



Quality assessment harmonisation

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The harmonisation of the quality assessment is a particularly challenging task. This challenge is applied not only at the formal level (i.e. ensuring the consistency of the style) but it is applied also at the level of content. This document introduces a certain number of standard sentences and provides further guidelines for improving the harmonisation process.

Harmonisation of the style used within the quality assessment

1.1. Capital and small letters

- **Capital letters** have to be used

For institutions, funding instruments and EU documents:

- *institutions*: Member States, Partner States, European Commission, Interreg Europe, etc.
- *programmes/funds/strategies*: Structural Funds programmes, European territorial cooperation (ETC), Investment for Growth and Jobs programmes, European Regional Development Fund, ERDF and ESF Funds, Europe 2020 strategy, Regions of Knowledge (RoK), Digital Agenda for Europe (DAE), NATURA 2000, Horizon 2020 Smart Specialisation Strategy (S3) platform, etc.
- *EU documents*: Regulation (EC), Directive (EC)

- ✓ **Small letters** have to be used

For programme related documents and expressions:

- application form, programme manual, lead partner, project partner, advisory partner, first level controller, interregional cooperation project, policy learning platform, stakeholder group, action plan, smart specialisation strategy etc.

For institutions:

- managing authority, joint secretariat, certifying authority, monitoring committee, audit authority

1.2. Financial information

- Euros

EUR in front of the figure + comma to indicate thousands and dots before cents

E.g. EUR 925

EUR 1,000 (and not 1.000 euros)

EUR 1,000,000.50 (and not EUR 1.000.000,50)

NB: the sign € should be avoided because it can cause technical problems in some countries or when converting documents into PDF for example.

- Percentage

Percentage should always be used with a reference (e.g. 23% **of the total budget**)

1.3 Dates

Day in figures + month in letter + year in figures: XX Month XXXX

E.g. 15 January 2016 (and not 15th January 2016 or 15/01/16)



1.4 Protected spaces

In order that dates or numbers (for examples) are not cut between two lines, when the assessor arrives at the end of a line, “protected spaced” have to be used whenever it is relevant (e.g. between the currency and the amount: EUR°14; between the day and the month in the date: 15°January°2009

This way, even if something is added in the line, the date or number will not be cut and it will automatically go to the following line. To create protected spaces click on SHIFT + CTRL + SPACE

1.5. References to the application form

- Reference to specific parts of the application should be stated as follow:
 - ✓ in **section B.2.1.2** (and not in field B.2.1.2) or in section B ‘Partnership’
 - ✓ in **semester 3 (phase 1)**
 - Acronyms should be as much as possible avoided (**application form** and not AF, **steering group** and not SG, **number** not No. etc.).
- NB: Some possible exceptions:

- ✓ EU funds/programmes:
 - European Regional Development Fund: ERDF, European Social Fund: ESF
 - 7th Framework Programme for Research & Technological Development: FP7
 - EU programme for the Competitiveness of Enterprises and Small and Medium-sized Enterprises – COSME
 - Reference to previous projects e.g. MORE4NRG
- ✓ Some commonly used abbreviations:
 - R&D or R&D&I
 - ICT or IT (equipment) or PC
 - SME
 - NGO or EGTC
 - EU28 or EU15
 - VAT
 - SWOT analysis

Acronyms have always to be used in capital letters.

- Reference to a specific partner should in principle be specified in brackets followed by the country abbreviation. For instance, **partner 2 (City of Sofia, BG)** (and not partner 2 alone).

1.6. Scoring and conditions

1.6.1 Scoring

The assessment of each criterion shall start by the overall opinion of the criterion assessed:

e.g. *The relevance of the proposal to the programme* is (very good 5; good 4; adequate 3; poor 2; very poor 1, followed by a detailed description of the reasons which justify the score given. Even if a *knock-out criterion* is applied a clear justification needs to be provided on its reasons. The knock-out criterion should be used with care in particular since only the criterion where the knock-out is used is commented.



1.6.2 Conditions

The main assessor of an application is also responsible for drafting the conditions where applicable. Two points should be taken into consideration:

- ✓ Make sure the condition is understandable even without the full picture of the assessment (this means that the reason behind the condition has in principle to be provided before stating the condition itself);
- ✓ Avoid the use of the term “should” as it can be ambiguous. Whenever the condition sets an obligation, the terms “must” or “have to” should be used.



2. Content-related harmonisation

As the process of quality assessment can be subjective and is open to interpretation, the content-related harmonisation of the quality assessment is an important process. The following information organised per criterion should contribute to reducing the differences in individual analyses by ensuring that all assessors share the same understanding and knowledge of certain programme issues and quality assessment mechanisms. At the beginning of each criterion, a reminder on the questions assessors should ask themselves is included.

2.1 Strategic assessment criteria

2.1.1 Criterion 1 - Relevance of the proposal

A. Indicative questions (and source in application form)

<i>Sub-category 1: Relevance of the theme tackled</i>
<ul style="list-style-type: none">✓ Are the theme tackled and policy instruments addressed clearly in line with one of the programme's specific objectives? Is the issue addressed by the project sufficiently focused? (B.1, C.2)✓ Is the theme addressed clearly related to regional development in general and the EU cohesion policy in particular? Is it clearly in line with the competences of the relevant authorities at local, regional and national level? (B.2.1.1, B.2.1.2, C.2)✓ Is the theme tackled clearly reflected in the different policy instruments addressed? (B.1, C.2)✓ Are the issues tackled at regional level linked to the regions' smart specialisation strategies? If so, has the link been sufficiently explained and justified? (B.2.1.1)✓ Is the theme of clear European added-value? Can this theme be considered of general interest in the context of EU regional policy? (C.2)
<i>Sub-category 2: Relevance of the proposed approach</i>
<ul style="list-style-type: none">✓ Is the theme of the project clearly being tackled at policy level? (B.2.1.2, C.2, C.3, C.4, Part D)✓ Does the project have a clear focus on the exchange of experience, and does it clearly build on the partners' experience? Is the exchange of experience at the policy level at the heart of the proposed cooperation? (B.1, B.2.1.2, C.4, Part D)✓ Does the project clearly demonstrate how it will contribute to the programme's objectives and in particular to the improvement of regional / local policy instruments? (B.2, C.2, C.3, C.4, C.6, Part D)✓ Is the proposed approach clearly interregional? (C.4, Part D)✓ Will the proposed cooperation benefit all partners? (B.2.1.2, C.4, Part D)✓ Does the proposal aim at developing any aligned or joint policies over borders? (B.2.1.1, C.6.1, Part D)

B. Tips for harmonisation

- ✓ Both the relevance of the proposal and the relevance of the approach must be demonstrated in order to gain a score of 3 or more. The relevance of the theme alone is not sufficient to ensure a score of 3 in the first criterion. As long as the relevance of the proposed approach is not demonstrated (and reciprocally for the relevance of the theme), the score of this criterion has to be below 3.
- ✓ Certain investment priorities may overlap (e.g. eco-innovation under TO1 and TO6 or support for SMEs under TO1 or TO3). In order to assess which priority is the most relevant, more details on the way they address the issue should be sought. In case of eco-innovation, a project which is driven by environmental considerations with the objective to promote resource efficiency should be submitted under the priority 6(g), while a project with the objective to develop technological innovation to foster economic growth



should be submitted under TO1. Furthermore, ICT itself is not covered by the programme, but it has to be seen as a cross-cutting theme contributing to the development of policies under the different investment priorities (see examples in the programme manual).

- ✓ There can be a link between criteria 1 and 4 when the theme tackled lacks clear focus. When the thematic focus of a proposal is not clear enough, it usually means that the relevance of the issue addressed is difficult to assess or that this relevance can even be questioned since the proposal addresses several issues at the same time. This weakness should be demonstrated in criterion 1. But the lack of clear focus may also mean that the proposed methodology is not clear enough and that the proposal lacks coherence. In such a case, the lack of focus is also tackled under criterion 4.
- ✓ Another link with criterion 4 can be related to a 'specific' activity in the work plan. If this activity is disconnected from the rest of the activities and its relevance is unclear in the Interreg Europe context (e.g. activity dedicated to pure local implementation, pilot actions for instance), then this weakness has to be addressed under the relevance of the proposed approach and should be commented under criterion 1. If this activity is not clearly linked to the rest of the exchange of experience activities, its coherence should then also be questioned under criterion 4.
- ✓ One of the elements to be taken into consideration when assessing whether the exchange of experience takes place at policy level, is whether the relevant policy-makers are directly involved in the project. If the partners are directly local and regional authorities (e.g. municipalities, cities; counties, provinces, regional ministries, regional councils) in charge of the policy instruments addressed, the policy level is usually not questioned. If partners are only bodies governed by public law and/or private non-profit bodies, the assessors should pay additional attention on the relevance of the activities proposed (implementation oriented bodies are usually tempted to propose more implementation oriented activities) and on the policy relevance of the partners (in section B.2 of the application form).
- ✓ The exchange of experience at policy level may not be demonstrated when a partnership is only constituted of implementation related bodies and when the policy relevance of these partners is not demonstrated in the application. Assessors should be careful with their comments: e.g. "the policy level is not tackled as only implementation oriented bodies are involved in the project" is not correct. A more nuanced phrase is needed for such cases: 'the fact that only implementation oriented bodies are involved in the project does not contribute to demonstrating that the exchange of experience will take place at policy level'. Related to this point, it should also be checked if the actual policymakers (e.g. MA/IB) are at least included in the stakeholder groups. This point also means that, to a certain extent, the assessment of criterion 1 is also related to criterion 3 (quality of partnership).



2.1.2 Criterion 2 – Quality of results

A. Indicative questions (and source in application form)

<i>Sub-category 1: Tangibility of the results</i>
<ul style="list-style-type: none">• Are the expected outputs and results clearly specified and precisely quantified? Are they realistic? (B.2, C.6, Part D)
<i>Sub-category 2: Relevance of the results</i>
<ul style="list-style-type: none">✓ Does the project demonstrate its capacity to directly influence the policy instruments addressed? (B.2, C.6)
<i>Sub-category 3: Innovative character of the results</i>
<ul style="list-style-type: none">✓ Is the innovative character of the expected results convincingly explained? Are they clearly different from the results already achieved in other running or past projects? (C.6.3)✓ Are potential synergies with and added-value compared to similar running projects clarified in the application form? (C.6.3)✓ For follow-up projects, is the added-value clearly demonstrated in particular through the partnership, and/or the theme tackled? (Part B, C.6.3)
<i>Sub-category 4: Durability of the results</i>
<ul style="list-style-type: none">✓ Are there realistic provisions to ensure the durability of the project's results? (C.6.4)

B. Tips for harmonisation

- ✓ In the majority of cases, if the score of criterion 1 is below 3 (i.e. overall relevance not confirmed), the score of criterion 2 will also be below 3. There are however a few cases where the quality of results may be considered as relevant although the overall relevance of the application would be questioned. It can for instance be the case of a project where the policy level is clearly addressed (majority of regional/local public authorities involved) but the approach is mainly implementation oriented.
- ✓ The 'tangibility of results' cannot be confirmed when the outputs / results are not clearly defined in a consistent way throughout the application. This tangibility depends also on the target value provided for the indicators in the indicators section. It is in this criterion that the assessor should check whether the programme's indicators have been properly and realistically estimated. For instance, if the estimated amount of Structural Funds influenced is high, it should not automatically be considered as good, but it should be assessed as how realistic the estimated amount is (e.g. by dividing this amount by the number of SF programmes addressed).
- ✓ Criterion 2 may also be linked with criterion 3 (quality of partnership). Indeed, the 'relevance of the results' is partly related to the nature of the partners involved in the cooperation. If the partnership involves directly the policy responsible organisations, it is likely that the expected results would be relevant to the programme as the 'policy makers' are directly the main actors in the cooperation. In the opposite case, the absence of policy makers may be used as an additional argument to question the relevance of the results (e.g. '*the fact that none of the policy responsible organisations is directly involved in the cooperation does not contribute to demonstrate the relevance of the expected results*').
- ✓ The relevance of results can be questioned not only due to the lack of project's capacity to improve



policies but also due to the poor relevance of the nature of the expected outputs and results (e.g. related to a research or implementation oriented approach) or due to the lack of information provided on the expected result for each instrument in section B.2.

- ✓ The relevance of the results and more precisely the capacity of the project to improve the policies of the participating regions cannot be questioned only because certain of these regions are not directly represented by their policy makers. It is only when the policy relevance of the implementation oriented bodies is not demonstrated that the relevance of the results may be questioned.
- ✓ As the core aim of Interreg Europe is to improve the performance of regional development policies and programmes and in particular Structural Funds programmes, the fact that the number of policies addressed related to Structural Funds fulfils only the minimum requirement (i.e. half of the policy instruments addressed), should not be considered as a weakness.
- ✓ The issue of innovative character becomes particularly important for follow-up projects. These projects should clearly explain how they are different from the previous projects (e.g. in terms of topics, partnerships and/or policy focus).
- ✓ Explanation on the difference and possible synergies between the application and already approved projects can be important to demonstrate the innovative character of the results (in particular in section C.6.3). However, there may be cases where it is not easy for applicants to identify approved similar projects. This has to be taken into consideration when assessing this point under quality of results.
- ✓ The absence of reference to the action plans in section C.6.4 (Durability of the results) has to be considered as a weakness in criterion 2.
- ✓ The effort to involve new-comers to Interreg Europe can be recognised under the 'innovative character of the results'.

C. Standard conditions

- ✓ Amount of funds influenced

The 'estimated amount of Structural Funds influenced by the project' seems overestimated (i.e. EUR 190 Million meaning an average of EUR 23.75 Million per Structural Fund programme addressed). Please note that this indicator estimates the financial impact of the expected policy changes. It should be an estimation of the amount that will be directly influenced by the change introduced by the project and not the overall amount that is dedicated to the related priorities in the participating regions. Clarification is required on this question and, if necessary, the target value should be reduced.

- ✓ People with increased capacity

The number of people with increased capacity is very low considering that this indicator covers not only the staff members from the partner organisations but also the people involved in the stakeholder groups. The indicator should be revised accordingly.

- ✓ N° of policy learning events

The number of policy learning events indicated in part C.6.2 of the application form has to be clearly reflected in the work plan (part D). Please take into account that the indicator 'policy learning events' includes not only the interregional exchange of experience meetings but also stakeholder group meetings in each region. Back-to-back meetings (e.g. study visit and seminar jointly organised by the same partner in the same place) should be counted as one. The two partners meetings planned in phase 2 should also be included in the target figure of the indicator "n. of policy learning events" (section C.6.2). The information provided has to be checked again and if necessary amended, to make sure that the target indicator in part C.6.2 complies with these principles. A perfect correspondence between the indicator and the information provided in the work plan must also be ensured.



- ✓ Consistency of indicators

In section C.6.2, the result indicators related to other policies are completed although the project addresses Structural Funds programmes only. This inconsistency has been corrected.

2.1.3 Criterion 3 - Quality of partnership

A. Indicative questions (and source in application form)

<i>Sub-category 1: Coherence between the objectives of the project and partnership</i>
<ul style="list-style-type: none">✓ Is the policy relevance of the partners involved clearly demonstrated? Is their capacity to influence the policy instrument addressed explained? (B.2)✓ Is the issue tackled of interest to all partners? Will all the partners benefit from, and contribute to, the project? (B.1, B.2.1.2, C.4, Part D)✓ Are the partners competent in the issue tackled? (B.1, B.2, C.2)✓ Are the stakeholders identified relevant to the issue addressed by the project? Are their roles and involvement in the project clearly described? (B.2.1.3, C.4, Part D)
<i>Sub-category 2: Proportionate involvement of all partners in developing project idea, preparing application, implementing and co-financing operation</i>
<ul style="list-style-type: none">✓ Do all partners seem to have been involved in developing the project? (C.1)✓ Does the involvement of all partners seem to be comparable? If not, is there a justification in the application form or evidence in the project's approach? (B.1, C.4, Part D)✓ Is the financial contribution between the partners proportionate and realistic? If not, is it justified? (A.4, Part D)
<i>Sub-category 3: Good mix of regions with different levels of development</i>
<ul style="list-style-type: none">✓ Is the partnership a mix between more and less developed regions? If not, is it justified in the application form or evident in the project's approach? (Part B, C.4)
<i>Sub-category 4: Geographical coverage</i>
<ul style="list-style-type: none">✓ Does the partnership go beyond cross-border and transnational programme areas? (A.4) If not, is there a justification in the application form or through evidence in the project's approach? (B.1, C.4,5, Part D)✓ Is the budget allocation balanced between the countries (including between a group of geographically close countries and the other represented countries)? If not, is it justified in the application form? (A.4, C.4)

B. Tips for harmonisation

- ✓ As indicated above, there can be a link between this criterion and the two first criteria. The nature of the partners involved is obviously important for the quality of partnership (i.e. are the involved partners in a position to influence their regional/local policies and strategies?) but it can also have an impact on the relevance of the proposed approach and expected results in particular when the 'policy relevance' of the partnership is questionable (i.e. no policy responsible organisation directly involved and lack of policy relevance of the involved partners).



- ✓ Details on how many policy responsible organisations are directly involved should be provided in quality of partnership only. Usually, the following sentence is used for this purpose: *“For X out of Z policy instruments addressed, the policy responsible organisations are directly involved in the project.”*
- ✓ Even if the programme introduces precise recommendations for the number of partners involved, the assessors should not be too strict in particular with the upper limit of these recommendations. For instance and because of the contributing partner principle, there may be partnerships where the same region is represented by several organisations. This kind of configuration could justify the fact that the programme’s recommendations are exceeded. However, this arrangement should not lead to significant financial imbalance between the represented countries.
- ✓ The proportionate involvement between the partners should be assessed not only as far as the activities are concerned, but also in financial terms. There might be cases where partners seem to be proportionally involved in the project’s description although the budget per partner is completely unbalanced (even taking into account the different levels of costs between countries). Even if specific partnership’s financial arrangements could lead to an unbalanced share of budget among the partners, an unbalanced financial arrangement among the partners should be justified in the application form.
- ✓ When checking whether the financial contribution between partners is realistic, the assessor should take into consideration the different levels of costs of the countries involved. An application where all the partners’ financial contributions are identical can be evidence of non-serious budgeting. It is also clear that, because of its specific role, the budget of the lead partner is in general higher than the budget of the other partners. As a conclusion, if the financial contributions of partners are identical a remark should be included in the assessment of criterion 3 ‘Partnership’. For those projects recommended for approval an appropriate condition will then be added under criterion 6 ‘Budget and finance’.
- ✓ When checking whether the financial contribution among partners is proportionate, the focus of the assessor should be on total budget per partner. When answering the question ‘is the budget allocation balanced between countries (under the geographical coverage), the focus of the assessor should rather be on ERDF budget per country (or per group of geographically close countries) except for very specific cases where Norway is represented (in this case, the focus should still be on total budget per country).
- ✓ As indicated in criterion 1, the wide geographical coverage (going beyond cross-border and transnational programme areas) is an important feature under Interreg Europe. In particular, the assessors should check whether the partners are all from the same transnational cooperation area: http://ec.europa.eu/regional_policy/en/policy/cooperation/european-territorial/trans-national/. If this is the case and no convincing justification is provided, the geographical coverage should be considered as poor, without added-value for the Interreg Europe programme. Partners may also not be located in an existing ETC area programme but still belong to the same geographical area. For instance; Northern Portugal and Spain does not belong to the MED area. Nevertheless, these partners still comes from the Southern Europe / Mediterranean Country. The assessor should be careful about this nuance when drafting the text of the assessment.
- ✓ The mix between different levels of regions refers to GDP. The way to assess this element is therefore tricky since certain regions can be rather rich although they are located in rather poor country.
- ✓ Be careful with unbalanced geographical coverage. In certain cases, the specific nature of the topic tackled could justify the unbalanced geographical coverage. However, this special arrangement should in principle be clearly justified in the application form (e.g. sections A.4, C.1, C.2).
- ✓ The legitimacy of a network organisation to develop an action plan may be questionable as this kind of organisation usually has a more specific role in particular in the dissemination strategy of the project. This point is also interlinked with the selected role of the partner (i.e. project partner vs. advisory partner) and could be commented that the notion of advisory partner seems misunderstood.



- ✓ If a project is recommended, it should be checked whether the partnership involves an “association of local authorities” or any other kind of association with member organisations. Experience of the past showed that this implies a risk that member organisations also claim funds through the umbrella association. Therefore, a standard request for clarification should be inserted in the conditions form, such as: *Partner X represents the association of Y. According to the ‘contributing partner principle’, only organisations that are directly listed as a partner in the application form can report costs, the programme does not accept sub-partners. Staff costs, for example, can only be claimed for staff directly employed by the association. Organisations that are members of the association cannot directly claim costs. Please confirm that the partner is aware of these requirements and that this is reflected in the partner’s budget set-up. If applicable, the partner’s budget has to be corrected accordingly.*
- ✓ When a partner is described as being financed by an EU programme (except for the case when yes is answered to the question ‘Partner financed through Investment for Growth and Jobs programme’ when they cannot receive Interreg Europe funding – article 96.3d), a remark on the risk of double funding has to be included in the text of the assessment. If the application is recommended, a condition on this issue has also to be added.
- ✓ The indication of the wrong type of partners should not be considered as a weakness under criterion 3 even if the mistake occurs for a majority of partners. The demonstration of the policy relevance of each partner in section B.2.1.2 of the application form is much more important. However, if a doubt emerges that a partner is wrongly indicated as a public body/body governed by public law instead of private non-profit body, this has to be raised as it would impact the co-financing rate (this should be double-checked with the relevant contact point in case the project is recommended for approval).
- ✓ When the role of certain partners is not very well explained and that these partners seem to have a rather passive role in the project, this can be commented under the ‘proportionate involvement of partners’ but not necessarily under ‘win-win’ cooperation in criterion 1. Win-win cooperation is more when there is a unilateral approach of cooperation and when the way certain partners will benefit from this cooperation is not clear at all.
- ✓ Wording related to the lack of policy makers involvement
Although the selection criteria can be interrelated, using the exact same statement in different parts of the assessment must be avoided. In particular, it is not always appropriate to provide details on the nature of the involved partners already in criteria 1 and 2. There are of course cases where the same kind weakness needs to be mentioned in several criteria. In such case, it is advised to precisely follow the assessment guidelines and to express the weakness differently in each of the criterion. For instance, with an application where the policy relevance of the partners will be poor, the following arguments can be used:

- Criterion 1

The way the project will contribute to the programme’s objectives and in particular to the improvement of the policy instruments addressed is not clearly demonstrated.

- Criterion 2 (all the comments provided in this criterion have to be related to the results)

The relevance of the results is poor. In particular, as the policy responsible organisations are not directly involved in the cooperation and poorly represented in the stakeholder group, it is not clear how the project will manage to have a direct impact on the policy instrument addressed.

- Criterion 3 (this is the criterion where details have to be provided on the nature of the involved partners)

No policy responsible organisations are directly involved in the project and the policy relevance of the involved partners is poorly demonstrated. Their link with the policy responsible organisations as well as their capacity to directly influence the policy instruments addressed (e.g. involvement in the policy making process) are poorly addressed in section B.2.

In any case, the above weakness alone cannot be used for decreasing the score of criteria 1 & 2.



C. Standard conditions

- ✓ Policy relevance
The policy relevance of partner X addressing policy instruments Y is not properly demonstrated in section B.2 of the application. Even if the partner's link with the respective policy responsible organisation is sometimes mentioned, its capacity to directly influence the policy instrument and its involvement in the policy making process is not precisely described. The policy relevance of this partner has therefore to demonstrate. If this is not possible, the concerned partner should be replaced by the relevant policy responsible organisation.
- ✓ Involvement in stakeholder group
The body responsible for policy instrument X (i.e.YY) is not a member of the stakeholder group. This is particularly regrettable, as the programme strongly recommends the involvement of the policy makers in the policy learning process. In addition, by signing the letter of support, this organisation has expressed its will to engage in the project through the stakeholder group. Therefore, it has to be included in the list of members, and its involvement in the project activities has to be specified.



2.2 Operational assessment criteria

2.2.1 Criterion 4 - Coherence of the proposal and quality of approach

A. Indicative questions (and source in application form)

Sub-category 1: Coherence of the proposed approach		
<ul style="list-style-type: none"> Are the following elements logically inter-related: issue tackled, objectives and expected results? (C.2, C.3, C.4, C.6.1, C.6.2, Part D) Can the expected results be achieved through the proposed approach and planned activities? (C.4, C.6.1, C.6.2, Part D) Is the proposed overall approach realistic and consistent? Are activities logically inter-linked? Is their sequencing logical? (C.4, Part D) 		
Sub-category 2: Quality of the work plan		
<ul style="list-style-type: none"> ✓ Are the planned activities and outputs described in enough detail in the project's work plan? (Part D) ✓ For each semester of the work plan, are the main outputs in line with the description of the activities? (Part D) 		
Sub-category 3: Consistency of the project with EU horizontal policies and compliance with state-aid rule		
<ul style="list-style-type: none"> ✓ Is the project in line with the EU horizontal policies (sustainable development, equal opportunities and non-discrimination, and equality between men and women)? (C.7) 		
<ul style="list-style-type: none"> Has it been established that none of the planned activities are state aid relevant in phase 1? (Part D)? 		
Guidance on State Aid (relevant checklist to be filled in)		
<p>According to article 107 of the Treaty on the Functioning of the European Union, any aid granted by a Member State or through State resources which distorts or threatens to distort competition by favouring certain undertakings or the production of certain goods is considered to be state aid in so far as it affects trade between Member States. For an activity to fall under the scope of state aid rules, all these criteria must apply cumulatively¹.</p>		
Criteria	Question	Guidance
Undertaking	Is any project partner carrying out an economic activity within the project?	<p>Any activity consisting in offering goods and services on a market is an economic activity.</p> <ul style="list-style-type: none"> Could the planned activity be carried out by an economic operator in order to make profit? <p><i>E.g. in a project on innovation in the public sector, partner x is a public regional transport company who wants to make the</i></p>

¹ The criterion 'state resources' is considered to be always fulfilled in Interreg Europe, due to the ERDF co-financing. Therefore, it does not need to be checked.



		<p><i>ticketing process easier for consumers and more cost-effective for them. For this purpose, they plan to produce a feasibility study.</i></p> <ul style="list-style-type: none"> • Does the planned activity consist in offering goods and services for which a market exists? <p><i>E.g. partner x delivers transport services in a region where other private companies do the same. They will use the results of the feasibility study to improve their ticketing system.</i></p>
Economic advantage	Will the project partner carrying out the economic activity within the project or a third party get an undue advantage?	<p>An undue advantage is an economic benefit which the beneficiary would not have obtained under normal market conditions, i.e. without the aid. Only the effect of the aid is relevant, neither the cause nor the object. The form of the measure is also irrelevant, as the relief from economic burdens or the access to know-how, information or professional contacts can constitute an advantage.</p> <ul style="list-style-type: none"> • Will the financial situation of the organisation improve as a result of the economic activity financed through the project? <p><i>E.g. thanks to the feasibility study, partner x will develop a new ticketing system which will not only be more innovative and consumer friendly but it will also reduce their costs.</i></p> <ul style="list-style-type: none"> • Is it planned not to widely disseminate the results of the collaboration, also in terms of access to know-how and information? <p><i>E.g. partner x does not plan to make the results of the feasibility study available to the general public, but only to exchange with the partnership. They will use them internally in order to make the ticketing system of their organisation easier and less costly.</i></p> <ul style="list-style-type: none"> • Is the partner planning to carry out trainings, coaching, business support or other type of activities which grant an undue economic advantage to others not directly partners of the project (indirect state aid)? <p><i>E.g. partner y is the regional innovation agency in a project on access to foreign investments by SMEs. They plan to organise a series of trainings for few SMEs on successful ways to attract foreign investors.</i></p>
Selectivity	Is the aid selective?	<p>The aid is selective when it discriminates the potential beneficiaries based on the geographical location, size, and type of economic sector. If the advantage is for the project partner, such advantage is considered selective 'per se', so this criteria is automatically fulfilled. However, when the advantage is provided to third parties not partners in the project (indirect state aid), it must be checked whether a transparent mechanism to exclude the selectivity was put in place.</p> <ul style="list-style-type: none"> • Does the partner plan to carry out trainings or other type of activities granting an undue economic advantage to third parties (indirect state aid) and no mechanism is foreseen to ensure a transparent and open participation to such activity? <p><i>E.g. the training organised by partner y is only targeted to the SMEs which are part of the local stakeholder group created within the project.</i></p>



Distortion of competition and trade within the Union	Does the aid have a (potential) distorting effect on trade and competition within the Union?	<p>An advantage granted to an undertaking operating in a market which is open to competition is normally assumed to distort competition and be liable to affect trade within the EU.</p> <ul style="list-style-type: none">• Is there a liberalised market where there is (or could be) competition between EU MS for the economic activity? <p>This criteria is always fulfilled unless there is no EU market for that activity (e.g. local activity and no competition). Normally if the above criteria are met, this one is met too.</p>
Standard condition to be included if any of the planned activities is state aid relevant		
If the activity is state relevant and not in line with the type of activities supported under phase 1, it should be excluded from the work plan.		<i>In section X of the application form, you indicate that partner X plans to... However, the relevance of this activity to the first phase of the project implementation is not demonstrated given that phase 1 has to focus on the interregional learning process. In fact, this activity is rather implementation-oriented and it seems to have an economic nature(, thus also falling under the scope of state aid rules). Since this type of activities cannot be financed by Interreg Europe during phase 1, this activity and the related costs have to be taken out from the application form.</i>
N.B. In case the activity is state aid relevant but it is still in line with phase 1, the condition can be re-formulated in a way that the activity may be changed as to exclude the state aid relevance.		

B. Tips for harmonisation

- ✓ The question related to the clear definition of planned activities and outputs under this criterion is linked to the 'tangibility of results', assessed under criterion 2 (Quality of results). Assessors should remain at a general level here by focusing on section C.6.1 of the application form in particular. They can also check whether the definition of the activities / main outputs is consistent throughout the application form. The following standard comment can for instance be used: '*Certain core programme's indicators (e.g. number of people with increased professional capacity, number of Growth & Jobs and ETC programmes addressed, number of action plans developed) are not properly tackled as their target value is not at all realistic.*' By comparison, the comments in the first category of criterion 2 would focus on the result indicators provided in section C.6.2 (i.e. to check whether the target value provided for these indicators is realistic).
- ✓ The question 'Can the expected results be achieved through the proposed approach and planned activities?' can sometimes be related to the criterion 1 question 'Does the project clearly demonstrate how it will contribute to the programme's objectives?' Indeed, it often happens that a project indicates the improvement of policies in its objective (section C.3 of the application form), but the way this objective will be achieved is not demonstrated in the rest of the application and in particular in the proposed approach (reflected for instance in the nature of the activities proposed and nature of the partners involved). If this is the case, the assessor has to answer 'no' to the questions 'Can the objectives and expected results be achieved through the proposed approach and planned activities?' (criterion 4) and 'Does the project clearly demonstrate how it will contribute to the programme's objectives?' (criterion 1).
- ✓ Despite the above comment, it is still fundamental to make a clear distinction between issues related to relevance and issues related to coherence. Criterion 4 is not dedicated to the relevance of the project and it can easily happen that an application is scored 2 in criterion 1 but scored 3 in the criterion 4.
- ✓ The consistency of the project with EU horizontal principles and agenda should be commented only when the information is particularly good or particularly weak. This consistency will be considered as ensured if it is not specifically commented in the assessment. Poor information on horizontal principles may not prevent a score of 4 in this criterion.



- ✓ In principle, it is not in the work plan where details on the overall approach (i.e. rationale and interrelation between the different activities, definition of core concepts introduced in the proposal) should be provided. The overall logic and core concepts related to the approach have to be explained in the general sections of the application (in particular in section C.4). This has the two following consequences:
 - A rather schematic work plan where the same information is often repeated would not necessarily prevent an application from being recommended if, in the general parts of the application, the overall approach for the exchange of experience is well tackled.
 - In comparison, the lack of information on the overall proposed approach or an incoherent methodology is a serious weakness which may impact the final recommendation.
- ✓ Duration shorter than 36 months (phase 1) is not an issue as long as it does not question the feasibility of the projects.
- ✓ In case a 'specific' activity is introduced in the work plan without any clear link with the rest of the project activities, a comment has to be made in criterion 4 to highlight the unclear rationale behind this activity and its disconnection with the rest of the activities. If in addition the relevance of this specific activity is unclear in the Interreg Europe context (e.g. activity dedicated to pure local implementation, pilot actions for instance), then this weakness should also be commented in criterion 1 under the relevance of the approach.

C. Standard conditions

- ✓ Work plan & stakeholder
It is regrettable that no information is provided in the work plan on the arrangements of the local stakeholder groups (e.g. number and frequency of meetings). Part D of the application (both activities and output sections) has to be revised in order to include qualitative and quantitative information on the arrangements of the local stakeholder groups.

The participation of stakeholder groups' members to interregional events should be further explained in section D (work plan) of the application form, in order to better understand how many events are envisaged, if all stakeholder groups' members will be involved in those interregional events or if only some stakeholders will take part in those events. Also the basis on which the participating stakeholder groups' members will be selected should also be explained.
- ✓ Involvement of stakeholder
The project partners plan to involve their stakeholders in almost all activities. Whereas a wide involvement of stakeholders is welcomed, the feasibility of such an approach is questionable. We recommend therefore to focus on the work with the stakeholders on local level and restrict the overall involvement to a manageable level, thus also limiting the budget that was planned for this and achieve hereby a better value for money.
- ✓ Poor quality if work plan
- ✓ The quality of the work plan is poor. The information provided is rather schematic and from semester 1 to semester 6 the quantity and the quality of the information decreases significantly. More generally, the text is so dry that it is not possible to understand how the exchange of experience will progress towards the development of the action plans. A full revision of the text has to be made. Qualitative information has to be added in each semester, avoiding the repetition of text that does not help to understand the evolution of the work of partners.
- ✓ Activities outside partnership area
The organisation of activities (four thematic seminars and related study visits) outside the partnership area and more generally the cooperation with four additional cities which are not partners in the project is not in line with the programme's guidelines. It is already challenging to ensure a successful learning



process among the regions directly involved in a project. The experiences and practices have to come primarily with these regions. Therefore, this arrangement needs to be revised to ensure that all efforts are concentrated on the participating regions. Activities outside the partnership area have to remain exceptional and may be possible only in duly justified cases.

✓ Horizontal policies

The contributions of the project to sustainable development and digital agenda under part C.7 are not convincing. The type of contribution for these two dimensions has to be changed from 'positive effects' to 'neutral'.



2.2.2 Criterion 5 – Communication and management

A. Indicative questions (and source in application form)

<i>Sub-category 1: Quality and coherence of the communication strategy</i>
<ul style="list-style-type: none"> • Is the communication strategy sufficiently elaborated? Are specific communication objectives defined? Are specific target groups and communication activities clearly defined for each communication objective? (C5, Part D) • Are the communication objectives SMART (specific, measurable, attainable, relevant and timed)? • Is the communication strategy well integrated in the overall project strategy? Does it clearly support the achievement of the project objectives? (C5, Part D) • Are both internal and external communication covered under the communication strategy? (C5, Part D)
<i>Sub-category 2: Quality of the communication activities</i>
<ul style="list-style-type: none"> • Are sufficient publicity measures planned for disseminating project activities and results beyond the project partners? (C5, Part D) • Are these activities clearly defined? (C5, Part D) • Do the communication activities of the project include online communication (website and social media), media relations and events? (C5, Part D)
<i>Sub-category 1: Clarity of the project coordination and management structures and procedures</i>
<ul style="list-style-type: none"> ✓ Are the procedures for management and coordination at strategic and operational levels clearly and satisfactorily explained? Are they transparent and fair? Are all partners involved in the decision-making process? If not, is it justified? (C.8.1, Part D) ✓ If a sharing of tasks is envisaged within the partnership, is this division clear and logical? If no division of tasks is envisaged, is it justified? (C.8.1, Part D)
<i>Sub-category 2: Quality of the project management</i>
<ul style="list-style-type: none"> • Are the project management-related activities clearly and precisely defined? (C.8.1, Part D) • Does the work plan include the basic management and coordination activities / outputs (i.e. progress reports and steering group meetings)? (Part D) • Are these activities in line and coherent with the description provided in section C.8.1 of the application form? (C.8.1, Part D)

B. Tips for harmonisation

- ✓ As explained in the programme manual, project partners are required to dedicate sufficient time and resources to project communication, at all stages of the project development. 'Communication' must be understood as a strategic project tool, which contributes to achieving the project's objectives. If this is not sufficiently reflected through the related indicators and activities, it has to be mentioned as a weakness in the quality assessment.
- ✓ Concerning the activities, the following points contribute to the quality of the communication strategy:
 - the communication activities target the relevant groups for the policies addressed
 - at least the three following activities are planned: online communication (website and social media), media relations and events
 - sufficient importance is given to the high-level dissemination event (tackled by the communication strategy; included among activities in C.5)
 - target group includes groups other than the project partners (including the general public)
 - specific dissemination activities are planned to inform the general public (defined in a more tailored way vis-à-vis the project focus) about the project's achievements



- ✓ Communication with stakeholders should fall under 'external' communication. 'Internal' is among the project partners. Qualified general public means general public specific for the policies addressed (no need to go necessarily to the general public in general).
- ✓ Several communication tools are provided by the programme (e.g. project website, branding with logo and templates, poster). These elements should not be developed and budgeted in the project. Tools not provided by the programme such as mailing tool, newsletter, intranet, blog, file-sharing can be considered if their relevance is demonstrated in the communication strategy.
- ✓ Production of 'giveaways'/ promotional material in principle is not possible. They may be envisaged if their communication role is well justified (Why needed? How will it help to reach the communication objectives of the project? Does it carry the message(s) of the project? Is approval of the JS foreseen in the planning of production of any 'gifts/ giveaways/ promotional material'?).
- ✓ The quality of management is the only element of the assessment which can be assessed almost independently from all the other elements. There is only one link with criterion 4 ('quality of the work plan) as far as the description of the project management in phase 1 is concerned. There is no obligation to share the responsibilities for project management among partners. Therefore, the fact that the lead partner remains responsible for the whole coordination is not necessarily a weakness. However, in certain cases, it may be considered as additional evidence for demonstrating the over-dominating role of a lead partner (as long as other evidence can be found in the work plan).
- ✓ The experience of the lead partner in managing similar projects should be commented only in cases when the assessor considers it brings added-value to the assessment. But in principle a lead partner should not be blamed for its lack of experience.

C. Standard conditions

- ✓ Communication strategy description
Although sufficient communication and dissemination activities are planned, their description is not sufficiently tailored to reach the different target groups. Section C.5 has to be amended, making sure that several separate objectives are listed, clearly identifying the respective target groups and activities.
- ✓ Reference to own website/logo to be removed
The project is planning to create the logo and website design. However, this is not needed since, as explained in section 8.2.1 of the programme manual, projects are not encouraged to develop their own corporate identity and the programme will host all project websites. The references to the own project logo and own website have to be removed from the application and the related budget reduced accordingly or can be reallocated.



2.2.3 Criterion 6 - Budget and finance

A. Indicative questions (and source in application form)

Value for money	
Is the overall budget reasonable compared with the planned activities/outputs and the project's duration? Is the overall budget reasonable compared with the number of partners involved? (A.1, A.3, A.4, Part D, Part E)	<ul style="list-style-type: none"> ▪ 'Value for money' is also related to 'consistency of the budget'. If the overall budget is considered very high (compared to the planned activities, project's duration and number of partners involved), it also means that the consistency of the budget is not clearly demonstrated because of this over-estimation. ▪ If criterion 1 (Relevance of the proposal) is scored below '3', the score of criterion 6 must also be below '3' as the value for money for the programme cannot be confirmed. ▪ If the overall project budget goes well beyond the recommendation (EUR 1-2 million of ERDF) without any clear justification, the value for money has to be questioned. ▪ Are there strong deviations between partners (except lead partner)? If yes, is it explained by geographical location and planned activities (special tasks)? (NB: The balanced financial contribution per partner is checked also under criterion 3) ▪ Reference for partner budget around EUR 200,000 ▪ For very high or low budgets, can it be explained through: <ul style="list-style-type: none"> - Large geographical coverage with a majority of North-Western or Eastern partners - A high number of (costly and justified) activities - Project duration - High number of partners (above 11) requiring a lot of coordination
Is the value for money demonstrated in the context of Interreg Europe? (all)	<ul style="list-style-type: none"> ▪ If criterion 1 (Relevance of the proposal) is scored below '3', the score of the budget criterion must also be below '3' as the value for money for the programme cannot be confirmed ▪ The same applies for criterion 2. If the quality of results is not confirmed, then the value for money of the application is in principle not demonstrated.
Is the budget share dedicated to 'external expertise and services' reasonable (i.e. is it below 50% of the total budget)? If not, is it justified? (E.1, E.2)	<ul style="list-style-type: none"> ▪
In case equipment costs are budgeted, is the amount reasonable (i.e. within the recommended EUR 5,000-7,000 per project)? If not, is it justified? (E.1, E.3)	<ul style="list-style-type: none"> ▪ Equipment costs have to remain exceptional and limited to the list under section 7.2.5 of the programme manual. ▪ Usually, when equipment costs are budgeted, it refers to IT or office equipment for the lead partner or project management (e.g. a PC and a printer for the coordinator). A comment has to be included in case all partners have budgeted equipment costs. ▪ If equipment costs go beyond the recommendation (EUR 5,000 - 7,000 per project) without any clear justification, a comment has to be included.



Consistency of the budget	
<ul style="list-style-type: none"> Do the financial arrangements reflect the planned activities? Are the costs by budget line coherent and in line with the corresponding activities? (Part D, E.1) 	<ul style="list-style-type: none"> Budget line <u>travel and accommodation</u> is often over-estimated. Calculation of average costs per partner per month with a reasonable number of interregional events: in principle not exceeding EUR 700 per month (in phase 1) + Alternative: travel budget / number of interregional meetings = 1,500 on average Attention: frequency of interregional events, level of direct partner's involvement versus local stakeholders under external expertise, location of partners and distance <u>Staff costs</u> in principle higher than external expertise (otherwise doubt about actual partner involvement), staff costs should be reasonable. Reference: staff budget / 36 months/number of partners = EUR 3,500 per partner per month on average (phase 1). For phase 2, not more than EUR 800 per partner per month. Attention: staff contained in external expertise (external management) and partner country (East lower than North-West)
<ul style="list-style-type: none"> Is the spending plan coherent and realistic? Does it reflect the planned activities? (Part D, E.5) 	<ul style="list-style-type: none"> Does the spending plan make sense? Does it reflect the activities and in principle lower spending at the beginning and more at the end (but attention to 2 phases)? Special attention on first semester of phase 1 and last semester of phase 1 and 2
<ul style="list-style-type: none"> Are the costs for 'External expertise and services' accurately and clearly described? Is the level and nature of these costs justified and in line with the planned activities? Are their additionality and interregionality clearly justified? Is there a risk that public procurement rules will not be respected (e.g. the name of the company is mentioned)? (Part D, E.2) 	<ul style="list-style-type: none"> Is the information complete (are all fields filled) and is the information precise enough? Cost of the services: Are the estimations logical? Or do they appear very high/low? Are there major mismatches between category & description? Does the list of expertise items exclude anything that belongs to administration costs (covered by flat rate)? Is the planned external expertise in line with the work plan? Can items be found as outputs/results in the activity/indicator sections? If the name of external experts/companies appear: names need to be removed, confirmation on compliance with public procurement rules has to be provided/reminder on public procurement rules Reference prices (per day): FLC up to EUR 1000, expert EUR 700, events EUR 80 per participant Did only partners with decentralised or paying systems budget for FLC costs? (reference: up to EUR 1000) If management is externalised (see section C.8.2-4), are related costs budgeted (and vice versa)? Are there reference to cost sharing? No sharing over programme (reminder) Potential administration cost items? To be removed. Costs for gadgets, gifts or website? To be closely checked and potential removal. <p>The condition on external expertise items to be removed, shall include one of the following formulations applying in case:</p>



	<p>a) The item is not necessary/justified and must be taken out: <i>"The costs have to be taken out and the total budget reduced accordingly"</i>.</p> <p>b) The item is not necessary/justified and the related costs can/should be allocated to another budget line: <i>"The costs have to be taken out and can be reallocated to XY"</i>.</p> <p>c) The item does not seem necessary and it should be taken out (unless sufficient justification is provided): <i>"The costs do not seem to be necessary and should be taken out"</i>.</p> <p>d) The item does not seem necessary but a link with the work plan can be made, thus it could be justified: <i>"The costs have to be taken out or further specified/justified"</i>.</p>
<ul style="list-style-type: none"> ▪ If equipment costs (e.g. IT equipment) are budgeted, are they clearly described? Is the nature of these costs justified? Are they of benefit to the partnership? (E.3) 	<ul style="list-style-type: none"> ▪ Equipment costs have to remain exceptional. Are there equipment items other than office equipment (pre-set description in application form)? If yes, is this justified by the planned activities?
<ul style="list-style-type: none"> ▪ If activities are organised outside the EU, is the location of these activities clearly specified (i.e. country or town)? Are these activities taking place outside the EU relevant and justified? Is there a risk that the costs paid by the EU partners for these activities exceed 20% of the project's total budget? (Part D, E.1) 	<ul style="list-style-type: none"> ▪ Have a look when special conferences are listed – if they are international, they might take place outside Europe

Special issues first call/other points

- Verify public/private allocation of partner contribution:
 - if all public partners, unlikely that source is for all private
 - Preparation costs might be allocated to private source of funding (due to bug)
- Verify if revenues are indicated: in principle very exceptional
- Use of external expertise/equipment categories