



# ERA-LEARN

EC Survey on the Administrative Burden of European Partnerships under Horizon Europe - results

17/06/2024

# 1. Introduction

The European Commission and its Executive Agencies are aware that European Partnerships are facing various administrative burdens under the current Framework Programme regarding the preparation, implementation, and monitoring/reporting of their partnerships.

The Commission wants to engage in a discussion to better understand the nature of these administrative burdens and to collect ideas and suggestions on how to alleviate them, both within Horizon Europe and within the next Framework Programme.

As a first step to further the understanding of these administrative burdens the European Commission launched a survey through the Partnership Knowledge Hub (PKH). Member States, Associated Countries and partnership representatives were given the opportunity to voice their comments and concerns on different topics. This report presents the results of the survey.<sup>1</sup>

In addition, the European Commission organised a workshop on June 5 in Brussels. The objective of the workshop was to have a more in-depth analysis of the current administrative burdens and a discussion on how these burdens could be limited both in the current and in the next Framework Programme (FP10). The consultation was divided into two main sections: 1) feedback on the current burden; 2) feedback on the possible measures addressing the burden in the future with a long-term perspective.

To facilitate the read of this report, comments were grouped per theme within each section and weighting was attributed to each comment in proportion to the number of times the issue was ad (e.g., ● one respondent, ●● two respondents, etc.).

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<sup>1</sup> **Disclaimer:** This report was prepared by ERA-LEARN at the request of the European Commission. It solely reflects the input and views provided by the survey respondents and does not include any analysis or opinions from the European Commission.

# 2. Survey on Administrative Burden of European Partnerships in Horizon Europe

## Respondents background

The survey collected 79 answers in total from Member States (MS) Representatives and European Partnerships' representatives.

		Answers	Ratio
Co-funded Partnership		36	45,57%
Co-programmed Partnership		8	10,13%
Institutionalised Partnership		9	11,39%
Member State/Associated Country		26	32,91%
No answer		0	0,00%

The MS representative respondents are 26 in total, but only 24 declared their nationality and some countries provided more than one answer to the survey.

Country	N. of answers
Austria	1
Belgium	1
Croatia	1
Czech Republic	1
Denmark	1
Estonia	1
Finland	1
France	1
Germany	5
Greece	1
Italy	2
Malta	1
Norway	1
Poland	1
Portugal	1
Spain	1
Sweden	1
The Netherlands	1
Türkiye	1

The EU Partnership respondents are 53 in total, with the majority representing the Co-funded partnerships.

Type of Partnership	N. of answers
Co-funded	36
Institutionalised	9
Co-Programmed	8

## Looking Back

### Comparison of complexity between Horizon Europe (HE) and Horizon 2020 (H2020)

The question posed was: “Compared to corresponding schemes under the previous Framework Programme (H2020) do you think the administrative burden for the European Partnerships has increased?”

		Answers	Ratio
Yes		70	88,61%
No		9	11,39%
No answer		0	0,00%

70 respondents out of 79 answered that the administrative burdens have increased in comparison with the previous funding schemes.

- 23 MS/AC
- 32 Co-funded
- 7 Co-programmed
- 8 Institutionalised

### Typology of partnership

For the typology of partnership for which burdens were met, the respondents could choose from the three types or provide no answer. a multiple choice was possible, and the results are as follows:

		Answers	Ratio
Co-funded		55	60,44%
Co-programmed		12	13,19%
Institutionalised		15	16,48%
No answer		9	9,89%

### Comments provided

Respondents provided comments in the open box where it was asked to add any information considered useful to complement the answer.

59 respondents provided argumentative comments in the box. Comments were grouped per type of partnership. However, comments belonging to partners who represent more than one type of partnership have been included in the Co-funded partnership comments section.

## Comments related to **Co-funded Partnerships**

**Multiannual programmes and different grant agreements:** this is reported as a source of great complexity in several aspects, from setting up the consortium, drawing up the budget, to managing and monitoring the grant agreement and the consortium agreement. The Multiple grant agreements also requires reporting costs separately for each grant agreement and this is increasing the management effort and complexity. ●●●●

**Lack of budget flexibility between the grant phases:** it was pointed out that the gap can only be bridged with amendments, which also contributes to a high administrative burden and an increased risk that the planned co-fund cannot be optimally utilized resulting in a high underspending of the co-fund. ●●

**Coordination activities that overlap with the subsequent grants** must be split and attributed to one grant or the subsequent, which is iterative and difficult to split clearly. The need for annual work plans and the repeated submission of new proposals is considered excessive. ●●●●

Other issues raised are:

- Low reimbursement rate for direct costs (30%, sometimes 50%) => Reimbursement rate for direct costs under H2020 is usually 100% (e.g., CSA) ●●
- Personnel costs are calculated based on a rounded half days for each person. This makes calculating costs on WP level hard and inconsistent. ●
- The possibility to include in-kind activities and in-kind contributions into a framework not made for this type of collaboration presents challenges. ●●
- Lack of clarity in definition and eligibility on "in-kind commitments": a concern was raised that Co-funded partnerships embark on huge and risky "financial experiments" in the hope of securing "in-kind commitments" that no one can be certain will ultimately be eligible or survive an audit. This is also detrimental for Research Performing Organisations to participate in future partnership. ●●
- Lack of clear guidelines for the implementation of the HE and structural Funds regulations' provisions, regarding the synergies between HE and Structural Funds and RRF, including the implementation of article 25c of the state aid rules (Block Exception Regulation). ●●●●●●●●

**Consortia are much bigger** than in ERANETs, JPIs and EJPs and this increases significantly the time needed for dealing with any operational matters. In addition, a doubling or even tripling of beneficiaries in a co-funded action leads to more internal coordination work. Since the co-financing rate is very low, it is difficult to find partners who take over work packages. Experience from the initial two years shows that a discussion is needed whether large project consortia with 60+ partner organizations really bring the expected added-value and support co-creation.

Whereas having the large number of funding agencies may be beneficial for the implementation of joint calls, many of these organizations simply do not have sufficient resources or capacities to engage in additional activities, apart from the joint calls. Management costs are also considered too high and effort demanding. ●●●●●●

**Affiliated Entities (AE):** for beneficiaries it is an additional administrative burden to be responsible for their AE. The existing link between Beneficiary and AE has to be evidenced and the data of the AEs has to be included in the Funding and Tender Portal. At National level, a Cooperation Agreement between beneficiary and AEs has to be implemented in addition to the Consortium Agreement. ●

**Call management:** it is more complex than before. Calls procedures overlap due to calls being launched every year and more bureaucracy is visible (e.g., detailed reporting for standard activities). Additional eligibility and evaluation criteria in the Joint Transnational Calls have been incorporated, such as the ethical evaluation and redress procedure that are now mandatory. The implementation of all steps required (scientific evaluation in two steps, redress, rebuttal, ethics checks) requires a lot of time. A call cannot last less than one year, a very long period for an R&D project. An Institutionalised Partnership reports huge complexity for single stage calls in comparison with its predecessor in Horizon 2020: in particular, eligibility for funding and different funding mechanisms and various types of participants that contribute to projects. ●

**Conflicts of interests (Col):** the need to consider potential Col and the lack of suitable guidelines for the inclusion of both Research Funding Organisations and Research Performing Organizations within the same consortium (while this is expressly wished in the new partnership scheme) for the avoidance of Col is considered a burden by several respondents. ●●●

**Gaps and overlap in reporting timing:** activities are more complex as well. In some comments emerged the problem of different reporting periods (month 1-20, month 1-24) which led to a 4-month gap in reporting. The overlap between grant agreements is reflected also in the periodic reporting. Coordination costs as actual costs (for personnel) instead of Unit Costs put a cumbersome burden on the participating Funding Agencies, which usually deal with several partnerships simultaneously. ●

**Deliverables submission** in a Partnership, before submitting a deliverable, there is the need to discuss it with the coordinator and EC officer, which is time consuming. During the yearly Review some Deliverables that have already been submitted can become subject to rejection again, which requires additional time to rewrite and resubmit it. ●

**Widening countries participation:** none of the Partnership is coordinated by a Widening country representative, this is also due to the complexity and administrative burden of the new Partnerships. Even considering that ERA-NET Co-funds in H2020 were less complex, only 4 ERA-NETs were coordinated by widening countries (Poland and Portugal). There is only a tiny number of organisations that can act as coordinators, and these organisations come from only four or five EU countries. The representation of the EU13 has also declined, even where they are formally listed as partners, their \*real\* involvement has declined further as they lack the capacities necessary to participate substantially. Small countries sometimes do not have the critical mass of stakeholders to join the partnerships. ●●

### Comments related to **Co-programmed Partnerships**

The number of fora in which partners are requested to participate causes an increase of the efforts: InterPartnership Assembly, Partnerships Knowledge Hub, request for multiple synergies with other Partnerships and initiatives (e.g., road-maps developed by the EC -or sectorial consultations), etc.

**Rationalisation/harmonisation:** the attempt to rationalise/harmonise procedures among different types of partnerships (co-funded, co-programmed, institutional) lead to a lot of misunderstanding (involvement of MS funding, commitment from private members) and these generated administrative activities provide a low added value to the (co-programmed) partnerships activities as such. ●●

### Comments related to **Institutionalised Partnerships**

**“Simplification does not automatically mean harmonisation”:** the more developed 'one size fits all' approach (notably via one Single Basic Act for the institutionalised partnerships) has increased the administrative burden and has not allowed to adequately consider the specific objectives, expected outcomes, governance and funding model of each partnership, creating a misalignment between the legislative approach and what the programme is meant to be. The SBA also captures too many operational details, not providing the necessary flexibility during programme implementation. ●●●

**Additional requirements:** the administrative burden has drastically increased from H2020 to HE, related to monitoring and reporting, supporting EU policies, synergies, etc. with completely new requests (e.g. in-kind contributions to additional activities -IKAA- and in-kind contributions to operational activities -IKOP-), requiring a commitment (both in time and resources) which is going far beyond what was implemented in H2020. ●●



**KPIs, Common Indicators and reporting:** several respondents reported difficulties in dealing with KPIs reporting. Partnerships need to report on a third level of KPIs, the HE Partnerships Common indicators, in addition to the already existing 2 levels (general H2020 KPIs and the partnership specific KPIs). While these HE Partnerships Common indicators have a valid objective to collect harmonized data from all partnerships to understand better their contribution to the HE, some of these KPIs are not well defined and are not appropriate for all types of partnerships. The decision to have a common set of indicators from all partnerships only results in an artificial aggregation of data that does not support monitoring of the achievements of the different partnerships since it is not compatible information. Moreover, these KPIs are reported both annually (in the AAR) but also every two years, with additional different questions, for the Biannual Monitoring Report (BMR). Additionally, the reporting on general HE Key Impact Pathways is also very problematic, since no direct access has been given to the partnerships to the HE dashboard that collects this data and as a consequence, additional efforts need to be invested by the JUs to compile and verify this data. In addition, some medium- and long-term indicators do not seem to refer to any data systematically collected in the system, so it's still uncertain how to report on them at later stages. ●

## Current Situation

### 1. Burden preparing the Partnership






The section aims at identifying which administrative burdens arise in the preparation phase of a partnership.

The answer could be expressed on a score from 1 (very limited burden) to 5 (very huge burden).

#### Access to information templates

There are 77 respondents.




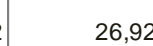

The intensity of the complexity in accessing information templates was perceived as follows (**average 3,34**):

		Answers	Ratio
1		3	3,90%
2		16	20,78%
3		22	28,57%
4		24	31,17%
5		12	15,58%

#### Complexity of requirements

There are 78 respondents.

The intensity of the complexity of requirements was perceived as follows (**average 3,85**):

		Answers	Ratio
1		2	2,56%
2		4	5,13%
3		19	41,03%
4		32	26,92%
5		21	26,92%

#### Other burdens related to Partnership preparation

Respondents provided comments in the open box where it was asked to add other burdens related to preparation of partnership. 47 respondents provided argumentative comments in the box. Comments have been grouped per type of partnership. However, comments belonging to partners who represent more than one type of partnership have been included in the Co-funded partnership comments section.

## Comments related to Co-funded Partnerships

**Harmonisation:** call requirements, structure and format of governance are not harmonised among Partnership thus leading to uncertainties as well as requiring additional effort to cope with. The relative novelty of the instrument and the inclusion of a variety of (new) beneficiaries also requires attention. ●●●●●

**Resources required:** the coordination of the process preparation of the Co-funded Partnership implies the accomplishment of several tasks (i.e. drafting the guidance proposal, preparation of SRIA, setting up the consortium, writing the final proposal, drafting first Annual Work Programme, defining financial commitments) in a very short period of time. This requires a huge amount of resources due to the complexity of the tasks, the number of partners involved, the necessity of conducting consultations with relevant stakeholders on both the national and international levels, and the achievement of the very ambitious goals, including participating to several meetings where it is expected for the partners to cover the travel expenses on their own. Project preparation could be very demanding for coordinators and members of the core group. The high complexity of partnerships is introducing a factor of discrimination among bigger and smaller countries and among countries with more flexible Human Resources policies. ●●●●●●●●●●

**Co-funding rate:** it is too low, this results as a practical obstacle for some organisations and countries to join partnerships, as finding the required in-kind co-funding and securing it may be difficult. ●●●●●

**Calculation of co-funding rate:** the obligation to have the % of the EC co-funding calculated per partner in the GA is really confusing for partners as it is not the last real case and adds major complications to the internal budget construction and acceptance. ●

**Financial commitment/budget flexibility:** at the partnership preparation stage a long-term financial commitment by funding agencies is required. The national contribution must be agreed at the national level requiring long procedures that may result in late confirmations of financial commitments. Commitment in a long-term perspective does not allow budget flexibility and adaptation to the needs and trends that arise during the implementation. Further financial commitments/adjustments should be allowed during the programme implementation phase leaving funding agencies more flexibility in financial planning. To this extent also better coordination and communication between EC and MS can be recommended. ●●●

**Application form/proposal template:** information required are extensive and sometimes redundant (e.g. work package description, tables on person month distribution, other direct costs, subcontracting, etc. repeated on the template and onto the portal) and some of it might not be necessary, since Annual Work Programmes have to be developed anyway at a later stage based on the SRIA. Template filling thus increases the risk of making mistakes, especially for

partnerships with many partners. Part B of the proposal and the Annual Work Plan template should be aligned. Not all templates or guidelines are clear. Additionally, application form/proposal template could be better adjusted to partnerships since some information requested (also in Part A of the proposal) is not suitable for partnerships. The limitation to 70 pages is unrealistic considering that already the number of budget tables can be considerable in partnership with many partners. ●●●●●●●●●●

**F&T Portal system:** when preparing a proposal, the system/interface does not support multiple people working on it at the same time (notably when entering financial information) and quite often information is lost and has to be re-entered multiple times. Also, it is not possible to transfer all the information entered in the submission for the grant preparation, which means the same information has to be re-entered again. The system should be better adapted for huge consortia proposals (i.e. currently it was possible to download the submitted proposal only 7 weeks after its submission). ●●●●●

**Experts:** recruitment is now more difficult to achieve, due to the higher number of Joint Transnational Calls launched at the same time and the need of additional experts to be included in the evaluation (e.g. ethical experts, data management experts, patient representatives...). The necessity of financial compensation of the experts should be reconsidered while preparing the partnerships, to include a dedicated budget if needed. Alignment between the evaluation results from the experts assessing the proposal and the requirements of the implementing agency following the proposal evaluation would make the contracting process much smoother. A single database of experts could also help. ●

**Grant Agreement and contract signature:** it takes more than one year from call publication (either for GA or amendment) to contract signature. As the contracted period covers an average of two years, partnerships are forced to either finance running activities ahead of contract signature that might be deemed ineligible (with the risk that national budgets will not be able to be allocated in the absence of a contract) or wait for contract signature before launching activities (with the risk of not using national budgets for the first year). Additionally, many requirements after the proposal phase can also delay the implementation, which in turn has an impact on the availability of national funding, as each country is subject to its own regulations (e.g. budget restrictions). ●

**National laws and state aid rules:** overarching framework of national laws relevant to funding and state aid, results in difficulties for the co-funded partnerships to fit with the corporate rules and therefore influence general participation and in particular the funding of enterprises in partnerships. ●

**Consortium Agreement:** too much freedom in the drafting of consortium agreements seems inefficient in terms of aspects such as the structure of each partnership, its governance or financial procedures. Consortium Agreements takes months or years to agree on and we need to comment, correct and consult our legal departments on very long documents, which are very similar but sufficiently different to make all of us revise them thoroughly. This multiplies the work. ●

**Timing uncertainties:** it is impossible to plan budget and/or communication activities if the timing (launch of the partnership/call) is not fixed and the start of the projects suffers from various technical obstacles. ●●●●

#### Comments related to Co-programmed Partnerships

**Resources required:** as one respondent recalled, the preparation of the SRIA required the efforts of more than 200 persons involved in several working groups and workshops along 3,5 years. The preparation of the concept note of the Partnership took around one year. ●●

**The process of drafting the MoU:** it proved to be quite long and complex, especially on reporting and when it came to establishing the KPIs, which presented significant difficulty. Respondents really appreciated receiving expert advice during the initial BMR reporting phase on KPIs, although it would have been even more beneficial had it been available earlier (comments and concerns regarding the MoU and the monitoring processes were not properly considered despite various exchanges). ●●●●

**The definition of Key Performance Activities:** it has been very challenging, with a lot of confusion on what should be objectives, targets, KPIs ... leading to a fixed very complex monitoring framework. ●●

**Templates** were not commonly defined, and there was a clear lack of information on the expectations, despite several requests to get more specific information. ●

One respondent commented that it is not clear how the MS can give input, feeling that there is a lack of transparency, leading to the impression that industry does what they want without taking into account the needs of the targets.

#### Comments related to Institutionalised Partnerships

**Harmonisation/Rationalisation:** the demands and the related workload (in line with the Partnership's ambition, scope and budget) are not complex, but repetitive and not coordinated. ●

**Access to information:** the main challenge was the lack of clarity on legislation, and the absence of dialogue with EC central services which left limited ground for discussion, inexistent access to official information and extended delays. The late adoption of the Single Basic Act and uncertainties around key concepts, impacted on the start of the programme / budget execution (e.g. call conditions). ●●






**Templates and guidance documents:** templates, guidance documents and tools have been regularly made available too late (e.g. rules of procedures, phasing-out plan), moreover till a range of key templates and guidance documents are not available yet (e.g. IKOP and IKAA). ●

## 2. Burden implementing the Partnership

### Access to national funding organisations

There are 63 respondents.






The intensity of the complexity in accessing to national funding organisation was perceived as follows (from 1, very limited burden to 5, very huge burden) **(average 2,67)**:

		Answers	Ratio
1		17	26,98%
2		7	11,11%
3		25	12,70%
4		8	9,52%
5		6	9,52%

### Need to comply with differentiated rules at national and European level

There are 66 respondents.

The need to comply with differentiated rules at National and European level was perceived as follows (from 1, very limited burden to 5, very huge burden) **(average 3,48)**:

		Answers	Ratio
1		5	7,58%
2		12	18,18%
3		12	30,30%
4		20	25,76%
5		17	25,76%

### Comments provided

Respondents provided comments in the open box where it was asked to add other burdens related to implementation of partnership.

45 respondents provided comments in the box. However, 8 of them declared that, as Institutionalised partnership, this section is not relevant to them since there is no access to national funds. Three respondents are still in the preparation phase and therefore did not provide any comments. Additionally, two comments were reported twice. Comments have been grouped per type of partnership. However, comments belonging to partners who represent more than one type of partnership have been included in the Co-funded partnership comments section.

## Comments related to **Co-funded Partnerships** (and other types)

**Applicants' perspective constraints:** setting up a project consortium to apply to the co-funded partnerships implies facing several constraints due to the different national rules regarding topics funded, additional and/or specific requirements at the national level, differences in funding rates, categories of eligible costs, synchronization of contracts etc. ●

**Resources required:** partners are required to carry out several activities at the national level (i.e. consultations with national stakeholders and scientific experts (establishment of mirror groups) to provide national input to the guidance documents/ statements/ databases/ policy guides developed by the Partnership, invest in communication activities, consult applicants, perform eligibility checks, make funding decisions, prepare contracts, consult grantees, etc.) which are very time-consuming, thus requiring considerable in-kind contribution. The workload for the funding agencies increases each year since new calls for proposals (one every year) add new tasks on top of tasks related to previous calls. Additionally, cross-functional activities such as coordination, communication, data management, etc. are insufficiently co-financed, which make difficult to find partners to carry out these activities and adds complexity to the internal budget rules and management. At national level, coordination of different funders must be assigned to someone as well as monitoring of the participation. ●●●●●●●●

**Widening countries:** the difficulties to get in contact with relevant pre-existing network, the number of tasks required as well as the in-kind contribution needed, results in discouraging active participation of Partners from smaller, underrepresented countries. ●●

**Harmonisation:** respondents detected differences in management of partnerships depending on the assigned executive agency (e.g. differences in number and duration of GA's; differences in (reporting) requirements, difference in implementation of different project phases / sub-grant / budget lines). When reporting, each partnership is using different excel files with a slightly different approach and excel formula to calculate the use of national budget and the EC top-up for third parties. Some partnerships use the ERA-Learn tools, which are very good. A single cost-efficient metadata Electronic Submission System (ESS for joint calls) available for all Partnerships would be beneficial for all actors. Common rules and clear EC requirements (i.e. guidelines, reporting phases, budgets, top-up distribution) would be desirable. ●●●●●

**Multiannual programme and different grant agreements:** the structure of subsequent grant agreements does not allow EC co-funding to be carried over from one period to the next. This disrupts continuous and cross-period activities within the partnerships, thus affecting their potential impact. ●

**Lack of budget flexibility and budget management:** the requirement to keep activities funded separated per Work Programme (e.g. activities funded under WP 21-22 separated from those funded under WP23-24), introduces budgetary rigidity in the implementation of co-funded partnerships that can lead to underspending across the 7 years of the programme and therefore to limit its impact. The management of the budget is identified as a major barrier (size / number of partners and the need for different rates of internal co-financing). The EC tools and funding rates for partnerships needs more flexibility and adaptability to better support the activities and budget management. The need for internal budget management and the separation of budgets

per partner create challenges in explaining and managing the overall budget effectively. The negotiation on the internal reimbursement rates, or implementation of new common funding rules may be challenging notwithstanding the good relationship among partners. ●●●

**Grant agreement amendments preparation is extremely labour intensive;** the level of details required for preparation as well as during the back and forth on deliverables and amendments can be too extreme, especially for large-scale partnerships. Responsiveness to existing and highlighted problems is lacking and raised issues are not being sufficiently acknowledged, leading sometimes to more/additional problems. ●●

**Synergies of funding:** there is a lack of concrete mechanisms for creating synergies between funding programme under HE and funding from other European programmes, either at the level of activities or/and at the level of expenditure. Using RRF for the co-funded partnership financing implies some additional administrative requests such as DNSH review, limited time frame. It also has different rules of financing from cohesion policy. ●●

**Cascade funding:** the EC platform is not designed for a smooth follow up of the cascade funding. The collection of information on cascade funding should be simplified. ●

**Reporting and monitoring:** those two activities are reported to be time-consuming by several respondents, simply due to the size of partnerships (with 50 partners or more). Granting and reporting procedures have to be delivered on European and National level in different formats and languages. ●

**Templates:** each partnership has its own organisation rules in supporting information and unique mechanisms for their implementation. Management templates availability and support in monitoring would be desirable (i.e., clear templates for some important documents like SRIA). ●●

#### Comments related to Co-programmed Partnerships

Access to national funding organisations and need to comply with differentiated rules at national and European level does not apply to co-programmed partnerships.

#### Comments related to Institutionalised Partnerships

Access to national funding is not applicable to Institutionalised partnership. However, a range of implementing provisions have increased the burden (e.g. preparing the Basic Ordering Agreement, preparing a phasing-out plan, etc.). Rules for in-kind valuation in HE are not in line (and are much more burdensome) than most national rules for valuation of contributions at national level.








### 3. Burden in monitoring and reporting the Partnership

#### Double reporting requirements due to multiple streams of funding being used, e.g. national and EU

There are 66 respondents.






The burden in double reporting requirements due to multiple streams of funding being used (e.g. national and EU) was perceived as follows (from 1, very limited burden to 5, very huge burden) **(average 3,56)**:

		Answers	Ratio
1		5	7,58%
2		12	18,18%
3		12	30,30%
4		20	25,76%
5		17	25,76%

#### Obligation to transmit information on projects funded (co-funded partnerships) and additional activities carried out (co-programmed and institutionalised partnerships) to the EC

There are 73 respondents.

The burden related to the obligation to transmit information on project funded and additional activities carried out to the EC was perceived as follows from 1, very limited burden to 5, very huge burden **(average 3,60)**:

		Answers	Ratio
1		5	6,85%
2		5	6,85%
3		25	23,29%
4		17	28,77%
5		21	28,77%

#### Comments provided

Respondents provided comments in the open box where it was asked to add other burdens related to monitoring and reporting the Partnerships.

39 respondents provided comments in the box. Two of them are still in the preparation phase and therefore did not provide any comments. Comments have been grouped per theme and per type of

partnership. However, comments belonging to partners who represent more than one type of partnership have been included in the Co-funded partnership comments section.

#### Comments related to **Co-funded Partnerships** (and other types)

**Multiple reporting requirements towards specific EU reporting exercises:** reporting different metrics and in different formats into multiple EU reporting schemes (e.g. BMR, mid-term evaluation, Annual Summary Report (ASR), Annual Work Plan (AWP), Periodic technical and financial report (PTFR), Strategic Research & Innovation Agenda (SRIA)...) adds to the administrative burdens of Partnership coordinators, diverting resources away from other tasks.

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**Double reporting requirements due to multiple EU funding decisions:** the need to separate activities by EU funding decision/work programme also adds complexity to the reporting, where each funding decision needs to be accounted for separately. This means that each Partnership needs to keep two accounting ledgers: one to be reported on through SyGMa (as only programme-level reporting is possible on the platform) and one to feed periodic reports (where work programmes need to be distinguished). As a result, for each funded project under each of the seven planned joint calls, comprehensive information for Partnership Monitoring (under Financial Support for Third Parties – FSTP) must be provided electronically and typed in manually in SyGMa. There is NO possibility to filter data or to upload already existing files in the Continuous Reporting System. As for co-funded partnerships with annual joint calls, this could lead to thousands of entries to be handled and updated manually. All this information can be provided in a lot of different formats, without the need to type them in manually. Submission system and SyGMa are not suited to the specificity of co-fund partnerships, which are not 'standard' HE projects. ••

**Double reporting requirements due to separation in sub-grants:** for the implementation of the action this means now that the Grant Agreement will include one overall budget table (Phase 1+2) but only for illustrative purpose as in fact this budget table is not applicable due to the separation into two sub-grants. For the use of co-fund this means that any co-fund not triggered and used in Phase 1 is lost and cannot be used by the consortium for later calls. This “rule” was even more tightened when in February 2024 the respondent Partnership was informed that no amendments to Phase 1 may be made. For the EC Reporting this means that we will have de facto two separate reports for each sub-grant included in one document; all deviations must be justified separately for each sub-grant; this means that the reporting efforts for each report are doubled. A co-funded Partnership reports that distinct internal management of costs for each “sub-budget” instalment have been suggested as to adequately report during the action lifetime at each reporting period and to reflect in a transparent way that no shifts of budget or over-reporting was done. ••

**Double reporting of in-kind and EC contributions:** separate reporting of in-kind and EC contributions also results to be an additional burden. The modalities for reporting in-kind contributions at the national level vary from country to country, and there is usually a lack of clear guidance from the EC and Ministries of Finance on how to account for these contributions. ••

**Parallel implementation of different grant agreements:** this implies that some activities will be carried out in parallel (common timeline) but are in two different phases. Reporting each phase separately will require to implement a reporting template at the sub-task level for a high number of partners. More consideration should be given to the scheduling of monitoring/reporting requirements and timelines and submittals deadlines for contractual deliverables by the coordinating EU agency. In the current situation several of the reporting periods are scheduled parallel with the preparation of the annual work plans (contractual deliverable), which puts an unproportionable high workload and administrative burden on all partners. ●

**Exchange rate:** considering the participation of partners coming from non-EUR area, differences in EUR exchange rate occurred depending on reporting period. The figures might change significantly between the reports, although the basic data in national currency is the same. ●

**EC project management:** it is not designed for the management of multi-annual, international research and innovation programmes, as they are far more complex in (financial) management. At the same time, the co-funded partnerships are reviewed more often and are more prone to detailed checks by the EC. ●

**Common understanding of in-kind commitments** (i) within the EC, between policy officers and financial/admin staff and (ii) between the EC and the executive agencies. The executive agencies are so afraid of making mistakes that everything is being micromanaged to the point of gridlock. ●

**Reporting of Additional Activities (AAs):** the current level of complexity of the reporting of AAs is extremely high at individual member level. Templates and definitions are missing. This leads to a burden towards the members of the Partners other than the Union, as each member has different structuring in internal reporting as well as different levels of confidentiality on planned investments. A common simplified structure would be needed including globalising data in groups of information. ●●●

**Synergies with other programmes:** the lack of knowledge, information or awareness about the possibility to implement synergies with other funds (e.g. European Regional Development Fund - ERDF) at the decision-making bodies level is perceived as a hindering factor, along with the timing mismatch between Calls/Programmes (different timing in the launching of the calls). ●

**Data transfer:** partnerships are required to send datasets on proposals and projects also in a machine-readable format (XML file). However, very insufficient technical information/guidelines and training has been provided, and no testing server has been made available, translating in several failures and therefore additional burden. In addition, the lack of API or bulk integration of project data adds to the burden. Additionally, the datasets required by the EC lack clear guidance on and definitions of data that needs to be transferred to the EC on projects funded. The complete definition of the data fields and their applicability to the Partnerships was provided very late, impacting the activities and resources. ●●●●●●●●

**Platform EMDESK:** it seems not suited for the financial reporting of a large co-funded partnership, at least at this point and development stage of EMDESK. ●

**Interim payments and monitoring:** submitting a new proposal to get additional funding every 2 years is heavy and delays interim payments. Annual reporting exercise to monitor budget consumption (in addition to the reporting required by the EC) exerts additional workload. ●

### Comments related to Co-programmed Partnerships

**Monitoring:** it is a substantial burden for co-programmed Partnerships since it consists of at least two separate and extensive monitoring processes which are run by more than one partner; each survey requires detailed and challenging-to-obtain information; country-level monitoring requires liaising with national public institutions, which already experience “survey fatigue”. The internal Partnership monitoring does not well-align with the requirements of the overall European partnership monitoring system (for instance, biennial monitoring of partnerships, full monitoring report, common indicators etc.). As no common methodology was used to collect information on the common indicators across partnerships, the results of the monitoring exercise only give little value as they are not comparable, despite the huge staff effort applied. One respondent reported to have two monitoring mechanisms in place, and these are not aligned: on one hand, the Partnership Association member organisations report annually, and on the other hand, MS provide data to annual Steering Board (SB) monitoring survey. Respondent request less detailed, more macro-level, monitoring requirements, to have a more global vision of the action and its impact, and its management, particularly in terms of budget. ●●

**Redundancies in reporting:** several redundancies between the different inputs required have been noticed such as in the IKAA-survey, the BMR-survey, and the 1st Full Biennial Monitoring Report. ●●●

**Sensitive data in monitoring:** monitoring processes are focused on financial aspects, requiring aggregation of monetised contributions that are deemed sensitive; not all the institutions asked to provide the data are willing to disclose them due to their sensitive nature (and hence these contributions cannot be captured by the national monitoring). In general, the information of on-going investments are considered as confidential by the industries, being related to competitiveness, so it is difficult to get it unless an investment is already public. It is especially difficult to get the information from affiliates and from other beneficiaries of Partnership which do not have a direct link to the Association and do not feel obliged to provide it. ●●●

**Additional and Operational Activities:** monitoring is highly time consuming. The request to have yearly planning and yearly reporting is generating a lot of confusion for members and make it very difficult to get the proper information. The distinction between IKAA and Investments in operational activities has never been properly clarified and is adding an extra layer of complexity and administrative burden. ●●●●

**Reporting templates:** templates were not established in advance, leaving uncertainty about which sections of the Full Monitoring Report (FMR) will be provided by the EC. Consequently, compiling the report has become confusing. Additionally, the deadlines have not been clearly communicated, adding to the challenge. Furthermore, the templates provided by the EC often do not align with the intended objectives of the specific report. For instance, with IKAA report, the emphasis in the template tends to lean towards financial aspects, while at the same time, partnerships are expected to focus predominantly on content-related impact and leverage. ●●●

**Country/Partnership Fiche:** it is not well-designed for Co-programmed partnerships lacking essential aspects and elements of in-kind contributions. ●

#### Comments related to Institutionalised Partnerships

**Specific tools for monitoring/reporting:** Institutionalised partnerships representatives report on the need to develop ad hoc tools or to carry-out manual monitoring / reporting (e.g. IKAA, non-EU in kind, specific JU KPI) and the misalignment between some reporting deadlines (e.g. IKAA). ●

**Simplification:** to ease the reporting exercise for members (for SME and non-profit organisations, such as UNIs and RTOs) simplification of the IKC/IKAA framework should be investigated and the certification requirements for IKAA need to be more flexible. ●●●






**Access to information:** how the requests are communicated from the EC seems too complex, with multiple loops of transmission within the EC before being send to the JUs. Also, requests are made without any background or rationality, making very difficult to establish the kind of information that is more suitable to answer the request. ●●

## 4. More general burden in reporting the Partnership

### Lack of clarity in reporting requirements

There are 73 respondents.






The lack of clarity in reporting requirements was perceived as follows (from 1, very limited burden to 5, very huge burden) (**average 3,89**):

		Answers	Ratio
1		1	1,37%
2		4	5,48%
3		19	36,99%
4		27	30,14%
5		22	30,14%

### Too high frequency of reporting

There are 71 respondents.






The answer could be expressed on a score from 1 (very limited burden) to 5 (very huge burden) (**average 3,24**):

		Answers	Ratio
1		5	7,04%
2		13	18,31%
3		27	16,90%
4		12	19,72%
5		14	19,72%

### Too much information/details to report

We have 72 respondents.

The answer could be expressed on a score from 1 (very limited burden) to 5 (very huge burden) (**average 3,57**):

		Answers	Ratio
1		6	8,33%
2		5	6,94%
3		20	33,33%
4		24	23,61%
5		17	23,61%

## Comments provided

Respondents provided comments in the open box where it was asked to add general burden in reporting the Partnerships.

44 respondents provided comments in the box. Two of them are still in the preparation phase and therefore did not provide any comments. Comments have been grouped per theme and per type of partnership. However, comments belonging to partners who represent more than one type of partnership have been included in the Co-funded partnership comments section.

### Comments related to **Co-funded Partnerships** (and other types)

**Frequency for Reporting:** Reporting annually is considered an excessive effort for the coordinating organisations. The periodic reporting and Annual Work Programmes are 2 ways of reporting, which are not aligned in terms of timing. A combination should be considered (also taking into account e.g. that Annual Work Programmes must be submitted a couple of months before the start of the year in question). The burden to compile the Annual Work Programme in huge consortia is disproportionate compared to its duration of 1 year; one could consider having Work Programmes for 2 years (potentially then better aligned with periodic reporting). Also, the review by external evaluators, could be run every 2 years, instead of once per year, in order to decrease the administrative burden for the consortia and to allow a suitable evaluation with more time for implementation and monitoring. The submitted deliverables along the year could help to monitor the development of the work planned. ●●●●●

**Excessive and unaligned reporting:** On the reporting, a Partnership can provide progress reports every 6 months (as example), periodic reports for every pre-financing event (every year), is supposed to send data reports on projects funded every month, completes 2 BMR exercises every 2 years, and has so far contributed to several ad-hoc reporting requirements from the EC. These exercises involve intense periods of work that follow in quick succession, taking up significant bandwidth from the coordinator. ●●●●●●●

**Unmanageability of multiple grants:** reporting personnel costs for Funding Agencies dealing with several partnerships and often lacking of dedicated grant offices/officers lead to extra burden and high probability of reporting errors. Simplification in the reporting structure (by applying standard unit costs) would ease the burden. ●●●●●●●

**Lack of clarity in reporting requirements:** as co-funded partnerships are considered a standard HE project, they are subject to the same

reporting requirements as other HE projects, without taking account of the special conditions of co-funded partnerships. This led to a situation where during preparation of the first interim report issues arose where the reporting details could not be provided as requested (FSTP tab), and the co-funded partnerships again had to rely on what type of adjustments their project officer would accept or not. ●●●●●●

**Audit Timelines and Guidelines:** the absence of audit guidelines creates concern of the organisations that might be subjected to second level audits. Some respondent stated that conducting an audit of all expenses solely at the partnership's conclusion, as foreseen in the Partnership Grant Agreement, is very risky given the extended duration of the action. Systematic mistakes would only come to light at the partnership's end, resulting in significant financial risk for the whole consortium. Moreover, many of the third parties financed through the calls might no longer exist at the point of the audit, with unclear consequences for the Partnership's financing. In the previous incarnation of the Partnership annual audits were implemented, giving partners (which are national public authorities) much needed reassurance regarding their financing. Two respondents, on the contrary, found not efficient annual audit also because audit is usually performed by private firms, often foreigner, which are not familiar with the administration rules or HE developments. ●●●

**Reporting tool:** it is not user-friendly, it is long and notifications are not clear. The communication channels used by the system are not very user-friendly and do not clearly identify who should do what when. ●

**Personnel cost reporting:** few respondents call for more lump sum or unit costs, especially for personnel costs, and to facilitate fungibility between different categories of expenditure. Other respondents consider the introduction of lump sum as an additional unnecessary burden. In fact, it requires the accounting teams to become acculturated and creates new difficulties for setting up projects (division into lots). Other respondent stated that concerning the monitoring and reporting of costs the rounded half-day approach (personnel costs), it did not simplify, it leads instead to discrepancies with established tools and to more effort. ●●●●

#### Comments related to Co-programmed Partnerships

**Disclosure of information when reporting:** reporting may reveal sensitive information and be quite difficult for large stakeholders/industrial partners in particular. First, those organisations can be considered as competitors, both as private companies and even as research institutes competing for same contracts. Even sharing a version with names only with the EC might require the explicit consent of those that have provided the data. Then, based on regulation related to the disclosure of business information by listed companies, any information that is considered to potentially have a material impact on the trading price of company shares needs to be disclosed to the whole market (current and potential future investors) at the same time and with the same content. If a listed company as a part of the Annual Activity Plan reports on company initiatives with a strategic nature and of an estimated major business impact, such reporting would potentially be considered as having an impact on the share price. Some data can simply not be monitored without infringing legal confidentiality rules of companies (i.e. reporting additional activities and investments of partnerships members who are not partners of funded projects). ●●●



**Reporting frequency and EP specificities:** the indications for the different reports were often contradictory and not considering the diverse realities of each type of Partnership and their MoUs. Reporting has moved from one report a year plus one report for the mid-term review of the programme to 3 or 4 reports a year plus a number of reports on the Framework Programmes (H2020 and HE). In a case of a co-programmed Partnership, its monitoring is based on a Steering Board Survey which takes place annually. Every two years would be enough as specific theme of the Partnership landscape does not change that much in one year. Data collection is quite detailed but it is somewhat unclear what kind of impact the collected data will actually have on partnership scientific topic and the development of the Partnership itself. ●●●

**Redundancies between the different reporting mechanisms:** information are requested more than once (e.g. ICAA-survey, BMR-survey, 1st Full Biennial Monitoring Report). The baselines requested do not consider the R&I developments but the real levels (e.g. of CO<sub>2</sub> emissions) once the innovations are deployed what does not allow for a proper monitoring of the value of the innovations developed by the projects. ●●●

**Harmonisation of reporting:** it was commented that it is up to each Project Coordinator how much effort is needed for reporting from the beneficiaries. For some Partnerships reporting does not bring too much of additional burden while for other Partnerships reporting requirements to the beneficiaries seem to bring a lot of additional burden. Reporting under each Partnership should follow a common fluent process. ●●

#### Comments related to Institutionalised Partnerships

**KPIs:** the number of KPIs against which the JU has to report has increased significantly, e.g. in the Work Programme, Annual Activity Report and Biannual Monitoring Report. The definition of some KPIs and/or the guidance received from the horizontal services is lacking clarity e.g. the JU common KPIs to be reported as part of the annual activity report. Access to systems to report some of the requested KPIs are limited to the EC. ●●








**Partnership Common indicators:** indicators are not always clear and suitable to the partnership; relating to objectives that are not set as an objective in the mandate of the Partnership. ●●

**KPIs reporting time at different levels:** JU Common indicators are reported annually, but also every 2 years again for the BMR. In general, a major difficulty in the reporting on different KPIs is the time lag between the time of reporting and the actual achievement of results. While the projects achieve their outcomes only some years after their start (after the mid time of the partnership), partnership are requested to report from the year 1, when there are hardly any results. ●●

**In-kind contribution reporting for companies:** for companies contributing in-kind and not receiving funding, reporting obligations are disproportionate and a disincentive for companies to commit contributions. In particular, requirements for certification create very significant issues (checking of employee info such as employment contracts, salary slips etc.) that are not in line with the fact that these companies contribute without requesting funding. ●

## Measures to address the burden

Measures considered most helpful in tackling the identified administrative burden in the perspective of the next Framework Programme beyond HE (multiple answers possible):

		Answers	Ratio
A. Simplification of Partnerships typology and Instruments		53	20,87%
B. A single set of (EU) rules for all partnership related projects, including for those with cascaded calls (as is currently the case in Co-funded European Partnerships)		34	13,39%
C. A specific grant agreement for partnerships implemented through Framework Programme grant agreements		47	10,63%
D. Unit costs for additional activities in partnership types where these activities are (partially) reimbursed		27	9,84%
E. Simplification of rules		25	9,84%
F. Targeted/in-depth support and guidance		42	16,54%
G. Other		26	10,24%
No Answer		0	0,00%

### Additional comments from those who selected answer E

Respondents who selected answer E (Simplification of rules) were asked to provide additional comments:

43 respondents provided comments in the box. The comments are related to the followings:

**Single Grant Agreement for the 7-year period:** in FP10 would be desirable to have only one Grant Agreement for the 7-year period without the need to submit multiple proposals or to separate funding decisions. It would: improve delivery of results, take away the administrative burden of writing proposals every two years, give contractual certainty for the most of the Partnership's timeframe, provide with budgetary flexibility between funding decisions (which would make the programme more easily adaptable and would maximise spending within the available allocated EU budget), limit the administrative burden to manage the activities and financing, as well as streamline the reporting by eliminating the need to separate costs by funding decision. Especially important should be to avoid dividing different activities of the partnerships into different specific budgets according to different phases, since this duplicates the reporting and financial management burden for both sides, not only for the consortia but also for the EC/Executive Agencies. It seems inconvenient that the hours for Grant Agreement 1 and Grant Agreement 2 must be broken down separately in the timesheets, even though the work done

forms a continuum and those boundaries between different Grant Agreements are quite artificially constructed. Some respondents mentioned also the preparation phase which could be simplified by using a non-competitive procedure for the application process. ●●●●●

**Simplification/harmonisation:** while most of the participants (at least the funding bodies, ministries and agencies) are the same in most partnerships, each partnership wishes and is free to adopt its own governance structure with different names and attributions for similar decision bodies, its own rules and its own firewalls (e.g. in some partnerships Research Performing Organisations are not allowed to take part in the SRIA development, in other partnerships, the SRIA is in the hands of RPO). Not exactly simplification of EC rules, but even on the contrary, homogenisation of procedures and governance structures of the partnerships (e.g. similar bodies with the same names and competences and firewalls) would help. ●●●●●●●

**Budget flexibility:** in the implementation and follow-up of the partnership and its activities should be allowed flexibility, including budget flexibility. The co-financing rate should not be applied per partner, but only at the global level of the partnership (for the budget and reporting). Compulsory co-financing for universities and non-profit organisations should be avoided since it leads to very complex arrangements. ●

**Unit costs scheme for additional activities:** similar to the ERA-Net previous scheme, the unit-cost scheme for reporting of additional activities would reduce the complexity of the budget management. This is important, taking into account the great number of partners that are included in the partnerships and the necessity for higher flexibility in the budget allocated (e.g. transfer of activities from one partner to another). ●

**Reimbursement rate:** Co-funded partnerships should not be standard HE projects based on actual incurred costs and the acknowledgment of current "internal reimbursement rates" that are applied by some partnerships would simplify the establishment of the budget for the whole partnership and the financial and admin follow up. This would mean that for the proposal submission there should be a possibility to choose a reimbursement rate that would be associated with the type of activity (for example: 100% for coordination & management, 70% for in house research, and 30% for provision of funding to third parties = Co-funded calls). Concerning the reimbursement rate, the 30% is not sufficient to reimburse the work in Work packages adequately. ●●

**Common templates:** common templates for the consortium agreement, budget management reporting would be desirable to clarify and set common rules for the implementation of the additional activities, to simplify the submission process for the top-up amendment. ●●

**In-kind additional activities' plan/report:** respondents detected over-complexity in the template for reporting of the Additional Activities, especially regarding the categorisation of activities into categories 1, 2, and 3. It appears that public funding is solely accounted for in category 1, even when the nature of the activity better fits the criteria outlined in categories 2 or 3. ●●

**Cascade funding scheme:** for the Institutionalised Partnerships a simplification of the cascading rules is needed. For projects requesting very limited amount of funds (e.g. 60k€) requirements are the same as for multiyear and multimillion EUR projects of HE. ●

**Harmonisation of indicators:** the harmonisation in the timing for reporting at different levels (HE general KIPs, HE JU Common indicators, partnership specific indicators) is required along with the adoption of fewer but well defined and suitable key performance indicators. If an aspect is crucial and JUs should deliver on it (e.g. synergies with other EU programmes, instruments, etc.; international participation; contribution to EU policy goals), these should be considered at the time of defining the scope of mandate of the partnerships. If these indicators are defined a posteriori, partnership have no dedicated budget or mandate to put them in place. Additionally, before establishing a new indicator, it should be clear what the aim is, and the feasibility of collecting data to ensure meaningful reporting. If a definition and the way of extracting the information are not clear before establishing an indicator, it should not be established. Well- defined indicators should be established and should be appropriate for each kind of partnership. ●

**Centralised distribution of funding:** centralised distribution of funding and signing the funding agreements on partnership level as been suggested in order to save a lot of workload for funding organisations. That would eliminate the need of double (national and by partnership) monitoring and reporting for projects. ●

**Involvement of Regions:** it is an issue when the regions take part in the partnerships, since the vote becomes a matter of discussion: 1-2-3 votes per country, independently of the number of members from the country, one vote per member, different votes for national or regional founders, each partnership has adopted different rules. Standardised rules could help. ●

#### **Additional comments from those who selected answer F**

Respondents who selected answer F (Targeted/in-depth support and guidance) were asked to provide additional comments.

30 respondents provided comments in the box. The comments are related to the followings:

**Synergies with other funds:** more detailed guidance on using ERDF for national contributions to the partnership is needed. In-depth case studies and community of practice engaging both DG RTD and DG Regio together with the national managing authorities and funding organisations would be appreciated. ●

**Access to tailored information:** respondents request more guidance on how to fit the national in-kind activities and contributions into the framework of the model grant agreement. The guidance should be relevant to the context (different from a regular research project) and intention of the partnership. ●●●●

**Audit:** respondents request to provide more support and tools for a harmonised common ex-post audit methodology considering the special situation of individual discharge of JUs and assurance

needed. Existing guidance and templates are tailored for the specific EC situation and not appropriate for the JUs. ●

**Access to information:** ERA-Learn platform is a good contact instrument but also the help desk should be easier to reach. The provision of timely information and guidance to the stakeholders, participated entities and national funding organisations as well as the training of HE NCPs and state representatives to the different governance structures of all types of partnerships are crucial for the smooth implementation of all the partnerships. The organisation of the workshops provides very limited/initial information. In most workshops, there were no answers at all to very essential questions asked by participants. In addition, HE HELP DESK usually does not respond to interested parties' questions, but even when it does respond in many cases it is with a long delay and even after a specific deadline. Additionally, JU should have direct access to structured periodic information available in EC systems. Several EC system reports are not available for JUs. JUs should be able to create their own queries in corporate systems beyond Corda. The JUs would appreciate to have structured periodic reports for beneficiaries' risk assessment, for in kind contribution accounting and KPIs reporting. ●●●●●●●●

**Operational toolbox:** a toolbox gathering all solution examples/templates/tools should be provided to address all steps of a partnership preparation, implementation and management. This toolbox should be regularly updated with the arising solutions provided by the partnerships (knowledge sharing) + Live training on step-by-step procedures using Scribe or other similar tools. Also, the improvement of the corporate training support to staff and programme participants for enhanced ex-ante controls aligned with HE Control Strategy has been suggested: Webinars or trainings for CFS auditors, frequent training capsules for SMEs/newcomers or for specific topics/best practices for externals and internals. ●●●●

**Eligibility of in-kind commitment:** EC/executive agencies should be able to provide specific - and binding - guidance on the eligibility of specific proposed in-kind commitments, and not just vague ideas about the theory of potential forms of in-kind funding. Procedures should be clear and well prepared from the beginning (e.g., how collaboration agreement should be approved and supported by a JU, tools and methodology for the IKA reporting,...) so that duplicated efforts and unnecessary stressful situations are avoided. Issues such as in-kind cost criteria should be clear when drafting the proposal and more support and guidance at proposal stage required. ●●●●

**Harmonisation:** The involvement of both DG policy officers and agency project officers, or trained and accredited staff, should be constant from the outset, with their full integration into coordination. At their level, a period of reflection and construction of the regulatory structures must be taken before deployment, and the rules should not be the result of ad hoc adaptations to correct an immature architecture. An international group of experts should be set up even before a programme is launched, to look at feasibility and possible frictions with pre-existing national schemes. The implementation of CSAs for the preparation of partnerships is a very good idea that should be systematic. Respondents suggest a centralised management with a single secretariat for partnerships management or at least a single agency for partnerships coordination and to create a "Partnership unit" within executive agencies to pool skills and harmonise the management of partnerships. ●●●

**Data Transfer:** Support on the obligation to transmit information via xml files is needed. ●

**Customised Solutions:** tailoring support to the specific needs and challenges faced by the partnership in terms of reporting requirements. This could involve assessing current reporting processes and identifying areas for improvement. ●

**Support Services:** support services to review existing reporting procedures, identify bottlenecks or inefficiencies, and develop strategies for improvement. ●●●●●●

**Guidelines and templates:** providing more detailed, adapted, and standardised templates, guidelines, and best practices for reporting to facilitate consistency and efficiency across the partnerships and training of the POs (to avoid contradictory implementation between agencies) and NCPs (who will train the participants). ●●●●

### Additional comments from those who selected answer answer G

Respondents who selected answer G (Other) were asked to provide additional comments. 24 respondents provided comments in the box. The comments are related to the followings:

- avoid misalignment between partnerships managed by different EC Executive Agencies; ●
- rules, processes, and guidelines for implementation should be ready before the start of the next Framework Programme; ●
- plan longer timeframes within the partnerships where appropriate (i.e., not just annual work plans) to hold budget in reserve for the addition of new partners over time; ●
- simplification of the governance of the Partnership including reduction of its governance structures; ●
- flexibility of the funding schemes (e.g. cascade funding or blended financing could be applied to different partnerships); ●
- to apply one fixed EUR exchange rate for the given; ●
- reporting Additional activities biannually (rather than annually); ●
- reporting alignment of additional activities with KPIs, PPPs Biannual report (BMR) and others so to streamline the request to the stakeholders. Decreasing administrative burden and unnecessary reporting would allow to focus on the implementation, on building synergies and on the acceleration of results and impact; ●
- importance to get the IT tools from the beginning of the programme in consideration of the JU's specificities. ●

Other comments were related to:

**Partnership rationalisation:** there are clearly too many different co-funded partnerships. In the beginning of the HE the idea was to simplify the system of ERA-NETs so it would not be so

fragmented. Unfortunately, the number of partnerships still continues to increase. On top of it, several ERA-NETs are still running in parallel. It seems that when finally, all the partnerships have started, (with elaborate and time-consuming decision processes), FP10 begins and this starts all over again. Too many partnerships dilute the funding for the national funding organisations. ●

**Reserves and funding security:** currently expenditure is committed on a forecasted national budget, which may change depending on the actual incurred level of in-kind contributions from partners at the end of the action. The entire financial risk of not achieving objectives is moved at the level of the partnership, without the partnership being able to set up tools in prevention of this risk, e.g. setting up a reserve or risk mitigation fund is not accepted in the budget rules of the EC. A respondent suggests to allow the inclusion of “budget reserves” for the implementation, at the beginning of the partnership, and allocating budgets to activities rather than partners. This will enable real flexibility in management and greater adaptability (adding new activities in the event of major issues, for example, including new partners, etc.).



**Access to information:** a Single Point of Contact (Entry Point) for Partnerships would help them to find their way in the EU landscape. In general, there is a responsibility for the EC to keep the global overview, to look for complementarities and synergies and (very important) to communicate and to inform member states continuously on actions, update of PSs. ●

**Indicators:** a respondent suggests to have either a set of common indicators for all Partnerships from the beginning, or allow for indicators to be specific for each type of Partnership. Especially as these indicators were put in the starting MoU. ●

**KIC sustainability:** it was planned that after 7 years of existence, the KICs would become financially autonomous. However, even with very high membership fees, including from public bodies, the KICs are not profitable. As a result, fewer services are offered without any real reduction in membership fees. ●



## Further remarks and suggestions

Respondents were requested to add, in the free text box, any additional comments. The comments are related to the followings:

**Minimum commitment from large Countries:** it was pointed out by one respondent that some scientifically very competitive countries commit less budget than necessary and this is jeopardising the calls, making the removal of excellent proposals the only option to step from phase 1 to 2, while allowing mediocre proposals pass only because their consortium does not include oversubscribed countries. This is being very harmful for partnerships and calls. Some clear indications should be given or even minimum commitments for large and relevant countries could be mandatory. ●

**About Partnership Instrument:** partnerships are heavy instruments under HE, many partners of different nature, with separate objectives, need to be mobilised thus resulting in difficulties in management. Joint activities between Partnerships are not foreseen. The relevance of the instruments should be reconsidered since the funding rate is low considering the significant EC requirements and most of the efforts have to come from the Member States. Additionally, the ambition of partnerships has not been matched by the necessary flexibility and capacity for adjustment. ●●●

**Participative approach and lesson learned:** the implementation of the partnerships should be conducted as efficiently and financially sound as possible. The EC's participative approach to improving partnership management is greatly appreciated. There is the hope to see a real awareness of the difficulties encountered and collaboration availability to take them into account and find measures to address these. A co-design process involving partnerships in an early stage of defining procedures would be much appreciated. For example, lessons learned provided by JUs should be discussed and duly considered in due time from a legislative and implementation perspective in order to avoid similar issues for the next Framework Programme (FP). A range of the lessons learned provided for the previous programme are still valid and may be already taken into account for the next FP. EC should consider the clear and detailed advice they received from many Ministries. ●●

**Specificities of co-funded Partnership:** co-funded partnership should not be implemented as standard HE research projects, they are rather alliances of funding bodies or programmes. More appropriate tools that are adapted to partnerships, to take into account their specificities such as scale and programme-like implementation (rather than project-like) should be developed and applied (e.g., custom management and IT reporting systems that allow for separation between funding decisions might for example alleviate the burden of double reporting). This would certainly make many things easier. ●

**CSA for preparing SRIA for all partnerships:** the proposal preparations and in particular the preparation of the SRIA should be funded by a CSA for all Partnership and not only for selected ones. That would result in having more time for the preparation, which would be good or, alternatively, more flexibility during the runtime should be desirable. ●

**Phase-out:** it is needed the addition of a phase-out (3-4 years more of duration of the partnership without additional activities) to be able to properly monitor the co-funded projects in the JTCs and also be able to close financially them to report officially to the EC. ●

**Co-funding rate identification:** identifying the co-funding rate on a global partnership level rather than per partner would avoid double monitoring and would simplify the explanations to partners. The high complexity of the creation and management of a co-funded partnerships, the high management costs, the small financial contribution of the EC (30%) and its unfair use (due to the EC rules) make it questionable the utility of such instrument. ●

**Flexibility in budget management:** there is a need for increased flexibility in managing budgets and in the bureaucratic process during the lifetime of the partnerships. More flexibility and requesting fewer details in reporting would help in keeping a more global vision of the action, its impact and its management. The obligation to work as a partnership in periods of 2-2-3 years certainly can be seen as avoidable administrative burden. ●

**Synergies between partnerships:** they are positive but need to be carefully elaborated. Joint activities of different partnerships, in particular joint calls, should be possible. Nonetheless, the efforts on synergies across partnerships should focus on what is relevant and feasible (quality over quantity also recommended). ●

**Timing at National and EU level:** more coordination between the EU and national funding channels is wished by the respondents (Submission dates and procedures between the national agency and the EU are not synchronised and are complex), but difficult in reality considering the profound differences among the MS and AC and the national public funding rules at the national levels. ●

**KPIs:** the number of KPIs to be reported should be limited to 10 highly significant KPIs. The actual number of KPIs due the current Logical Framework puts very high pressure on Partnerships and founding members, whereas many of these KPIs are not necessarily relevant to it. These KPIs should be monitored applying exactly the same methodology across all partnerships, should be input and consolidated in electronic way so the data is directly feed into the KPIs reporting. Reporting KPI and additional activities within the same IT tool would be desirable. ●●

**Work Programmes preparation:** Work Programmes are the heart of partnership activities; their preparation is too complex from an administrative point of view. A more streamlined approach, more technically driven, and with a simpler preparation phase and topics definition will certainly be useful. ●

**Col Management:** concerning the internal research and external funding calls in one partnership is a complicate issue and extensive countermeasures/Firewalls are needed which increase the complexity. ●●

**Private sector participation:** the participation of the private sector in cofounded partnerships is very difficult and not profitable. Industries are reluctant to take part in the calls. This should be taken into account when designing new partnerships. It might be good not to invite the private sector into cofounded partnerships. ●

**Interest in the instrument:** the added value of KIC funding is increasingly focused on innovation and start-up creation. However, in some participant Countries, these activities are funded by national funds, thus reducing the interest in these instruments on the part of universities. Education/training projects, for their part, are less developed, their added value is limited in relation to what institutions already offer and their funding is not very attractive. ●

#### Specific comments for **Co-Programmed Partnerships.**

**Harmonisation and simplification:** A flexible set of funding schemes that can be applied to different Partnerships and to other calls of the Framework Programme would allow to apply the needed support for different needs. This would be more effective than a single set of rules, which could set constraints and difficulties due to the different nature of the Partnerships, calls and needs to cover. It would also help move beyond the usual schemes the Framework Programme has used for years (RIAs, IAs and CSAs) which are good but not enough to support the speed of development required to fulfil the transition nor to increase the participation of SMEs or of partners from the low participating countries. ●●

**Companies' commitments monitoring:** monitoring the leverage investment of companies participating in partnership projects, applying the same methodology across all partnerships. ●

**KPIs reporting:** it should be included to the funded projects periodic reporting (or final report) requirements for the data regarding the contribution to the partnership KPIs. This should be input and consolidated in electronic way so the data is directly feed into the KPIs reporting. Considering the large share of beneficiaries which are not partnership members (around 80% in one case) and, hence, the partnership private side does not has access to, this would be the way to assure a good and reliable data. ●●●

**Synergies among partnerships:** generating synergies is good. Nonetheless, the efforts on synergies across Partnerships should focus on what is relevant and feasible (quality over quantity also recommended). ●●●

## Specific comments for Institutionalised Partnerships

**Administrative validation of non-EU entities:** it is very challenging. ●

**Affiliated companies:** modalities for inclusion of and reporting from company affiliates are much worse than in H2020, only the mother companies had to sign the GA and provide one single consolidated report). Definition of affiliates and their obligations should be embedded in the FP and legislation for partnerships, instead of referring to only the Financial Regulation for this matter.

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**Third countries:** the rules should make it possible for third countries to participate and sign GAs when they are not requesting funding. ●

**Association agreements:** during negotiation and signature there is high uncertainty on timing and modalities of eligibility. Implications for JUs should be considered during the process. In particular, contributions from associated countries (e.g. UK, Canada, Switzerland) should be considered EU contributions in all projects from the time of accession onwards: otherwise this create multiple different reporting requirements for portfolio of projects taking place simultaneously. ●

**Phase-out:** effective “transitional arrangements” and a structured “preparedness plan” should be in place to avoid delays in the PPPs establishment (like in HE), ensuring a smooth continuation of the technical activities under FP10. Using the existing JU during this transition helps to align stakeholders’ views on technical priorities and operating framework and is a huge advantage to secure the timely start of the new Partnership. The phase-out plan of the JU will be designed in a strategic manner and as a “bridging strategy” to FP10. ●

**No pressure:** all processes in the partnership should be optimised and streamlined in such a way that time pressure can be taken out of the processes (reporting, governance) as far as possible.

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