survey and to confirm the findings of the literature review, a complementary sample study analysis was undertaken. The main objective of the sample study was to provide qualitative insights focusing on the key actors at the programme level including: Managing Authorities, National Coordinators, Audit Authorities, Certification Authorities and Intermediate Bodies.

To ensure that the selection of sample studies was representative, the following categories were used:

- Cohesion Policy objective: Convergence/ Regional Competitiveness and Employment / European Territorial Cooperation
- Country: EU15 /EU12
- Relation between domestic and EU policies: differentiated/aligned/integrated (for further information, see the Methodology Report)
- Type of management structure: centralised, mixed, regionalised (for further information, see the Methodology Report)

This resulted in 45 samples covering all EU Member States. The sample studies were based on interviews and documentation. The interviews focused on key actors with considerable experience who could provide valuable answers and insights. The interviews were undertaken either by phone or face-to-face. In terms of the documentation studies, the Compliance Assessment was of particular interest. Other relevant sources included the Annual Implementation reports and the Operational Programme documents. All interviews were based on the same questionnaire which is presented in the box below.

Questionnaire for the sample studies.

What is the overall impression of the Structural Funds administration?

What are the main challenges?

What is considered specific for the case at hand?

What is the main evolution of the administrative costs?

How does the internal administrative capacity affect the cost patterns?

Are there any types of operations which imply a higher administrative workload?

How is the current administrative workload as compared to the 2000-06 period

What are the key features for which the administrative workload/costs have been increased or decreased?

Are these changes "one off" additional administrative workload (e.g. getting used to the new situation, employment of new staff etc.) or permanent workload?

Are the changes mainly related to changes in the EU or in the national settings?

How do the costs/workload of the Structural Funds administration compare to national policies/programmes

Are there any intangible benefits of EU Cohesion Policy for the administration?

What are the main bottlenecks and possible improvements?

What are the specific Structural Funds bottlenecks concerning the management task?

Are there any bottlenecks related to the timing of administrative tasks?

Do you have any suggestions for the future?

All in all, more than 200 different individuals were contacted and interviewed, representing a total of 127 different organisations, bodies or authorities. The table below illustrates the scope of the sample study and the distribution of organisations approached.

Distribution of interviewed organisations

Function	Number of interviewed
Managing Authorities	45
National coordinators	16
Certification Authorities	19
Audit Authorities	17
Intermediate Bodies	2
Beneficiaries	28