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AVIS DU COMITÉ DES ANALYSES D'IMPACT

COMMUNICATION DE LA COMMISSION AU PARLEMENT EUROPEEN, AU
CONSEIL, AU COMITE ECONOMIQUE ET SOCIAL EUROPEEN ET AU COMITE DES
REGIONS

UN CADRE STRATEGIQUE ACTUALISE POUR LA COOPERATION EUROPEENNE
EN MATIERE D'EDUCATION ET DE FORMATION

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Opinion

Title **Impact Assessment on the Communication "An updated strategic framework for European cooperation in education and training"**

Lead DG **DG EAC**

1) Impact Assessment Board Opinion

(A) Context

Policy cooperation between Member States and the Commission in education and training has taken the form of a specific Open Method of Coordination (OMC). The current arrangements are laid down in the Education and Training 2010 work programme. The European Council has on various occasions (most recently December 2007 and March 2008) emphasised that education and training/lifelong learning is a key driver of the Lisbon Strategy. This is reflected in the integrated guidelines for growth and jobs. Education and training are also identified as a key element throughout the renewed Social Agenda.

Following a specific request in the 2008 Joint Progress Report of Council and the Commission, the Education Council, and subsequently the March 2008 European Council, invited the Commission to make a proposal for an updated strategic framework for European cooperation in education and training.

(B) Positive aspects

In view of the strategic and framework-setting nature of the initiative, the analysis seems in general proportionate. The report provides a good account of the importance of education and training for the Lisbon goals.

(C) Main recommendations for improvements

The recommendations below are listed in order of descending importance. Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report, subject to the discussions that took place in the meeting with the Board

General recommendation: The report needs further work on a number of issues. In particular, it should better clarify the context of the initiative and corresponding IA, firstly by evaluating the current state of play in education and training on the basis of the existing 5 evaluation benchmarks; and secondly by evaluating to which extent the reported insufficient progress is a consequence of an inadequate set-up of the current Open Method

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of Coordination (OMC), new challenges, or the willingness of Member States to pursue educational reform and to coordinate at Community level. It should better relate the content of the different options with the specific governance issues of the current OMC and assess these options against the proper baseline and appraisal criteria. The report needs to be more specific on the monitoring indicators to be used, specifically on indicators on the OMC organisation and working methods.

(1) The report should provide a more explicit evaluation of the current state of play in education and training using the existing 5 evaluation benchmarks, formulated by Council in 2003. This would help to illustrate more clearly whether current progress is merely too slow or whether (some) problems have in fact deteriorated. Linking the benchmarks with the content of the discussion in the OMC would help to understand the role and contribution of the current OMC. Additionally, providing more information on the corresponding set of national targets would help to indicate both the ambition level and progress across the Member States, respectively through the indication of how many Member States have set national targets in the first place and the indication how much progress they have made in moving towards their own targets.

(2) The report should better explain the relation between the challenges identified in the field of education and training and the functioning of the current OMC. The report should explicitly recall the limited prerogatives of the Community in these policy fields and outline more clearly the supporting role of the OMC. Subsequently, it should indicate to which extent the noted lack of progress can be attributed to the set-up and working of the OMC. The report should also indicate whether the current OMC has been able to deal with the new challenges which have been identified such as those related to migration and sustainability.

(3) The content of the policy options should be more clearly related to the problems identified and to the operational objectives. Specifically, the definition of the different options (no OMC, continuation of current OMC, updated OMC, wider and deeper OMC) should address how the foreseen governance arrangements would address the identified weaknesses of the current OMC (need for stakeholder involvement, need for more mutual learning, need for better coordination etc). Furthermore, it should also be explained why the options cannot reflect different ambition levels on OMC outcomes or a different priority setting as regards the different fields of education and training policies.

(4) The assessment of the various options should be against a well defined baseline scenario and on the basis of appraisal criteria. The report needs to provide a clear description of the baseline scenario including future developments such as autonomous actions by Member States or progress in connection with the annual and biennial reports in the OMC context. All options need to be assessed against this dynamic baseline and not against the current situation. In case current OMC arrangements expire, the baseline should be clearly separated from the option where the current arrangements are prolonged. The report should use appraisal criteria which do not overlap (as is by definition the case with present criteria corresponding one-to-one with the different levels in the hierarchy of objectives) and which inform on to what degree the proposed options would tackle the identified OMC weaknesses, drawing explicitly on the main conclusions from the detailed analysis in Annex 2.

(5) The monitoring and evaluation arrangements should provide information on possible indicators. Specifically, the report should define already some "success indicators" on the OMC organisation and working methods, corresponding to the operational objectives.

(D) Procedure and presentation

The stand alone character of the IA report should be improved. In addition to the recommendations above, the main text of the IA report should explicitly draw on the extensive analysis of Annex 2 through references and through the recapitulation of its main conclusions.

The IA report should explain how the Board's recommendations have been taken on board. It should also better report on the procedural side of the internal and stakeholder consultation. As regards the former, the report should mention which DGs have participated in the Inter-Service Steering Group and how often it has met. As regards the latter, the report should state whether the minimum consultation standards have been met.

2) IAB scrutiny process

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