

Summary

This summary presents the results of the studies carried out to (1) support the planning of data collection for the remaining evaluations after 2017 included in the Evaluation Plan of Operational Programme "Good Governance" and (2) to support data collection for the common long-term performance indicators for participants in project funded under the Programme.

The studies were carried out between April and May 2018 by a team of experts of "Consult" Consortium composed of Ecorys South East Europe Ltd., Bulgarian Consultancy Organization Ltd. and D&D Consulting Ltd., and are summarised in a report from which this summary is inseparable part.

The report is a second part, out of two, of the following public procurement procedure: "Evaluation of the implementation of Operational Programme "Good Governance" in the period 2015-2017 and studies supporting the planning and data collection for the remaining evaluations after 2017, included in the Evaluation Plan.

The **specific objectives** of these studies are:

1. To determine measures for protection of personal data and of administrative information in the provision of data for all remaining evaluations after 2017q included in Operational Programme "Good Governance"'s Evaluation Plan, as well as the scope of data that will be needed for each of the evaluations, the period and the frequency of data collection, data sources that can/should be used;
2. To analyse the advantages and disadvantages of collecting data for the common indicators for long-term results about participants in projects under the Operational Programme "Good Governance" (Annex I to Regulation (EC) No 1304/2013) on a sample basis, on the one hand, and through consulting all participants - on the other. Formulation of recommendations and sampling criteria on the basis of the analysis for ensuring sample's internal validity or a methodology for collection of exhaustive information by consulting all participants.

The studies were structured around two main tasks and related topics as follows:

Task 6: An analysis of the data that will be needed for each of the post-2017 evaluations included in the Operational Programme "Good Governance"

6.1. *What measures for protection of personal data and for internal information would be most relevant for providing data for all remaining after 2017 evaluations included in the Evaluation Plan of Operational Programme 'Good Governance'?*

6.2. *What should be the scope of data that will be needed for each of the evaluations, the period and frequency of their collection, as well as the data sources that can/should be used?*

6.3. *What best practices from other operational programs in the Republic of Bulgaria and other Member States of the European Union for the programming period 2014-2020 in terms of preparation of information and data for conducting evaluations, especially impact assessments, are applicable to Operational Programme "Good governance?"*

6.4. *Is the current data collection and monitoring system adequate to the information*

needed for future evaluations? What changes/improvements would be needed?

6.5. *Is the time planning in the Evaluation Plan adequate?*

Task 7: Analysis of the reporting of the common long-term performance indicators (Annex I to Regulation (EC) No 1304/2013)

7.1. *What are the advantages and disadvantages of collecting information and reporting the common indicators for long-term results about participants in projects funded by Operational Programme "Good Governance" on a sample basis?*

7.2. *What are the advantages and disadvantages of collecting information and reporting the common long-term performance indicators about participants in projects funded by Operational Programme "Good Governance" on the basis of individual consultations with each of them?*

7.3. *Which of these approaches is more appropriate taking into account the specifics of Operational Programme "Good Governance"?*

7.4. *What best practices from other operational programs in the Republic of Bulgaria and other Member States of the European Union for the programming period 2014-2020 are applicable to Operational Programme "Good Governance" for reporting the common long-term results indicators?*

7.5. *Are any changes needed in the current data collection system in view of the recommended approach for data collection and reporting common long-term performance indicators?*

7.6. *Are the available to the Managing Authority resources sufficient to ensure smooth collection and reporting of information in compliance with the recommended approach?*

The analyses were carried out on the basis of the available information in key documents of the Programme, the European Commission's Monitoring and Evaluation Guidelines, the information provided by the Managing Authority of the Programme and the information gathered through interviews with key stakeholders: the Managing Authority, the Administration of the Council of Ministers, the Central Coordination Unit, the National Statistical Institute, the Institute of Public Administration, the National Association of Municipalities in the Republic of Bulgaria, the National Institute of Justice, as well as through studying the best practices in other operational programs.

The main data and information gathering methods for conducting the analyses include:

- Desk research (documents review);
- Meetings-interviews;
- Review of best practices;
- Expert evaluation.

The main **conclusions and recommendations** stemming from the analyses are given below.

Concerning the data for planned future evaluations, indicated in the Evaluation Plan of Operational Programme "Good Governance"

The **data** gathered by the **Programme's Monitoring System** needed for the evaluations are **available to the Managing Authority**. Most of them are collected in electronic form and can be immediately provided for evaluation purposes. These are data regarding: procedures and projects; about beneficiaries and key stakeholders; indicators data, and data about training activities.

Data about the **financial implementation** are generally available in the Monitoring System, but they need to be prepared upon request by the evaluators taking into account the different types of expenditures and the funded activities.

Information gathered from the **beneficiaries** through the Monitoring System (about the performed activities, the achieved results and the applied horizontal principles) cannot be provided in a summarised form for evaluation purposes. In order to be provided for evaluation purposes, the information should be processed by monitoring experts, or there should be an option which allows the annual/technical reports to be filled in electronically in the Management and Monitoring Information System by automatic retrieving of data.

The Managing Authority stores only the so-called "micro-data" about the **individual participants** in trainings which should be taken into account for the common indicators¹. The "micro-data" do not contain all information necessary for evaluations purposes. Data about the individual participants in trainings is available at the training institutions and at the beneficiaries in a scope that is sufficient for the evaluations purposes. However, the data collection and processing practices among the main beneficiaries vary. At present, only the National Institute of Justice can provide processed data about individual participants in an electronic form suitable for using in for analyses and for surveys. In the future, it is recommended the main training institutions to standardise the data collection and processing methods about the trainees so that homogeneous information for evaluation purposes could be available.

Serious **difficulties** might be experienced during the planned **counterfactual analysis** within Evaluation 7², both due to the lack of data and the difficulties with establishing a direct link between the trainings and the studied changes. Practices in other Member States show that such analyses in studying the training effects are rare and are not directly linked to an impact assessment of trainings for the public administration and the judiciary. Within Evaluation 7, at best, it will be possible a partial counterfactual survey to be carried out aimed at certain target groups for which establishing of a control group from non-trained participants is possible (data from the National Institute of Justice). At the same time the selection criteria and other requirements should allow collecting

¹ According to Annex I to Regulation (EU) 1304/2013

² Evaluation of effectiveness, efficiency and impact of training activities in the administration and in the judicial system under Priority Axes 2 and 3 of the OPGG.

information about the change (pre- and post-intervention status), as well as for accounting of external factors. It is advisable the Managing Authority to revise its expectations regarding the scope of the counterfactual analysis within Evaluation 7 and to plan the evaluation mostly around theoretical evaluation approaches, without a counterfactual analysis, or to significantly limit the counterfactual survey scope.

Practices within other operational programmes show that the data from the Monitoring System is usually not sufficient for performing evaluations and especially for conducting surveys among individual participants. Where possible, **data from existing administrative registers are used**. For evaluation purposes of the Operational Programme "Good Governance", data from existing registers about the administration, the administrative services and the judicial system³ could also be used. It could be expected that with the e-governance development more and more data stored in such registers will be available. Therefore, optimisation of the existing registers is recommended so that the latter could provide suitable data for analyses and evaluations.

The **data protection** rules (regarding data provided to evaluators) should take into account the nature of the data and the requirements of the European and the national legislation. In case of personal data, it is advisable, where possible, evaluators to receive anonymised or pseudonymous data, which significantly improves the protection of personal data and reduces the risk of misuse.

The **timing of evaluations** as provided for in the Evaluation Plan is adequate to the needs of the Programme's Managing Authority and evaluations' objectives. Optimisation in terms of the time for performing of two evaluations is possible.

Concerning reporting of the common long-term performance indicators (Annex I to Regulation (EC) No 1304/2013)

In practice, the Programme's specific indicators (R2-2, O2-6, R3-3, O3-8, O4-1, and O5-1) indicate both persons receiving direct support from the European Social Fund and persons receiving indirect support (i.e. within the framework of operations aimed at strengthening the capacity of the organisations in which they operate). In this case, there should be no direct link between the **common indicators** about participants, on the one hand, and the **specific indicators** set out in the Programme's Indicators System, on the other. To that end, the relevant texts of the "Guidelines for e-reporting through the Information system for management and monitoring of projects and financial plans under Operational Programme "Good Governance" (section 1.2.4 "Introduction of micro-data for participants"), should be amended accordingly.

The process of data collection for reporting common performance and common result indicators is not described in the Implementation Manual of Operational Programme "Good Governance". With regard to this, a detailed documentation in the

³ E.g. data from the Integrated Information System of the State Administration, data gathered by the Institute of Public Administration, the National Institute of Justice and the Supreme Judicial Council.

Management and Control System of the Programme should be developed, describing the overall process, as required by Regulation (EU) 1304/2013 and the Guidelines for its implementation.

The electronic XLS file "*microdata_ESF*" serves all programmes funded by the European Social Fund. Due to the Programme's specifics, much of the information in this file is irrelevant. The latter creates unnecessary administrative burdens for both the beneficiaries and the Managing Authority. For this reason, it is recommended the questionnaire distributed among project participants or financial plan under the Operational Programme "Good Governance"⁴ to be simplified by eliminating the non-relevant fields for the Programme.

The target group which will be studied (public administration officials, judiciary and magistrates) suggests that individual participants could be consulted through various instruments. When conducting an online survey, the "comprehensive" approach is recommended, while in telephone interviews - the "sampling" approach. A combined approach, which is advisable in these studies, is also possible as it enables the cross-check of information and elimination of errors and false information.

Regulation (EU) 1304/2013 requires that the **whole sampling process**, including the selection of the sampling method and all stages of collection, processing, analysing and reporting of data to be **documented**. Furthermore, the research process requires the availability of specialised expertise (statistical, econometric, sociological, IT, etc.). For that reason, it is advisable to use an external contractor with the required expertise in the field.

Although reporting of the common long-term performance indicators is expected for two time periods⁵ (2019 and 2025), it is advisable the data to be collected on a yearly basis for maintaining a balanced workload, resource efficiency and gathering information that can be used for management objectives or for analyses and evaluations.

⁴ Annex 8 to the Guidelines for E-Reporting by UMIS of Projects and Financial Plans under OPGG.

⁵ According to Regulation (EU) 1304/2013.