



EUROPEAN COMMISSION
IMPACT ASSESSMENT BOARD

Brussels,
D(2011)

Opinion

Title

DG SANCO - Impact Assessment for Health for Growth programme (2014-2020)

(draft version of 25 August 2011)

(A) Context

The Commission adopted an over-arching proposal for the next multiannual financial framework (MFF) for EU spending on 29 June 2011, fixing the overall budget, allocations across high-level headings and key implementation choices. A series of follow-up proposals to provide a legal basis for sectoral spending programmes and to establish their specific budgetary arrangements are currently being finalised. This Impact Assessment report will accompany one such proposal relating to the Health for Growth Programme. Total proposed allocation for the 2014-2020 period is €396 million (2011 prices).

The IAB has focused on the policy choices not yet fixed by the June MFF Communication.

(B) Overall assessment

The IA report needs to be improved in several important respects to better support decision making. Firstly, it should better present the policy context and improve the intervention logic to clearly reflect the links between the MFF communication announcements, the identified challenges for public health and the evaluation recommendations. Secondly, it should strengthen the baseline scenario and the presentation of policy change options, by clearly identifying the trade-offs between different actions, by considering sub-options, by explaining which actions are considered as priorities and by providing an overview of the planned budget allocations for different areas of intervention. Thirdly, the report should enhance the assessment of impacts. Finally, the monitoring and evaluation arrangements should be improved, particularly by defining robust progress indicators and by aligning the evaluation arrangements with the decision-making needs of the follow-up programme.

(C) Main recommendations for improvements

(1) Better explain the context of the proposal and improve the intervention logic.

The report should better present the policy context, by indicating the relevant announcements of the MFF Communication which already pre-define the scope of the new health programme. It should clarify how the identified challenges for public health in Europe relate to these announcements, and to what extent the new programme will be in a position to address these challenges. It should also explain the role of the envisaged financial measures in relation to the Commission's broader objectives and policy actions in this area. The report should be clearer about how the evaluation recommendations are reflected in the problem definition and the objectives. It should also strengthen the explanation about the necessity and the EU value added of the proposal, for instance by providing relevant examples from the previous programme. The report should make clearer that the programme mainly aims to leverage greater involvement and funding from Member States and private sector actors.

(2) Develop the baseline scenario and strengthen the presentation of options.

The report should present a robust baseline scenario describing more precisely how the identified problems would evolve in future if no changes are made to the current practice. As regards the policy change options, these should be clearly linked to the identified problems in line with the strengthened intervention logic. For policy option 3, the report should explain which measures are (i) a continuation of existing action under the two previous programmes, (ii) adapted to reflect the evaluation results or lessons learnt or (iii) new ones. It should then consider sub-options to option 3 that would reflect possible trade-offs between the measures. The report should clarify on which of the actions envisaged under option 3 the new programme will focus, and should explain how the priority areas of intervention were defined. It should also provide an overview of the planned budget allocations for different areas of intervention of the new Health programme (compared to the current programme). Also, the implementation aspects of the programme - including the simplification measures - should be discussed in greater detail.

(3) Improve the assessment of impacts and comparison of options.

The report should describe more precisely how the different measures of the new health programme will lead to the expected impacts. It should base the qualitative judgements on previous programme experience and underpin it by illustrative examples. In addition, the impact of potential measures to cut administrative costs should be more thoroughly analysed including through further quantification. Finally, the impacts of policy change options should be assessed as net changes against the baseline.

(4) Improve the monitoring and evaluation arrangements.

The report should define robust progress indicators which are clearly linked to the objectives of the programme. The evaluation arrangements should also be improved, particularly by clarifying how the decision-taking needs of the follow-up programme will be satisfied and by explaining the respective responsibilities of actors involved.

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.

(D) Procedure and presentation

The report should follow the structure set out in the IA guidelines. The different views of stakeholders should be presented in greater detail and should be better reflected throughout the report.

(E) IAB scrutiny process

Reference number	2011/SANCO/048
External expertise used	No
Date of Board Meeting	21 September 2011