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#### COMMISSION STAFF WORKING DOCUMENT

**Evaluation of the Educational, Audiovisual and Culture Executive Agency (EACEA)** 

Accompanying the document

## REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL AND THE COURT OF AUDITORS

Evaluation of the Consumers, Health, Agriculture and Food Executive Agency, the Educational, Audiovisual and Culture Executive Agency, the Executive Agency for Small and Medium-Sized Enterprises, the European Research Council Executive Agency, the Innovation and Networks Executive Agency and the Research Executive Agency

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## Glossary

Term or acronym	Meaning or definition
Agency/Agencies	Executive agency/agencies
Commission	European Commission
CBA	Cost-benefit analysis
CHAFEA	Consumers, Health, Agriculture and Food
	Executive Agency
EACEA	European Education and Culture Executive
	Agency
EASME	Executive Agency for Small and Medium-Sized
	Enterprises
EDF	European Development Fund
EFTA	European Free Trade Association
ERCEA	European Research Council Executive Agency
EU	European Union
MFF	Multiannual financial framework
REA	European Research Executive Agency
SFS	Specific financial statement

#### 1. INTRODUCTION

Purpose and scope of the evaluation/fitness check

The purpose of this periodic (three-yearly) evaluation is to assess the operations of the Education, Audiovisual and Culture Executive Agency ('EACEA' or 'the Agency') from 1 January 2018 to 31 March 2021. In accordance with Article 25 of the Framework Regulation for executive agencies¹, the Commission submits this evaluation to the European Parliament, the Council, the Court of Auditors and the Steering Committee of the Agency.

During the evaluation period, EACEA was governed by:

- the Framework Regulation for Executive Agencies;
- its Establishment Act<sup>2</sup>, which sets out its mandate;
- the Delegation Act<sup>3</sup>, which specifies the tasks to be carried out and the powers delegated to the Agency; and
- the Decision setting up the EACEA Steering Committee.

EACEA is responsible for programme management that does not entail political decision-making but requires a high degree of technical and financial expertise throughout the project cycle. The Commission Decision of 18 December 2013 delegating powers to the Agency stipulates that 'it shall not perform any tasks involving a large discretion implying political choices'.

The legal framework is supplemented by the General Memorandum of Understanding between EACEA and its parent Directorates-General (signed in March 2015), which specifies the arrangements and procedures for their cooperation. The delimitation of responsibilities and tasks between the Agency and its parent Directorates-General, as set out in the Memorandum of Understanding, is analysed in greater detail in subsequent evaluation questions on coherence.

In accordance with Article 25 of the Framework Regulation<sup>4</sup> for executive agencies, the Commission assess the operations of each agency every three years and performs a cost-benefit analysis. It submits the respective report to the agency's Steering Committee, the European Parliament, the Council and the Court of Auditors.

This staff working document reports on the three-yearly evaluation of EACEA, which was part of a broader evaluation of the six executive agencies<sup>5</sup>. It concerns the period of EACEA's

Council Regulation (EC) No 58/2003 of 19 December 2002 laying down the statute for agencies to be entrusted with certain tasks in the management of Community programmes (OJ L 011, 16.01.2003, p.1, http://data.europa.eu/eli/reg/2003/58/oj).

Commission Implementing Decision 2013/776/EU of 19 December 2013 establishing the 'Education, Audiovisual and Culture Executive Agency' and repealing Decision 2009/336/EC.

Commission Decision of 18 December 2013 delegating powers to the Education, Audiovisual and Culture Executive Agency with a view to performance of tasks linked to the implementation of the Union programmes in the field of education, audiovisual and culture comprising, in particular, implementation of appropriations entered in the general budget of the Union and of the EDF allocations, C(2013) 9189 final.

Council Regulation 58/2003 of 19 December 2003 laying down the statute for executive agencies to be entrusted with certain tasks in the management of Community programmes (OJ L 011, 16.01.2003, p. 1).

Consumers, Health, Agriculture and Food Executive Agency (CHAFEA), Executive Agency for Small and Medium-Sized Enterprises (EASME), Innovation and Networks Executive Agency (INEA), Education, Audiovisual and Culture Executive Agency (EACEA), Research Executive Agency (REA) and European Research Council Executive Agency (ERCEA).

mandate under the 2014-2020 multiannual financial framework (MFF) that ran from 1 January 2018 to 31 March 2021.

In line with Article 12 of the Decision establishing the new agencies<sup>6</sup>, the evaluation covered all six agencies in a coordinated manner and followed a common evaluation methodology. It focused on their operations and performance during the evaluation period by providing answers to specific evaluation questions on effectiveness, efficiency and coherence, and included a retrospective cost-benefit analysis.

EACEA's operations were evaluated to assess how the Agency had implemented the parts of the EU funding programmes entrusted to it. This concerns the six programmes managed by EACEA between 2018 and 2021: Europe for Citizens (2014-2020), Erasmus+ (2014-2020), Creative Europe (2014-2020), the European Solidarity Corps (2018-2020), EU Aid Volunteers (2014-2020) and the Pan-African programme (2014-2020). While the evaluation did not focus on their operational achievements, because such results are evaluated separately, the evaluator took into account the results of such completed evaluations where necessary.

In line with the Commission's better regulation principles<sup>7</sup>, the evaluation assesses whether: (i) the Agency has fulfilled its tasks effectively and efficiently; (ii) there are overlaps, gaps or inconsistencies in its management of the programme portfolio; and (iii) whether there is a clear delimitation of tasks between EACEA and the parent Directorates-General or other executive agencies (coherence)<sup>8</sup>.

The evaluation also assesses whether the functioning of the Agency has produced the positive results that were predicted in the 2013 cost-benefit analysis and in the specific financial statement to occur as a result of the delegation of tasks to the Agency. To that end, the assessments in the 2013 cost-benefit analysis have been tested to prove the validity of the assumptions in the *ex ante* scenario by considering in a structured way the actual costs and benefits of programme implementation by the Agency. The aspects to be covered by the cost-benefit analysis are specified in Article 3(1) of the Framework Regulation<sup>9</sup> and in the Guidelines on establishing and operating executive agencies<sup>10</sup>.

Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on 'Better Regulation: joining forces to make better laws', COM(2021)219 final of 29.4.2021, and Commission Staff Working Document on 'Better Regulation Guidelines', SWD(2021)305 final of 3.11.2021.

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Commission Implementing Decision (EU) 2021/173 of 12 February 2021 establishing the European Climate, Infrastructure and Environment Executive Agency, the European Health and Digital Executive Agency, the European Research Executive Agency, the European Innovation Council and SMEs Executive Agency, the European Research Council Executive Agency, and the European Education and Culture Executive Agency and repealing Implementing Decisions 2013/801/EU, 2013/771/EU, 2013/778/EU, 2013/779/EU, 2013/776/EU and 2013/770/EU (OJ L 50, 15.2.2021, p. 9).

The assessment of 'EU added value', or why the EU should act, is not perceived to be a relevant criterion, as the agencies execute tasks transferred to them by the European Commission. The EU added value of the programmes that the agencies manage is assessed as part of the programme evaluation. The programme evaluation also assesses previous needs that the Agency has to address and whether they are still pertinent today (relevance).

The Cost-benefit analysis should include the following: (i) the identification of tasks that justify being outsourced; (ii) the costs of coordination and checks; (iii) the impact on human resources; (iv) possible savings within the general budgetary framework of the European Union; (v) efficiency and flexibility when implementing outsourced tasks; (vi) the simplification of the procedures used; (vii) the proximity of outsourced activities to the final beneficiaries; (viii) the EU's visibility as promoter of the EU programme concerned; and (ix) the need to maintain an adequate level of know-how within the Commission.

Appendix II of the Guidelines for the establishment and operation of executive agencies financed from the Union budget (C(2014) 9109 from 2 December 2014.

The evaluation of EACEA provides useful input for evaluating the programmes, as the Agency's performance affects the efficiency and effectiveness of the programmes it manages. The evaluation is based on a study carried out by an external contractor<sup>11</sup>.

The evaluation of the Agency's performance is evidence-based and uses a mixed-methods approach, which combines:

- a qualitative approach, based on open-ended survey questions, interviews, a documentary review and desk research, a qualitative cost-benefit analysis; and
- a quantitative approach, based on administrative and monitoring data, surveys and a quantitative cost-benefit analysis.

Relevant stakeholders were consulted via interviews and surveys (Commission staff, EACEA staff, beneficiaries, unsuccessful applicants and experts). Unsuccessful applicants participated less actively than beneficiaries. The low response rate (i.e. 15% on average) to the survey by beneficiaries and unsuccessful applicants could be due to survey fatigue.

The evaluation examines the efficient use of resources and the effective achievement of the tasks entrusted to the Agency. It assesses whether:

- the alignment of programme portfolios that are more coherent with the Agency's core mandate and its brand identity delivered the estimated qualitative benefits;
- the consolidation of the management of different EU programmes delivered the estimated synergies, simplification and economies of scale;
- the pooling of instruments guaranteed consistent service delivery; and
- whether there is scope for simplification and further efficiency gains.

#### 2. WHAT WAS THE EXPECTED OUTCOME OF THE INTERVENTION?

#### 2.1. Description of the intervention and its objectives

As outlined in the Framework Regulation for executive agencies and in EACEA's Establishment Decision, the outsourcing of certain management tasks to the Agency in the 2014-2020 MFF has a twofold purpose.

Firstly, it allows the Commission to focus on its institutional tasks, i.e. tasks assigned to the institutions by the Treaty on the Functioning of the European Union which require discretionary powers in translating political choices into action. Such institutional tasks should not be outsourced.

Secondly it enables the Commission to achieve the objectives of the delegated EU programmes more effectively. The 2013 cost-benefit analysis indicated that it was more cost-efficient to delegate certain programme tasks to the Agency than to perform them in house.

The Establishment Decision stated that aligning programme portfolios that are more coherent with the Agency's core mandate and its brand identity would bring qualitative benefits and

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Study supporting the evaluation of CHAFEA, EACEA, EASME, ERCEA, INEA & REA (2017/2018-2021), Final Report: EACEA,

that consolidating the management of different EU programmes would bring synergies, simplification and economies of scale.

The Agency has a varied portfolio of programmes and compared with other agencies, awards its beneficiaries smaller than average grants. During the evaluation period (1 January 2018 to 31 March 2021), EACEA managed the following programmes or parts of programmes:

- Creative Europe,
- Erasmus+,
- Europe for Citizens,
- EU Aid Volunteers,
- the European Solidarity Corps, and
- the Pan-African programme.

Not only has EACEA's mandate changed with regard to various EU programmes, but the Agency's parent Directorates-General have also changed slightly. During the current evaluation period, four parent Directorates-General supervised EACEA:

- the Directorate-General for Education, Youth, Sport and Culture (the lead parent Directorate-General);
- the Directorate-General for Communications Networks, Content and Technology;
- the Directorate-General for Migration and Home Affairs (replaced by the Directorate-General for Justice and Consumers on 1 January 2020 due to the transfer of the Europe for Citizens programme to that Directorate-General); and
- the Directorate-General for European Civil Protection and Humanitarian Aid Operations.

The intervention logic is in line with the Agency's objectives and activities, as provided for in its legal basis. It has been adapted to the specific context, objectives, inputs, and processes for measuring the Agency's key results and performance. The below figure summarises the intervention logic used:

#### EACEA's intervention logic: **Outcomes** (results **Needs and context Objectives** Outputs Inputs **Processes** and impact · Calls for proposals/tenders Needs Context · Managing all stages of programme · Human resources · Satisfaction of the key · High level of technical and financial Adding European implementation and all phases in · Proposal evaluation and Financial resources expertise throughout the programme Solidarity Corps to the lifetime of specific projects selection stakeholders (applicants, · Achievement of KPIs · IT tools beneficiaries, experts and the and project management cycle the portfolio of · Signing of grant · Adopting the instruments of budget · Key metrics related to Communication Commission) · Efficiency and flexibility in the EACEA execution for revenue and agreements/contracts proposal and project channels Increased and better supported implementation of the delegated tasks · Rebuilding the expenditure and carrying out all the · Financial management management cycle access to the EU funding · Simplifications of the procedures used smooth collaboration operations necessary for the · Project/contract monitoring · Provision of policy · Improved attractiveness of the and closure/follow-up activities Clear division of programme with parent DGs in management of the programme feedback to parent DGs EU programmes and activities management tasks between the the light of IAS audits Providing support in programme · Information and support to (improved visibility of the EU and Commission and the agencies EACEA's implementation, including support potential applicants, applicants its image among the citizens) · Availability of the Commission to focus and beneficiaries (through reorganisation in dissemination activities, where · Better informed policy making by on legislative and strategic tasks in through the relevant in cooperation with various stages of the parent DGs policy formation and monitoring, Transformation national agencies programme cycle) · Contribution to policy priorities of including those connected with Union Project · Implementation, at Union level, of · Dissemination activities and parent DGs and programmes COVID-19 pandemic programmes the network of information on recommendations to parent DGs/stakeholders managed · Increased visibility without any and Brexit education in Europe (Eurydice) and intervention by third parties as activities intended to improve · Preparations to move intermediaries to the corporate understanding and knowledge of · Proximity of the delegated tasks to eGrants tool the field of youth and in the field of final beneficiaries vocational education and training. · Having a single entry point for all potential recipients of Union funds in a Efficiency Coherence given field (Internal) · Possibility of economies of scale (process) Efficiency (operational) Relevance **Effectiveness** Coherence Added (External)

Source: Study supporting the triennial evaluation of the Agency

value

When implementing the programmes delegated to it, EACEA was responsible for: (i) publishing calls for proposals after their approval by the Commission; (ii) evaluating and selecting projects; (iii) signing grant agreements and contracts; (iv) monitoring projects; (v) carrying out the necessary checks and recovery procedures; and (vi) performing budget implementation tasks covering revenue and expenditure under the EU Financial Regulation<sup>12</sup>. The budget implementation tasks involve, in particular:

- managing the operations and procedures leading to the adoption of Commission award decisions and to the conclusion of grant agreements, and managing the ensuing decisions and agreements;
- providing support in programme implementation;
- performing all the operations required to launch contests and award prizes under the EU Financial Regulation; and
- concluding public procurement procedures and managing the ensuing contracts, including the operations required to launch and conclude such procedures.

The key inputs are human resources, financial resources, IT tools and communication channels. The key processes are set out in EACEA's Act of Delegation, and the main outputs of EACEA's performance relate to the management of the delegated programmes. The achievement of the outputs depends on the achievement of key performance indicators (standard indicators of financial management), which reflect the key metrics related to proposal and project management life cycle (e.g. number of calls, number of ongoing projects, etc.). The key policy feedback-related outputs were also taken into consideration.

Outcomes relate to the key results and impacts achieved during the evaluation period (medium- to long-term outcomes). The satisfaction of unsuccessful applicants, beneficiaries and experts with the Agency's performance was one of the key indicators used to measure those results. Outcomes also include better-informed policymaking by the parent Directorates-General, as well as contribution to the policy priorities of the parent Directorates-General and the programmes managed by the Agency.

The results of the quantitative cost-benefit analysis are also presented in this evaluation. They include the workload analysis and the evaluation of key workload drivers, assumptions and productivity indicators (operational budget delegated to the Agency, number of proposals, number of projects, etc.) underpinning the workload analysis and staffing estimates in the 2013 cost-benefit analysis and/or specific financial statement, compared with the current situation.

### 2.2. Baseline and point(s) of comparison

This evaluation of EACEA's operations from 1 January 2018 to 31 March 2021 assesses the actual costs and benefits of programme implementation by EACEA (executive agency scenario) compared with the alternative scenario of management by Commission departments (in-house scenario).

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Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012 (OJ L 193, 30.7.2018, p. 1).

Accordingly, the reference points for the current EACEA evaluation are the 2013 ex ante cost-benefit analysis and EACEA's specific financial statement.

The costs of the executive agency scenario were much lower than the estimated costs of the in-house scenario. In 2018-2020, the cost difference between the executive agency scenario and the in-house scenario resulted in cost savings of EUR 87.7 million (or 36.4% of the estimated costs under the in-house scenario).

As shown in the intervention logic table above, the main outputs of EACEA's performance relate to the Agency's implementation of the EU programmes and the provision of policy feedback to parent Directorates-General. Key performance indicators, standard indicators of financial management, and key metrics for the proposal and project management lifecycle (e.g. number of calls, number of running projects, etc.) were used to assess the implementation of EU programmes. The Agency's key policy feedback-related outputs were also taken into consideration.

The satisfaction of unsuccessful applicants, beneficiaries and experts with the Agency's performance was considered a key output and was measured via a survey. The EU's visibility as the promoter of the programmes entrusted to the Agency was assessed through the Agency's external communication and media campaigns and via a survey.

#### 3. HOW HAS THE SITUATION EVOLVED OVER THE EVALUATION PERIOD?

*Current state of play* 

EACEA was set up by Commission Decision No 2005/56/EC to manage EU activities in the fields of education, audiovisual and culture, and is one of the oldest executive agencies of the Commission. Since 2006, EACEA has been responsible for programme management that does not entail political decision-making, but which requires a high degree of technical and financial expertise throughout the project life cycle. Its programme management and policy feedback activities help to implement the broader Commission priorities and the objectives of the parent Directorates-General.

As stipulated in the EACEA Delegation Decision, a Memorandum of Understanding was signed between EACEA and the parent Directorates-General. It established the detailed rules and procedures for interaction and set out a clear delimitation of responsibilities between EACEA and its parent Directorates-General. This evaluation assesses whether that distribution of roles was complied with between 1 January 2018 and 31 March 2021, as well as the effects of the intervention on the coherence and the efficiency of EACEA's activities.

EACEA successfully adapted to the challenges of the COVID-19 pandemic by adapting its activities to the remote working environment and enabling staff to work remotely.

The retrospective cost-benefit analysis revealed that in 2018-2020, EACEA managed to cope using the staff allocated to it. The composition of staff (the ratio of temporary agents to contract agents) corresponded to estimates in the specific financial statement. Over the course of the evaluation period, the Agency underwent significant organisational changes, which were implemented via EACEA's transformation project and led by the newly appointed Director and the Steering Committee. The Agency's reorganisation was carried out in a participatory manner, informed by extensive consultations with its staff. As a result, a second

department (Department B: Creativity, Citizens and Joint Operations) and two horizontal support units were set up to strengthen coherence, synergies and administrative support across the Agency's operational units, and to contribute to efficiency and compliance.

EACEA's staff engagement index increased from 59% in 2018 to 67% (i.e. 2% above the threshold) outside the evaluation period in 2021. Although the Agency did not achieve its target for the percentage of women in middle management (which fell from 23% in 2019 to 20% outside the evaluation period in 2021), the responsibility for this lies with the Commission, which appoints the Agency's leadership.

The occupation rate at EACEA remained stable between 2018 and 2020, while the staff turnover rate increased slightly. In 2021, with the arrival of the new MFF and a continued increase in activities and staff, the occupation rate was initially slightly lower than in previous years (91%), while the turnover rate was 5.5%.

During 2018-2020, the administrative budget actually implemented by EACEA<sup>13</sup> amounted to EUR 149.7 million. Based on the EU contributions, the actual administrative budget of EACEA amounted to EUR 140.94 million and was 4.7% lower than that estimated in the specific financial statement, representing savings of EUR 6.95 million. The estimates in the specific financial statement were based on the EU contribution only, whereas EACEA's administrative budget also included contributions from EFTA, non-Member States and the European Development Fund (EDF) (EUR 8.746 million in 2018-2020) which gave the Agency an additional operational budget.

EACEA's actual operational budget<sup>14</sup> in 2018-2020 amounted to EUR 2.65 billion, of which EUR 101.49 million came from contributions from EFTA, non-Member States and the EDF, which were not taken into consideration in EACEA's specific financial statement. Excluding those contributions, EACEA's operational budget in 2018-2020 amounted to EUR 2.55 billion, which is 4% higher than the initial estimates in the specific financial statement (EUR 2.45 billion).

The total number of calls for proposals launched by EACEA remained stable overall throughout the previous evaluation periods and during 2018. During the current evaluation period, the number of calls launched each year varied widely. In 2019, the number of calls increased significantly to 51 (from 28 in 2018) but decreased sharply again in 2020. That fall could be attributed to the end of the 2014-2020 programming period, which led the Agency to focus on evaluating and finalising ongoing projects. The year in which the greatest number of calls for proposals was launched (106) was 2021, which marked the beginning of the 2021-2027 MFF.

The number of grants concluded under 2018-2020 calls was very close to the estimates in the cost-benefit analysis. The number of grants was 19% higher for Erasmus+, which was mostly due to the programme's higher operational budget. The lower number of Creative Europe grants in 2019 and 2020 was due to the revision of three schemes under the MEDIA subprogramme, which resulted in a reduction in the number of low-value grants awarded. The

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Based on executed commitment appropriations.

In commitment appropriations. Including EDF – Intra-ACP (African, Caribbean and Pacific) allocations, which were not included in the draft annual accounts and financial reports presented in Annex 3 of EACEA's Annual Activity Reports.

number of Europe for Citizens grants was 25% lower than initially estimated in the costbenefit analysis owing to higher-than-anticipated average grant sizes.

The number of signed grants increased slightly throughout the period (i.e. from 3 606 in 2018 to 3 932 in 2020).

During the evaluation period, EACEA continued to manage a broad but thematically coherent portfolio of programmes, requiring high levels of expertise in several policy fields (citizenship, education and training, media, youth, sport, culture, volunteering, and humanitarian aid). The programmes (or parts of programmes) managed included Creative Europe, Erasmus+, Europe for Citizens, EU Aid Volunteers, the Pan-African programme, the European Solidarity Corps and some projects from the 2007-2013 legacy programmes. EACEA's mandate was expanded four times to include:

- youth, social inclusion, volunteering and policy support in 2018;
- the European Universities initiative and the management of European Youth Together later in 2018;
- parts of the management of the European Solidarity Corps programme, which were delegated to the Agency in November 2018 (the key change to its portfolio during the evaluation period); and
- higher education, vocational education and training, social inclusion, volunteering, and humanitarian aid in 2019.

#### 4. EVALUATION FINDINGS (ANALYTICAL PART)

### 4.1. To what extent was the intervention successful and why?

#### **Effectiveness**

For this evaluation, effectiveness relates to how successful the Agency has been in achieving or progressing towards its objectives as set out in the annual work programmes during the evaluation period. Other questions concerned the Agency's ability to react and adapt to the challenges posed by the COVID-19 pandemic.

The analysis of EACEA's operations concluded that it operated within its legal framework during the evaluation period, continuously improved its operations and achieved a high level of overall effectiveness, as demonstrated by key performance indicators and the high satisfaction rate expressed in surveys by the stakeholders.

Overall, EACEA performed well about programme implementation and achieved most of the key performance indicators, as mentioned below.

The Agency smoothly and effectively accommodated changes in its mandate. It responded well to the Commission's changing political priorities and to the COVID-19 pandemic. EACEA was successful in producing its intended outputs and results and in achieving most of the key performance indicators. Overall, EACEA's stakeholders (parent Directorates-General, beneficiaries, unsuccessful applicants, and external experts) were satisfied with its performance.

The Agency took steps to improve its key external communication channels and measures during the evaluation period and met all its various external communication targets for 2018-2020.

EACEA provided effective support and remained accessible to unsuccessful applicants, beneficiaries, and external experts during the different stages of the proposal and project life cycle. However, the study found that the Agency had room to further improve the support it provided during the application phase, for example, by:

- encouraging Erasmus+ and European Solidarity Corps national agencies to coordinate their interaction with the applicants;
- identifying and addressing gaps in support for and communication with applicants; and
- sharing good practices and lessons learned.

The Agency should improve or formalise cooperation with Erasmus+ and European Solidarity Corps national agencies to share and implement good practices.

Other improvement measures include facilitating the application process, enhancing the accessibility of funding opportunities and providing applicants across different programmes, actions and countries with access to relevant guidance, information materials, upcoming information sessions, workshops and training.

The Agency's mandate has been extended several times. Overall, based on the findings of the document analysis and interviews with Commission officials and Agency staff, EACEA's activities were consistent with its mandate and tasks during the evaluation period, and the evaluation team did not identify any discrepancies. According to interviews with both Commission and EACEA staff, the Agency aligns its activities with its mandate so that it can perform its tasks coherently.

#### **Efficiency**

This section considers the relationship between the resources used by the Agency and the output. Among other factors, it covers the management and execution of programmes managed by the Agency, and how sound the financial and human resource management was during the evaluation period. It also includes an analysis of the administrative and regulatory burden and looks at aspects of simplification. Those aspects are covered by key indicators taken from Agency performance and by additional survey data.

Overall, EACEA managed and executed the programmes efficiently and performed well in terms of operational efficiency during the evaluation period. The Agency exceeded the estimated 'budget per head' ratio and spent less than the estimated administrative budget, thereby decreasing the ratio of the administrative to the operational budget compared with the previous evaluation period. In addition, the parent Directorates-General highlighted the Agency's long experience in programme implementation, specialised processes and knowledge, the number of available staff members and their proximity to beneficiaries.

However, in line with the previous evaluation period, EACEA's costs remain higher compared with other agencies evaluated. This is because its projects are smaller than those of other agencies and because it has a large number of different types of applicants and beneficiaries, including small civil-society organisations.

EACEA introduced changes and simplifications in preparation for the 2021-2027 MFF, mainly by onboarding the corporate IT tool eGrants to streamline business processes across programmes, which temporarily increased the applicants' and beneficiaries' workload. Future simplifications and changes to processes should be linked to specific outcomes, and a clear

approach must be taken to monitoring and evaluating their effectiveness across different programmes/measures, to identify potential gaps.

EACEA achieved its operational objectives during the evaluation period. EACEA implemented its budget in line with sound financial management principles. The Agency also had good results in relation to financial management and control system indicators.

EACEA launched an in-depth revision of its internal control system and made consistent improvements throughout the evaluation period to address the audit recommendations received. In this respect, EACEA also implemented the 'EACEA Transformation Project' and achieved internal synergies by centralising certain business processes and procedures across programmes in horizontal support units. This gave the opportunity to carry out a substantial internal mobility exercise to support career development and the best use of staff competencies. By the end of the evaluation period, EACEA demonstrated an effective and reliable internal control system aligned with the principles of sound financial management.

As the result of an Internal Audit Service Audit on Erasmus+ and Creative Europe grant management, the Service recommended that EACEA's anti-fraud strategy should be updated. The Commission revised its 2019 anti-fraud strategy and its accompanying action plan in 2023. It concluded that the 2019 anti-fraud strategy remains valid and that the action plan merely needs to be updated. The EACEA anti-fraud strategy for 2021-2023 was approved in June 2021.

During the evaluation period, EACEA was monitored through five key performance indicators. The Agency met most of those key performance indicators in 2019-2021, with the exception of the 'time-to-pay' targets. The content of some key performance indicators changed during the evaluation period, with significant changes occurring in 2021.

The 'time-to-grant' indicator remained stable during the evaluation period with a target of 9 months, which was achieved (7 months in 2018, falling to 5.52 months in 2021). The Agency met the 'time-to-pay' indicator in 2018 (achieving 98% vs a target of 90%), was close to the target in 2021 (97% vs a target of 100%) but fell below the target value of 100% in 2019 and 2020 (achieving 95% in both years). The deviation from the target in 2020 was mainly due to the lockdown and enforced remote working, which slowed down the processes.

Although the Agency's operational and administrative budget increased during 2018-2021, EACEA proved to be an efficient and cost-effective structure for managing the delegated programmes. This was demonstrated by the programme management cost ratio between the Agency's administrative budget and the operational budget it manages.

EACEA almost achieved full budget execution, with 97% of commitments and 94% of payments executed in 2018, rising to 100% and 99% respectively in 2021. The payments executed dropped to 91% in 2020 as a result of the COVID-19 pandemic and the lockdown policies that halted the implementation of some projects.

In general, the Agency's administrative budget rose steadily from EUR 49.6 million in 2018 to EUR 53.9 million in 2021. The largest rise was seen in the budget for infrastructure and operating expenditures (from EUR 8 million in 2018 to EUR 9.1 million in 2021) and in staff expenditures (from EUR 35.9 million in 2018 to EUR 39.5 million in 2021).

In general, EACEA's operational budget has been fluctuating since 2018. It rose from EUR 752 to EUR 970 million in 2018-2020 but fell to EUR 834 million (EUR 136 million less than the year before) in 2021.

There were 1 026 experts in 2020 and 806 in 2021, but the evaluation report does not state how many experts were contracted during 2018-2019.

The costs for experts varied in line with the operational budget. The average expert expenditure was at its lowest in 2018 at EUR 354 per proposal, it peaked at EUR 473/proposal in 2020 and then declined to EUR 401/proposal in 2021.

The Agency's application, evaluation and selection processes were transparent, user-friendly and clear overall. However, as in the previous evaluation period, EACEA's programme management costs remain higher than those of the other executive agencies evaluated. In this context, it should be noted that the average size of the projects managed by the Agency are smaller than those of other agencies, and it works with a large number of applicants and beneficiaries of various types, including small civil-society organisations.

During the evaluation period, EACEA introduced changes and simplifications in preparation for the 2021-2027 MFF. The Agency increased digitalisation (by implement remote working and streamlining and digitalising workflows), switched to corporate IT tools (e.g. the onboarding of the corporate grant management tool eGrants) and created horizontal units. The expansion of simplified cost options has eased the work of beneficiaries and reduced EACEA's administrative burden. The Agency expects those simplifications to help maintain low error rates and contribute to faster payment and application processes.

However, based on interviews with the Agency and its parent Directorates-General, the transition increased the workload for applicants and beneficiaries during some stages of the application and project cycle.

#### Coherence

Coherence looks at any overlaps and complementarities within the programme portfolio managed by the Agency and at the delimitation of responsibilities between the Agency and its parent Directorates-General. Other questions related to the Agency's ability to provide feedback on policy to its parent Directorates-General.

The study confirmed EACEA's ability to fulfil its responsibilities efficiently and effectively. The Agency's significant expertise in programme management in the specific fields of the delegated programmes enables the Commission to focus on its primary policymaking role.

EACEA took a coherent approach to implementing programmes and coordinating with the Commission. The revisions and updates of the Agency's organisational structure, various communication and working arrangements and streamlining of processes facilitated that progress.

To ensure overall coherence, the legal framework and the supplementary Memorandum of Understanding set out clear provisions on the division of responsibilities between EACEA and its parent Directorates-Generals. EACEA's transformation project successfully exploited opportunities to enhance coherence. The project addressed the organisational setup to accommodate the increasing complexity of the Agency's mandate and its interactions with a growing number of Directorates-General. The organisational restructuring brought clarity to

the overall management of the Agency. In addition, overall efficiency and coherence were increased through further streamlining of processes, setting up working arrangements and harmonising the points of contact between the Agency and its parent Directorates-General.

Overall, the evaluation revealed significant improvements to the coordination and communication arrangements and practices between EACEA and the Commission.

The cooperation between the Agency and the Commission in preparing work programmes was positive overall, but the study found that it could be improved by ensuring the earlier involvement of the Agency and by further exploiting the potential for smoother planning and implementation.

Feedback to policy by the Agency could benefit from a more qualitative approach to better reflect the real-life impact of the programmes. The parent Directorates-General and the Agency should work closely together to set specific feedback to policy arrangements.

#### 4.2. Cost-benefit analysis

The retrospective cost-benefit analysis for 2018 to 31 March 2021 was carried out based on the results of the 2013 *ex ante* cost-benefit analysis, the assumptions in the specific financial statement and EACEA's actual costs.

For EACEA, the costs of the executive agency scenario were much lower than the estimated costs of the in-house scenario. In 2018-2020, the difference in costs between the executive agency scenario and the in-house scenario is EUR 87.7 million. When the savings initially estimated in the specific financial statement and the cost-benefit analysis were compared with the actual savings from delegating tasks to EACEA, the actual savings during 2018-2020 were found to be 24.7% higher than the estimates in the initial specific financial statement (EUR 87.7 million compared with EUR 70.3 million). The savings in the executive agency scenario resulted primarily from a higher proportion of lower-cost contract agents being employed in the Agency, and a lower overall number of staff members.

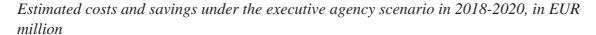
During 2018-2020, the administrative budget actually implemented by EACEA<sup>15</sup> amounted to EUR 149.7 million. The estimates in the specific financial statement were based on the EU contribution only, whereas EACEA's administrative budget also included contributions from EFTA, non-Member States and the EDF (EUR 8.746 million during 2018-2020) to manage an additional operational budget. Based on the EU contributions, the actual administrative budget of EACEA amounted to EUR 140.94 million and was 4.7% lower (representing savings of EUR 6.95 million) than that estimated in the specific financial statement.

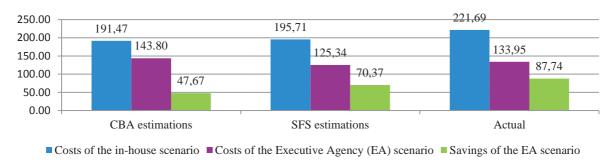
The specific financial statement estimates were based on the EU contribution alone, but EACEA's administrative budget also included contributions from EFTA, non-Member States and from the EDF (EUR 8.746 million during 2018-2020) which gave the Agency an additional operational budget. Based on the EU contributions only, the actual administrative budget of EACEA amounted to EUR 140.94 million, 4.7% which was lower than estimated in the specific financial statement, with savings of EUR 6.95 million.

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Based on executed commitment appropriations.

Between 2018 and 2020, the number of staff at the Agency decreased slightly (from 442 to 432 actual staff). The planned number of staff decreased from 462 in 2018 to 455 in 2020. There were fewer posts at the Agency in 2018 compared with 2017 due to the move to SEDIA (Single Electronic Data Interchange Ares) and a decrease in posts financed by R0 ('Third Countries') and EDF credits. In 2021, which is largely outside the period of this evaluation, the total number of posts increased to 500<sup>16</sup>, of which 454 were occupied at the end of the year<sup>17</sup>. The Agency received additional posts under the 2021-2027 MFF and launched efforts to bolster its staff in 2021.





Source: Study supporting the triennial evaluation of the Agency

Staff-related expenditure (Title I) was higher than in the initial estimates because of average staff costs being higher than initially estimated. Therefore, average staff cost estimates in the specific financial statement were constant for 2014-2020, but actual average staff costs rose during that period due to salary indexation, promotions, seniority increments<sup>18</sup>. During 2018-2020, actual average staff costs at EACEA were higher than the average costs for the Commission, in terms of both temporary agents and contract agents.

The actual infrastructure and operating expenditure (overheads, Title II) during 2018-2020 was 11% below the specific financial statement estimates. EACEA's actual average overheads were also lower than the average costs for the Commission. Actual programme support expenditure (Title III) in 2018-2020 was 25% below the specific financial statement estimates. The increase in Title I expenditure could be offset by the lower actual expenditure under Title II and Title III.

#### 5. WHAT ARE THE CONCLUSIONS AND LESSONS LEARNED?

#### 5.1 Conclusions

The results of the evaluation of EACEA confirm that the delegation of programme implementation generated significant cost savings in EU budget and high value for money and was therefore considerably more cost-effective than the in-house scenario, as demonstrated by the retrospective cost-benefit analysis in the evaluation report.

<sup>&</sup>lt;sup>16</sup> EACEA's Annual Work Programme for 2021.

EACEA's Annual Activity Report for 2021

The issue of higher staff costs was already highlighted during the previous evaluations of EACEA and corresponding retrospective CBAs.

The Agency was effective and efficient in achieving its objectives, which are to implement the parts of EU programmes that have been delegated to it and to provide administrative and logistical support to Commission services and other agencies. This is demonstrated by the key performance indicators and the high levels of stakeholder satisfaction.

The Agency and the relevant Commission departments communicated through well-functioning mechanisms, which were formalised and improved over the evaluation period. No evidence of overlaps, gaps or inconsistencies in the Agency's management of the programme portfolio was identified. There was a clear delineation of tasks between the EACEA and the parent Directorates-General.

With pressure on the EU budget rising, EACEA is encouraged to strengthen the internal synergies between the different programmes it manages and to improve its cooperation with other agencies. It should do this, in particular, by continuing the positive trend of sharing knowledge and good practices so that it can maintain and improve its performance as a lean and flexible administration.

#### 5.2 Lessons learned

In the light of the above, EACEA may wish to consider developing measures to improve the support provided to potential beneficiaries during the application stage. Such measures could serve to: (i) encourage national bodies to streamline existing support; (ii) identify and address gaps in support for - and communication with - applicants; and (iii) share good practices and lessons learned. Several steps in this direction have already been taken (e.g. formalising the cooperation between EACEA and national agencies, expanding the use of multilingual resources, and improving information sharing and communication procedures).

Another recommendation that is already being addressed by EACEA and the Commission is to ensure that current and future harmonisation and simplification efforts serve the needs of EACEA's programmes and stakeholders. Over the years, the central Commission departments have taken robust steps towards harmonising processes and procedures across the Commission and its agencies, while still addressing the needs for flexibility specific to different policy areas. With the 2021-2027 MFF, programmes and the IT systems that underpin them have been designed to address gaps and lessons learn from the previous programmes.

EACEA underwent a significant organisational change during the evaluation period. This resulted in the introduction of a second department and two horizontal units that aim to improve coherence, synergies and administrative support across operational units. These changes are starting to show results in 2023. The Commission and EACEA will continue to monitor and track the Agency's progress to identify not only opportunities for further fine-tuning and improvement, but also potential best practices that could help other agencies undergoing similar transformations.

The evaluation study has confirmed that the monitoring, reporting and supervision arrangements put in place by the Agency and the Commission were effective. They ensured accountability and sufficient knowledge transfer between EACEA and its parent Directorates-General. The Agency and its parent Directorates-General should address a point for improvement by strengthening their cooperation during the preparation of work programmes.

Through its feedback to policy activities, the Agency provides its parent Directorates-General with extremely useful insights on the functioning of the programmes it implements. The Agency could further strengthen this work, by focusing more on qualitative data to better reflect the programmes' real-world impact.

#### ANNEX I: PROCEDURAL INFORMATION

The evaluation was supported by an external study and followed the Commission's Better Regulation principles, by applying the standard evaluation criteria. This evaluation of EACEA's operations had a clearly defined scope:

- The reference period of the evaluation was 1 January 2018 31 March 2021.
- The scope of the evaluation covered EACEA's mandate, which consisted of programme implementation and administrative and providing logistical support services. With regard to programme implementation, EACEA continued to manage between January 2018- March 2021 the following programmes: Europe for Citizens (2014-2020), Erasmus+ (2014-2020), Creative Europe (2014-2020), the European Solidarity Corps (2018-2020), EU Aid Volunteers (2014-2020) and the Pan African Programme (2014-2020).
- The current generation of agencies established under the 2021-2027 multiannual financial framework was outside the scope of this evaluation.

Knowledge from the present evaluation will inform on possible improvements in the implementation by the agencies of the programmes of the Commission.

The evaluation of EACEA was part of the evaluation of all the six agencies, which was made in a coordinated manner based on a supporting study carried out by an external contractor. The preparations for the evaluation started in 2022, when an interservice group was set up by all lead parent Directorates-General and the concerned central services (Directorate-General for Budget and the Secretariat-General). The six group meetings were chaired by the Common Implementation Centre, set up within the Directorate-General for Research and Innovation, who also ensured the secretariat. The evaluation of each agency was led by the respective lead parent Directorate-General (PLAN/2022/1912). The Commission also launched a 'call for evidence' on 10 March 2023 on its 'Have your say' portal. The call was open for feedback on agencies activities until 7 April 2023.

The methodology used for the evaluation was consistent across the agencies in accordance with the criteria provided in the Commission's Better Regulation guidelines. The assessment of the evaluation criteria 'EU added value', i.e. why the EU should act, was not considered relevant as each agency carries out tasks which the Commission transferred to it. The EU added value of the programmes that each agency manages is assessed in the context of the programme evaluations.

Evidence was taken from sources such as the Commission databases, annual reporting exercises, adopted decisions. The supporting study was prepared using a mixed-methods approach at the levels of methodologies and methods and worked on a qualitative methodological approach (based on documentary review and desk research, interviews, answers to open-ended survey questions and qualitative cost-benefit analysis) combined with a quantitative methodological approach (based on administrative and monitoring data, surveys and quantitative cost-benefit analysis), as detailed in Annex II.

Furthermore, the results of this evaluation will be useful for accountability purposes. The final evaluation reports on the performance of the six agencies will allow the Commission to report the results of the retrospective cost-benefit analysis to the budgetary authority while informing various European Union (EU) institutions on the value of the cost savings achieved as a result of the executive agency scenario compared with the costs of in-house management by the Commission, as well as identifying potential areas for improvement. The results of this evaluation will be communicated to the Steering Committee of the Agency, to the European Parliament, to the Council, and the European Court of Auditors.

Along with changes to EACEA's mandate for various EU programmes, the Agency's parent Directorate General have also changed slightly. During the present evaluation period, four parent Directorates-General supervised EACEA:

- Directorate-General for Education, Youth, Sport and Culture (the lead parent Directorate-General)
- Directorate-General for Communications Networks, Content and Technology
- Directorate-General for Migration and Home Affairs (replaced by Directorate-General for Justice and Consumers on 1 January 2020, due to the transfer of the Europe for Citizens programme to that Directorate-General), and
- Directorate-General for European Civil Protection and Humanitarian Aid Operations.

#### ANNEX II: METHODOLOGY AND ANALYTICAL MODELS USED

#### **Short description of methodology**

As mentioned in Section 1, the evaluation was supported by a study carried out by an external contractor. The study covered the evaluation of the six executive agencies (INEA, EACEA, EASME, ERCEA, CHAFEA and REA) in the period between 2017/2018 and March 2021 in a coordinated manner, based on the same methodology. The study was structured around a series of evaluation questions outlined in Annex to the study.

A combination of evaluation methods providing for the collection of qualitative and quantitative information and evidence including:

- Extensive documentary review and desk research concerning all relevant documentation relating to EACEA's legal base, its relation with the parent Directorates-General, the delegation of programme and its financial and non-financial performance, and program management, including the memorandum of understanding, the annual work programmes, the annual activity reports, the European Court of Auditors and Internal Audit Service audit reports, the previous evaluations and cost-benefit analysis; the results of the 2018 staff satisfaction survey. As part of the desk research, an in-depth analysis was conducted on communication and policy feedback.
- **Interview program:** this targeted two types of key stakeholders:
  - (1) The Commission and EACEA staff; and
  - (2) EACEA's beneficiaries, unsuccessful applicants and external experts. It included 39 interviews involving 47 interviewees were conducted between 18 August 2022 and 24 February 2023.

This is in line with the initial plan to conduct around 40 interviews for the evaluation of EACEA.

- **Survey program:** Two surveys were conducted as part of the evaluation:
  - **Survey A:** EACEA beneficiaries and unsuccessful applicants.
    - This survey addressed all of the Agency's beneficiaries, and a random sample of 5,000 unsuccessful applicants to Erasmus+, Creative Europe, Europe for Citizens, EU Aid Volunteers, the European Solidarity Corps and the Pan-African Programme, who had applied for or received funding during the evaluation period. In total, we received 3,296 responses to this survey from EACEA beneficiaries, and 929 from unsuccessful applicants. This constitutes a response rate of 29% for beneficiaries and 19% for unsuccessful applicants, with an overall response rate for Survey A of 26%.
  - **Survey B:** external experts contracted by EACEA.
    - This survey targeted all external experts contracted by EACEA during the evaluation period. There were 1,341 responses, representing a response rate of 50%.

Due to the slightly lower response rate achieved (compared with the previous evaluation), partial responses were also used to inform the evaluation. Excluding these partial responses, the response rate for Survey A (beneficiaries) was 24%, while the response rate for Survey A (unsuccessful applicants) was 15%.

• Cost-benefit analysis included a workload analysis and the cost-effectiveness and actual savings from the delegation of programme implementation, when by comparing the actual indicators with the estimates foreseen in the 2013 ex ante cost-benefit analysis and respectively the specific financial statement.

The conclusions and the recommendations proposed by the study were discussed with each EACEA and their lead parent Directorates-General.

#### Limitations and robustness of the findings

All relevant stakeholders were consulted via interviews and surveys (Commission staff, EACEA staff, beneficiaries, unsuccessful applicants, experts). Unsuccessful applicants participated less actively compared with beneficiaries. The survey response rates were slightly lower than those for the previous evaluation, amounting to 29% for beneficiaries (compared with 40% for the previous round of evaluation) and 50% for external experts (compared with 63% for the previous round of evaluation). The specific measures applied by the study team had only a minor influence on these response rates. The comparatively lower interest on the part of the survey respondents could mostly be explained by survey fatigue among respondents. However, while the response rate achieved is lower than for the previous survey, it is still sufficient in absolute numbers to perform analyses per target group (unsuccessful applicants, beneficiaries, external experts).

No sampling bias was observed as the profile of the respondents to the surveys was very similar to the overall population, guaranteeing statistical representativeness. The non-response bias (not all characteristics of the group that did not reply had been captured in full) was mitigated through triangulation with the results of follow-up interviews.

The triangulation approach, using multi-level and multi-stakeholder dimension in the data collection, ensured the robustness and reliability of the data and information used to draw up conclusions in the supporting study. It utilized diverse data sources, including documentary reviews, desk research, surveys, and interviews, ensuring a comprehensive assessment of EACEA's operations.

# ANNEX III: EVALUATION MATRIX AND ANSWERS TO THE EVALUATION QUESTIONS (BY CRITERION)

The purpose of the evaluation was to respond to evaluation questions relating to the criteria of effectiveness, efficiency, coherence, as defined by the Better Regulation. Evidence-based answers, including the points of comparison and sources, can be found in Section 4 of the external evaluation report<sup>19</sup>.

EACEA evaluation report

## ANNEX IV: OVERVIEW OF BENEFITS AND COSTS

The benefits and costs are detailed in the Cost Benefit Analysis in Section 4.2 and Annex V below.

#### ANNEX V: COST BENEFIT ANALYSIS

A cost-benefit analysis was performed to assess whether the conclusions of the ex ante assessments (the estimates of savings provided in the specific financial statement,) are still valid when compared with the actual situation, and what the overall possible savings are.

The following approach was adopted:

- To use data on the actual performance of EACEA (actual execution of the administrative budget, actual staffing, etc.) for the executive agency scenario.
- To follow the assumptions laid down in the specific financial statement to ensure the comparability and validity of results, and to provide estimates of the comparable 'actual' inhouse scenario (the comparator), which would best reflect the actual situation.
- To assess based on these estimates whether the conclusions of the *ex ante* assessments provided in the specific financial statement are still valid when compared with the actual situation, and what the overall possible savings are.

To deconstruct the 'actual' in-house scenario (the 'comparator'), estimates were based on the following assumptions:

- Number and composition of staff at the Commission and EACEA under an in-house scenario corresponds with specific financial statement estimates<sup>20</sup>. Further contract agents were added to the estimated number of staff at the Commission during the period 2018-2020 (20 contract agents in 2018, 18 in 2019, and 17 in 2020), to reflect the additional authorised staff at EACEA financed from the contributions of the EFTA, EDF and the participation of candidate countries and/or third countries, to manage additional operational budget not covered in the cost-benefit analysis/specific financial statement resource calculations.
- Commission staff costs and overheads correspond to the average costs set by Directorate-General for Budget for the estimates of human resources and overheads in legislative financial statements for the respective year.
- Programme support expenditure (Title III) remains the same under both the in-house scenario and the executive agency scenario.

The table below presents the results of the analysis of the estimated actual costs of the in-house scenario and the actual costs of the executive agency scenario.

Additional resources allocated under Specific Financial Statement amendments are also considered.

Estimated actual costs of the in-house scenario and the actual costs of the executive agency scenario, EUR

	2018		2019		2020		Total 2018- 2020
	No	Cost	No	Cost	No	Cost	
In-house scenario							
Commission							
Title I. Staff-related expenditure	574.7	55,520,800	584.8	58,667,600	618.8	63,616,000	177,804,400
Establishment plan posts	388.2	46,195,800	398	48,954,000	422.6	52,825,000	147,974,800
Contract agents	186.5	9,325,000	186.8	9,713,600	196.2	10,791,000	29,829,600
Title II. Infrastructure and operating expenditure		13,792,800		14,620,000		15,470,000	43,882,800
Title III. Programme support expenditure		5,382,974		7,611,700		6,139,886	19,134,560
TOTAL COST	574.7	74,696,574	584,8	80,899,300	618,8	85,225,886	240,821,760
Executive Agency scenario							
EACEA							
Title I. Staff-related expenditure	442	35,645,355	429	35,707,175	432	35,971,057	107,323,587
Establishment plan posts	100	12,633,939	97	12,682,051	98	12,856,435	25,490,374
Contract agents	342	18,318,288	332	18,837,909	334	19,343,418	71,559,528
Interim supportive agents and trainees		2,896,561		2,381,302		2,094,676	4,994,676
Professional development and recruitment costs		1,796,567		1,805,914		1,676,529	5,279,010
Title II. Infrastructure and operating expenditure		7,601,641		7,780,365		7,846,653	23,228,660
Title III. Programme support expenditure		5,382,974		7,611,700		6,139,886	19,134,560
Total EACEA cost:		48,629,970		51,099,240		49,957,597	149,686,806
Commission							
Title I. Staff-related expenditure	7.7	916,300	7.7	947,100	7.7	962,500	2,825,900
Establishment plan posts	7.7	916,300	7.7	947,100	7.7	962,500	2,825,900
Contract agents		-		-		-	-
Title II. Infrastructure and operating expenditure		184,800		192,500		192,500	569,800
Total Commission cost:		1,101,100		1,139,600		1,155,000	3,395,700
TOTAL COST	449.7	49,731,070	436.7	52,238,840	439.7	51,112,597	153,082,506
ESTIMATED SAVINGS	125.0	24,965,504	148.1	28,660,460	179.1	34,113,290	87,739,253

Source: Study supporting the triennial evaluation of the Agency

### The analysis concluded that:

• The overall actual costs of the executive agency scenario<sup>21</sup> amounted to EUR 153.1 million for the period 2018-2020. To evaluate the extent to which the actual costs corresponded to the initial specific financial statement estimates, it is important to follow the same assumptions that

Including the cost of coordination and monitoring by the Commission and the costs covered from EDF and third-country contributions.

led to such specific financial statement estimates. The specific financial statement estimates (EUR 151.0 million for the period 2018-2020) were based on the EU contribution alone, but EACEA's administrative budget also included contributions from the EFTA, third countries and the EDF (EUR 8.7 million during the period 2018-2020) to manage its additional operational budget. Consequently, based on the EU contribution alone, the actual costs of the executive agency scenario amounted to EUR 144.3 million, which means that the actual savings amounted to EUR 6.6 million, corresponding to 4.4% of the specific financial statement estimates.

- The costs of the executive agency scenario were much lower than the estimated costs of the inhouse scenario. In 2018-2020, the actual cost savings deriving from the difference in cost between the executive agency scenario and the in-house scenario amounted to EUR 87.7 million (or 36.4% of the estimated costs under the in-house scenario).
- When comparing the savings initially estimated in the specific financial statement and costbenefit analysis with the actual savings from the delegation of tasks to EACEA, the actual savings during the 2018-2020 period were 24.7% higher than the initial specific financial statement estimates (EUR 87.7 million, compared with EUR 70.3 million), and 84.1% higher than the initial cost-benefit analysis estimates (EUR 87.7 million, compared with EUR 47.7 million). As forecast in the specific financial statement and the *ex ante* cost-benefit analysis, the savings from the executive agency scenario resulted primarily from a higher share of lowercost external personnel (contract agents) employed within the executive agency, and an overall lower number of staff<sup>22</sup>.

The number of staff at the executive agency scenario was reduced; however, the in-house scenario was not modified in the specific financial statement

#### ANNEX VI: STAKEHOLDERS CONSULTATION – SYNOPSIS REPORT

This annex summarises the consultation of stakeholders, which was undertaken for the evaluation and was performed on the basis of the Better Regulation Guidelines. A similar approach was adopted for the evaluation of all six agencies.

#### 1. Outline of the consultation strategy

The consultation strategy was designed as follows:



Source: Study supporting the triennial evaluation of the Agency

EACEA's stakeholders are grouped as follows:

- Agency staff;
- staff from the five parent Directorates-General;
- applicants (successful and unsuccessful) to the funding programmes managed by EACEA; and
- experts hired by EACEA to assess funding proposals.

A survey programme was carried out for applicants and experts, and an interview programme targeted all four groups of stakeholders.

Consultation activities and target groups covered

Consultation activity		Target groups	Date
Surveys	Survey A	Beneficiaries (successful candidates) of and unsuccessful applicants to the programmes managed by EACEA	29 November to 13 December 2022
	Survey B	External experts contracted by EACEA	25 November to 8 December 2022
Interview programme		<ul> <li>EU officials from parent Directorates-General;</li> <li>Directorate of EACEA;</li> <li>Heads of Sector and Heads of Unit;</li> <li>representatives of EACEA's Staff Committee;</li> </ul>	18 August 2022 to 24 February 2023

<ul> <li>members of the EACEA     Steering Committee;</li> <li>beneficiaries (successful     candidates) of and unsuccessful     applicants to the programmes     managed by EACEA; and</li> </ul>	
<ul> <li>external experts contracted by EACEA.</li> </ul>	

Source: Study supporting the triennial evaluation of the Agency

Those stakeholder consultations complemented one another and informed the answers to the evaluation questions on effectiveness and efficiency. Interviews with Commission officials and EACEA staff not only provided information on those questions but also allowed coherence-related evaluation questions to be covered.

Consultation activity and evaluation criteria covered

	Effectiveness	Efficiency	Coherence
Interviews with the European Commission	<b>√</b>	✓	<b>√</b>
Interviews with representatives of EACEA	✓	✓	✓
Interviews with unsuccessful applicants, beneficiaries and experts	✓	<b>√</b>	
Survey of EACEA's beneficiaries and unsuccessful applicants	✓	✓	
Survey of external experts contracted by EACEA	✓	✓	

Source: Study supporting the triennial evaluation of the Agency

### 2. Key results of the consultation activities

#### 2.1 Summarised results of the survey

Two surveys were performed using the Alchemer online survey tool.

The survey programme targeted applicants to all programmes managed by EACEA during the evaluation period<sup>23</sup>. **Survey A** included unsuccessful applicants who had applied to EACEA calls launched between 1 January 2018 and 31 March 2021, and beneficiaries, whose projects had started within the same period. Applicants from all six programmes participated in the survey. **Survey B** addressed experts who were contracted also within the same timeframe.

- Survey A: EACEA beneficiaries and unsuccessful applicants. This survey addressed all the Agency's beneficiaries, and a random sample of 5 000 unsuccessful applicants to Erasmus+, Creative Europe, Europe for Citizens, EU Aid Volunteers, the European Solidarity Corps and the Pan-African programme, who had applied for or received funding during the evaluation period. Survey A had an overall response rate of 26%, with 3 296 responses (29% response rate) from EACEA beneficiaries and 929 responses (19% response rate) from unsuccessful applicants.

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Erasmus+, Creative Europe, Europe for Citizens, the European Solidarity Corps, EU Aid Volunteers and the Pan-African programme.

- Survey B: external experts contracted by EACEA. This survey targeted all the external experts contracted by EACEA during the evaluation period. There were 1 341 responses, representing a response rate of 50%.

Main statistics related to the implementation of the surveys:

Target group	Full launch of the survey (majority of invitations sent on this date)	Survey closure date	Population targeted / number of invitations sent out	Number of responses received	Response rate*	Number of responses included in the analysis after cleaning
Beneficiaries	29 November 2022	13 December 2022	11 276	Partial: 548 Complete: 2 748 Total: 3 296	Total: 29% Only including complete: 24%	Partial: 241 Complete: 2 744 Total: 2 985
Unsuccessful applicants			4 933	Partial: 188 Complete: 741 Total: 929	Total: 19% Only including complete: 15%	Partial: 90 Complete: 741 Total: 831
Experts	25 November 2022	8 December 2022	1 341	Partial: 61 Complete: 604 Total: 665	Total: 50% Only including complete: 45%	Partial: 38 Complete: 602 Total: 640

*Note: the response rate was calculated based on the formula:* 

Response rate = (No. of responses received/No. of invitations sent out) \* 100%

Source: Study supporting the triennial evaluation of the Agency

Owing to the slightly lower response rate achieved (compared with the previous evaluation), partial responses were also used to inform the evaluation. Excluding those partial responses, the response rate for Survey A was 24% for beneficiaries and 15% for unsuccessful applicants.

#### **Effectiveness**

Overall, beneficiaries were satisfied with the quality of services provided by the Agency at the different stages of project management. The respondents were the most satisfied with the payment process (94%, 1708 out of 1819 respondents agreed/strongly agreed that this process was smooth), followed by the grant amendment (89%, 735 out of 824), granting (87%, 1753 out of 2023), project implementation (86%, 1626 out of 1886), and monitoring/audit (84%, 249 out of 298) processes. Experts generally had the same positive attitudes towards the services provided by EACEA, with 95% (566 out of 593) of them agreeing or strongly agreeing that the quality of EACEA's services during the execution of expert tasks was satisfactory.

Most of the surveyed beneficiaries, unsuccessful applicants, and experts were satisfied with the Agency's response to the COVID-19 pandemic. Their responses can be broken down as follows:

- 87% (2 094 out of 2 395) replied that EACEA had acted promptly and flexibly to maintain the quality of its services during the pandemic;
- 91% (2 197 out of 2 430) agreed that the Agency and/or the Commission had been flexible in adjusting deadlines or arranging other changes to the project;
- 85% (1 934 out of 2 276) found the transition to virtual activities smooth; and
- 86% (2 058 out of 2 381) found the response to be effective in terms of outreach and dissemination of information.

As in previous evaluations, beneficiaries and unsuccessful applicants had different opinions on the Agency's effectiveness during the evaluation and selection stage. Beneficiaries were significantly more satisfied with the clarity and transparency of the process (86%, 2 302 out of 2 663 respondents agreed/strongly agreed) than unsuccessful applicants (55%, 397 out of 722). The latter highlighted the need for more information on the decision-making process and better feedback to enable them to improve their applications. Most of the respondents from both groups felt that information for applicants related to the call and the application process was easy to find (80%, 2 899 out of 3 620 and also clear enough for them to understand the application procedures (81%, 2 806 out of 3 487).

Overall, beneficiaries and unsuccessful applicants considered the application process to be clear. Compared with other aspects, they were somewhat less satisfied with the proportionality of the application process to the administrative burden experienced when filling in the application (75%, 2 615 out of 3 472 of respondents agreed/strongly agreed that they were proportionate). Overall, both groups considered the procedures related to the application process to be user-friendly. However, they considered that there is still some room for improvement, especially to make IT tools more user-friendly (69%, 2 380 out of 3 430 respondents agreed/strongly agreed that they were user-friendly).

Beneficiaries considered the various communication channels to be very effective, with most respondents indicating that they provided them with relevant and helpful information. The highest ratings were for direct email contact (93%, 1 846 out of 1 986) and the Agency's website (71%, 1 306 out of 1 837), whereas video conferences, face-to-face contacts and telephone contacts scored somewhat lower<sup>24</sup>. Similar trends were observed among external experts, who awarded the highest score for support by EACEA's staff (94%, 209 out of 223).

In response to open questions on areas for improvement, the applicants expressed discontent with the bureaucratic language of applications, the length and complexity of the application form, and the time needed to fill in and submit the application. A particular source of dissatisfaction was a perceived need to repeat similar information throughout the form. The following potential weaknesses and suggestions for improvement were mentioned:

- a lack of multilingual resources and services, including guidelines, help desks, web pages, and especially IT tools in languages other than English;
- unclear communication by the Agency on channels for direct contact;
- the need to improve the usability of e-forms for Mac OS users;
- the need for more good examples throughout the application platform; and
- the need to make the existing guidelines less complex, long and unclear, and more directly relevant (although some applicants found them helpful).

#### **Efficiency**

Overall, surveyed beneficiaries and unsuccessful applicants provided largely positive feedback on all the simplifications introduced. In particular, they praised the move towards paperless procedures, including the increased use of electronic signatures (87%, 2 865 out of 3 283 respondents agreed/strongly agreed that this simplified the project application/implementation process). The respondents also provided very positive feedback on the use of simplified cost options instead of actual cost funding (83%, 2 588 out of 3 102), and the simplification and clarification of call guidelines (83%, 2 675 out of 3 237). Compared with all the other simplifications, they reported somewhat lower satisfaction with the introduction of eGrants and the Funding and Tender

However, a significant share of respondents selected 'Do not know / not applicable' when assessing these channels, indicating that many respondents may not have used them at all during the evaluation period.

Opportunities Portal (68%, 383 out of 565 for the application; 66%, 361 out of 547 for the implementation)<sup>25</sup>.

Beneficiaries were generally positive about the grant agreement finalisation stages, except for the user-friendliness of the electronic tools used to validate and assess beneficiaries and the smoothness of the validation process. Only 18% of beneficiaries (351 out of 1 957) did not agree that the tools were user-friendly, and 13% (240 out of 1 911) considered the validation process too cumbersome or demanding. Most of the surveyed beneficiaries whose grant agreement was amended agreed that the related processes were smooth (89%, 735 out of 824) and clear (90%, 741 out of 824), and that assigned EACEA staff were easily contactable and responsive (91%, 754 out of 827).

The beneficiaries strongly agreed that the project implementation process was smooth, with 86% (1 626 out of 1 886) responding positively. On average, 78% to 88% of beneficiaries agreed that the reporting instructions were clear and user-friendly (83%, 1 539 out of 1 855) and reasonable (84%, 1 548 out of 1838). Surveyed experts also reported a generally positive opinion on the reporting process, agreeing that the reporting requirements were reasonable (84%, 495 out of 591).

The beneficiaries who were monitored and/or audited, generally had positive experiences. More than 80% of beneficiaries (strongly) agreed that the time it took the experts or EACEA to monitor/audit them was appropriate (82%, 242 out of 296), and that the amount of information to be provided was reasonable (85%, 259 out of 305) and clearly indicated (86%, 262 out of 304). The surveyed experts and beneficiaries held similar opinions on the smoothness of the monitoring or audit/evaluation process. 84% (249 out of 298) of beneficiaries thought that the monitoring/audit process was smooth, while 10% (30) had a neutral opinion on that statement. Similarly, 91% (543 out of 593) of experts assessed the evaluation/project monitoring process positively, while 3% (19) had a neutral opinion.

#### 2.2 Summarised results of the interview programme

The interview programme encompassed scoping, the main phase and follow-up interviews with the representatives of the Commission and EACEA, as well as with beneficiaries, unsuccessful applicants and external experts contracted by the Agency. The interview programme was designed to cover a wide variety of views, including those of representatives of the Commission and the Agency, as well as those of other stakeholders.

The interviews were conducted using a standardised questionnaire, which included questions on the evaluation criteria and which was adjusted to the experience of individual stakeholders. Each interview was recorded, and interview notes and/or transcripts were prepared on the basis of the recording. In line with the planned number of interviews, a total of 39 interviews were conducted with 47 interviewees, which can be broken down as follows:

- 10 interviews (11 interviewees) with the representatives of parent Directorates-General;
- 17 interviews (23 interviewees) with the representatives of EACEA;
- 8 interviews (8 interviewees) with the unsuccessful applicants or beneficiaries of programmes managed by EACEA;
- 2 interviews (2 interviewees) with the external experts contracted by EACEA;
- 2 interviews (3 interviewees) conducted for follow-up and validation purposes with senior staff from the Directorate-General for Education, Youth, Sport and Culture and EACEA.

The interview data was used to answer the relevant evaluation questions, in particular those questions where the opinions of respondents were of prime importance. All information from the interviews was incorporated into the final evaluation report.

Only respondents who took part in calls piloting eGrants during the evaluation period were asked to assess the tool, resulting in a smaller proportion of responses compared with all other statements. The proportion of respondents who selected 'Do not know / not applicable' was higher for both eGrants statements than for any of the other statements, which contributed to the more negative assessment.

#### **Effectiveness**

In general, the interviewed members of the parent Directorates-General evaluated the programme management performance of the Agency positively. Although the respondents also mentioned a few areas for improvement, they praised EACEA for successfully managing the flagship initiatives (such as the European Universities initiative) and commended its performance in satisfying the needs of beneficiaries in the evaluation period. According to the interview programme, the Agency also demonstrated efficient results in carrying out tasks related to providing policy feedback. This included providing the parent Directorates-General with useful information for their policy work.

A lack of awareness of funding opportunities within the sectors targeted by the calls was identified during several interviews with beneficiaries and unsuccessful applicants who had experience in applying for EU funding. They suggested that the Agency should promote the funding opportunities more actively through social media channels such as Facebook or Twitter, or through newsletters and mailing lists.

Interviewees' satisfaction with the communication channels used during the application and implementation phase varied. Several interviewees either did not consider contacting the Agency for support during the application phase and solved any issues themselves or indicated that they were not able to identify any available communication channels at that stage. A few interviewees commented very positively on the usefulness of support and guidance provided by national bodies during that process. Both applicants and beneficiaries considered meetings organised by EACEA (e.g. call info days, sessions for newcomers, meetings for beneficiaries) to be particularly helpful in helping them understand funding procedures (although one interviewee highlighted the need to make the corresponding recordings more accessible). Several of them also emphasised the importance of direct contact with staff and the possibility to ask for help when needed.

Several beneficiaries noted that external constraints as a result of COVID-19 negatively affected their projects and resulted in delays in the implementation. However, interviewees assessed the support of EACEA's staff during the pandemic very positively overall and highlighted the Agency's flexibility in allowing them to adjust activities and project timelines.

#### **Efficiency**

Some interviewees from EACEA highlighted that local IT tools for grant management (which will eventually be replaced by eGrants but remain in use for legacy projects) are creating an additional workload for staff, who need to switch between multiple tools. Several interviewees from the Directorates-General and the Agency highlighted challenges resulting from the complexity of the eGrants tool. According to the interviewees from the Agency, it does not sufficiently address the needs of their stakeholders (i.e. the high number of smaller organisations and lower value grants).

Several interviewees from EACEA highlighted imbalances in workload that were noticeable during the substantial changes and processes that the Agency underwent during the evaluation period (implementation of audit recommendations made by the Internal Audit Service, reorganisation, onboarding of eGrants, COVID-19 and preparation for the new MFF). The workload imbalance was noticeable between different units or sectors of the Agency and depended on the number of calls and the stage of the project cycle, resulting in increased pressure on some staff.

Interviews with beneficiaries and unsuccessful applicants revealed that they consider the application procedure to be manageable, although the process was described as complex and requiring a lot of time and effort. Interviewees emphasised that this stage is less challenging for experienced applicants but can be very complicated, burdensome and bureaucratic for newcomers and smaller

organisations with fewer resources. A few interviewees found it challenging to understand the application requirements and what specific information they were being asked for. They also noted that guidelines and application forms should be less complex and that good examples throughout the process would be useful. Two interviewees described the narrative-based application templates as more challenging to complete compared with the previous matrix-based forms. One interviewee highlighted that, given the complexity of the application, the info days for potential applicants were held too close to the deadline.

Most interviewees (beneficiaries and unsuccessful applicants) considered the evaluation report summaries to be useful, also for preparing future applications. A few interviewees noted that evaluations should be more transparent and that their approach and quality varied. One interviewee indicated that they received very generic and nearly identical comments for several applications.

A few interviewees among the beneficiaries and unsuccessful applicants described increasingly digital processes, such as the use of electronic signatures, as positive developments that facilitate funding processes. Several interviewees also highlighted that the increased use of simplified cost options (lump sums) reduces administrative burdens and makes budgeting and reporting procedures easier.

Interviewed beneficiaries and unsuccessful applicants provided various ideas on how to improve funding processes. They suggested:

- improving the promotion of calls outside the Funding and Tenders Portal, i.e. through social media channels such as Facebook or Twitter, or through newsletters and mailing lists;
- holding outreach activities, information sessions, seminars and targeted courses for applicants more frequently and making all recordings of online events available;
- improving the availability of helpdesks and support during the application phase and the frequency of direct exchanges with project officers during implementation;
- simplifying application forms and guidelines and providing detailed Q&A sections for actions;
- providing more support for smaller organisations/companies to succeed when competing against larger ones with substantially more resources, and reducing administrative burdens;
- enhancing knowledge exchanges among applicants/beneficiaries, and facilitating regional events; and
- allowing the budget to be allocated flexibly throughout the project to reflect changes in activities during longer projects.

#### Coherence

Overall, the Commission officials who were interviewed strongly acknowledged the importance of the Agency model in helping them focus on policymaking tasks. Delegating tasks to EACEA added significant value owing to the Agency's long-term experience and expertise in both programme management and the specific fields of the programmes. In addition, the benefits of the more flexible Agency model were noted, such as the ability to process payments more promptly, and to contract and manage human resources more efficiently, which allows for greater flexibility in accommodating additional tasks.

The interview programme revealed a clear understanding among the interviewees in the Agency and the Commission of the overall delimitation of responsibilities between EACEA and its parent Directorates-General. No examples of overstepped boundaries on EACEA's part or of micromanagement by the parent Directorates-General were reported.

Overall, during the interviews, EACEA staff praised the establishment of two horizontal units for helping to improve and standardise tasks and processes within the Agency. Many staff members considered this to have significantly clarified and harmonised the Agency's overall work. However, some noted that it was still too early to form an opinion. Interviewees at the Agency also pointed out that the horizontal units have taken on an oversight function to a certain degree. This was mostly described in a positive light, as it helped bring about more quality control in the common processes. However, a smaller group thought that the horizontal units have created an extra layer of control without any tangible benefits so far.

When considering EACEA's involvement in preparing work programmes, interviewees from both the Agency and the Commission maintained that the Agency's involvement was sufficient. It was informed of the policy goals once they had been drawn up by the Commission and was able to provide information on the implementation aspects. However, interviewees at both the Commission and the Agency mentioned that involving the Agency earlier (while respecting the delineation of roles) would help improve the strategic quality of the document.

The interview programme revealed a small gap between what was expected and what was delivered in terms of policy feedback. The interviewees from the parent Directorates-General outlined their need for more proactive and improved qualitative, impact-based policy feedback from the Agency, while noting that reporting outputs were too process-oriented during the evaluation period. However, the interview programme also identified room for enhanced participation and dialogue on the part of parent Directorates-General to calibrate the specific policy feedback arrangements with the Agency. It was not always clear to the Agency what policy feedback outputs would be most valuable to its parent Directorates-General.

The increased supervision measures taken over by the Agency were seen as appropriate to mitigate risks identified by the Internal Audit Service audit during the evaluation period. Some interviewees, nevertheless, noted that carrying out increased supervision arrangements was highly work-intensive on both sides.

#### 2.3 Comparison of the results of consultation activities

The table below presents the key results per consultation activity, organised by evaluation criteria, as well as by the level of consistency, complementarity and convergence of results across consultation activities.

Overall, as summarised in the table below, there was high convergence in the results of different consultation activities.

## Summary of key findings

Evaluation criterion	Survey	Interview programme	Consistency of results across consultation activities	Complementarity of results across consultation activities	Contradiction of results across consultation activities
Effectiveness	High satisfaction overall among beneficiaries with the quality of services.  Beneficiaries were satisfied with the clarity and transparency of the process, whereas unsuccessful applicants expected better feedback.  Overall, beneficiaries and unsuccessful applicants considered the application process to be clear.  Lower satisfaction among surveyed applicants with the proportionality of the application process and the administrative burden experienced.  High satisfaction with the Agency's response to the COVID-19 pandemic and its communication channels.	Interviewed members of the parent Directorates-General evaluated the programme management performance of the Agency positively.  A lack of awareness of funding opportunities within the sectors targeted by the calls was identified during several interviews with beneficiaries and unsuccessful applicants who had experience in applying for EU funding.  Interviewees' satisfaction with the communication channels used during the application and implementation phase varied.  Overall, beneficiaries assessed the support of EACEA's staff during the pandemic very positively and highlighted the Agency's flexibility in allowing them to adjust activities and project timelines.	High	High	Low
Efficiency	Largely positive feedback on all simplifications introduced.  Beneficiaries generally had positive opinions about the grant agreement finalisation stages, except for the user-friendliness of the electronic tools.  The beneficiaries strongly agreed that the project implementation process was smooth and the reporting requirements reasonable.  The beneficiaries who were monitored and/or audited, generally had a positive	Interviewees from EACEA noted that the simplification of funding schemes had greatly simplified the work for beneficiaries.  The Agency's staff noted imbalances and increases in workload during the substantial changes and processes that the Agency had undergone.  Interviews with beneficiaries and unsuccessful applicants revealed that they consider the application procedure manageable, although the process was described as complex and requiring a lot of time and effort.	High	High	Low

Evaluation criterion	Survey	Interview programme	Consistency of results across consultation activities	Complementarity of results across consultation activities	Contradiction of results across consultation activities
	opinion of those processes.	Most interviewees (beneficiaries and unsuccessful applicants) considered the evaluation report summaries useful.  A few interviewees among the beneficiaries and unsuccessful applicants described increasingly digital processes as positive developments.			
Coherence	Respondents indicated high levels of understanding of the different roles performed by the Agency and its parent Directorates-General.	Overall, the Commission officials who were interviewed strongly acknowledged the importance of the Agency model in helping them focus on policymaking tasks.  The clear delineation of tasks between the Agency and the parent Directorates-General was highlighted.  The establishment of two horizontal units was praised for standardising tasks and processes within the Agency.  Interviewees from both the Agency and the Commission maintained that the Agency's involvement in the preparation of work programmes was sufficient. However, earlier involvement was also noted as an underexploited opportunity to improve the strategic quality of the document.  A gap between the feedback to policy expected by the Commission and the feedback to policy delivered by the Agency was noted. However, the parent Directorates-General need to be more involved in calibrating specific arrangements.  The supervision arrangements were considered appropriate to mitigate risks during the evaluation period.	High	High	Low

Source: Study supporting the triennial evaluation of the Agency