



EUROPEAN COMMISSION
Impact Assessment Board

Brussels,
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Opinion

Title

DG EAC - Four impact assessments supporting the proposal for establishing a single Education, Training, Youth and Sport Programme for the period 2014-2020

(draft version of 4 August 2011)

(A) Context

The Commission adopted an over-arching proposal for the next multiannual financial framework (MFF) on 29 June 2011, fixing high-level budget allocations and some 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. To support one such proposal relating to the single Education, Training, Youth and Sport Programme for the period 2014-2020, DG EAC has prepared a package of four impact assessments (IA) examining (a) the operations of the relevant existing programmes (Lifelong Learning, different international cooperation programmes and Youth Programme) and (b) the options for the new sport strand.

The IAB has focused on the policy choices not yet fixed in the MFF package.

(B) Overall assessment

While a substantial amount of preparatory work has been carried out, the impact assessment reports require significant further work on a number of important aspects. The reports should provide a thorough assessment of the performance of the current programmes so as to indicate which actions and policy areas have given most effective results and what have been the main shortcomings in terms of programming. All conclusions should be better supported by evidence. The objectives should be more specific and clearly linked to the identified problems. On that basis the options should address, in addition to the different management modalities, alternatives in terms of policy content and priorities. Potential simplification and efficiency gains of the new integrated programme should be better corroborated. The *Lifelong Learning IA* should better present the rationale and key elements of the new European Student Loan Guarantee Facility. The scope and focus of the *Sport IA* should be more commensurate with the available resources and the limited scope of the EU intervention.

(C) Main recommendations for improvements

(1) Strengthen and focus the problem definition. Rather than being limited to the discussion of the broad policy context, the problem definitions of the reports should clearly focus on the scope and the value added of the relevant EU programmes (or preparatory action in case of the Sport IA). Following a brief overview of the main actions and objectives of the current programmes, the reports should provide thorough assessments of their performance. The analysis should consider stakeholder views and should particularly build on concrete evaluation results and other available evidence (e.g. statistics, examples). On that basis, the reports should indicate which actions/elements of the current programmes have been most effective and created a high EU value added, and which have not, e.g. due to lack of critical mass. The reports should also assess the efficiency of the administrative and management arrangements of the existing programmes.

(2) Be more specific about the objectives and focus of the programmes. In each policy field, the reports should set more concrete specific objectives, which reflect the priorities and ambition of the future programme and would enable its performance to be assessed. The operational objectives should *inter alia* reflect the identified performance gaps of the existing programmes, e.g. related to fragmentation of action, complexity of administration or budget unpredictability.

(3) Design and assess substantive policy options. Currently the reports consider only two alternative management options – integrated versus self-standing programmes. However, it would also be pertinent to analyse alternatives in terms of policy content and priorities. Coupled with the strengthened problem definition and focussed objectives, as suggested above, this would help to present a clearer intervention logic and better demonstrate the EU value added of the new programme. The reports should better show how the identified policy-relevant options would support swift reform of education systems and are linked to the Europe 2020 objectives. This should include a discussion of alternative allocations of the available overall budget between the different policy strands and key actions.

(4) Better demonstrate the efficiency gains. The conclusion that the new single programme could result in efficiency gains of about 40% (compared to the current situation of several self-standing programmes) should be corroborated by identifying and quantifying/monetising the main sources of anticipated savings (e.g. cutting the number of actions, streamlining management structures, reducing fixed costs, simplifying and modernising administrative procedures).

(5) Clarify the rationale for the European Student Loan Guarantee Facility. The IA on Lifelong Learning should better justify the need for the proposal to offer loan guarantees for Masters level students studying abroad (including proper subsidiarity analysis) and should better analyse its expected impacts. The report should clarify how the preparatory work for this new policy instrument has been carried out (e.g. feasibility study, consultations with stakeholders and experts), give an overview of its key elements (e.g. eligibility criteria, loan conditions), clarify management arrangements and assess the expected leverage effects and the risks related to non-reimbursements. The core points should be presented in the main report, while the technical details can be kept in an annex. The report should be clear that it would be an EU 'guarantee' and not a 'loan' facility.

(6) Clarify the objectives and the rationale of the Sport programme. Given the wide range of related problems, on the one hand, and the limited EU competence and funds, on the other hand, the Sport IA should focus in the problem definition on issues with the strongest EU added value potential. The objectives should accordingly be more commensurate with the available resources and help to show how the proposed actions (primarily incentive measures) would contribute to solving the identified problems. The report should also be clearer that the main reason for including the Sport strand in the integrated Education and Youth programme is administrative efficiency (rather than potential policy synergies).

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 reports should cross-refer to choices already made in the MFF June package. Given that this package of four IAs will support one proposal for a single programme, further efforts should be made to improve the consistency and complementarity of the individual IA reports (e.g. by harmonising structure and analytical approach, avoiding repetitions and using cross-references). Alternatively, the presentation of one integrated impact assessment report could be considered. The chapeau document, explaining the linkages between the individual IAs, could also serve as a common executive summary for the four IAs. However, such an integrated summary should reflect comprehensively all key findings of the individual IAs (it can be slightly longer than the standard 10 pages) and should be translated into all official languages.

(E) IAB scrutiny process

Reference number	2011/EAC/001
External expertise used	No
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