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Rapid assessment of reporting systems and data quality

Final Report

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Executive summary

The rapid assessment of reporting systems and data quality was performed on a sample of eight EEA and Norway Grants programmes that represent various priority sectors, programme sizes, implementation modalities, and countries.

All Programme Operators (POs), Fund Operators (FOs), and National Focal Points (NFPs) covered by this assessment declare an understanding of the reporting requirements to their full extent. However, there are variations in the depth and quality of understanding. Overall, data produced and submitted by POs, FOs, and NFPs can be considered reliable and meaningful despite some issues. The issues relate to:

- The proper reporting of cumulative values of indicators where the unit of measurement is "number" and of indicators from surveys where the unit of measurement unit "scale".
- A high share of the category "not specified" under indicators that require disaggregation.
- Some reported achievements far exceeding targets.
- Discrepancies between the numbers of contacted projects and the project level information (PLIs).

The underlying causes of these issues are mainly technical and/or manual relating to omissions, insufficient experience, and/or staff workload. These deficiencies are not related to issues of data validity and accuracy within the systems of POs/FOs and NFPs.

Two main challenges relate to collecting, storing, and reporting data by POs, FOs, and NFPs. Specifically, 1) there are some limitations in the digital data collection systems that are used, such as the lack of an automatic aggregation option, and 2) some project promoters (PPs) lack reporting skills, despite the written and technical guidance provided by the POs/FOs.

All programmes make use of systems (digital or otherwise) that ensure the generally high accuracy and validity of structured data submitted to the FMO, despite some limitations concerning the disaggregation of data, automatic cumulations of indicator values among projects, and, in limited occasions, correspondence between collected data and the meaning of the relevant variable. Structured data has also been assessed as relevant, as it allows the tracking of links between activities, outputs, and outcomes at both the project and programme level.

Although most digital systems used by the POs/FOs, and the progress report templates provided by the POs/FOs to the PPs, do not include fields in which the data sources can be indicated, the information submitted is generally easily verifiable, as PPs provide various types of evidence. Structured data across all programmes in the sample is collected and recorded on time by the PPs. In programmes with no synchronised reporting schedule applicable to all PPs, there is a slight risk to the timely aggregation of results for Annual Programme Reports (APRs) and September Interim Financial Reports (IFRs).

The accessibility of structured digital systems varies by programme, from detailed manuals describing the internal processes, data collection procedures and access, roles and rights of different users, to guidance provided on an ad-hoc basis through webinars and information sessions. Most systems have user-friendly automatic features such as pre-populated data and drop-down lists, as well as help desks or dedicated experts providing technical support to users.

A discrepancy between the opinions of the FMO and the POs/FOs and the NFPs regarding the understanding of reporting requirements is identified with POs/FOs and the NFPs being more positive than the FMO. Overall, FMO reporting requirements are perceived by POs, FOs, and NFPs as being easy to understand, relevant, proportionate, and not causing a serious administrative burden.

The assessment team recommends the following:

- The FMO should prepare a short instructional guideline and a checklist to be used by the POs/FOs for the quality control of PLIs. This would allow POs/FOs to conduct a primary review of PLIs and apply corrections before submitting them to the FMO. The intended effect would be an improvement in the quality of PLIs.
- The FMO should introduce mandatory completion of the “comment” field in instances where a non-zero value has been entered within the section “not specified” in disaggregation under relevant core indicators. POs/FOs should provide guidance to the PPs that clearly states and explains the allowed and recommended approaches for collecting disaggregated data so that uniform implementation at programme level would be guaranteed. Solutions may involve filling in a non-obligatory anonymous participation card before accessing an online event or adopting a common methodology to record the participation of a specific target group in an event. Depending on the activity and the type of disaggregation, the measurement methodology could differ.
- The FMO should introduce a requirement for all POs/FOs to designate a Data Quality Manager to serve as a reporting quality assurance expert under the respective programme, and as the main point of contact for the FMO regarding quality reporting issues. The FMO should conduct focused work with quality assurance experts and consider creating an informal network, allowing the exchange of experience and discussion of cases. The FMO should establish a clear methodology on indicators from surveys where the unit of measurement is “scale”, including who, how, and when to conduct the survey, and who the survey target groups are. The FMO should provide short specific and/or more detailed instructions where reporting might be ambiguous (i.e. definitions for specific indicators or instructions on collecting disaggregated data). The FMO should provide anonymised good and bad examples for reference on what correct reporting looks like.
- The FMO should continue its efforts to communicate the importance of non-structured/narrative data through existing channels (general training, guides, meetings), and should consider introducing new channels, such as targeted training sessions for POs and FOs, short instructions on specific cases, and provision of anonymised good and bad examples for reference.
- For programmes that already use a structured digital system, the POs/FOs and NFPs should explore IT solutions for introducing extra functionality to allow the automatic aggregation of data within the system. The POs, FOs, and NFPs that transfer data manually to Excel tables, should apply control mechanisms to minimise technical errors, employing the four-eyes principle as a minimum. The POs, FOs, and NFPs processing data entirely in Excel should introduce a structured digital tool, and reduce the need for manual adjustment as much as possible.
- In the project application process, the POs/FOs should ensure that the PPs only include indicators that are strongly related to the nature of the project, its activities, and expected results, to focus attention accordingly. The POs/FOs should draw the attention of PPs to the most common data issues under each programme in the relevant guidance documents. The POs/FOs should conduct dedicated training sessions for PPs on problematic topics, even in programmes with a smaller number of projects. The POs/FOs should provide a list of “do’s/don’ts” and examples of dealing with the most common challenges in the guidance. The provided guidance should be adapted and extended in case of unexpected major events (e.g. the COVID-19 crisis). The guidance and solutions should be based on FMO guidance and instructions, and the FMO should be consulted at an initial phase. The guidance should acknowledge the difficulties and possible country-specific concerns regarding the collection of sensitive data (e.g. ethnicity) at the programme level, and recommend methodological solutions.

- The POs/FOs should introduce an additional requirement for all PPs to report by a planned date in the calendar year, which would allow the operators to easily compile the information needed for APRs and September IFRs.
- As GrACE is the main tool for reporting and management under the EEA and Norway Grants 2014-2021, the FMO should continue its efforts to further improve the system in close cooperation with POs/FOs/NFPs, i.e. the main users of the system. This would facilitate the reporting processes and improve GrACE's effectiveness as a tool for monitoring and management. Recommendations for further improvements include: allowing POs/FOs/NFPs to view earlier versions of Programme Agreements and APRs; allowing import and export of data; automatic backup of work in progress; allowing edits of previously submitted information on calls; allowing filtering by categories; ensuring algorithms or calculations made by GrACE are transparent and available for review.
- The FMO should continue to provide training and guidance. The FMO should proactively address reporting requirements and their application in meetings with FOs/POs/NFPs.

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List of abbreviations

ACF	Active Citizens Fund
APR	Annual Programme Report
BI	Bilateral Initiative
BS	Beneficiary State
DPP	Donor Programme Partner
EEA	European Economic Area
FM	Financial Mechanism
FMO	Financial Mechanism Office
FO	Fund Operator
GrACE	Grants Administration and Collaboration Environment
IFR	Interim Financial Report
MoU	Memorandum of Understanding
NFP	National Focal Point
PA	Programme Area
PLI	Project Level Information
PO	Programme Operator
PP	Project Promoter
PS	Priority Sector

I. Purpose and scope of the assignment

The rapid assessment of reporting systems and data quality has two main **purposes**. The first is to provide an analysis of the quality of structured data submitted to the Financial Mechanism Office (FMO) by Programme Operators (POs), Fund Operators (FOs), and National Focal Points (NFPs). The second is to formulate recommendations on how to improve the quality of structured data submitted to the FMO.

"Structured data" encompasses a predefined set of information fields describing project calls, bilateral calls, projects, bilateral initiatives, and results in programmes funded by the EEA and Norway Grants. These fields have been introduced in FMO guidance and encoded in GrACE reporting forms, which POs, FOs and NFPs fill in either: semi-annually in the case of results; within a short period after project or bilateral initiative signature/completion; or when updated project call or bilateral call information is available.

The assessment is focused on the quality of structured data submitted to the FMO by a selection of POs, FOs and NFPs (the latter concerning bilateral initiatives and bilateral calls) via GrACE. The GrACE system itself is not a subject of this assessment.

More specifically, the **scope** of this assessment covers:

- The quality of the structured data that selected POs, FOs and NFPs collect, store, and submit to the FMO on calls for project proposals, bilateral initiative calls, projects, bilateral initiatives, and results when submitting Annual Programme Reports (APRs), September Interim Financial Reports (IFRs) (result section only), Project Level Information (PLI), Bilateral Initiatives (BIs), or call information for both projects and bilateral initiatives. The quality of the structured data submitted to the FMO for each of the selected programmes has been analysed in detail for this report, through desk research on relevant documents and reports and digital fieldwork covering the data systems used for data collection and storage.
- The data collection and data storage practices of the selected programmes.
- The process of compiling and submitting data to the FMO following reporting requirements.

This analysis covers a review of the procedures and systems, including overall functionality and accessibility of data collection and data storage systems, accuracy, validity, transparency, relevance and timeliness of the structured data and the compatibility of each system with FMO requirements. Management and Control Systems (MCS) at both national and programme levels, as well as internal guidelines and manuals on data collection have also been reviewed, including the roles and adequacy of personnel.

The assessment encompasses four main assessment questions:

1. What are the main issues for POs, FOs and NFPs to meet FMO reporting requirements?
2. What are the main challenges for POs, FOs and NFPs to collect, store, analyse and report on the data?
3. What are the main issues with the quality of the structured data in the PO, FO and NFP systems, and when submitted to FMO in the FMO IT system GrACE?
4. How are the FMO reporting requirements perceived by POs, FOs and NFPs?

Part III of the report contains the analysis and the answers associated with the assessment questions.

II. Methodology

The assessment is based on a detailed analysis of the data collection procedures and data storage systems in a sample of 8 programmes. The selected programmes cover all five priority sectors of the EEA and Norway Grants. They are of various grant allocation sizes, with different implementation modalities, and with both small and large numbers of contracted projects. Some of the programmes are implemented by first-time operators, while others are run by operators that have gained experience in the previous programming period. In addition to these variables, the selection of programmes also considered their disbursed and incurred rates, and some preference was given to programmes in a sufficiently advanced implementation phase. The sample was selected from a total of 97 programmes. Table 1 contains information on the final sample of programmes. Annex 2 describes the sample selection in detail.

Table 1. Sample of programmes for in-depth analysis[1]

Programme	Country	PS[2]	Grant, EUR	Number of projects	Modalities[3]	Level of experience	Disburse-ment rate, %	Incurred rate, %
PL-Basic Research	PL	A	44 000 000	31	two	first-time	52%	16%
PT-INNOVATION	PT	A	38 000 000	57	three	second-time	28%	7%
MT-LOCALDEV	MT	B	5 984 000	4	three	second-time	32%	32%
LT-ENVIRONMENT	LT	C	12 000 000	7	three	first-time	41%	14%
RO-CULTURE	RO	D	28 863 000	31	single	second-time	35%	23%
BG-ACTIVECITIZENS	BG	D	16 045 000	133	two	second-time	39%	22%
HR-JUSTICE	HR	E	13 000 000	4	two	first-time	65%	14%
RF-YOUTH		GF	60 610 625	26	single	first-time	48%	32%

The following data gathering methods were used:

- **Desk research.** It covered:
  - General regulatory and guidance documents.[4]
  - Programme-specific documents for programmes and projects included in the sample (MoUs, concept notes, programme agreements, management and control systems at both national and programme levels, internal guidelines and manuals).
- **Interviews[5] with:**
  - FMO reporting and data quality officers.
  - POs, FOs and NFPs.
- **Focus group** with FMO programme managers.
- **Digital fieldwork**. The evaluation team studied APRs, September IFRs (results section only), BIs, and call information for both projects and bilateral initiatives, as well as a sample

[1] Data as of June 2021.
[2] The priority sectors as per the EEA and Norway Grants 2014-2021 – Blue Book: An overview of supported programme areas.
[3] The modalities are pre-defined projects, calls for proposals, small grant schemes and financial instruments.
[4] A list of the documents that were reviewed can be found in Annex 1.
[5] Details on the conducted interviews with stakeholders can be found in Annex 3.

of PLIs[6] to check if the content of these documents follows the structure and overall logic of the templates established by the FMO. In addition, the team studied formal written internal documents (when available) on data collection, aggregation, and storage, including guidelines directed to PPs which had been provided by the POs, FOs and NFPs. The investigation of the set-up and the functionalities of the data storage systems of the sample programmes was carried out in line with a devised compliance checklist.

- **Online survey among project promoters** (PPs) in the sample programmes. Details on the survey and the collected answers are provided in Annex 4.

The data gathering activities took place between mid-June and mid-September 2021. The team investigated documents (and document versions) available up to 30 June 2021.

Analytical methods include process analysis, comparative analysis, risk assessment, and case studies.

For the purposes of the assessment and the narrative that follows, "structured data" refers to the data included in the APRs, September IFRs (results section only), BIs, PLIs and call information. "Non-structured/narrative data" refers to the text fields and sections of the APRs, September IFRs, and PLIs that describe the goals, activities and achieved results, and provides the background information for the programmes and projects.

The assessment team would like to highlight that the analysis, conclusions, and recommendations are based on the findings from the programmes in the sample. The identified issues might not be widespread among other programmes supported by the EEA and Norway Grants. In addition, the team was able to observe only the final, FMO-approved versions of the APRs and PLIs. Information about the challenges with draft versions of these reports is based on stakeholders' opinions as expressed during the interviews. Although the team was often granted access to the digital data collection systems, it was not always full access, and there was no access to auxiliary or work files used outside the official systems. The evaluation draws heavily on opinions and information collected during the interviews with the POs, FOs, and NFPs i.e. their perceptions and self-reporting on data-related issues. The findings could nonetheless be used to infer preliminary insights into other programmes, or as a means to improve the quality of structured data in the current and the next programming period.

[6] The FMO provided the team with the results from the application of an internal PLI risk assessment tool that classifies the PLIs as high, medium or low risk in terms of compliance with requirements. Within every programme from the sample, the team focused on investigating PLIs that are scored high and medium risk, if such PLIs were identified.

III. Answers to the evaluation questions

EQ1. What are the main issues for POs, FOs and NFPs to meet FMO's reporting requirements?

All POs, FOs, and NFPs covered by this assessment declare an understanding of the reporting requirements to their full extent. However, there are variations in the depth/quality of understanding regarding structured and non-structured/narrative data and information. Overall, data produced and submitted by POs, FOs and NFPs can be considered reliable and meaningful, despite some issues, mainly related to delays and gaps in the timely updating of information, or deficiencies in the quality of narrative information.

There is a prevalent focus on the accuracy, monitoring and verification of structured data, at the expense of a relatively formal understanding and application of the requirements regarding non-structured/narrative data. Non-structured/narrative data can be improved in terms of being more comprehensive (providing more details on activities and/or background information on the intervention) and thus having higher informational value.

Sufficient experience has been accumulated during the 2014-2021 programming period to guarantee a good level of understanding of the reporting requirements, and the reported structured data is generally of high quality. The identified issues relate to the proper reporting of the cumulative values of indicators where the unit of measurement is "number", and of indicators from surveys where the unit of measurement is "scale". Additionally, there are challenges linked to the fact that the "not specified" category is returned frequently as a response for indicators that require disaggregation. There may also be issues with reported results that far exceed targets in 2021. A specific issue is the discrepancy between the numbers of contacted projects and the number of registered PLIs, often because reported call information cannot be updated by the POs/FOs once the respective GrACE section (step) in the module "Calls" is closed. The reasons for issues in structured data are mainly technical and/or manual relating to omissions, insufficient experience, and/or staff workload. These deficiencies are not related to issues of data validity and accuracy within the systems of POs/FOs and NFPs.

There is a relative lack of understanding regarding FMO requirements and standards for non-structured/narrative data. The main challenges and issues identified both by the FMO and through this assessment are related to the narrative sections of the reports. To improve the understanding of POs/FOs and NFPs regarding the importance of non-structured/narrative data for monitoring, and to develop an overall understanding of how programmes are implemented and what their actual achievements are, the FMO should utilise all available instruments and means of communication (general training, guides, meetings).

a) To what extent do the POs, FOs and NFPs understand FMO's requirements and guidance?

All POs, FOs, and NFPs within the sample of programmes declare an understanding of the reporting requirements to their full extent. However, this understanding is not uniform among programme stakeholders. Certain differences regarding the depth of awareness and understanding of the requirements between different POs/FOs exist, as well as between individual experts within organisations (PO/FO/NFP). One of the factors leading to such differences relates to the level of professional experience gained, and the level of training received by the relevant POs/FOs/NFPs.

Despite the nuances in the depth and extent of understanding of the requirements, the Management and Control Systems in place largely guarantee compliance with all management and reporting requirements under the EEA and Norway Grants.

Variations in understanding the reporting requirements were observed in the depth/quality of understanding the requirements of structured data versus non-structured/narrative data and

information. It has been noted that there is a prevalent focus on the accuracy, monitoring and verification of structured data at the expense of a relatively formal understanding and application of the requirements regarding non-structured/narrative data.

Structured data

Within the programmes investigated, all POs, FOs and NFPs are familiar with the FMO requirements and guidance regarding **structured data**, including deadlines, definitions, aggregation and disaggregation of indicators, reporting formats, templates, and the functionalities of GrACE. Keeping in mind that most programmes have been in the implementation stage for over 3 years, enough experience has been accumulated during the 2014-2021 programming period to guarantee a good understanding of these requirements, and the generally high quality of structured data.

Nevertheless, there are some challenges and issues. They include delays and gaps in the timely updating of information, and the fact that the "not specified" category is returned frequently as a response to indicators that require disaggregation. These issues are not a result of a lack of understanding of the requirements and guidance on the part of POs/FOs/NFPs. They are partly due to the workload of responsible persons in POs/FOs, and largely fall outside the scope and control of POs/FOs.

Within the programmes investigated, only two cases were identified that involve a relative lack of understanding of the requirements and guidance in the context of structured data:

- Cumulative reporting in the APRs of indicators where the unit of measurement is "number" (for details, see section 1b) APRs).
- Difficulties related to the FMO requirements for indicators where the unit of measurement is "scale".

In the interviews, several POs and NFPs noted difficulties related to FMO requirements for indicators for which the measurement unit is "scale". This is due to insufficient knowledge and experience, and no established methodologies to prepare and perform good surveys and collect relevant quality data from the appropriate target groups. In this regard, additional support from the FMO could be needed.

Non-structured/narrative data

In the focus group conducted with FMO Programme Managers, as well as the interview with FMO Reporting and Data Quality Officers, the extent of the FMO's emphasis on and attention to **non-structured/narrative data** became clear. FOs/POs and NFPs, unlike the FMO, do not identify problems connected to non-structured/narrative data. This demonstrates that the perceptions of the two parties differ or that there is a lack of understanding, or insufficient understanding regarding the FMO's requirements and standards for quality non-structured/narrative reporting.

The documents reviewed in this study show that it is indeed necessary to invest efforts towards an increased understanding of the FMO reporting requirements to align perceptions and improve the quality of non-structured/narrative data. The main challenges and issues identified are related to the narrative sections of the reports. These are often very short, tend to be overly focused on numbers, and lack the level of detail, depth, and analysis necessary to make them as informative as possible.

To improve the understanding of POs/FOs and NFPs regarding the **importance of non-structured/narrative data** for monitoring, and to develop an overall understanding of how programmes are implemented and what their actual achievements are, the FMO could apply the following potential instruments and actions to facilitate improvement of non-structured/narrative reporting:

- Provide additional training to POs/FOs and NFPs, including more focused training on specific themes, such as the quality of particular documents and types of data. The training should be timely and precede the reporting deadlines.
- Hold individual, focused meetings between POs/FOs and the respective Programme Manager from the FMO.
- Provide short, specific instructions on specific cases.

- Provide anonymised good and bad examples for reference.

b) To what extent can the POs, FOs and NFPs produce reliable and meaningful input data when submitting APR, IFR (result section only), PLI, BIs, or Calls information for both projects and bilateral initiatives?

Reporting systems in all programmes in the sample were assessed to be adequate, relevant and working well, as to provide reliable and meaningful input data. The identified challenges relate mainly to delays and gaps in the timely updating of information, or deficiencies in the quality of non-structured/narrative information. Non-structured/narrative data can be improved in terms of being more comprehensive (provide more details on activities and/or background information on the intervention) and thus having higher informational value.

Presented below are the main challenges and issues identified by the assessment in terms of POs, FOs and NFPs meeting FMO reporting requirements, identified in the framework of this assessment. Where appropriate, recommendations for possible solutions have been provided.

Annual Programme Reports (APRs)[7]

The APRs are the main monitoring tool used to assess progress and achievements, as well as to obtain an overall picture of the programme.

The main challenges related to data in the APRs can be divided into two groups: 1) Relating to structured data in Annex 1 Updated Results; 2) Relating to the non-structured/narrative data in the main text of the APRs.

The following key issues were identified regarding the data in Annex 1 of the APRs:

- Mistakes in APRs concerning the reporting of achievement values for indicators where the unit of measurement is “number”. Rather than cumulative values, only annual achievements for the current year have been filled in.

This problem was shared in the interview conducted with the FMO Reporting and Data Quality Officers, but was not observed in the approved versions of the APRs for the programmes in the sample. The POs/FOs interviewed noted that they are aware of the requirement and have not encountered issues in reporting. However, the problem is a result of an insufficient understanding of (and consequent lack of compliance with) the clear requirement for how to report achievements for “number” indicators. The issue should be easy to overcome, including via additional reminders before the submission of annual reports, since it is not connected to a lack of information or incorrect data but rather concerns a technical issue in the correct and accurate reporting of said data.

- High incidence of the category “Not specified” under indicators that require disaggregations.

There are various reasons why this category is selected so often. Disaggregation might be impossible in certain cases, depending on the activity. Participants may decline to disclose/specify some information, preventing the disaggregation by minorities (for example), and such issues largely fall outside the scope and control of POs/FOs. It is recommended that the FMO considers introducing mandatory completion of the “comment” field in cases where a non-zero value has been entered in the section “not specified”. This would provide the FMO with an opportunity to monitor the reasons, and, in cases lacking sufficient justification, to request additional disaggregation.

- Results (far) exceeding targets in 2021.

There are several explanatory factors as to why reported results are (far) exceeding targets. On the one hand, a cautious approach in setting targets may have applied at the programming stage

[7] It should be underlined that we have reviewed only the final versions of APRs (reviewed and commented by FMO, revised by POs/FOs and approved by FMO), where the quality is relatively good. The information for quality of previous versions used is gathered through interviews with FMO and PO/FO representatives.

(underestimation). In addition, many training sessions and events have been conducted online due to the pandemic, and consequently resulted in higher values which could not have been predicted during programme design. Still, the number of instances in which reported results greatly exceed targets should be examined in greater depth on a case-by-case basis to elucidate the reasons for these overachievements, as they may indicate an issue with data quality.

The issues and problems related to the main text of the APRs are related to the insufficient quality of the information provided, which lacks the level of detail, depth, and analysis necessary to be as informative as possible. For example, context information may be lacking, or there may be an excessive focus on numbers (including bilateral outcomes) without analysing effects and expected outcomes. Additionally, the narrative sections may not contain sufficient background information on what has occurred in the field within the beneficiary state.

Interim Financial Reports (IFRs) (result section)

The September IFRs contain structured results data, with updated achievement values for output and outcome indicators with a biannual reporting frequency. The non-structured/narrative result section is filled in rather formally and without details on milestones or in-depth analysis of deviations from the programme plan.

Project Level Information

The POs/FOs apply two main approaches in gathering the information necessary for the initial registration of PLIs. In the first approach, POs (ex. PT-INNOVATION) request the PPs (under approved and contracted projects) to fill in and submit a template for PLIs. Then, after review by the PO, the verified/approved data is recorded into GrACE by the PO. In the second approach (ex. RO-CULTURE) each project application includes a section dedicated to policy markers, in which PPs must choose from a drop-down list to indicate if the contribution is neutral, relevant or fundamental, and describe the project's contribution. Based on the option selected by the PP, the PO further verifies, considering the project's objectives, activities and planned results, whether the PP's assessment is correct. The PO subsequently enters the data into GrACE, based on relevant information in the application form.

Both approaches are applied in the same way for the final registration of PLIs (once the project is completed), but in the second approach, the information is gathered based on the final project report.

There are often discrepancies between number of contracted projects registered in PLIs and the number of contracted projects registered in calls (see the section on calls information below).

Most reviewed PLIs under all programmes in the sample are not compliant with the reporting requirements in terms of quality.[8] Concerns regarding the quality of PLIs were also shared by FMO Reporting and Data Quality Officers. Although the quality under most of the programmes can be defined as good, there is room for improvement. It is necessary to improve the quality of PLIs, mainly in the section "Project content" – particularly the "Summary" field within Initial Registration – as well as in the two sections "Results summary" and "To what extent are the positive effects …?" within Final Registration. Fundamental and relevant policy markers are often selected, but may be completely missing in the narrative parts. One possible explanation for insufficient quality is the fact that there are no detailed instructions/requirements for POs in terms of the quality of these fields (in addition to the required information, described in p. 6.2 and 6.10 of the Results Reporting Guide and Checklist to writing clear project level information). Another reason could be that given the high number of PLIs, all (or most) PLIs can't be reviewed and approved before their publication by the FMO.

It is recommended that the FMO considers the possibility of preparing a short instruction or guideline document (1 page would be sufficient), and a checklist to be used by the PO for quality control regarding the completion of PLIs. These documents could be sent by Programme Managers to all POs, requiring

[8] The desk research of PLIs was focused on high and medium risk PLIs. See assessment methodology for further details.

them to conduct a review and apply necessary corrections to PLIs within a reasonable deadline. The intended effect would be the improved quality of PLIs, and a significant reduction in the number of PLIs requiring review.

Bilateral Initiatives at programme level and national level

Among the eight programmes in the sample, there are only nine BIs at programme level registered in GrACE (8 under RO-CULTURE and 1 under LT-ENVIRONMENT). There are 80 BIs at national level, of which 52 are under PT-BF. The others are under PL-BF, RO-BF, LT-BF, and HR-BF.

The quality of input data in BIs format is assessed as good. Given that only a brief description of the initiatives is required, there are no serious issues identified.

Calls information

The issue concerning the discrepancy between the data in the "Calls information" and the PLIs was highlighted by the FMO Reporting and Data Quality Officers. The assessment confirmed that this problem occurs quite frequently. In the programmes in the sample, there are more PLIs registered than are reflected in the "number of projects/bilateral initiatives contracted" under "Calls information". This problem has been observed not only in calls information for projects (BG-ACTIVCITIZENS – 167 PLIs and 131 projects contracted; RO-CULTURE – 37 PLIs and 16 projects contracted), but also in the calls information for BIs (RO-CULTURE; LT-BF; PT-BF).

The problem is not a result of delays in the submission of PLIs (although there might be some delays). The timelines for submitting PLIs is relatively short, at 15 days. Rather, the problem stems from the fact that calls information is not submitted and updated promptly and, given that the call information is not updated in GrACE, it is not possible to trace them within the system. The situation was also discussed with POs/FOs to establish the reasons for this frequently occurring issue, which bears no relation to the availability, accuracy and validity of information. In some cases, the problem is a result of the workload of responsible employees and the corresponding lack of sufficient administrative capacity.

In addition, POs/FOs have shared that they have experienced problems with the functionalities of the "Calls information" module within GrACE. Specifically, that POs/FOs cannot edit a section once it is closed, even though updates are sometimes necessary. In such cases, some of the POs/FOs and NFPs fill in the information in the comment section. However, comments are sometimes missing and it may not be possible to understand the reason for the discrepancy between the number of projects approved, contracted and registered (PLIs).

Because information is validated by and available to the POs/FOs, and that the issue is easy to overcome, the introduction of an automated reminder to POs/FOs is recommended, so that the information can be updated in combination with the introduction of the functionality in GrACE for updates after the step "submitting selection information".

Conclusions

The main issues for POs, FOs and NFPs to meet FMO's reporting requirements are as follows:

- Issues, related to structured data.
- Issues, related to non-structured/narrative, analytical data.

The causes of issues in structured data can be categorised as mainly technical and/or manual relating to omissions, insufficient experience, and/or staff workload. These deficiencies are not related to issues of data validity and accuracy within the PO/FO/NFP systems and can be easily solved. This would, however, require additional efforts, including both human resources and time on the part of the FMO to establish even clearer and more frequent communication and providing additional instructions.

The issues related to non-structured/narrative data will certainly require more effort, and specific recommendations in this regard can be found under the section on EQ1a.

In addition, the FMO should consider introducing a requirement for all POs/FOs to designate a Data Quality Manager to serve as a reporting quality assurance expert under the programme, and to be the main point of contact for the FMO regarding quality reporting issues. It would be useful for the FMO to conduct focused work with the quality assurance experts, and even to create an informal network, allowing the exchange of experience and the discussion of cases.

EQ2. What are the main challenges for POs, FOs and NFPs to collect, store, analyse and report on the data?

The main challenges related to collecting, storing and reporting data by POs, FOs and NFPs can be classified into two groups. The first group relates to the limitations of data collection systems in place. Although seven out of eight analysed programmes have structured digital systems, they vary in content and functionality, and one programme only uses SharePoint. While some systems are fully developed and feature a wide range of functionalities, others simply provide shared storage and the classification of documents, meaning that additional tools outside the systems are needed to gather and process structured data for indicators (for example). A serious limitation observed in six out of eight programmes is that systems do not have a built-in function allowing automatic aggregation. Instead, POs/FOs extract, manually adjust and aggregate data in Excel worksheets, which poses a risk to data accuracy, especially in programmes with large numbers of contracted projects.

The second group of challenges relates to the PPs' understanding of reporting requirements. Although POs/FOs provide various types of written and technical guidance to PPs, additional efforts are needed for the development of their results reporting skills. Conveying the meaning of certain indicators to PPs, especially within ACF programmes, has been difficult and consistent reporting is a challenge. In addition, some PPs encounter difficulties in narratively describing achievements and data disaggregation, especially concerning Roma participation.

a) How many POs, FOs and NFPs have set up a structured digital system for collecting and storing this data? For digital systems, consider why they introduced these systems, what the format is, what information they include and what they do not include. For systems that are not digital, what kind of system are used instead? For both, is there an internal process description to guide users?

Overall, the POs, FOs and NFPs of all programmes in the sample collect structured data necessary for reporting to the FMO in a digital format. Seven of eight programmes have **structured digital systems**, which vary in content and functionality. In only one programme in the sample (HR-JUSTICE), does the PO not have a structured system and uses collaborative platforms like SharePoint and Microsoft Teams instead.

Four of the structured digital systems were introduced to gather data **beyond the scope of the specific programme**. These are systems which cover all EEA and Norway Grants programmes in a country, such as the NORIS system in Lithuania and the CARS II system in Malta, as well as systems that integrate data from different funding sources, such as the EGREG system (covering both the Fund for Youth Employment and the Fund for Regional Cooperation) and the ZSUN OSF system, which covers PL-Basic Research, PL-Applied Research, and other publicly funded research and development projects in Poland.

Three of the structured digital systems are **dedicated to a specific programme** and therefore designed to meet its specific needs. These are the systems used to register, process and store data under BG-ACTIVECITIZENS, PT-INNOVATION and RO-CULTURE.

In terms of **format**; all seven digital systems are web-based but while some are fully developed and feature a wide range of functionalities, others simply provide shared storage and the classification of documents. POs/FOs in some of the reviewed programmes use additional external tools to gather data that is not collected through the main digital systems. The FO of BG-ACTIVECITIZENS uses online surveys to collect data on the achieved values of output, outcome and programme level indicators. The PO of PL-Basic Research uses two external tools: a governmental portal[9], through which electronically

[9] Electronic Documentation Management (Elektroniczne Zarządzanie Dokumentacją - EZD).

signed documents such as contracts, reports and annexes are submitted; and the Oracle Business Intelligence tool, through which data on key indicators is analysed and aggregated.

In three programmes within the sample, PPs report data to POs/FOs by email or through a file repository, while in MT-LOCALDEV hard copies are required in addition to electronic submissions. In contrast with these examples, digital systems used under RF-YOUTH, LT-ENVIRONMENT and RO-CULTURE meet all data collection needs and no complementary tools are used by programme stakeholders.

The structured digital data collection systems used by POs, FOs and NFPs are quite similar in terms of **user access**. None of the systems are publicly accessible. All are open to registered users only and require authentication, with login credentials provided by the entity in charge. Six of the reviewed systems are accessible to PPs and thus are used by them to submit different types of documentation (e.g. payment requests, progress reports) to POs/FOs and NFPs. This varies by programme. One system (under PT-INNOVATION) is strictly for internal use by PO team members.

In three of the reviewed programmes (LT-ENVIRONMENT, PL-Basic Research and MT-LOCALDEV[10]) the **NFP** uses the same data collection system as the PO/FO. In Romania and Portugal, the NFPs do not have a dedicated system for data collection on bilateral initiatives (BIs) at national level. In Romania, technical and financial reports on BIs are submitted by email and hard copies. Financial data is collected and aggregated by the NFP in Excel databases (audited and cross-checked by the audit authority), whereas technical data (achievement values for indicators) is collected and aggregated in Word or Excel. In Portugal, the NFP collects Activity Reports submitted by POs (for BIs at programme level) and PPs (for BIs at national level), which contain financial information, detailed descriptions of the BI, results, and the contribution to the overall objectives of the EEA Grants. Excel is used as a data aggregation tool, as well as for internal management purposes.

The data collection systems reviewed vary in **content** but most (six of seven) are comprehensive, i.e. the POs/FOs use them to collect and store data at each stage of programme implementation – from calls preparation and management, application submission and evaluation, contract signature, to project implementation and monitoring. Different datasets are structured into separate thematic modules or sections, with minor variations across systems. In most of the reviewed systems, a user can navigate through the modules and trace a project back to the submitted application, received score/ranking, contract documents and subsequent progress reports.

Data collection systems store data on implementation at project level in the form of progress reports submitted by PPs, which are usually of two types: interim and final ones. In some programmes, such as RO-CULTURE and PT-INNOVATION, separate technical and financial reports are collected, while in others such as RF-YOUTH, one document combines data on expenditure and progress. In LT-ENVIRONMENT, reporting on project implementation is done as part of advance, interim and final requests for payment. In general, collected data on progress at project level includes non-structures/narrative updates on activities and progress towards objectives, as well as achievement values of output and outcome indicators. In some cases, additional details are included in progress reports due to programme specifics. For example, in RF-YOUTH and BG-ACTIVECITIZENS, PPs are also required to submit data on target groups reached during the reporting period.

In one of the reviewed programmes (MT-LOCALDEV), the digital system is more limited in content, as it is used only for storing accounting records at project and programme level. Collected information covers financial implementation, submission of payment requests, verification, procurement and irregularities. Data on project progress, including data necessary for reporting on indicators and monitoring purposes, is gathered outside the digital system, via email and hard copies. It should be noted that the system, called CARS II, could be used more efficiently, including for the reporting of progress, as there are some modules which are currently not in use. Using these modules for reporting

[10] For MT-LOCALDEV both roles (PO and NFP) are performed by the same entity.

would reduce the administrative burden for the PPs and enable a faster and more efficient implementation of the responsibilities of all stakeholders involved in the management process.

For one programme in the sample (HR-JUSTICE) there is **no structured data collection system** established. Instead, the PO and PPs use collaborative platforms (SharePoint and Microsoft Teams) for data storing and monitoring purposes. Each project has a separate SharePoint, in which data on implementation is stored. The PO has a restricted (read-only) access to the PP SharePoint accounts to perform project monitoring. Reporting at project level is carried out by email, as PPs submit several types of documents to the PO: periodic progress reports, annual project reports, forecasts of likely payments and final project reports. In addition, the PO conducts bi-monthly monitoring meetings with PPs, where all issues and challenges related to project implementation are discussed.

Reporting from the PO of HR-JUSTICE to the NFP is also carried out by email. The PO submits quarterly reports to the NFP, which include information on programme dynamics and the status of each project, implemented activities, achievement values for indicators, incurred costs, difficulties and risks identified in the reporting period, as well as proposed mitigation measures.

In three of the reviewed programmes (LT-ENVIRONMENT, RF-YOUTH and RO-CULTURE), detailed manuals are describing the internal processes and data collection procedures in the digital systems. In these manuals, the access, roles and rights of different users are specified. Other programmes do not have a dedicated manual but instead provide guidelines to PPs and applicants on an ad-hoc basis. For example, for each published call for proposals under BG-ACTIVECITIZENS, the FO provides applicants with guidelines on how to submit a proposal through the electronic system.

An overview of the characteristics of different data collection systems used by the programmes in the sample is presented in Table 2 below. Additional details on the PO/FO and NFP organisation, data collection procedures, content and functionalities of reporting systems, identified issues and recommendations are provided in the case studies presenting each programme in Annex 5 (provided in a separate document).

Table 2. Overview of data collection systems in the sample

Programme	Structured digital system	Number of programmes covered	Data collected by additional tools	Data collected by email	Hard copies	User access	Used by NFP	Data covers all stages of programme implementation	Manual
BG-ACTIVECITIZENS	Yes	One	Yes	No	No	Accessible to PPs	N/A	Yes	No
HR-JUSTICE	No	One	Yes	Yes	No	N/A	N/A	N/A	N/A
LT-ENVIRONMENT	Yes	Several	No	No	No	Accessible to PPs	Yes	Yes	Yes
MT-LOCALDEV	Yes	Several	Yes	Yes	Yes	Accessible to PPs	Yes	No	No
PL-Basic Research	Yes	Several	Yes	No	No	Accessible to PPs	Yes	Yes	No
PT-INNOVATION	Yes	One	Yes	No	No	Internal	No	Yes	No
RF-YOUTH	Yes	Several	No	No	No	Accessible to PPs	N/A	Yes	Yes
RO-CULTURE	Yes	One	No	No	No	Accessible to PPs	No	Yes	Yes

b) To what extent are these digital or non-digital systems compatible with the FMO reporting requirements? Do the systems allow the POs, FOs and NFPs to aggregate results data accurately across multiple projects contributing to the same programme indicator, in line with FMO reporting requirements?

The POs, FOs and NFPs systems are compatible with FMO reporting requirements. In general, submitted data is in line with the Core Indicators Guidance, the Results Reporting Guide, and the Results Guideline.

However, a serious limitation observed in six of eight programmes is that **data collection systems do not have a built-in function allowing automatic aggregation**. Currently, only the digital system of LT-ENVIRONMENT allows the aggregation of data across multiple projects contributing to the same programme indicator. For PL-Basic Research, which is at an early stage of implementation, PPs have not yet reported any progress; therefore, no aggregation of results has been made. A reporting module is soon to be introduced in the ZSUN OSF system used by PL-Basic Research and by connecting an additional tool (Oracle Business Intelligence), data on key indicators such as number of publications, number of researchers supported, and the engagement of young scientists, can be sourced, (dis)aggregated and analysed. It is expected that the system will then allow tracking of all indicators in the results framework, and subsequent aggregation.

In six other programmes, even those with structured digital systems that store data on indicators at project level, processing and aggregation are carried out externally. To calculate achieved output and outcome indicator values at programme level, **POs/FOs extract and aggregate data in Excel worksheets**. Calculated values are then fed into APRs and September IFRs submitted in GrACE. This practice poses a risk to data accuracy (for example, technical errors due to wrong inputs result in erroneous calculation of aggregated data despite use of formulas), especially concerning core indicators, which are intended to measure aggregated results for specific areas of high political interest for donors.

Extracting data from multiple sources such as online surveys (BG-ACTIVECITIZENS) or progress reports submitted by email (HR-JUSTICE, MT-LOCALDEV) poses a higher risk to data accuracy, as compared to extracting data from a single source or a digital system (RO-CULTURE, RF-YOUTH). In the case of BG-ACTIVECITIZENS, one of the risks is related to the accuracy of data input, as the responsibility for selecting the correct outcome and output indicators applicable to a certain project (from the full list provided in the survey) lies with PPs. Another risk comes from aggregation, as data is not automatically exported to Excel. Instead, the FO goes through each submission separately and specifically checks for coherence between indicator achievement values provided through online surveys and the narrative information provided in technical reports from PPs. Where there are unrealistically high indicator achievement values, lack of data sources or other issues, the FO contacts the PP for further details or corrections, and only after these manual adjustments is data aggregated. It should also be noted that systems that allow automatic export to Excel are more reliable than manual ("copy-paste") extraction. The risk of error is highest for programmes with a large number of contracted projects, where manual adjustments are needed for data aggregation. Manual processing is also needed in RF-YOUTH but this is mainly because some of the project-specific indicators under the programme are not reported in GrACE and data from EGREG needs adjustment to fit into the GrACE framework.

As already mentioned in the answer to EQ2a, the NFPs in reviewed countries either use the same data collection systems as POs/FOs, or store information in Excel. To summarise information on bilateral initiatives (BIs) at national level, Excel and Word are used as data aggregation tools.

Overall, it is recommended for programmes that already use a structured digital system, that POs/FOs and NFPs explore IT solutions for introducing an extra functionality that would allow automatic aggregation of data within the system, including internal control checks. For POs, FOs and NFPs that process data entirely in Excel, it is advisable to introduce a digital data management tool and reduce manual adjustments as much as possible.

c) What kind of written or technical assistance guidance on data quality and reporting is given by NFPs to POs, and by POs/FOs to project promoters?

Guidance from NFPS to POs

In all programmes in the sample, POs are required to submit annual reports to the NFP with information on the implementation progress, achievements and dynamics of the respective programme, while some POs also submit periodic reports during the year (e.g. HR-JUSTICE). For this type of reporting, guidance is provided in the **Description of the Management and Control Systems** (DMCS) at national level in each country. The roles, responsibilities, deadlines and procedures for data collection and reporting to the NFP are all set out and described in detail in the DMCS. No additional guidance is provided by NFPs, except for ready-to-use templates for different types of document, which ensure uniformity in reporting.

NFPs are responsible for the management of the Fund for Bilateral Relations (FBR).[11] In line with the Bilateral Guideline for the EEA and Norwegian Financial Mechanisms 2014-2021, POs report to the NFP on the use of funds for bilateral relations allocated to their programmes. For this type of reporting, **separate guidance documents on BI reporting** have been prepared by the NFPs in most countries. For example, in Croatia, these include guidelines for monitoring of the implementation of activities funded by the FBR for POs[12], beneficiaries, and the NFP itself.[13] Similarly, in Portugal, the NFP has developed a Fund for Bilateral Relations Manual to support beneficiaries, which is available on the EEA Grants Portugal national website.

In terms of **document templates** designed by NFPs to facilitate BI reporting, in Portugal there are templates for Activity Reports, which are submitted by the PO for BIs at programme level and by PPs for BIs at national level. In Romania, these documents include a BI contract, which prescribes reporting obligations to promoters, and a BI interim/final implementation report template.

Guidance from POs/FOs to PPs

For all programmes in the sample, the POs/FOs have designed some kind of written guidance on data collection and reporting for PPs, which varies in format. For most programmes, the most comprehensive guidance is provided in **project implementation manuals** (BG-ACTIVECITIZENS), handbooks (RF-YOUTH) or beneficiary guides (RO-CULTURE). For PPs under LT-ENVIRONMENT, there is no integrated manual but detailed instructions for reporting are provided through PowerPoint presentations available on the Norway Grants in Lithuania website. These presentations also include screenshots, demonstrating each step of the reporting process within the NORIS electronic system.

Some POs/FOs provide additional **guidance on specific types of reporting**. For instance, the FO of BG-ACTIVECITIZENS has prepared a PowerPoint presentation on statistical (structured) data reporting (related to indicators), which is carried out through online surveys. The presentation provides details on: the purpose of statistical data reporting, as compared to regular technical reports submitted by PPs; differences between indicators at output, outcome and programme level and their applicability to projects; guidance on avoiding double counting and keeping a register with individuals reported within the *Number of people engaged in CSO activities* indicator; and examples of the most common mistakes in data reporting that should be avoided.

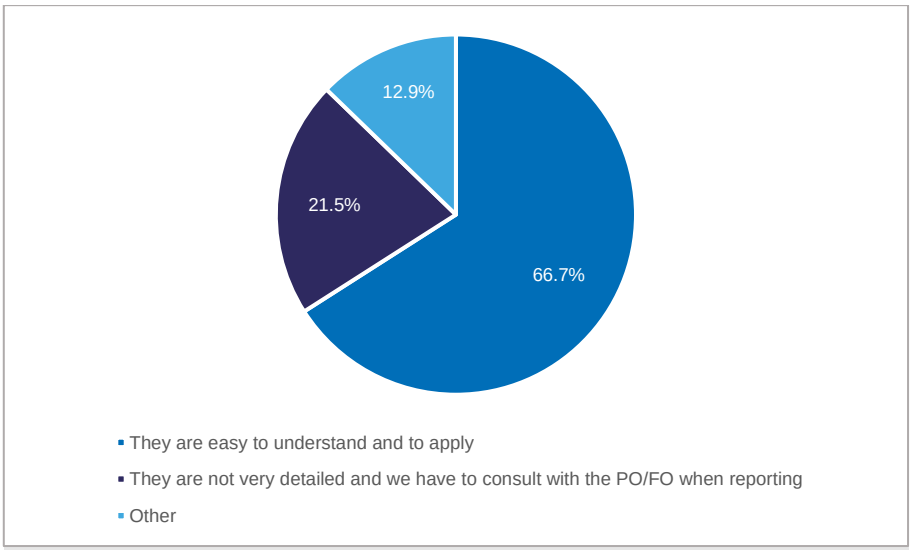
The POs of other programmes provide very limited guidance on data quality and reporting. For PPs under PL-Basic Research, reporting requirements are specified only in the project contract templates

[11] Excluding RF-YOUTH and BG-ACTIVECITIZENS, which do not receive funding from the Fund for Bilateral Relations.
[12] Smjernice za upravljanje i financijsko praćenje provedbe programa i aktivnosti iz Fonda za bilateralne odnose za upravitelje programa (Guidelines for Management and Financial Monitoring of Programme Implementation and Activities from the FBR for Programme Operators).
[13] Smjernice za upravljanje i financijsko praćenje provedbe mehanizama, programa i aktivnosti iz fonda za bilateralne odnose za Nacionalnu fokalnu točku (Guidelines for Management and Financial Monitoring of the Implementation of Mechanisms, Programmes and Activities from the FBR for the National Focal Point).

for GRIEG, IdeaLab and POLS calls, which are available on the PO website.[14] Templates for annual, final and sustainability reports are attached as annexes to the project contract. However, no additional guidance or written instructions are provided to PPs.

The majority of PPs who participated in the conducted online survey (66.7%) consider guidance documents provided by POs/FOs to be easy to understand and apply, while for 21.5% additional consultation is necessary (see Figure 1 below).

Figure 1. Project promoters' views on guidance documents provided by POs/FOs



Source: Online survey conducted as part of this assessment.

Two PPs of BG-ACTIVECITIZENS mentioned that guidance documents are detailed but not easy to implement. Some PPs of RO-CULTURE were also critical, as one respondent noted that there is always a need for further clarification, while another noted that PPs are routinely directed to these documents by the PO, even when they do not provide information on specific problems encountered.

The most common reporting difficulties encountered by PPs are related to disaggregation of achieved indicator values in certain projects, especially with gender and age disaggregations for media-related activities (reached audience). In discussion with FMO, the FMO stated that media-related activities should not have gender and age disaggregations for reached audiences, and that this may imply an issue with the accuracy of some of the reported achievement values. The PPs of BG-ACTIVECITIZENS also experience difficulties with disaggregation by Roma participation due to national legislation prohibiting non-voluntary indication of affiliation with an ethnic, religious or linguistic minority.

In addition, PPs sometimes have difficulty understanding and measuring indicators. Even where the FO understands FMO guidance, conveying the meaning of certain indicators to PPs has proven to be difficult. As a result, PPs do not consistently interpret these indicators. For example, concerning the indicator *Number of beneficiaries of services provided or improved*, a PP may report a large number of beneficiaries, which turns out to be the number of views for published videos. The interpretation of the core indicator *Number of people engaged in CSO activities* also seems challenging for PPs, especially in the context of COVID-19 and adapted project activities carried out in a virtual setting. In such cases, although the number of views or registration is known, the degree of engagement is hard to evaluate and hence the reported value of the indicator could be misleading. This may indicate an issue for data accuracy, as the reported values do not represent the relevant variable.

In terms of **capacity development**, in programmes with a large number of projects, the POs/FOs organise various training sessions and coaching events for PPs. In BG-ACTIVECITIZENS, these

[14] Official website of the National Science Centre.

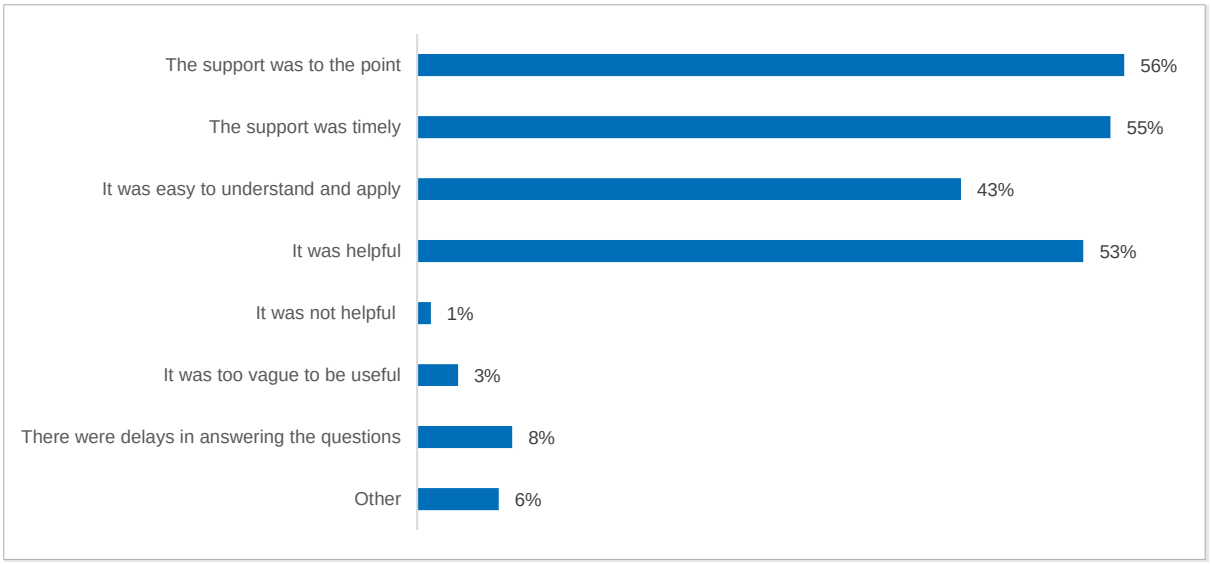
include webinars focused on financial and technical reporting within the established digital system. In PT-INNOVATION, RF-YOUTH and RO-CULTURE, targeted orientation sessions are organised for the PPs of newly contracted projects. A specific challenge in RF-YOUTH are the frequent changes within consortia implementing projects, which often leads to problems with reporting later on, and the need for additional support and explanations from the FO.

In programmes with a smaller number of projects (LT-ENVIRONMENT, MT-LOCALDEV), POs/FOs do not organise formal training for PPs. Instead, support is provided mainly through informal exchanges by email and phone, ad-hoc consultations and private meetings. Similarly, in PL-Basic Research, three PO team members are assigned to specific PPs to provide assistance and consulting, when necessary. As the PO of PL-Basic Research will soon introduce a reporting module in the ZSUN OSF system, training for PPs is planned, including guidance on calculating indicators.

In seven out of eight programmes in the sample, **technical support** is also provided to PPs by a dedicated PO/FO officer or help desks, which could be contacted by phone or email. The contact details and working hours of these officers and help desks are available on the programme websites or in project implementation manuals.

The majority of the PPs who participated in the online survey consider the support/advice they have received from POs/FOs to be timely (55%), helpful (53%) and to the point (56%). Fewer respondents mention delays in having their questions answered (8%), and only 3% of participants consider the support/advice received too vague to be useful (see Figure 2 below).

Figure 2. Project promoters' views on support/ advice provided by POs/FOs



Source: Online survey conducted as part of this assessment.

Overall, it is recommended that the POs/FOs draw the attention of PPs to the most common data issues under each programme in the relevant guidance documents (manuals, handbooks, etc.). It is advisable that even in programmes with a smaller number of projects, POs/FOs conduct dedicated training sessions for PPs. This training could cover various topics such as measuring structured data, data disaggregation, narratively describing achievements or other topics, depending on the most common difficulties faced by PPs. Such trainings, as well as introductory sessions on the digital systems in place, could be especially helpful for new PPs under the programmes.

EQ3. What are the main issues with the quality of structured data in the PO, FO and NFP systems, and when submitted to FMO in the FMO IT system GrACE?

Accuracy

Only two programmes use systems which allow for the fully automated processing of structured data. Manually transferring data to Excel tables implies the possibility of errors in the calculation of relevant variables. However, the occurrence of such a risk is much less likely in smaller programmes. The possibility of making mistakes in larger programmes is a serious risk, and the PO/FO of larger programmes should apply control mechanisms to minimise it – at least the four-eyes principle.

The correspondence between collected data and the meaning of the indicator is evaluated as sufficient although there are some indications of issues. Additional methodological guidance could be provided by the POs/FOs to the PPs to set a common approach to data collection and reporting.

Overall, the assessment performed shows that all programmes apply systems (whether digital or otherwise) and procedures (including guidance materials and communication with the PPs) that aim to guarantee the accuracy of structured data submitted to the FMO.

Validity

Regardless of whether the data collection and storage systems are entirely digital and automatised, or if additional means are used to collect and record the necessary structured data (emails, surveys, databases, Excel, etc.), all data collection and management systems of the programmes in the sample are structured and implemented in a way which aims to guarantee that the final recording of structured data in GrACE is delivered per FMO requirements, rules, definitions and templates.

Transparency

In all programmes in the sample, sufficient transparency of data is ensured. Although most digital systems and progress report templates do not offer the possibility of indicating data sources, submitted information is easily verifiable, as PPs keep track of data sources in their internal record systems. Most of them also provide various types of evidence in the form of attached documents or hyperlinks for each reported result. Data sources are also verified by POs/FOs through regular monitoring, including on-the-spot checks.

Relevance

Overall, all programmes apply systems (whether digital or otherwise) that guarantee the relevance and completeness of structured data submitted to the FMO. The data collected allows the tracking of links between activities, outputs, and outcomes at the project level.

Timeliness

Overall, structured data across all programmes in the sample is collected and recorded on time. The schedule, frequency and timeframe for reporting vary by programme, but interviewed POs, FOs and NFPs confirmed that PPs meet set deadlines. In programmes with no synchronised reporting schedule applicable to all PPs, there is a slight risk to the timely aggregation of results for APRs and September IFRs. However, this could easily be overcome by introducing a reporting requirement for all PPs at a set time in the calendar year.

Accessibility

The accessibility of structured digital systems varies by programme. In three of the reviewed systems, detailed manuals are describing internal processes and data collection procedures, as well as the access, roles and rights of different users. In other programmes, guidance is provided through other means such as webinars, info sessions and YouTube tutorials. Most systems have user-friendly automatic features such as pre-populated data and drop-down lists, as well as help desks or dedicated experts providing technical support to users.

a) Accuracy: Does the data provide a clear representation of the relevant variable? How do the systems accommodate cumulations, account for double counting, and include disaggregated data (such as by gender, age, minority group, Financial Mechanism [EEA vs. Norway Grants])?

All systems from the sample have been designed and applied to ensure full compatibility with the FMO's Results Reporting Guide and the Core Indicators Guidance. The systems allow the tracking of all indicators across the eight programme results frameworks, to ensure their compliance with the Core Indicators Guidance. Systems are in place to guarantee representation of the relevant indicators, as well as cumulation and disaggregation of data, whether through fully automated processes or by combining information from digital systems and manual cumulation/disaggregation carried out via worksheets in Excel.

Five digital systems permit the tracking of all indicators, and two of them (PL-BASIC RESEARCH, LT-ENVIRONMENT) allow for automatic cumulation of achieved values of indicators with "number" as the unit of measurement, and disaggregation by specified categories. In PL-BASIC RESEARCH, the tracking of all indicators is achieved by connecting an additional tool (Oracle Business Intelligence) to the IT system. Automation ensures the absence of technical errors in addition and division, as well as double counting.

The system used by RF-YOUTH allows the automatic cumulation of achieved indicator values within a project. However, when preparing data at the fund level, the Fund Manager goes through all projects in EGREG and aggregates data manually outside the system. GrACE was not yet established when the results framework of RF-YOUTH was developed, and it has therefore been agreed that the requirement for disaggregated data for certain indicators is waived for RF-YOUTH.

In two of the systems (RO-CULTURE and PT-INNOVATION), there are plans to introduce functionalities related to automated cumulation and disaggregation relatively soon. In Portugal, a national IT system is currently being developed (expected to be operational in the beginning of 2022) and will include these functionalities. Under RO-CULTURE, a cumulation functionality is under development, and a functionality for disaggregation is being considered too. However, neither system currently allows the automatic cumulation/disaggregation of achievement values for indicators at the programme level. These processes are performed by the POs outside the systems through Excel tables, whereby POs can aggregate achievement values for output and outcome indicators, and arrive at the final figures to report in GrACE.

Under BG-ACTIVECITIZENS, achievement values for indicators at the project and programme level is collected outside the digital system through online surveys. The structure and content of the online surveys are in line with the Core Indicators Guidance and the Manual for ACF FOs, and therefore allow the disaggregation of results data. However, PPs often have problems with disaggregation, especially in media-related projects. As the FO is aware of this challenge, it has instructed PPs to duly describe such limitations in the comment fields of surveys used for indicator reporting. PPs also experience difficulties with disaggregation related to Roma participation, due to national legislation. In Bulgaria, every person belonging to an ethnic, religious or linguistic minority has the right to choose whether or not to be treated as belonging to a minority. Hence, participants who fill out feedback forms can opt out of indicating their ethnicity.

HR-JUSTICE use SharePoint (Teams) to collect all project/programme related data. Each project has a separate SharePoint to store data and facilitate the PO's monitoring. The PO has read-only access to the PPs' SharePoints to perform project monitoring. Data collected from PPs via emails is processed and aggregated manually by the PO for reporting in GrACE at the programme level.

The only programme where the whole process is carried out manually before submitting in GrACE is MT-LOCALDEV. Reports from the PPs are collected via email and/or via hard copies submitted to the PO. The data necessary for reporting at the programme level is cumulated and disaggregated manually, using working tables in Excel and other software.

The manual transfer of data to Excel tables means that errors are possible, including counting values twice or omitting certain achieved values. However, this risk is lower in smaller programmes (MT-LOCALDEV, HR-JUSTICE) and is not currently a challenge within programmes that have less than 5 projects in the implementation stage. However, the possibility of making mistakes in larger programmes is a serious risk, and the POs/FOs of larger programmes should apply control mechanisms to minimise this risk, using the four-eyes principle as a minimum (two experts independently checking the values and the formulas).

Overall, the assessment performed shows that all programmes apply systems (whether digital or otherwise) that aim to guarantee the accuracy of structured data submitted to the FMO. The following table provides summary information on the accuracy of data on the indicators achieved within and outside the scope of digital systems.

Table 3. Accuracy of reported indicators

Accuracy of reported indicators	Programmes from the sample	
	Yes	No or N/A and Comments
1. The digital system allows tracking of all indicators of the results framework of the programme.	**PL-BASIC** **RESEARCH LT-ENVIRONMENT** **RO-CULTURE** **PT-INNOVATION** **RF-YOUTH**	**MT-LOCALDEV** – The indicators are collected outside the IT system. **BG-ACTIVECITIZENS** – Data is collected outside the IT system through online surveys (Survey Monkey). Statistical data provided by PPs is manually processed by the FO. **HR-JUSTICE** – The tracking is done using Excel files, outside SharePoint.
2. The digital system complies with the Core Indicators Guidance FM 2014-2021.	**PL-BASIC** **RESEARCH LT-ENVIRONMENT** **RO-CULTURE** **PT-INNOVATION** **RF-YOUTH**	**MT-LOCALDEV and BG-ACTIVECITIZENS** – Data and indicators are collected outside the IT systems. **HR-JUSTICE** – There is no IT system (SharePoint is used at the Project level) and data is collected in Excel databases.
3. The digital system allows for automatic cumulations of achieved values when the unit of measurement is "number".	**PL-BASIC** **RESEARCH LT-ENVIRONMENT**	**PT-INNOVATION** – The SharePoint used does not allow for automatic cumulations. The PO is using shared Excel tables. **RO-CULTURE** – The module for automatic cumulations is under development. Currently, the PO is using shared Excel tables. **HR-JUSTICE** – There is no digital system. The cumulations are done using Excel files, which are updated regularly. **RF-YOUTH** – The digital system allows cumulation only at the project level; at the fund level they are carried out manually, through Excel tables. **MT-LOCALDEV** – Excel and other working tables are used for cumulations of indicators achieved. **BG-ACTIVECITIZENS** – Data is aggregated manually by the FO.
4. The digital system allows for disaggregation by specified categories (e.g. age, gender, Roma, Donor State, Financial Mechanism).	**PL-BASIC** **RESEARCH LT-ENVIRONMENT**	**PT-INNOVATION** – The SharePoint used does not allow for automatic disaggregation, which is done via shared Excel tables. **RO-CULTURE** – There is no separate field for data disaggregation in the system. The PO is considering the introduction of such a functionality. **HR-JUSTICE** – No digital system. The disaggregation is done manually. **RF-YOUTH** – Waives the requirement to disaggregate data on certain indicators. **MT-LOCALDEV** – Excel and other tables are used for the disaggregation of relevant indicators. **BG-ACTIVECITIZENS** – Online surveys used for data collection allow disaggregation by category.

The guidance materials and channels employed by the POs and FOs and directed to PPs usually include details and examples on reporting data on indicators, which facilitates the accuracy of the reported values in terms of correspondence between indicator meaning and content. Overall, this correspondence is evaluated as sufficient, as the POs/FOs often provide not only written but also oral guidance on demand. They also double-check the values of submitted indicators with the PPs. Indicators for which disaggregation is not easily acquired (depends on self-reporting) present a challenge. This also includes participant reporting for online events (especially relevant for modified events due to COVID-related restrictions). To minimise the risk of poor correspondence between the reported value of the indictor and the variable it is meant to measure, it is recommended that the guidance provided by the POs/FOs to the PPs includes a clear methodology on the indicators, including

a list of do's/don'ts and examples of dealing with the most common bottlenecks and challenges. The guidelines could also suggest solutions for cases where the variable of interest could not be easily measured – for example providing methodology for measuring the participation of a specific target group in an activity open to the general public.

New challenges, such as the COVID-19 crisis, might require some updates of the guidance on data collection; specifically on how to report participation in online events. The guidance should be developed in consultation with the FMO (or suggested by it) so that a common approach is employed by all supported programmes.

Additional details on accuracy of data are provided in the case studies presenting each programme in Annex 5 (provided in a separate document).

b) Validity: Is the data recorded following relevant FMO requirements, rules and definitions?

All systems in place (whether fully digital or otherwise) are structured and implemented in a way that seeks to ensure that the data is collected and further recorded in GrACE in compliance with FMO requirements, rules and definitions. The systems allow timely recording in line with relevant templates, GrACE User Manuals, Results Reporting Guide and Core Indicators Guidance. NFP/PO/FO systems in place guarantee that monitoring can be performed regularly to record validated data in GrACE.

Management and control systems at the national and programme levels are in place in all eight beneficiary states, as are more detailed manuals and guides at the programme level, such as the Manual of Operations (MT-LOCALDEV), the Project Implementation Manual (BG-ACTIVECITIZENS), and Monitoring and Verification Procedures (RO-CULTURE). They describe in detail the responsibilities of different stakeholders, procedures, and the reporting documents and data, to ensure that all participants in the process are fully aware of the rules and procedures needed to ensure compliance with FMO requirements.

In the terms of definitions, the data (including achievement values for indicators) recorded in GrACE complies with definitions provided in the Results Reporting Guide and its annexes, as well as the Core Indicators Guidance. Indicators are validated in line with metadata for core indicators in terms of unit of measurement, source of verification, disaggregation (where required) and method of calculating the indicator values.

The table below provides a summary of some of the criteria for the data validity under the eight programmes in the sample:

Table 4. Validity of data

Validity of data	Programmes from the sample	
	Yes	No or N/A and Comments
1. In the case of APRs, is data is recorded in accordance with the template for APRs?	**PL-BASIC** **RESEARCH LT-ENVIRONMENT** **PT-INNOVATION** **RF-YOUTH**	**MT-LOCALDEV** – Malta prepares mixed APRs and strategic reports. The data is collected in line with template, but outside CARS II. **HR-JUSTICE** – The project's SharePoint and emailed PP reports are the main sources for collecting necessary information for the APRs. **RO-CULTURE** – The system represents one of the sources for the APRs, but data for some of the sections in APRs cannot be extracted directly. **BG-ACTIVECITIZENS** – Some of the data is collected through online surveys, outside of the system.
2. In the case of PLI, is data recorded following the template for PLI?	**PL-BASIC** **RESEARCH LT-ENVIRONMENT** **RO-CULTURE** **RF-YOUTH** **HR-JUSTICE** **BG-ACTIVECITIZENS** **PT-INNOVATION**	**MT-LOCALDEV** – There is a project module in CARS II, but it is not used, no information is filled in. Data is collected outside the IT system.

Validity of data	Programmes from the sample	
	Yes	No or N/A and Comments
3. In the case of Calls information, is data recorded following the template for Calls?	**PL-BASIC RESEARCH LT-ENVIRONMENT PT-INNOVATION RO-CULTURE RF-YOUTH BG-ACTIVECITIZENS**	**HR-JUSTICE** – N/A for the programme, just one modality – PDPs. **MT-LOCALDEV** – There is no calls/application module in CARS II. As there are only PDPs and SGS under the programme, the SGS Operator will collect information manually.
4. In the case of BI, is data recorded following the template for BI?	**LT-ENVIRONMENT PT-INNOVATION**	**RO-CULTURE** – The data is recorded in line with templates, but outside the EMSC – offline. **BG-ACTIVECITIZENS, RF-YOUTH, PL-BASIC RESEARCH** – N/A under these programmes. **HR-JUSTICE** – There are no BIs under selected PDPs. At national level, only one BI is funded. The data is recorded following a template. **MT-LOCALDEV** – No BIs currently funded. The data will be collected following template, manually.
5. Is data recorded following the relevant GrACE user manual?	**PL-BASIC RESEARCH LT-ENVIRONMENT PT-INNOVATION RO-CULTURE RF-YOUTH BG-ACTIVECITIZENS**	**HR-JUSTICE, MT-LOCALDEV** – Data is collected following the relevant GrACE user manual, outside of the IT system, manually.

Regardless of whether the data collection and storage systems are entirely digital and automatised, or additional means are used to collect and record the necessary structured data (emails, surveys, databases, excel etc.), the systems of all the programmes included in the sample allow the POs/FOs and NFPs to record the data in GrACE per the FMO requirements, rules, definitions and templates. When it comes to the quality of structured data recorded, there are some deficiencies, but they are not due to data validity issues, and are discussed in more detail in the answer to EQ1b above.

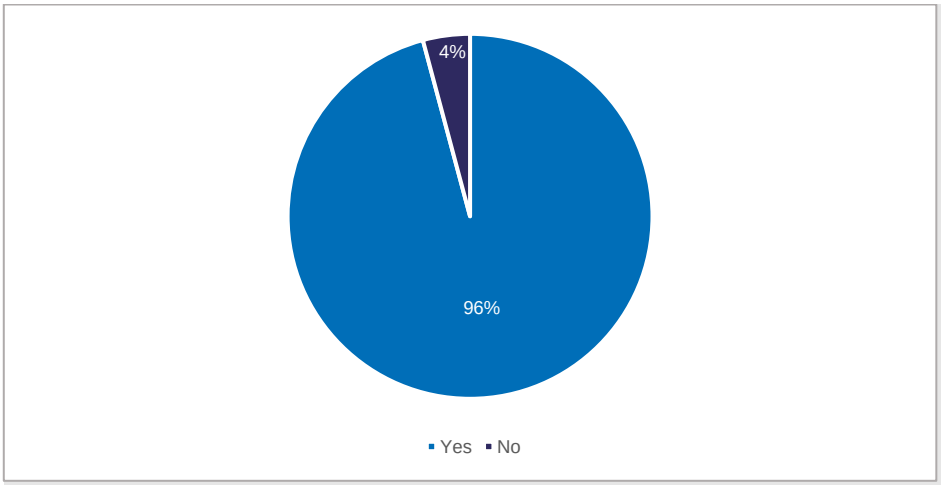
c) Transparency: Are the data sources recorded, and is the meaning known and applied by all users in the PO, FO or NFP?

Overall, the POs, FOs and NFPs of all programmes in the sample ensure sufficient transparency of collected and recorded information. Data sources that need to be used are specified in advance by POs/FOs in project implementation manuals and guidelines for reporting, in line with the sources of verification specified in the Core Indicators Guidance.

In most of the reviewed programmes, which use structured digital systems, PPs provide additional **details on key data entries** related to progress of activities, outputs and outcomes. In the system used by RF-YOUTH, specific outputs (deliverables) are attached as separate files or annexes to interim reports. In the system used by BG-ACTIVECITIZENS, PPs attach supporting documents (e.g. lists of participants, feedback forms, project related publications, photos, etc.). They are required to attach evidence in the form of documents or hyperlinks for each result achieved, otherwise the activity might be considered unfulfilled and the costs might be considered ineligible. These provisions contribute to the overall reliability of data.

Most digital systems and progress report templates used by programmes in the sample do not offer the possibility to indicate **data sources**. However, information submitted by PPs is easily verifiable, as the majority keep track of data sources in their internal systems, as confirmed by respondents in the online survey (see Figure 3 below).

Figure 3. Responses to Q10 "Do you keep track of data sources for every reporting on project activities?"



Source: Online survey conducted as part of this assessment.

POs, FOs and NFPs verify data sources through different types of **monitoring**, including desk-based monitoring (i.e. verification of interim reports) and on-the-spot checks. Some POs/FOs perform on-the-spot checks of each project at least once during the project implementation period (LT-ENVIRONMENT), while others perform checks on a sample of projects (RO-CULTURE) in line with their annual monitoring plan. Among the main elements assessed during on-the-spot checks are the method of calculation and the correctness of reported indicator values. Interviewed POs and FOs noted that no physical on-the-spot checks were carried out in 2020 due to COVID-19 restrictions, but that all necessary information was collected from PPs through online meetings, email exchanges or by phone.

d) Relevance: Is the data relevant for the purpose and complete?

Overall, the assessment shows that all programmes apply systems (whether digital or otherwise) which aim to guarantee the relevance and completeness of structured data submitted to the FMO. The data collected allows for the tracking of connections between activities, outputs, outcomes at the project level. Further aggregations of data at the programme level, including aggregating data across multiple projects contributing to the same indicator, are mainly carried out outside of the systems (in six of the eight programmes). Regardless of the specific method, the information is collected and aggregated, and it is relevant and complete to submit the APRs, September IFRs, PLIs, BIs, or call information. Systems in place ensure an audit trail and allow for the monitoring and evaluation of the programmes.

The table below provides summary information on some of the criteria for the relevance of data under the eight programmes in the sample.

Table 5. Relevance of data

Relevance of data	Programmes from the sample	
	Yes	No or N/A and Comments
1. Does data allow tracking of the result chain links between activities, outputs, outcomes and impact (objective)?	**PL-BASIC** **RESEARCH LT-ENVIRONMENT** **RO-CULTURE** **RF-YOUTH** **HR-JUSTICE** **BG-ACTIVECITIZENS** **PT-INNOVATION**	**MT-LOCALDEV** – There is no data on activities, outputs, and outcomes in CARS II. The relevant data is collected on paper and in working tables outside of CARS II, but allows tracking of the result chain links.
2. Does the system collect only data that is relevant for the purpose? (no excessive information is collected)	**PL-BASIC** **RESEARCH LT-ENVIRONMENT** **RF-YOUTH** **HR-JUSTICE** **BG-ACTIVECITIZENS** **PT-INNOVATION**	**MT-LOCALDEV** – The system collects mainly financial data that is relevant for payment and financial verification processes. The other data is collected on paper and in internal tools/tables/files outside of CARS II. **RO-CULTURE** – A lot of data is required and collected, regarding the additional national requirements, or different purposes of reporting the programme, such as procurement etc.

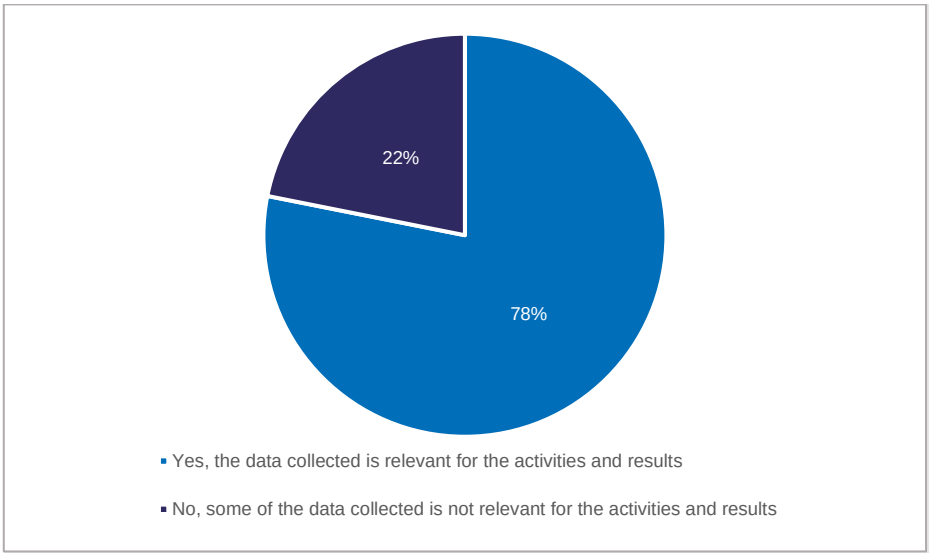
3. Is the collected data relevant for all activities and results?	**PL-BASIC RESEARCH LT-ENVIRONMENT PT-INNOVATION RO-CULTURE RF-YOUTH BG-ACTIVECITIZENS HR-JUSTICE**	**MT-LOCALDEV** – There is no data on activities and results in CARS II. The relevant data for all activities and results is collected on paper and in working tables outside of CARS II.

In all programmes in the sample, POs/FOs collect relevant data for all activities and results. In seven out of eight programmes, PLIs is collected through digital systems and tools (such as SharePoints and Surveys). Only in the case of MT-LOCALDEV is data collected from the PPs on paper and via email. Regardless of the way information is gathered and stored, it allows for the tracking of the result chain links between activities, outputs, and outcomes. Systems in place keep records for each project, structured into the project modules or files in hard copies (MT-LOCALDEV), which contain relevant information for all activities, outputs and outcomes.

During the interviews, all POs/FOs indicated that they do not recognise any significant problems in collecting (at the project level) and producing (at the programme level) relevant and reliable data for all activities and results necessary for the submission of the APR, September IFR, PLI, BIs, and calls information.

This is also confirmed by the opinion of the majority of PPs who participated in the online survey. 78% of PPs consider the data reported as relevant to activities and results, while the remaining participants in the survey (22%) assessed some of the data collected as not relevant (Figure 4 below).

Figure 4. Project promoters' views on the relevance of data collected by POs/FOs

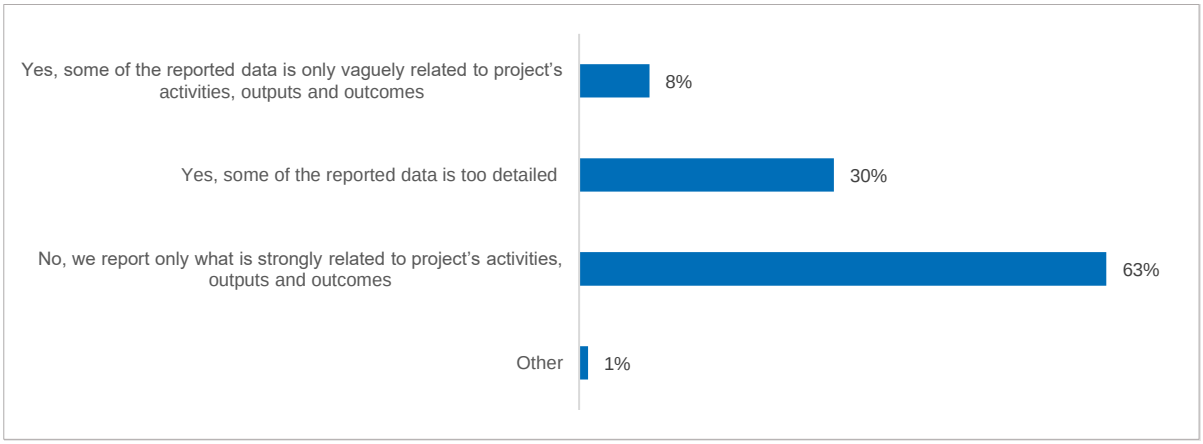


Source: Online survey conducted as part of this assessment.

The opinion of seven of the eight POs and FOs interviewed is that the systems only collect data that is relevant to FMO reporting requirements (i.e. no excessive information and data are collected). The PO of RO-CULTURE shared that the Electronic Management System is also used for the collection of additional data concerning some national requirements.

Although the opinion of the majority (63%) of PPs who participated in the online survey is that no excessive reporting data is required by POs/FOs, more than one third of the respondents think that required data is too detailed and/or only vaguely related to the project's activities and results:

Figure 5. Project promoters' views on excessive data and information reported to POs/FOs



Source: Online survey conducted as part of this assessment.

Overall, it is recommended that POs/FOs draw the attention of PPs to the objectives of any information that is required, to avoid the potential perception that unnecessary or irrelevant information is required by POs/FOs, as this could affect the motivation of PPs and the quality of their reporting. POs should make constant efforts to reduce the administrative burden on PPs and strive to optimise reporting processes, while ensuring that the necessary information is available and complete. This approach should ensure a focus on the quality of data relevant to the outcomes of the projects.

e) Timeliness: Is the data collected and recorded as quickly as possible after the event or activity took place? Is the data regularly updated in the system to reflect possible changes? Is the meaning of the collected data consistent in time?

Overall, structured data across all programmes in the sample is collected and recorded **on time**. While some POs/FOs have introduced a synchronised reporting schedule applicable to all PPs, reporting periods vary by project in other programmes. In three programmes (BG-ACTIVECITIZENS, PT-INNOVATION and RO-CULTURE), PPs submit data as specified in the individual reporting plans set in their contracts. The PO of PT-INNOVATION admitted that sometimes this could pose a risk to the timely aggregation of results. It therefore plans to introduce an additional requirement for all PPs to report by a set date in the beginning of the calendar year, which would allow the PO to easily compile the information needed for the APR and submit it to the FMO by the 15th of February.

In terms of **frequency of reporting**, RF-YOUTH stands out as the only programme in which PPs are required to submit monthly updates on the status of project activities, incurred project costs and payments. This enables the FO to identify irregularities and problems in implementation at an early stage and to mitigate risks by taking adequate measures. In two programmes from the sample (HR-JUSTICE and LT-ENVIRONMENT), data at project level is collected quarterly, i.e. every three months. In the other programmes from the sample (MT-LOCALDEV and RF-YOUTH), progress reports from PPs are collected twice a year, i.e. every six months.

The **timeframe for reporting** is quite short in LT-ENVIRONMENT, as PPs are required to submit their first project implementation report within 15 working days after the project is contracted, and a final report not later than 20 working days after project completion. In comparison, the timeframe set in RF-YOUTH is much longer, as PPs are expected to submit their final report no later than 90 calendar days after the end date of the project.

Structured data collected by POs, FOs and NFPs is generally consistent in time, and in some systems provisions are made to **reflect updated guidance and revised indicators**. For example, in the NORIS digital system used under LT-ENVIRONMENT, if a user notices missing, incorrect or outdated data, they can inform the PO and request the addition of missing or updated data. Similarly, the ZSUN OSF system used under PL-Basic Research provides means for updates in case of changes in the scope, schedule or activities of a project, and in case of updated guidance documents on indicators.

The EGREG system used under RF-YOUTH could be noted as an exception, as it does not reflect all requirements set in the latest versions of GrACE User Manuals. This is due to the fact that GrACE had not been established before the effective launch of the programme and at the time the results framework of RF-YOUTH was developed. Therefore, it was agreed that RF-YOUTH does not need to disaggregate indicator data.

f) Accessibility: Is the system straightforward, user-friendly, and easily accessible for relevant users in the PO, FO or NFP?

In three of the reviewed programmes (LT-ENVIRONMENT, RF-YOUTH and RO-CULTURE), detailed manuals are describing the internal processes and data collection procedures in the digital systems. In these manuals, the access, roles and rights of different users are specified, and each step in reporting, project technical management and verification is described in detail. The manuals also contain instructions with screenshots, demonstrating which fields are editable and which are automatically filled in or updated by the system. In RO-CULTURE, there are two separate manuals for the EMSC system: one for applicants with guidance on registering and submitting a project proposal, and another one for PPs with guidance for project implementation and reporting.

In other programmes, guidance is provided through other means, on an ad-hoc basis. In BG-ACTIVECITIZENS and PL-Basic Research, for each published call for proposals, applicants are provided detailed guidelines on how to register and submit a proposal through the systems in place. Sometimes, **interactive events** are organised by POs/FOs such as a dedicated webinar with a YouTube tutorial[15] on using the digital system (BG-ACTIVECITIZENS) and “info chats” where applicants can ask questions (PL-Basic Research).

Other systems, such as CARS II used by MT-LOCALDEV, are perhaps not as straightforward or intuitive to use. On the programme website, only a user account application form can be found but there are no instructions as to how to fill out the form or submit it.

In five of the reviewed data collection systems, there are various **user-friendly automatic features** and pre-populated data fields. In the NORIS system used by LT-ENVIRONMENT, there are automatic features related to data classifications (e.g. state, county, municipality, horizontal principles, unit of measurement and funding sources), which are displayed as drop-down lists. In the digital systems used by RF-YOUTH and PL-Basic Research, certain fields are automatically filled in. To guide users, the systems used by MT-LOCALDEV and RO-CULTURE, include help screens and small pop-up windows with instructions for filling in the necessary data.

In seven of eight programmes, there is either a help desk or a dedicated expert providing **technical support** to users. In LT-ENVIRONMENT, this service is most developed, as there are four PO experts, who advise NORIS users, and each is specialised in a specific topic (e.g. payment claims; reporting progress; reporting on bilateral initiatives). In four other programmes, there is one IT officer within the PO/FO who provides technical support when necessary. Their contact details (email address and/or phone number) are published on the programme websites. In EGREG, used under RF-YOUTH, there is a built-in help desk within the digital system, offering support to users and solving technical issues.

As mentioned in the answer to EQ2a, the digital portal established for data storage under PT-INNOVATION is used only as an internal tool by PO team members. As it is based on SharePoint, which is a popular and widely used collaborative platform, no manual has been prepared. The portal does not have a public module and is not accessible to PPs under the programme. Similarly, no guidelines are in place for the SharePoint and MS Teams folders used for data storage under HR-JUSTICE.

[15] https://www.youtube.com/watch?v=Roth70t8VvM.

Table 6. Accessibility of data collection systems used by POs, FOs and NFPs

Accessibility criteria	Programmes from the sample	
	Yes	No or N/A and Comments
5. Is there a detailed guidance document or manual for users?	**LT-ENVIRONMENT** **RF-YOUTH** **RO-CULTURE**	**BG-ACTIVECITIZENS** – For each published call, applicants are provided detailed guidelines on how to submit a proposal through the system. A dedicated webinar with a YouTube tutorial was also organised. **PL-Basic Research** – For each published call, applicants are provided detailed guidelines on how to submit a proposal through the system. "Info chats" with applicants were also organised. **MT-LOCALDEV** – On the PO website, only a user account application form can be found but no instructions as to how to fill it out. **PT-INNOVATION** – The digital portal is used only as an internal tool by PO team members. As it is based on SharePoint, no manual has been prepared. **HR-JUSTICE** – No guidelines have been prepared for data storage under the programme, as the PPs and PO use only SharePoint and MS Teams.
6. Are there user-friendly automatic features in the system (e.g. pre-populated data)?	**LT-ENVIRONMENT** **MT-LOCALDEV** **PL-Basic Research** **RF-YOUTH** **RO-CULTURE**	**BG-ACTIVECITIZENS** – There is not enough information, as team members were given access as observers. There are no help screens or pop-up windows to guide users.
7. Is there a help desk / dedicated expert providing technical support to users?	**BG-ACTIVECITIZENS** **LT-ENVIRONMENT** **MT-LOCALDEV** **PL-Basic Research** **PT-INNOVATION** **RF-YOUTH** **RO-CULTURE**	**HR-JUSTICE** – No help desk or dedicated expert is providing technical support to PPs. Both they and the PO use only SharePoint and MS Teams folders for data storage.

The various characteristics of the programmes in the sample generally do not have a significant effect on the quality of the data collected by the programmes. There is a greater risk in data cumulation for programmes with larger numbers of projects, especially if the employed solutions involve low levels of automatization in the process. However, even in those cases, the adopted solutions and processes aim to guarantee that the data quality is good.

EQ4. How are the FMO reporting requirements perceived by POs, FOs and NFPs?

The FMO reporting requirements regarding **structured** data are perceived by POs, FOs and NFPs as being easy to understand, proportionate, relevant, and not causing serious administrative burden. Although there are some (mainly technical) gaps and weaknesses, the reporting of structured data is not perceived to be a significant challenge by POs, FOs and NFPs, except that it is time consuming.

Reporting timelines are generally assessed as reasonable and feasible and to not cause any particular difficulties. However, deficiencies in the timely updating of information were identified.

A discrepancy between the opinions of the FMO and the POs, FOs and the NFPs – at the level of understanding reporting requirements – is identified, indicating a need for continued improvement in the training and guidance provided.

Although the POs, FOs and NFPs are entirely positive to GrACE, and they highly appreciate the continuous improvement of the system and the efficient GrACE support provided, GrACE is still seen as an evolving system with some limitations.

Reporting requirements regarding **non-structured/narrative** data are perceived relatively formally and are not interpreted in the same way by all POs, FOs and NFPs. Narrative parts of documents are often not sufficiently detailed, may lack background/context information, may be too focused on numbers, and lack sufficient analysis of the effects and expected outcomes or outputs of specific activities. Overall, non-structured/narrative data is a challenge. Additional efforts are necessary to improve this from the side of POs/FOs and NFPs, as well as from the FMO, by continuing to communicate the importance of quality non-structured/narrative data through all existing and new channels.

POs, FOs and NFPs believe they are very well aware of all FMO reporting requirements. According to the POs, FOs and NFPs, they do not face serious issues with reporting rules, templates or timelines. They take the guidelines connected to reporting results and core indicators, as well as the GrACE User Manuals, into consideration. Overall, the documents developed by the FMO are assessed as being very clear and useful by the POs, FOs and NFPs regarding the process of collecting, aggregating and submitting data to the FMO. The trainings that are regularly provided by the FMO also contribute to a better understanding of the reporting requirements.

The **reporting timelines** are assessed by POs, FOs and NFPs to be reasonable and feasible and to not cause any particular difficulties. The ideas shared by NFPs for potential optimisation, given that similar information is collected at the same time (e.g. IFRs on 15 September and forecasts for likely payment on 20 September), are mainly related to internal organisation at the level of the beneficiary state and coordination in the collection of information between CA, NFP and POs.

Although the reporting deadlines are not identified as a challenge by POs/FOs, delays and gaps in the timely updating of information (mainly in the case of calls information and PLIs) have been noted. In this regard, the case studies for the eight programmes, presented in Annex 5 (provided in a separate document), provide specific recommendations to the POs and FOs.

FMO representatives note that the first drafts of submitted documents often require corrections, especially in structured data, or are submitted late. This discrepancy between the opinions of the FMO and the POs, FOs and NFPs indicates that there is a need for continued improvement in training and guidance.

As **GrACE is the main tool** through which POs/FOs and NFPs meet the reporting requirements, it would be useful to pay attention to their perception of the system. Although the POs, FOs and NFPs are entirely positive to GrACE, and they highly appreciate the continuous improvement of the system and the efficient GrACE support provided, they shared some opportunities for further development. As such, GrACE is seen as an evolving system with some limitations. In terms of new functionalities, it was suggested to develop features to enable the following:

- The (dis)aggregation of data.
- The export of data.
- The generation of tables for analyses outside the system.
- Ensuring algorithms or calculations made by GrACE are transparent and available for review.

Some of the above functionalities are already available in GrACE, but should be better communicated to the POs, FOs and NFPs. The remaining functionalities should be developed as such features would be useful for programme management, and would simplify the process of reporting, monitoring and analysis. It was also recommended considering functionality which would allow statistical comparisons between different countries and programmes. In addition, GrACE should ensure the visibility of earlier versions of documents (currently only last revisions are available) to have the possibility of tracking changes (for APRs and Programme Agreements, for example) as it will help POs, FOs and NFPs identify commonly occurring issues, support consistent treatment of similar issues, and could thus have a positive impact on the quality of future documents. Some minor technical gaps and limitations were also noted, such us the lack of automatic backup of work in progress when uploading information, and the lack of a possibility to update information on calls once the section is closed (submitted).

The FMO reporting requirements regarding **structured data** are perceived by POs, FOs and NFPs to be well understood, proportional, relevant, and not cause for serious administrative burden. The overall quality of structured data and information submitted to the FMO is high. The data is collected, checked, verified and aggregated. It is reliable, thanks to the systems that have been put in place, whether entirely electronic or a combination of electronic systems and other tools. Nevertheless, some PPs, POs, FOs and NFPs have identified two challenges in terms of structured data:

- Data disaggregation, which is a challenge at the project level for a variety of reasons beyond the control of PPs, POs/FOs or NFPs.
- Difficulties related to FMO requirements on indicators where the measurement unit is “scale”, such as trust, satisfaction, etc. There is insufficient knowledge and experience, and there is a lack of established methodology to prepare and perform good surveys and collect relevant quality data. In this regard, the FMO needs to provide support.

Although there are some errors which may be considered technical and easy to overcome (e.g. discrepancies in data regarding the number of contracts in calls information and PLIs, errors in cumulative achievements for the number indicators in APRs and September IFRs), the reporting of structured data has become routine and poses no significant challenges for POs, FOs and NFPs. Its main disadvantage is that it is quite time consuming and takes up a large part of the working time of experts, especially for POs/FOs.

Even though POs, FOs and NFPs seem to share an understanding of the need to be well-versed in FMO reporting requirements regarding **non-structured/narrative data** and do not see the requirements as particularly challenging, findings from this assessment (including interview and focus group with FMO representatives) are that the quality of non-structured/narrative data is a serious challenge.

The key issue with non-structured/narrative data is that it often lacks the level of detail, depth, and analysis necessary to be as informative as possible, which would allow it to reveal the ‘story behind the numbers’ (i.e. the story behind the structured data). The main reason for this is the relatively formal perception of requirements related to non-structured/narrative data reporting. This is often written briefly, without sufficient background/context information, too focused on numbers, and without analyses of the effect of specific activities or outputs. This trend is mainly noticeable in the APRs (versions before FMO approval) and PLIs, and is largely due to the concentration of effort at POs/FOs on the quality of structured data.

Overall, additional efforts by NFPs, POs and FOs are necessary to improve non-structured/narrative data. Likewise, the FMO needs to continue its efforts to communicate the importance of non-structured/narrative data through all existing and new channels.

IV. Conclusions and Recommendations

Table 7. Conclusions and recommendations

	Conclusion	Recommendations	Responsible body
1.	The review of Project Level Information (PLIs) under the programmes in the sample shows that it is necessary to improve the quality of PLIs overall; mainly concerning the information provided under “Project content.” There are varied approaches and corresponding variations in quality, dependent on the judgement of individual staff within project promoters (PPs) and POs/FOs. Within the framework of a single programme with more than 10 PLIs, the quality and style of PLIs varies as well, as they are completed by several PO staff. The insufficient quality of PLIs is also because all or most of them can't be reviewed and approved before their publication due to their high number.	The FMO should prepare a short instructional guideline and a checklist to be used by the POs/FOs for the quality control of PLIs. This would allow POs/FOs to conduct a primary review of PLIs and apply corrections before submitting to the FMO. The intended effect would be an improvement in the quality of PLIs.	FMO POs, FOs
2.	Data disaggregation under the relevant indicators is a challenge, both at the project and programme level. This is due to a variety of reasons beyond the control of project promoters, POs/FOs, or NFPs – this is reflected in a very high share of achievements reported as “not specified”.	The FMO should introduce mandatory completion of the “comment” field in instances where a non-zero value has been entered within the section “not specified” in disaggregation under relevant core indicators. The POs/FOs should provide guidance to the PPs that clearly states and explains the allowed and recommended approaches for collecting disaggregated data, so that uniform implementation at programme level would be guaranteed. Solutions may involve filling in a non-obligatory anonymous participation card before accessing an online event, or adopting a common methodology to record the participation of a specific target group in an event. Depending on the activity and the type of disaggregation, the measurement methodology could differ.	FMO POs, FOs
3.	There are issues with data quality for structured data due to challenges related to reporting cumulative values for indicators where the unit of measurement is “number”, and for survey indicators where the unit of measurement is “scale”. Reported results that already in 2021 greatly exceed targets suggest further challenges to data quality. Additionally, there are discrepancies between the numbers of contracted projects registered under “calls” and the number of projects registered under PLIs, often because call information is not submitted and updated on time. The	The FMO should introduce a requirement for all POs/FOs to designate a Data Quality Manager to serve as a reporting quality assurance expert under the respective programme, and as the main point of contact for the FMO regarding quality reporting issues. The FMO should conduct focused work with quality assurance experts and consider creating an informal network, allowing the exchange of experience and discussion of cases. The FMO should establish a clear methodology on indicators from surveys where the unit of measurement is “scale”, including who, how and when to conduct the survey, and who the survey target groups are.	FMO

	Conclusion	Recommendations	Responsible body
	causes of issues in structured data can be categorised as mainly technical and/or manual relating to omissions, insufficient experience, and/or staff workload.	The FMO should provide short specific and/or more detailed instructions where reporting might be ambiguous (i.e. definitions for specific indicators or instructions on collecting disaggregated data). The FMO should provide anonymised good and bad examples for reference on what correct reporting looks like.	
4.	The quality of the non-structured/narrative data submitted by POs/FOs and NFPs often lacks the level of detail, depth, and analysis necessary for the FMO to understand "the story behind the numbers". The main reason for this is a relatively formal perception of requirements related to non-structured/narrative data reporting, and a concentration of effort by POs/FOs and NFPs on the structured data. This is a challenge that has to be addressed to improve the overall reporting quality of non-structured/narrative data.	The FMO should continue its efforts to communicate the importance of non-structured/narrative data through existing channels (general training, guides, meetings), and should consider introducing new channels, such as targeted training sessions for POs and FOs, short instructions on specific cases, and provision of anonymised good and bad examples for reference.	FMO
5.	A serious limitation observed in six out of eight programmes is that digital systems do not have a built-in function that allows automatic aggregation. Instead, POs/FOs extract, manually adjust and aggregate data in Excel worksheets, which poses a risk to data accuracy, especially in programmes with a large number of contracted projects.	For programmes that already use a structured digital system, the POs/FOs and NFPs should explore IT solutions for introducing extra functionality to allow the automatic aggregation of data within the system. The POs, FOs and NFPs that transfer data manually to Excel tables, should apply control mechanisms to minimise technical errors, employing the four-eyes principle as a minimum. The POs, FOs and NFPs processing data entirely in Excel should introduce a structured digital tool, and reduce the need for manual adjustment as much as possible.	POs, FOs, NFPs
6.	Although POs/FOs provide various types of written and technical guidance to project promoters, additional efforts are needed to develop project promoters' result reporting skills. Conveying the meaning of certain indicators to project promoters (especially within ACF programmes) has been difficult, and consistent reporting is a challenge. Some project promoters encounter difficulties in describing non-structured/narrative achievements and in collecting and reporting disaggregated data, especially concerning Roma.	In the project application process, the POs/FOs should ensure that the PPs only include indicators that are strongly related to the nature of the project, its activities and expected results, to focus attention accordingly. The POs/FOs should draw the attention of PPs to the most common data issues under each programme in the relevant guidance documents. The POs/FOs should conduct dedicated training sessions for PPs on problematic topics, even in programmes with a smaller number of projects. The POs/FOs should provide a list of "do's/don'ts" and examples of dealing with the most common challenges in the guidance. The provided guidance should be adapted and extended in case of unexpected major events (e.g. the COVID-19 crisis). The guidance and solutions should be based on FMO guidance and instructions, and the FMO should be consulted at an initial phase. The guidance	POs, FOs

	Conclusion	Recommendations	Responsible body
		should acknowledge the difficulties and possible country specific concerns regarding the collection of sensitive data (e.g. ethnicity) at the programme level, and recommend methodological solutions.	
7.	In some programmes, there is no synchronised reporting schedule applicable to all project promoters and reporting periods are instead specified in the individual reporting plans set in project contracts. This could pose a risk to the timely aggregation of results needed for APRs and September IFRs.	The POs/FOs should introduce an additional requirement for all PPs to report by a planned date in the calendar year, which would allow the operators to easily compile the information needed for APRs and September IFRs.	POs, FOs
8.	Although POs/FOs and NFPs are entirely positive to GrACE, it is seen as an evolving system with some limitations. There is room for further improvements in terms of new functionalities, which would be useful for programme management and would simplify the process of reporting, monitoring and analysis.	As GrACE is the main tool for reporting and management under the EEA and Norway Grants 2014-2021, the FMO should continue its efforts to further improve the system in close cooperation with POs/FOs/NFPs, i.e. the main users of the system. This would facilitate the reporting processes and improve GrACE's effectiveness as a tool for monitoring and management. Recommendations for further improvements include: allowing POs/FOs/NFPs to view earlier versions of Programme Agreements and APRs; allowing import and export of data; automatic backup of work in progress; allowing edits of previously submitted information on calls; allowing filtering by categories; ensuring algorithms or calculations made by GrACE are transparent and available for review.	FMO
9.	There is a discrepancy of opinion regarding the level of understanding of reporting requirements and their application of the FMO on the one hand and of the POs, FOs, and NFPs on the other.	The FMO should continue to provide training and guidance. The FMO should proactively address reporting requirements and their application in meetings with FOs/POs/NFPs.	FMO

V. Annexes

Annex 1. List of documents used

- Regulation on the implementation of the European Economic Area (EEA) Financial Mechanism 2014-2021 (including the PA template in Annex 6)
- Blue Book 2014-2021: Priority Sectors and Programme Areas 2014-2021
- Programme Implementation Agreement Template
- Results guideline 2014-2021
- Bilateral Guideline 2014 - 2021
- Results manual for the Active Citizen Fund 2014-2021
- Guideline for educational programmes 2014-2021
- Guideline for research programmes 2014-2021
- EEA and Norway Grants 2014-2021: Results reporting guide
- Core indicator guidance FM14-21
- EEA and Norway Grants 2014-2021: Annotated annual programme report template
- EEA and Norway Grants 2014-2021: Project level information template
- EEA and Norway Grants 2014-2021: Calls template
- GrACE user Manual – Annual Programme Reports
- GrACE User Manual – Project Level Information
- GrACE User Manual – Call information
- GrACE User Manual – Bilateral Initiatives
- MoU between Donor States and selected Beneficiary States.
- Programme Agreements of selected programmes.
- Management and Control Systems of the Active Citizens Fund Bulgaria.
- Project Implementation Manual of the Active Citizens Fund Bulgaria.
- PowerPoint presentation with guidelines on statistical data reporting on indicators.
- National Description of the Management and Control Systems ("DMCS").
- DMCS of the Programme operator for the Justice and Home Affairs programme ("Programme");
- Smjernice za upravljanje i financijsko praćenje provedbe mehanizama, programa i aktivnosti iz fonda za bilateralne odnose za Nacionalnu fokalnu točku (Guidelines for Management and Financial Monitoring of the Implementation of Mechanisms, Programs and Activities from the Bilateral Relations Fund for the National Focal Point) and its annexes.
- Smjernice za upravljanje i financijsko praćenje provedbe aktivnosti za korisnike sredstava Fonda za bilateralne odnose (Guidelines for Management and Financial Monitoring of the Implementation of Mechanisms, Programmes and Activities from the Bilateral Relations for the Beneficiaries of the Bilateral Relations Fund) and its annexes.
- Smjernice za upravljanje i financijsko praćenje provedbe programa i aktivnosti iz Fonda za bilateralne odnose za upravitelje programa (Guidelines for Management and Financial Monitoring of the Implementation of Mechanisms, Programs and Activities from the Bilateral Relations Fund for the Programme Operators) and its annexes.
- Management and Control Systems (MCS) of the Norwegian Financial Mechanism 2014-2021 "Environment, Energy, Climate Change" programme.
- User Manual of the National Information System of the EEA and Norway Financial Mechanisms 2014-2021 (NORIS).
- Terms of Use of the National Information System of the EEA and Norway Financial Mechanisms 2014-2021 (NORIS).
- PowerPoint presentations with NORIS instructions for submitting advance and interim payment claims.
- Description of The Management and Control Systems for EEA Financial Mechanism 2014-2021 and the Norwegian Financial Mechanism 2014-2021, Malta, May 2019 and its Annexes 1-6.
- Programme Concept Note Malta, Final version developed by NFP, 31.08.2017.

- Manual of Procedures for the implementation of projects funded under the EEA Grants 2014-2021 and the Norway Grants 2014-2021, Third Edition, May2021.
- Small Grant Scheme Guidelines for Applicants, Call 1, November 2019 - Guidelines Call 1.
- Small Grant Scheme Guidelines for Applicants, Call 2, March 2021 - Guidelines Call 2.
- Programme agreement for the Basic Research programme.
- Basic research programme draft description of indicators.
- Supplementary information related to the management of the programme - Annotated Template – Programme Agreement preparation.
- Contract templates for GRIEG, IdeaLab, POLS calls.
- Guidelines for applicants for GRIEG, IdeaLab, POLS calls.
- Description of the Management and Control Systems at national level, Version 3, July 2021.
- Description of the Management and Control Systems of the Blue Growth programme.
- Beneficiary Manual for the Blue Growth programme.
- Technical report template for the Blue Growth programme.
- Management and Control Systems of the Fund for Youth Employment (Version 4.0) and annexes.
- Project Implementation Handbook of the Fund for Youth Employment.
- EGREG User Manual.
- Management and Control System, RO-CULTURE, Ministry of Culture – Project Management Unit Romania, January 2021.
- Monitoring and Verification Procedures (only in Romanian) - Procedura operaţională privind monitorizarea și verificarea implementării proiectelor finanțate în cadrul Programului, PA14 RO-CULTURA, Revizia 5.
- Template for Interim report on BF PO to FNP.
- Checklists for technical and financial verification of PO Interim Reports.
- Description of MCS 2014-2021 for the EEA FM and NFM 2014-2021, Romania.
- Template for interim/final BI implementation report.
- Checklists for technical and financial verification of BI Financial Reports.
- Instructions for use of the Electronic Management System for RO-CULTURE Programme (EMSC): 1. For Applicants and 2. For Project Promoter’s – EMSC user (only in Romanian) - https://www.ro-cultura.ro/documente-proiecte.

Annex 2. Selection of sample of programmes

The sample of programmes complies with several requirements:

- It should cover all **five priority sectors** – Innovation, research, education and competitiveness; Social inclusion, youth employment and poverty reduction; Environment, energy, climate change and low carbon economy; Culture, civil society, good governance, fundamental rights and freedoms; Justice and home affairs.
- It should include programmes of various **grant allocation size**. There are three categories based on grant size: up to EUR 15m, between EUR 15m and EUR 40m, and exceeding EUR 40m.
- It should include programmes with various **implementation modalities**[16] – single modality, two modalities and three modalities.
- Programmes with various **numbers of contracted projects** are selected.
- Programmes implemented with entities with different **level of experience** should be covered - a first-time or second-time PO/FO.

In addition to these variables, the selection of programmes also considered the **disbursement and incurred rates** of the programmes, so that preference is given to programmes in a sufficiently advanced implementation phase.

The sample was prepared based on the following sources: extraction from GrACE system, provided by FMO with information on all 97 programmes, as well as additional review in GrACE system performed by the assessment team.

To select the specific programmes to be included in the sample, all programmes were grouped according to their priority sector. After this, within each priority sector, the projects with disbursement and incurred rates above 5% were selected.[17] Out of those "active" programmes within every priority sector, a sub-sample of programmes with various combinations of grant allocation size, implementation modalities, number of projects and level of experience of the PO/FO was selected. The final sample is selected after combining those sub-samples and balancing the various requirements the sample should comply with while acknowledging the limits imposed by the project time frame.

Table 8. Programmes per priority sector

Priority sector	Total number of programmes	Total grant, EUR mn	Total number of projects	Type of modalities	Level of experience
A. Innovation, research, education and competitiveness	17	432.8	654	1-, 2-, and 3 modalities	first-time and second-time operators
B. Social inclusion, youth employment and poverty reduction	12	352.5	165	2- and 3 modalities	first-time and second-time operators
C. Environment, energy, climate change and low carbon economy	10	364.4	170	2- and 3 modalities	first-time and second-time operators
D. Culture, civil society, good governance, fundamental rights and freedoms	23	378.7	995	1-, 2-, and 3 modalities	first-time and second-time operators
E. Justice and home affairs	14	327.9	76	2- and 3 modalities	first-time and second-time operators
Global Fund for Regional Cooperation	3	109.2	106	1- and 2 modalities	first-time and second-time operators

Source: GrACE, data as of 10 June 2021.

[16] The modalities are pre-defined projects, calls for proposals, small grant schemes and financial instruments. The discussions with FMO experts revealed that there are limited number of programmes that use financial instruments and those are not identified in GrACE.

[17] Only two such programmes were identified in the "Environment, energy, climate change and low carbon economy" thematic area.

Annex 3. Interviews carried out

The interviews and meetings held are summarised in the table below:

Programme	Organisation	Role	Date	Method
	Financial Mechanism Office	Reporting and Data Quality officers	23 June 2021	MS Teams meetings
	Financial Mechanism Office	Programme managers	30 August 2021	MS Teams meetings
PL-Basic Research	National Science Centre	PO	14 September 2021	MS Teams meetings
	Ministry of Development Funds and Regional Policy, Department of assistance programmes	NFP	14 September 2021	MS Teams meetings
PT-INNOVATION	The Directorate-general for Maritime Policy of the Ministry for the Sea	PO	23 September 2021	MS Teams meetings
	The National Management Unit of the European Economic Area Financial Mechanism	NFP	21 July 2021	MS Teams meetings
MT-LOCALDEV	Ministry for Foreign and European Affairs	PO and NFP	21 July 2021	MS Teams meetings
LT-ENVIRONMENT	Central Project Management Agency	PO	27 July 2021	MS Teams meetings
	Ministry Of Finance, Investment Department	NFP	13 August 2021	MS Teams meetings
RO-CULTURE	Ministry of Culture and National Identity	PO	28 July and 04 August 2021	MS Teams meetings
	Ministry of European Funds, General Directorate for European Non-Reimbursable Financial Mechanisms and Instruments	NFP	N/A	MS Teams meetings
BG-ACTIVECITIZENS	Foundation Open Society Institute – Sofia	FO	7 July 2021	MS Teams meetings
HR-JUSTICE	Ministry of Justice	PO	13 July 2021	MS Teams meetings
	Ministry of Regional Development and EU Funds	NFP	22 July 2021	MS Teams meetings
RF-YOUTH	ECORYS Polska sp.z.o.o.	FO	30 July 2021	MS Teams meetings

Annex 4. Summarised information on the survey among PPs

The survey was conducted online between 30 August and 15 September 2021. Invitations were sent to 411 unique contacts. Of those, 108 participated in the survey and 93 completed the whole survey. The tables below summarise the participation and the results.

Table 9. Number of projects, number of unique contacts and number of responses per programme

Programme	Number of projects	Number of unique contacts	Number of responses
PL-Basic Research	45	30	3
PT-INNOVATION	57	56	11
MT-LOCALDEV	4	11	1
LT-ENVIRONMENT	7	7	2
RO-CULTURE	43	68	22
BG-ACTIVECITIZENS	129	211	52
HR-JUSTICE	3	3	3
RF-YOUTH	25	25	14

Table 10. Results of the survey among project promoters

Question/responses	Number	Share
1. Please, indicate the programme that funded your project		
BG-ACTIVECITIZENS (Bulgaria)	52	48.1%
RF-YOUTH	14	13.0%
RO-CULTURE (Romania)	22	20.4%
PL-Basic Research (Poland)	3	2.8%
PT-INNOVATION (Portugal)	11	10.2%
LT-ENVIRONMENT (Lithuania)	2	1.9%
HR-JUSTICE (Croatia)	3	2.8%
MT-LOCALDEV (Malta)	1	0.9%
Total number of responses		*108*
2. Please, select the type of institution that best describes your organisation:		
NGO	73	67.6%
Research organisation/university	5	4.6%
Public body (ministry, government agency, etc.)	13	12.0%
Social service provider	2	1.9%
Health institution	0	0.0%
Other (please, specify)	15	13.9%
Total number of responses		*108*
3. Please, indicate if this is the first time your organisation implements a project that is funded by the EEA and/or Norway grants?		
Yes, this is the first time	53	49.1%
No, we implemented EEA and/or Norway grants projects in the past.	55	50.9%
Total number of responses		*108*
4. Please, indicate the type of EEA project your organisation implements:		
It is a pre-defined project	7	6.5%
It is selected under a small grant scheme	25	23.1%
It is selected under a call for proposals	73	67.6%
I don't know	3	2.8%
Total number of responses		*108*

Question/responses	Number	Share
5. Does the data you collect and report to the Programme Operator (PO)/Fund Operator (FO) fully cover all activities performed, outputs delivered and outcomes achieved? *(more than one answer is allowed)*		
It covers all activities	89	92.7%
It covers all outputs	58	60.4%
It covers all outcomes	58	60.4%
Some performed activities are not included in the reporting	6	6.3%
Some delivered outputs are not included in the reporting	3	3.1%
Some achieved outcomes are not included in the reporting	5	5.2%
Total number of responses		*96*
6. Do you think you are required to report more data and information than necessary for tracking project progress? *(more than one answer is allowed)*		
Yes, some of the reported data is only vaguely related to project's activities, outputs and outcomes	8	8.3%
Yes, some of the reported data is too detailed	29	30.2%
No, we report only what is strongly related to project's activities, outputs and outcomes	60	62.5%
Other	1	1.0%
Total number of responses		*96*
7. Is collected data relevant to all activities and results? *(more than one answer is allowed)*		
Yes, the data collected is relevant for the activities and results	75	78.1%
No, some of the data collected is not relevant for the activities and results	21	21.9%
Total number of responses		*96*
8. When do you collect data on project's activities, outputs, and outcomes? *(more than one answer is allowed)*		
As quickly as possible after the event or activity took place	50	52.1%
Regularly in advance of reporting	61	63.5%
It depends on the activity/event	4	4.2%
Other	1	1.0%
Total number of responses		*96*
9. When do you report data on project's activities, outputs, and outcomes to the PO/FO? *(more than one answer is allowed)*		
As quickly as possible after the event or activity took place	7	7.3%
When regular reporting is due	81	84.4%
When we are asked to report	24	25.0%
It depends on the activity/event	2	2.1%
Other	3	3.1%
Total number of responses		*96*
10. Do you keep track of data sources for every reporting on project activities?		
Yes	92	95.8%
No	4	4.2%
Total number of responses		*96*
11. How often does the PO/FO ask you to revise/ clarify submitted data? *(more than one answer is allowed)*		
It has never happened	33	34.4%
Once or twice – the text was edited but the meaning/reported values were not changed	30	31.3%
Once or twice – the text was edited as well as the meaning/reported values	9	9.4%
Once or twice – disaggregation was included	5	5.2%
Every time we report on events/activities – the text was edited but the meaning/reported values were not changed	6	6.3%

Question/responses	Number	Share
Every time we report on events/activities – the text was edited as well as the meaning/reported values	9	9.4%
Every time we report on events/activities – disaggregation was included	0	0.0%
Other	6	6.3%
Total number of responses		*96*
12. What have been the most common difficulties you've encountered when reporting project progress to the PO/FO? *(more than one answer is allowed)*		
On achieved results for output indicators	8	8.3%
On achieved results for outcome indicators	16	16.7%
On implemented activities	10	10.4%
No difficulties have been encountered so far.	59	61.5%
Other	10	10.4%
Total number of responses		*96*
13. What were the difficulties you encountered? *(only for those PP that selected the first three responses from question 12 above, more than one answer is allowed)*		
Measuring quantitative data to report achieved results for indicators	10	35.7%
Describing qualitative achievements	13	46.4%
Data disaggregation (by gender, minorities, age, etc.)	9	32.1%
Data accumulation	5	17.9%
Data measurement unit	4	14.3%
Describing activities and results	2	7.1%
Other	3	10.7%
Total number of responses		*28*
14. Do you have difficulties when providing disaggregated data (e.g. based on gender, age group, Roma participation) on the achieved values of certain indicators, when required? *(more than one answer is allowed)*		
No, collecting disaggregated data isn't an issue	29	30.2%
Yes, it is challenging to collect disaggregated data for some activities	29	30.2%
Yes, we have difficulties due to personal data protection concerns	16	16.7%
Yes, it is challenging to collect disaggregated data on gender	7	7.3%
Yes, it is challenging to collect disaggregated data on age groups	3	3.1%
Yes, it is challenging to collect disaggregated data on minorities	18	18.8%
No, this is not applicable to our project	22	22.9%
Other	3	3.1%
Total number of responses		*96*
15. Are you provided with guidance documents or manuals on what data should be collected and reported and how it should be collected and reported?		
Yes, there are documents provided by the PO/FO	84	90.3%
No, there are no documents provided by the PO/FO	9	9.7%
Total number of responses		*93*
16. If the PO/FO provided guidance documents, would you say that: *(more than one answer is allowed)*		
They are easy to understand and to apply	62	66.7%
They are not very detailed and we have to consult with the PO/FO when reporting	20	21.5%
Other	12	12.9%
Total number of responses		*93*
17. If the PO/FO provided guidance documents, those documents cover: *(more than one answer is allowed)*		

Question/responses	Number	Share
Details on qualitative reporting on project activities	49	52.7%
Details on quantitative reporting on project activities	56	60.2%
Details on reporting achieved results for indicators	57	61.3%
Details on data collection (qualitative, quantitative)	33	35.5%
Other	3	3.2%
None of the above	10	10.8%
Total number of responses		*93*
18. In case you need assistance or advice from the PO/FO on data collection and reporting:		
There is a help desk / dedicated expert that provides support – both technical (for example, what should be populated where in a system) and content-wise (for example, how to report an activity or an indicator)	72	77.4%
There is a help desk / dedicated expert that provides only technical support	8	8.6%
There is a help desk / dedicated expert that provides only content-wise support	6	6.5%
There is no help desk / dedicated expert, we receive feedback after we report project progress.	7	7.5%
Total number of responses		*93*
19. If you've ever needed support/advice on data reporting from the PO/FO, would you say that: *(more than one answer is allowed)*		
The support was to the point	52	55.9%
The support was timely	51	54.8%
It was easy to understand and apply	40	43.0%
It was helpful	49	52.7%
It was not helpful	1	1.1%
It was too vague to be useful	3	3.2%
There were delays in answering the questions	7	7.5%
Other (please provide details)	6	6.5%
Total number of responses		*93*