



EUROPEAN UNION

EUROPEAN SOCIAL  
FUND  
EUROPEAN REGIONAL  
DEVELOPMENT FUND



OPERATIONAL PROGRAMME  
SCIENCE AND EDUCATION  
FOR SMART GROWTH



## EVALUATION REPORT

under the thematic strand "Effectiveness of the operations: Result orientation and level of achievement of the specific objectives under Investment Priority 9i and 9ii under Priority Axis 3 of the Programme"

The Contractor



Sofia, 05.04.2023

*effectiveness, efficiency and impact of procedures directed directly or indirectly at marginalised groups such as Roma under Priority Axis 3 "Educational Environment for Active Social Inclusion" of Operational Programme "Science and Education for Smart Growth 2014-2020"*

## GENERAL INFORMATION

<b>Contract number</b>	<b>E 03-24</b>
<b>Subject of the contract:</b>	Evaluation of the effectiveness, efficiency and impact of procedures directed directly or indirectly at marginalised groups such as Roma under Priority Axis 3 “Educational Environment for Active Social Inclusion” of Operational Programme “Science and Education for Smart Growth 2014-2020”
<b>The contracting authority</b>	Education Programme Executive Agency
<b>The Contractor</b>	Global Advisers JSC
<b>Team that fulfilled the contract</b>	Silvia Tsanova – Team Leader Boyka Boynuzova – key expert Andrey Lalov – key expert Todor Nikolov – key expert
<b>Date of signature of the contract</b>	08.09.2022
<b>Deadline of the contract</b>	08.07.2023
<b>Type of report</b>	Final evaluation report
<b>Date of report</b>	05.04.2023

## Table of content

<b>LIST OF ABBREVIATIONS USED .....</b>	<b>6</b>
<b>GLOSSARY OF THE TERMS USED .....</b>	<b>7</b>
<b>I. INTRODUCTION .....</b>	<b>8</b>
<b>II. THE SUMMARY .....</b>	<b>9</b>
<b>III. METHODOLOGICAL APPROACH .....</b>	<b>13</b>
3.1. Evaluation methods used, evaluation questions, data sources and information .....	13
3.2. Statistics of the methodology for carrying out the evaluation .....	14
<b>IV. EVALUATION UNDER THEMATIC STRAND EFFECTIVENESS: RESULT ORIENTATION AND LEVEL OF ACHIEVEMENT OF THE SPECIFIC OBJECTIVES UNDER INVESTMENT PRIORITY 9I AND 9II UNDER PRIORITY AXIS 3 OF THE PROGRAMME.....</b>	<b>14</b>
4.1. What is the progress (including the achievement of final targets) in implementing the Priority Axis 3 indicators aimed directly or indirectly at marginalised groups such as Roma, including milestones and targets in their performance framework? .....	14
4.2. What are the external factors and the extent to which they have influenced the achievement/non-achievement of the indicators set? .....	20
4.3. Is the selection of target groups adequate in the grant award procedures under evaluation and are they in line with the indicators set out? .....	27
4.4. To what extent are the data collected for the calculation of indicators reliable and qualitative? What should be the parameters of the collected data?.....	30
4.5. Is it necessary to introduce additional data collection from other sources such as administrative registers, sociological surveys, etc.? Have any obstacles been identified to the use of information from administrative registers for the purposes of the implementation of projects under the OP SESG, aimed directly or indirectly at marginalised groups, including Roma, and what are the possible solutions for overcoming them?.....	35
4.6. To what extent do the operations under the OP SESG which are the subject of this evaluation achieve the planned results in the short, medium and long term? .....	37
4.7. What helps or hinders the achievement of the objectives and results of the operations under the OP SESG subject to this evaluation? .....	41
4.8. What factors determine the better performance of certain operations than others financed under the Programme?.....	47
4.9. To what extent have the operations implemented under the Operational Programme SESG, subject of this evaluation, contributed to the achievement of the objectives of the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020) and of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020)? .....	53
4.10. Is there a causal link between the intervention(s) carried out under the operations under Priority Axis 3 and the results achieved? .....	59
<b>V. FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS .....</b>	<b>61</b>
<b>USED LITERATURE .....</b>	<b>74</b>
<b>APPLICATIONS .....</b>	<b>77</b>

## List of tables

Table 1 Statistical data from the applied methodology.....	14
Table 2 Common result indicators for which a target of PA 3 and programme-specific result indicators corresponding to the specific objective have been set .....	16
Table 3 Common and specific output indicators under PA 3 .....	17
Table 4 Indicators in the Performance Framework under PA 3 .....	17
Table 5 Contribution of the procedures assessed to the achievement of the output indicators under IP 9ii of PA 3 ...	18
Table 6 Contribution of the procedures assessed to the achievement of the IP 9ii result indicators of PA 3 .....	18
Table 7 Results of the analysis of the adequacy of the selection of target groups .....	27
Table 8 Implementation of result indicators for completed procedures against MCSOs .....	49
Table 9 Macrocharacteristics of BG05M2OP001-3.004 and BG05M2OP001-3.020 .....	50
Table 10 Macrocharacteristics of BG05M2OP001-3.001 and BG05M2OP001-3.005 .....	50
Table 11 Macrocharacteristics of BG05M2OP001-3.002 and BG05M2OP001-2.011 .....	51
Table 12 Macrocharacteristics of BG05M9OP001-2.018 and CLLD procedures .....	51
Table 13 Contribution of the evaluated procedures under Priority Axis 3 of OP SESG to achieve the objectives of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020).....	55
Table 14 Contribution of the evaluated procedures under Priority Axis 3 of OP SESG to achieve the objectives of the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020).....	58
Table 15 Results of causation analysis between intervention and results achieved .....	59
Table 16 Findings, conclusions and recommendations under the “Effectiveness” direction.....	63

## List of figures

Figure 1 Used methods for data collection and analysis .....	13
Figure 3 Quantitative distribution of the assessments by type of procedure for factor: “Desire to participate on behalf of the target groups” .....	23
Figure 5 Quantitative distribution of the assessments by type of procedure for factor: “Support and assistance from stakeholders, municipal administrations and civil society organisations” .....	23
Figure 7 Quantitative distribution of the assessments by type of procedure for factor: “Adequate regulatory framework, administrative acts and instructions of the MA applicable to the implementation of the activities and the achievement of project results” .....	24
Figure 9 Quantitative distribution of the assessments by type of procedure for: “Adequate response of the MA, other institutions and/or partners involved, enabling the implementation and adaptation of the envisaged activities to the changed environment following the introduction of containment measures against the COVID-19 outbreak” .....	25
Figure 10 Answers to the question: “In your opinion, is the selection of target groups in the procedures adequate and are they consistent with the indicators set?” .....	29

Figure 11 Answers to the question: “To what extent is the data collected by the MA to calculate the indicators reliable and qualitative?” .....	34
Figure 12 Answers to a question: “Do you have any suggestions for changes to the parameters of the data collected?” .....	34
Figure 13 Answers to the question: “Have you identified any obstacles to the use of information from administrative registers during the project?” .....	36
Figure 14 Percentage ratio of the verified values of indicators to the target values set in the MCSO and the Guidelines/Conditions for Applicants .....	38
Figure 15 Percentage ratio of the verified values of indicators to the target values set in projects.....	39
Figure 16 Percentage ratio of the reporting values of indicators to the target values set in projects under separate CLLD grant award procedures .....	40
Figure 17 Answers to a question: “What do you think contributes to achieving the objectives and results of the procedure under which you are implementing/implemented a project?” .....	41
Figure 18 Answers to a question: “What do you think is/was an obstacle to achieving the objectives and results of the procedure under which you are implementing/implemented a project?” .....	43
Figure 19 Answers to a question: “Have you experienced any significant difficulties in the implementation of the project activities that led to: substantial modification of the financing contract, significant delays in the implementation of activities, failure to achieve planned indicators, financial corrections, etc.?’ .....	44
Figure 20 Target values of planned MCSO output indicators and such contracted under projects presented by procedures .....	48
Figure 21 Ratio between target values of result indicators contracted by projects to the target values of MCSO result indicators .....	48

## LIST OF ABBREVIATIONS USED

<b>GRANT</b>	Non-repaible financial aid
<b>CLLD</b>	Community-led local development
<b>TFEU</b>	Treaty on the Functioning of the European Union
<b>EC</b>	European Commission
<b>EU</b>	European Union
<b>ESF</b>	European Social Fund
<b>EAPE</b>	Executive Agency “Programme Education”
<b>CPI</b>	Consumer Price Index
<b>IP</b>	Investment Priority
<b>UMIS</b>	Information system for the management and monitoring of EU funds
<b>DB MES</b>	Direct Beneficiary Ministry of Education and Science
<b>CCU</b>	Central Coordination Unit
<b>MC</b>	Monitoring Committee
<b>LAG</b>	Local Action Groups
<b>MCSO</b>	Methodology and criteria for selecting an operation
<b>MES</b>	Ministry of Education and Science
<b>NSRIRB</b>	National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020)
<b>NIP of NSRIRB</b>	National Implementation Plan of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020)
<b>OP</b>	The Operational Programme
<b>OP SESG</b>	Operational Programme “Science and Education for Smart Growth” 2014-2020
<b>OP HRD</b>	Operational Programme “Human Resources Development”
<b>IP of SEICSEM</b>	Implementation Plan of the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020)
<b>CMD</b>	Council of Ministers Decree
<b>PA</b>	Priority axis
<b>WB</b>	The World Bank
<b>SEICSEM</b>	Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020)
<b>MA</b>	Managing Authority

## GLOSSARY OF THE TERMS USED

<b>Beneficiary</b>	As referred in Article 2(10) of Regulation (EU) No 1303/2013: a public or private body responsible for initiating or initiating and implementing operations; and in the context of State aid schemes, pursuant to Article 107(1) TFEU, an organisation receiving the aid.
<b>Output indicators</b>	Output indicators relate to operations supported. An output is considered what is directly produced/supplied through the implementation of an ESF operation, measured in physical or monetary units. Outputs are measured at the level of supported people, supported entities (entities are defined as organisations – a group of people formally organised to pursue a collective objective that can both implement and be supported through projects, and should only be taken into account if they benefit directly from ESF support that leads up to costs), provided goods or services delivered. They are set at the level of investment priorities or specific objective.
<b>Result Indicators</b>	Result indicators capture the expected effects on participants or entities brought about by an operation. Result indicators should correspond to the specific objectives set out for each investment priority selected. They go beyond output indicators in so far as they capture a change in the situation, in most cases related to supported entities or participants. They must be set as closely as possible to the activities carried out under the relevant investment priority in order to minimise external factors that could affect the reported value of result indicators.
<b>De minimis aid</b>	Aid which does not distort or threaten competition or has a negligible effect on competition due to its minimum amount, as defined in the current EU regulation, on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to De minimis aid.
<b>Financial Indicators</b>	The financial indicators relate to the total amount of eligible expenditure entered into the accounting system of the certifying authority and certified by it, in accordance with point (c) of Article 126 of Regulation No 1303/2013. They may be used to monitor progress in terms of the payment of the funds available for any operation, measure or programme in relation to its eligible cost. They are compulsory in the Performance Framework.
<b>Managing Authority</b>	National, regional or local public authority designated to manage an operational programme pursuant to Decision No 823/21.10.2015 of the Council of Ministers.

## I. INTRODUCTION

The present evaluation report was prepared in implementation of Contract No D03-24/08.09.2022 with subject matter: Evaluation of the effectiveness, efficiency and impact of procedures directed directly or indirectly at marginalised groups such as Roma under Priority Axis 3 “Educational Environment for Active Social Inclusion” of Operational Programme “Science and Education for Smart Growth” 2014-2020, concluded between the Executive Agency “Programme Education” – Contracting Authority and Global Advisers JSC – Contractor.

The main objective of the evaluation is “Evaluating the effectiveness, efficiency and impact of grant procedures aimed at active inclusion and social economic integration of marginalised groups, including Roma, under Priority Axis 3 “Educational Environment for Active Social Inclusion” of Operational Programme “Science and Education for Smart Growth” 2014-2020.”

The present evaluation has been prepared in accordance with the Technical Specification of the Contracting Authority for the preparation of the evaluation and covers answers to evaluation questions from the thematic field Effectiveness of operations: Result orientation and level of achievement of the specific objectives under Investment Priority 9i and 9ii under Priority Axis 3 of the Programme:

- to what extent the indicators included in the procedures referred to in point 3.4 of the Technical Specification are adequate to the objectives of the relevant procedure, investment priority and priority axis;
- the extent to which the planned values of the indicators for each procedure have been met, and the extent to which their implementation contributes to achieving the values of the indicators at the level of investment priority, priority axis and the Programme as a whole;
- the level of achievement of the objectives when comparing the actual and expected results of the activities carried out under the operations under Priority Axis 3 directed directly or indirectly to marginalised groups such as Roma.

In the present report, the answer to the three sets of questions was carried out by assessing the evaluation questions asked by the Contracting Authority within the thematic strand “Effectiveness”:

- 1.1/ What is the progress (including the achievement of the end goals) in implementing the Priority Axis 3 indicators directed directly or indirectly at marginalised groups such as Roma, including milestones and end goals in their performance framework?
- 1.2/ What are the external factors and the extent to which they have influenced the achievement/non-achievement of the underlying indicators?
- 1.3/ Is the selection of target groups adequate in the grant award procedures under assessment and are they in line with the set indicators?
- 1.4/ To what extent are the data collected for the calculation of indicators reliable and qualitative? What should be the parameters of the collected data?
- 1.5/ Is it necessary to introduce additional data collection from other sources such as administrative registers, sociological surveys, etc.? Have any obstacles to the use of information from administrative registers been identified for the purposes of the implementation of projects under the OP SESG, directed directly or indirectly at marginalised groups, including Roma, and what are the possible solutions for overcoming them?



- 1.6/ To what extent do the operations under the OP SESG which are the subject of this evaluation achieve the planned results in the short, medium and long term?
- 1.7/ What helps or hinders the achievement of the objectives and results of the operations under the OP SESG subject to this evaluation?
- 1.8/ What factors determine the better performance of certain operations than others funded under the Programme?
- 1.9/ To what extent have the operations implemented under the Operational Programme SESG, that are subject of this evaluation, contributed to the achievement of the objectives of the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020) and of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020)?
- 1.10/Is there a causal link between the intervention /the activities carried out under the operations under Priority Axis 3/and the results achieved?

## II. THE SUMMARY

The present summary outlines the results of the evaluation under the thematic strand "Effectiveness of operations: Results orientation and level of achievement of the specific objectives under Investment Priority 9i and 9ii under Priority Axis 3 of the Programme" under Contract No D03-24 from 08.09.2022 for the implementation of public procurement with the subject "Conducting an evaluation of the effectiveness, efficiency and impact of procedures directed directly or indirectly at marginalised groups such as Roma under Priority Axis 3 "Educational Environment for Active Social Inclusion" of Operational Programme "Science and Education for Smart Growth" 2014-2020. The contracting authority is the Executive Agency "Programme Education" and the Contractor is "Global Advisers" JSC.

The evaluation covers 23 procedures under Priority Axis 3 of OP "Science and Education for Smart Growth" 2014-2020 (OP SESG) aimed directly or indirectly at marginalised groups, including Roma, 15 of which are grant procedures under the Community-led Local Development (CLLD) approach with funding under the OP SESG. The date of analysis of the data in this report is 30.09.2022.

### EVALUATION METHODOLOGY

The methodology for the implementation of this evaluation is focused on thematic strand Effectiveness of the operations and the evaluation questions set by the Contracting Authority. The methods used for data collection are: cabinet study; stakeholder consultations (interviews and focus groups) and a survey. Whereas the methods of analysis are: analysis of indicators; analysis of the logic of intervention; analysis of the contribution; descriptive statistics; analysis of stakeholders' views and expert assessment. The methods for data collection and analysis are selected on the basis of the evaluation questions, the available information, and the data collected further during the evaluation. The choice of their use in carrying out the evaluation is justified on the need to provide data of the fullest possible scope and quality, so as to provide the necessary basis for formulating adequate answers to the evaluation questions. The methods complement each other so that the limitations of one method are offset by the advantages of another. These methods are in line with the European Commission's Guidelines for Socio-Economic Development Assessment EVALSED and the European Commission's Guidance on Monitoring and Evaluation of the European Cohesion Policy (for ESF) of 2018.

The carrying out of the evaluation made use of available data from the programme monitoring system (financial data, indicators, data on participants in operations), statistics, data from previous analyses, strategic and normative documents, etc.

In addition, primary data were collected through interviews with representatives of the MA of the SESG, representatives of a Direct beneficiary MES (3 interviews), representatives of the MA of OP HRD (1 interview), representatives of the CCU (1 interview) and focus groups with representatives of MA and MC of OP SESG (2 focus groups), and a survey conducted in the period 15.12.2022-11.01.2023 among 105 beneficiaries (out of 276).

## **MAIN GUIDANCE POINTS AND CONCLUSIONS**

The procedures subject to this evaluation show progress in their contribution to achieving the objectives of the OP SESG, in particular PA 3 of the Programme, expressed by the output and result indicators. In some cases, the contribution of the evaluated operations to the achievement of the target values of the indicators under the Programme is around 75 to 85 %.

The risk of non-achievement of the value set in the Programme is only available for output indicator 3213 “Persons over 16 (including Roma) involved in literacy courses or courses for mastering the learning content intended for the lower secondary stage of basic education under the OP” included in the evaluated procedures related to adult literacy.

With regard to the achievement of the objectives and results set out in the operations under the OP SESG subject to this evaluation, it can be concluded that in the short term the operations which have been completed (BG05M20P001-3.001, BG05M20P001-3.002 and BG05M20P001-3.004) generally achieved the target results to a high extent. Based on the progress made in the output indicators and the data on the contracted result indicators for the operations under implementation, the analysis shows that in the medium term the planned results are achieved at an expected pace and in the longer term it can be predicted that at the end of the programming period the planned results will be achieved and, in some cases, significantly exceeded, such as the result indicator P3211 “Children, students and youths from ethnic minorities (including Roma) integrated in the education system”

The adequacy to the objectives and results target groups, activities, duration and budget, and that the procedures are programmed in line with the real needs for support to the target groups make a significant contribution to the objectives and results of the procedures. Interviews and focus groups highlight the key role of the motivation of the professionals involved in the implementation of activities, as well as the managers of/from the relevant institution/organisation, which is committed to the implementation of the specific project.

There are no serious obstacles negatively affecting the achievement of the objectives and results of the procedures covered by the evaluation, with some exceptions including the effects of the COVID-19 pandemic.

The use of quantifiable result indicators that measure new qualitative changes in the situation related to the participants when exiting the operation can be defined as good practice.

The use of result indicators (such as “net enrolment coefficient in kindergartens – 84 %” under BG05M20P001-3.001 and BG05M20P001-3.005 “Group net enrolment coefficient in kindergartens – 2 % increase for the period of the operation”) for which are set too ambitious targets or are susceptible to influence factors beyond the effect of the operation activities is an indication of a risk to the quality of planning or monitoring of the interventions. In this case, the risk is not significant, because they are additional indicators specific to the operations.

The absence of specified target values of programme-relevant MCSO indicators and, accordingly, the setting of those in the Application Conditions or Guidelines and which are reported at the end of the projects, leads to the impossibility of an objective ongoing assessment of the contribution of the measures under an operation to the achievement of the objectives of the Programme. In addition, in so far as the indicators are part of the MCSO, they should be amended, including the setting of target values, by the MC, in accordance with Article 11(1)(1) of Council of Ministers Decree No 79 of 10 April 2014.

The analysis identified a need to change the parameters of the collected data by changing the definitions of existing indicators or adding new ones that also measure qualitative change in relation to the participants.

The following external factors had the greatest influence to the achieving of the set indicators of operations: the adequate response of the institutions, including the MA during the lockdown measures imposed as a consequence of the COVID-19 pandemic and the motivation for participation of the target groups in the project activities. The presence of support and assistance from municipal administrations and civil organisations and the availability of adequate regulations, administrative acts and instructions of the MA, applicable in the implementation of the activities, are also of high influence.

The evaluation of the external factors that influenced the failure of beneficiaries to achieve indicators, as well as their shared opinion, identified three main groups of external factors related to the failure to achieve planned indicators: those related to the absence or lack of motivation of the target groups; related to difficulties resulting from obstacles to the implementation of the envisaged activities as a result of containment measures against the COVID-19 outbreak and related to financial challenges stemming from the rising inflation.

The selection of target groups for the procedures in the scope of the evaluation is adequate and they correspond to the indicators set out, with some exceptions: in one case (BG05M2OP001-3.004) target groups are defined without an age limit, unlike the output indicator. In another case, target groups are not part of the groups that are expected to be necessarily included in activities and are therefore not included in an output indicator when there is a corresponding one at an OP level (BG05M2OP001-3.001 and BG05M9OP001-2.018).

Based on the documentary analysis and survey that were carried out, it can be argued that the data collected for the calculation of the indicators are highly reliable and qualitative, but further actions are possible to improve the processes that guarantee reliability and quality.

No obstacles to the use of information from administrative registers have been identified for the purpose of the implementation of OP SESG projects with one exception (the difficulties of the MA with regard to the use of information from NEISPSE<sup>1</sup>).

Considering educational integration activities carried out by NGOs as activities of an economic nature and, accordingly, the application of the rules for granting aid under the 'De minimis' leads to a limitation of the participation of experienced NGOs in selection procedures due to the accumulation of aid under the 'De minimis'.

The full national scope and implementation of the operations by the Ministry of Education and Science as a Direct Beneficiary is a serious prerequisite for achieving better results on operations in cases where the objectives set imply a systematic approach. Funding schemes through project selection procedures shall be assessed as a prerequisite for achieving better results where a local and targeted approach or an individualised design and approach to the implementation of activities is needed and a high degree of pro-

---

<sup>1</sup> National Electronic Information System for Pre-School and School Education

activity or innovation is expected to solve problems and achieve the objectives of the operations. A common factor in the analysed operations with better cost efficiency per unit of like product and achieving the planned results is the availability of simplified cost options.

The operations under Priority Axis 3 of OP SESG have made a significant contribution to achieving the objectives of the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020) and of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020).

## RECOMMENDATIONS

- When programming operations, the MA to provide in the MCSO to be set target values for indicators referring to OP indicators, as well as not to allow by Application Conditions or Guidelines to set targets defined at the level of Application Conditions or Guidelines, which are to be reported at the end of the projects.
- When planning future operations, the MA should ensure close monitoring of the intervention logic so as to ensure compliance of the target groups with the indicators set.
- To carry out the necessary coordinated actions by the units responsible in the MES system to improve the possibilities for carrying out additional validation of the microdata in NEISPSE. This recommendation should be implemented as soon as possible.
- To complement the procedure in the Management Manual of OP SESG describing the approach, steps and responsible units for data collection and processing for the purpose of monitoring and reporting under the programme with a description of the definitions of the indicators, the data sources for their tracking and a mechanism for verification and further validation for the purposes of the annual reports and data reporting to the EC. To the extent that the operations under OP SESG complete their implementation by the end of this year at the latest and given the expected introduction of functionalities in the UMIS for aggregating the data for indicators for the purpose of reporting under the programme, the MA should assess to what extent and whether it is not appropriate to take this recommendation into account in relation to the management manual of the Programme Education.
- For further operations, it would be appropriate for the MA to take into account the proposal to make greater use of indicators to monitor the qualitative change resulting from the activities carried out in relation to participants in operations and to make further efforts to better define the main indicators related to the integration of vulnerable groups. A good example of quantifiable indicators reporting qualitative change can be the following: BG05M2OP001-3.005, BG05M2OP001-2.011 and BG05M2OP001-3.020, where the established system of indicators is also used in the methodology for the assessment of project proposals, and the commitment to the different achievements is reported with different weight, according to the importance of the indicator for the achievement of the policy, to which is the contribution of the operation.
- The MA should ensure that the target values of the indicators of operations are preceded by precise analyses of the expected results of the interventions.
- The MA should carefully analyse whether the targets for certain types of specific indicators are not too ambitious or whether the reasons for non-achievement are linked to a limited degree of impact of the interventions on this type of indicators, with a view to their future use.
- When planning further operations, the MA should ensure that operations-specific result indicators are set as close as possible to the planned activities below the relevant operation in order to minimise external factors that could affect their reported value.
- The MA should, if necessary, carry out a further review with regard to the definition of the aid rules for NGOs implementing activities/projects related to educational integration. If deemed appropriate,

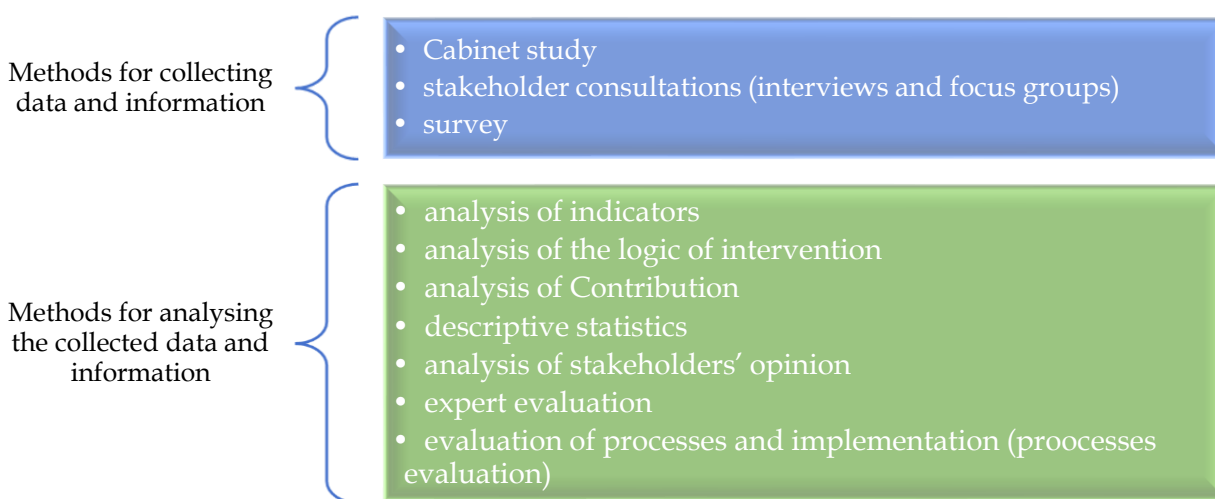
review the experience of other Member States or consult the MF and DG Competition with a view to exploring how to overcome this obstacle. The recommendation should be taken into account in the programming of subsequent operations.

### III. METHODOLOGICAL APPROACH

#### 3.1. Evaluation methods used, evaluation questions, data sources and information

The methodology for the implementation of this evaluation is focused on thematic strand Effectiveness of the operations and the evaluation questions set by the Contracting Authority. The figure below presents the methods for data collection and analysis used to assess the procedures under PA 3 of the OP SESG in order to answer the evaluation questions covered by the thematic strand. The methods for data collection and analysis are selected on the basis of evaluation questions, available information, and data collected further during the evaluation. The choice of their use in carrying out the assessment is justified on the need to provide data of the fullest possible scope and quality, so as to provide the necessary basis for formulating adequate answers to the evaluation questions. The methods complement each other so that the limitations of one method are offset by the advantages of another.

Figure 1 Used methods for data collection and analysis



The carrying out of the evaluation made use of available data from the programme monitoring system (financial data, indicators, data on participants in operations), statistics, data from previous analyses, strategic and normative documents, etc.

In addition, primary data were collected through interviews with representatives of the MA of the OP SESG, representatives from the Direct Beneficiary MES, and focus groups with representatives of the MA and MC of the OP SESG (see statistics of the methodology for carrying out the evaluation).

### 3.2. Statistics of the methodology for carrying out the evaluation

Table 1 presents the statistical information related to the methodology applied for the evaluation carried out.

*Table 1 Statistical data from the applied methodology*

Survey of Beneficiaries	The period	Number/ %
Period of conduct	15.12.2022-11.01.2023	-
Total number of invited respondents	-	276
Total number of respondents	-	105
% of respondents	-	38 %
Interviews conducted	Date of holding	Number
Interview with representatives of DB MES (project BG05M2OP001-2.011-0001-C04 "Support for success")	12.01.2023	1
Interview with representatives of DB MES (project BG05M2OP001-3.005-0004-C03 "Active inclusion in the system of pre-school education")	13.01.2023	1
Interview with representatives of DB MES (project BG05M2OP001-3.004-0001-C04 "New chance for success")	13.01.2023	1
Interview with representatives of the MA of OP SESG on the CLLD approach	26.01.2023	1
Interview with representatives of the CCU	13.03.2023	1
Interview with representatives of the MA of OP HRD (concerning procedure BG05M9OP001-2.018 "Social and economic integration of vulnerable groups. Integrated measures to improve access to education" – Component 1)	14.03.2023	1
Organised Focus Groups	Date of holding	Number
FG with representatives of the MA	19.12.2022	1
FG held with representatives of the MC	30.01.2023	1

The specific methodologies for the carried out: survey of beneficiaries; interviews and focus groups, as well as their data and information are presented in *Annexes 1 to 17* to this report.

## IV. EVALUATION UNDER THEMATIC STRAND EFFECTIVENESS: RESULT ORIENTATION AND LEVEL OF ACHIEVEMENT OF THE SPECIFIC OBJECTIVES UNDER INVESTMENT PRIORITY 9I AND 9II UNDER PRIORITY AXIS 3 OF THE PROGRAMME

### 4.1. What is the progress (including the achievement of final targets) in implementing the Priority Axis 3 indicators aimed directly or indirectly at marginalised groups such as Roma, including milestones and targets in their performance framework?

For the purpose of answering this evaluation question, an analysis of the indicators set out in the evaluated procedures was carried out in the context of the assessment of the progress made against the values of the indicators at Priority Axis 3 level and investment priority, aimed directly or indirectly at marginalised groups, including Roma as of 30.9.2022.



OP “Science and Education for Smart Growth” 2014-2020 (OP SESG)<sup>2</sup> is a key instrument for achieving the objectives adopted by the Republic of Bulgaria within the framework of the Europe 2020 Strategy. The programme is structured into five priority axes (PAs) with a total budget of BGN 1.349 billion (European and national funding). The first three main axes propose solutions to achieve the objectives of the Europe 2020 Strategy, namely:

- ensuring access to quality education: condition of complete participation of citizens in the inclusive economy/PA 2 “Education and lifelong learning” – quality education, PA 3 “Educational environment for active social inclusion” – accessible education/.
- development of scientific, research and innovation potential in the Republic of Bulgaria: condition for the development of smart economy/PA 1 “Research and Technological Development” – development of research potential/; PA 2 – quality of higher education, access to and quality of lifelong learning vocational education and training. They are all key activities to bridge the gap between research and education systems, on the one hand, and the needs of business and the labour market, on the other hand/. The strong synergy between these additional measures is an argument in favour of using the two-fund approach in the OP SESG – funding from the European Regional Development Fund (ERDF) for PA 1 and funding from the European Social Fund (ESF) for PA 2 and PA 3.

The subject of this evaluation is the Priority Axis 3 procedures aimed directly or indirectly at marginalised groups, including Roma, referred to in the Technical Specification. The third priority axis “Educational environment for active social inclusion” provides funding through the European Social Fund for a total of BGN 229.2 million or 16.99 % of the total budget of the Programme, invested in measures for active inclusion and socio-economic integration. The interventions under this priority axis aim to build an educational environment that promotes the development of the potential of each child and student for personal development, as well as successful realisation and socialisation. It also relies on the effective integration into the education system of children, students and young people from ethnic minorities and other vulnerable groups. The implementation of PA 3 aims at higher quality and better access to education by creating a supportive environment for education for children and students with special educational needs.

Priority Axis 3 includes measures under thematic objective 9 "Promoting social inclusion, combating poverty and all forms of discrimination under two investment priorities:

- Investment priority 9i (IP9i) – Active inclusion, including with a view to promoting equal opportunities and active participation and better employability. The allocation is EUR 22 099 394.50 (ESF). Investment priority 9i Specific Objective – Increase the number of educational institutions providing a supportive environment for inclusive education. Investment priority 9i funds are planned to support the implementation of measures both to achieve the national Europe 2020 target of reducing the number of early school leavers (up to 11 %) and indirectly to reduce the number of people living in poverty by 260 000 by 2020;
- Investment priority 9ii (IP 9ii) – Socio-economic integration of marginalised communities such as Roma. The allocation is EUR 77 527 675.50 (ESF). Specific objective – Increasing the number of children and pupils from marginalised communities, including Roma, who are successfully integrated through the education system. The funds are intended to support measures for the

---

<sup>2</sup> <http://sf.mon.bg/?go=page&pageId=32> - Version 5.0/approved by the EC on 07.05.2021/

integration of children at risk of exclusion from the education system for reasons related to belonging to closed and marginalised ethnic groups. In this sense, PA 3 measures are complementary to national measures. The development of a favorable educational environment creates the prerequisites for: 1) reduction in the number of drop-outs (a significant percentage of them belong to minority groups at risk) and 2) better realisation of the labour market as a means of increasing employment and reducing social exclusion. Both results are in direct relation to the national Europe 2020 targets: reduce by 260,000 people living in poverty and increase the employment rate to 76 %.

According to data from the public portal “Information System for Management and Monitoring of EU Funds in Bulgaria 2020”<sup>3</sup> (UMIS) for the period of the evaluation under the PA 3, a total of 27 operations have been financed, 15 of which are grant procedures under the Community-led Local Development (CLLD) approach financed under the OP SESG. According to the Technical Specifications for this procurement, four operations are outside the scope of the evaluation, namely: BG05M2OP001-3.018 “Supporting inclusive education”; BG05M2OP001-3.003 “Providing conditions and resources for the construction and development of supportive environment in kindergartens and schools for implementation of inclusive training – Phase 1”; BG05M2OP001-3.019 “Supporting vulnerable groups for access to higher education”; BG05M9OP001-2.056 “Socio-economic integration of vulnerable groups. Integrated measures to improve access to education – Component 2.”

In order to achieve the objectives of Priority Axis 3 in OP SESG the following indicators are defined:

*Table 2 Common result indicators for which a target of PA 3 and programme-specific result indicators corresponding to the specific objective have been set*

Identifier	Code	Unit of measurement	Base value 2014	Target value 2023
<b>I. Investment Priority 9i</b>				
Children aged between 3-6 who have received early prevention services which aim to prevent educational difficulties	P3111	number	150	500
Kindergartens, who have provided a supportive environment for early prevention of learning difficulties	P3113	number	25	43
<b>II. Investment Priority 9ii</b>				
Children, students and youths from ethnic minorities (including Roma) integrated in the education system	P3211	number	30 000	45 000
Share of pedagogical specialists among those involved in actions under the OP qualified to work in multicultural environment	P3212	%	90	90
Share of persons (including Roma), who have received certificates for successfully completed literacy courses or courses for mastering the learning content intended for the lower secondary stage of basic education under the OP.	P3213	%	71	80

<sup>3</sup> <https://2020.eufunds.bg/bg/7/0>



Table 3 Common and specific output indicators under PA 3

Identifier	Code	Unit of measurement	Target value 2023
<b>I. Investment Priority 9i</b>			
Children and school students with special educational needs, participating in activities, supported by the IP9i	3111	number	2 300
Full day kindergartens/united childcare institutions supported to provide supportive environment for early prevention of learning difficulties	3112	number	155
<b>II. Investment Priority 9ii</b>			
Children, students, and youths from marginalised communities (including Roma) involved in measures for educational integration and reintegration	3211	number	56 250
Pedagogical specialists involved in training to work in a multicultural environment	3212	number	3 600
Persons over 16 (including Roma) involved in literacy courses or courses for mastering the learning content intended for the lower secondary stage of basic education under the OP	3213	number	20 000

Table 4 Indicators in the Performance Framework under PA 3

Identifier	Code	Unit of measurement	Milestone 2018	Final target 2023
Certified funds	F3	Euro	16 751 919,6	117 208 319,00
<b>I. Investment Priority 9i</b>				
Children and school students with special educational needs, participating in activities, supported by the IP9i	I3111	number	1 500	2 300
<b>II. Investment Priority 9ii</b>				
Children, students and youths from marginalised communities (including Roma) involved in measures for educational integration and reintegration	I3211	number	1 500	56 250

The procedures under this evaluation include measures under investment priority IP 9ii “Socio-economic integration of marginalised communities such as Roma”. Only procedure BG05M2OP001-3.005 “Active inclusion in the system of pre-school education” has been programmed under both investment priorities of PA 3, and it sets specific indicators for the operation, including such referring to indicators under the PA, but without having set target values. In the Application Conditions, the MCSO indicators are broken down and additional target values are set for the indicators that directly refer to indicators at programme level-3112, 3211 and P3211. These indicators track the contribution of BG05M2OP001-3.005 to the investment priorities, but no data on their implementation is available at the time of preparation of this report due to the fact that the operation is still in implementation. In response to a question to the MA, it was clarified that the progress on the additionally set target values of indicators will be reported in the final report.

Due to the above, the procedure is not included in the assessment of the contribution of the operations under assessment to the achievement of the objectives at the level of the investment priority and priority axis of the OP SESG, and accordingly, in this part of the evaluation report, only the contribution of the other

procedures assessed to the IP 9ii are a subject. Evidence of the level of achievement of the planned results of this procedure is provided in response to evaluative question 6. It is apparent from the above that, after taking into account the final results, the procedure is expected to make a significant contribution to the relevant initiators under IP 9ii and IP 9i.

The total contribution of the evaluated procedures to the achievement of IP 9ii is presented in the following tables.

*Table 5 Contribution of the procedures assessed to the achievement of the output indicators under IP 9ii of PA 3*

Identifier	Code	Unit of measurement	Target value 2023	Verified value
Children, students and youths from marginalised communities (including Roma) involved in measures for educational integration and reintegration	3211	number	56 250	47 991
Pedagogical specialists involved in training to work in a multicultural environment	3212	number	3 600	2 688
Persons over 16 (including Roma) involved in literacy courses or courses for mastering the learning content intended for the lower secondary stage of basic education under the OP	3213	number	20 000	11 406

The contribution of the evaluated procedures to the target under indicator 3211 is slightly above 85 %. Here it should be noted that according to the Annual Report on the implementation of the OP SESG for 2021, the total cumulative value of the indicator is 102 684 or almost twice above the target value, which gives grounds for suspicion of underestimating the target value of the indicator in the Programme.

Indicator 3212 also reported a high rate of progress in the evaluated procedures against the target value of the Programme – above 75 %. Here, unlike the results of indicator 3211, in the 2021 Annual Implementation Report of the SESG, the cumulative value of the indicator was only 271, which may be due to progress in the implementation of measures reported by the indicator in 2022, including under procedure BG05M2OP001-3.017 “Increasing the capacity of pedagogical professionals to work in a multicultural environment”, in which only from the other procedures assessed this indicator is reported.

Progress is also observed in the contribution of indicator 3213, which is slightly above 57 % compared to the OP target. The indicator is included in the two evaluated adult literacy procedures – Phase 1 and Phase 2, of which Phase 2 is still in operation. The performance of the Phase 1 indicator is overachieved – 107 %. However, in the case of Phase 2, with the target value of the indicator 12 000, the contracted for projects is only 4 036, meaning that there is a serious risk of not achieving the indicator value set in the Programme.

*Table 6 Contribution of the procedures assessed to the achievement of the IP 9ii result indicators of PA 3*

Identifier	Code	Unit of measurement	Base value 2014	Target value 2023	Verified value
Children, students and youths from ethnic minorities (including Roma) integrated in the education system	P3211	number	30 000	45 000	27 516
Share of pedagogical specialists among those involved in actions under the OP qualified to work in multicultural environment	P3212	%	90	90	13,82

Share of persons (including Roma), who have received certificates for successfully completed literacy courses or courses for mastering the learning content intended for the lower secondary stage of basic education under the OP.	P3213	%	71	80	73.47 Phase 1 and 3.75 % Phase 2 of the “Elderly Literacy” procedure
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------	---	----	----	----------------------------------------------------------------------------------------------

The contribution of the operations subject to this assessment to the target value of indicator P3211, similarly to the performance indicator 3211, is relatively high, slightly above 61 %, when reported in the Annual Implementation Report of the OP SESG for 2021, a cumulative value above 141 %.

A low contribution rate is observed under indicator P3212, which can be explained by the fact that procedure BG05M2OP001-3.017 “Increasing the capacity of pedagogical specialists to work in a multicultural environment”, which is only reported in implementation and the final results of the measures have not yet been achieved and reported.

The contribution to the performance of result indicator P3213 is a consequence of the implementation of procedures BG05M2OP001-3.004 “Adult literacy – Phase 1” and Procedure BG05M2OP001-3.020 “Adult literacy – Phase 2”. While in the first phase the indicator was reached almost 92 %, the second phase procedure, which was in place at the time of preparation of this report, reached a book value of 3.75 %. To the extent that the baseline value of the indicator is 71 % and the achievement of Phase 1 is 73.47 % and in the absence of sufficient data to assess the progress under Phase 2 given the early stage of implementation at the time of the assessment, this indicator should be considered with the potential to present a risk of non-achievement of the target set.

With regard to the indicators in the performance framework under PA 3 of the OP SESG, it can be concluded that the milestones of the indicators included in the performance framework for 2018 have been achieved, as reported in the Annual Implementation Report of the OP SESG for 2018.

Under indicator I3211 “Children, students and youths from marginalised communities (including Roma) involved in measures for educational integration and reintegration” the final target for 2023 has already been reached and almost doubled.

The financial indicator F3 as of 2018 reported certified funds under PA 3 amounting to EUR 21 436 018.71 with a milestone of EUR 16 751 919.6.

As of 2021, the certified resources under PA 3 amounted to EUR 48 746 470.33 or close to 42 % of the 2023 final target.

As of 30.9.2022, the funds verified under the evaluated procedures amounted to BGN 118 991 445.08 or EUR 60 839 359.80 and the certified expenditure, respectively BGN 114 376 917.39 or EUR 58 479 989.26.

The contribution of the evaluated procedures as of 30.9.2022 to the achievement of the target value of the financial indicator under PA 3 of OP SESG as of 30.9.2022 is almost 50 %.

#### 4.2. What are the external factors and the extent to which they have influenced the achievement/non-achievement of the indicators set?

External factors that have influenced the achievement or non-achievement of the indicators set for the purpose of answering the evaluation question can be conditionally divided into two groups: significant factors, largely unforeseen and affecting a wide range of socio-economic relationships, and factors external to the implementation of operations and projects, which are rather sectoral or even local, but are not initially foreseen in their planning or at least not entirely. The impact can be identified by actions taken by the MA, the MC, the beneficiaries and, of course, established by the actual achievement or non-achievement of the indicators at the level of the operation or project.

The first group of external factors are publicly visible, such as the COVID-19 pandemic, the war in Ukraine, accompanied by a wave of refugees, rising energy prices and rising inflation.

The COVID-19 pandemic has led to an end to face-to-face forms of schooling since 13 March 2020. A reorganisation of the learning process, remote learning in electronic environment and other remote forms of learning were needed. This, along with other adverse effects on households, the economy and socio-economic relations in general, is summarised as a challenge in the report of the World Bank (WB) "Bulgaria: Early childhood education and care, general education and inclusion: situation analysis and policy orientation recommendations, where *"The growing gap in achievement and decline in learning due to the pandemic can have long-lasting consequences if not addressed systematically in the new strategic framework. Students lagging behind in the educational process will be demotivated and will be at greater risk of dropping out of school. The loss of household income due to COVID-19 will also test their ability to keep pupils in school, increasing the share of young people out of school and hindering the transition to higher education"*.<sup>4</sup> Similar is the perception of the impact of the pandemic on vulnerable communities in the Republic of Bulgaria's National Strategy for Equality, Inclusion and Participation of the Roma (2021-2030): *"The COVID-19 pandemic has increased the vulnerability of isolated and marginalised Roma communities and demonstrated the urgent need for a more effective and comprehensive policy response at national and European level."* The most vulnerable groups are most affected by the distance learning, according to MES analysis of online education and distance learning<sup>5</sup>. The same analysis argues that teachers have brought additional stress, emotional pressure and a number of new challenges that require a new type of support for teachers. In the study conducted by the Ministry of Education and Science, 40 % of teachers and 60 % of the directors said that the students' knowledge deteriorated as a result of online distance learning, with more than a third of them seeing a decrease in the academic performance of the students.

In addition to the necessary regulatory changes for the reorganisation of the educational process undertaken by the Ministry of Education, the MA of the OP SESG also reacted to the challenges posed by the containment measures. Outside the direct operational measures, such as the temporary suspension of project activities, adaptation of a number of processes, etc., REACT-EU resources were made available to finance measures in the education system under the thematic objective 'Supporting crisis repair caused by the COVID-19 pandemic and preparing a green, digital and resilient recovery of the economy'.

---

<sup>4</sup> <http://sf.mon.bg/?go=page&pageId=451>

<sup>5</sup> 'Distance learning in electronic environment 2020-2021: Implications and look forward' – Main trends in the education system during the COVID-19 pandemic and recommendations for an effective and safe course of the 2021/2022 school year, July 2021, <https://www.mon.bg/bg/news/4268>

Another unforeseen external factor is the war in Ukraine with the subsequent economic effects and refugee pressure, especially in the first months. In December 2022, the monthly inflation as measured by the Consumer Price Index (CPI) stood at 0.9 % compared to the previous month, while annual inflation in December 2022 compared to December 2021 was 16.9 %<sup>6</sup>. It is inevitable that this presents the beneficiaries with serious challenges and the social and educational system under great pressure to address the challenges of the refugee wave.

An external factor of sectorial importance for the implementation of operations is the amendment of basic regulations, e.g. the adoption by the National Assembly of the Law on Pre-School and School Education (PSE) in force since 1 August 2016, the Ordinance on Inclusive Education, Ordinance No 5 of 3 June 2016 on pre-school education, Ordinance No 10 of 1 September 2016 on the organisation of activities in school education, Regulation No 15 of 22 July 2019 on the status and professional development of teachers, directors and other pedagogical professionals, etc., which have a direct effect on the operations carried out within the scope of the evaluation. For some of the operations, acceptance occurs during implementation, while others are reflected in their planning at the level of an operation or project. Such is also Decree No 100 of 8 June 2018 establishing and operating a mechanism for joint work of institutions to cover, include and prevent the drop-out of children and pupils in compulsory pre-school and school age (Mechanism). Such are the normative changes, such as compulsory inclusion in the system of pre-school education of children from 4 years of age, the abolition of fees for nurseries and kindergartens as of 1 April 2022, etc. A similar factor is the increase in salaries of pedagogical specialists. The starting teacher's salary at the beginning of 2017 was BGN 660 and for 2021 it reached BGN 1260. The average salary for pedagogical specialists in 2020 was BGN 1,547, or about 11 % above the national average salary, while in 2015 the average salary for pedagogical specialists was about 6 % below the national average<sup>7</sup>. There are many external factors of this nature that directly or indirectly influence the achievement or failure to achieve the indicators of the operations under assessment.

Outside of this type of factors are the external environmental factors related to the specific implementation of an operation or project, such as the presence or not of sufficient motivation of the target groups, the presence or not of a supportive environment (local and national institutions, local community, partners, etc.) and others. The list of local external factors is, of course, not exhaustive, but due to some specificities of activities and target groups in this type of operations, perhaps the two mentioned are most prominent. E.g. under the Strategy for reducing the rate of early leavers from education 2013-2020, the reasons for leaving the education system can be economic, social, educational, ethnocultural and even institutional, it is logical that those for non-participation in the education system are similar. Almost always, a multi-purpose, complex and interdisciplinary approach with the participation of various stakeholders, such as family, local community, local and central institutions, various pedagogical and non-pedagogical specialists, is needed to carry out the activities.

In order to establish the extent to which the external factors for achieving or failing to achieve the indicators set were influenced, a question was included in the survey carried out among the representatives of the beneficiaries whether they had not fulfilled at least one of the indicators envisaged or were convinced that they would not achieve it. The aim of this question was to establish the opinion of those who achieve the

---

<sup>6</sup> [https://www.nsi.bg/sites/default/files/files/pressreleases/Inflation2022-12\\_TDOVJ2Z.pdf](https://www.nsi.bg/sites/default/files/files/pressreleases/Inflation2022-12_TDOVJ2Z.pdf)

<sup>7</sup> The data are taken from the "Strategic Framework for Development of Education, Training and Learning in the Republic of Bulgaria (2021-2030)"

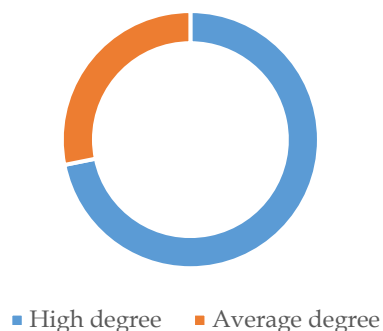
indicators, which external factors have contributed to this, and therefore those who do not achieve them, which external factors have influenced this.

In the framework of the survey, representatives of only 4 out of 105 beneficiaries replied that they have not or will not achieve a type of output indicator or result. They implement projects under procedures BG05M2OP001-3.017, BG05M2OP001-3.020 and the CLLD approach. Of these, one gave the specific reason<sup>8</sup>: *“Number of educational mediators – the indicator will not be achieved because only a few partners have appointed mediators. With an indicative number – 30 persons (as many as there were in the partnering schools at the time of submission of the project proposal), only 5 people are currently involved. School directors share that, in order to provide funds for a mediator, they have to participate in other programmes and the opportunities have been limited for the last school year.”* Another of the beneficiaries considers that, based on an extension of the project which it implements under procedure BG05M2OP001-3.017, despite the challenges it will be able to achieve the indicators set, and for the difficulties it has considered that the factors that have greatly influenced are: lack of willingness to participate on the part of the target groups, changed circumstances and obstacles to the implementation of the envisaged activities as a result of containment measures against the COVID-19 outbreak and rising inflation and the accompanying difficulties in the financial provision of the planned activities. A beneficiary implementing a project under procedure BG05M2OP001-3.020 considers that the following factors have an impact on the failure to achieve the indicators: the changed circumstances and obstacles to the implementation of the envisaged activities, as a result of the containment measures against the COVID-19 outbreak – to a high extent, the low willingness of target groups to participate, and rising inflation and the accompanying difficulties in the financial provision of the planned activities – to a low extent. A beneficiary with a CLLD project considers that the reason is a change in the structure of vulnerable groups and, in his opinion, the external factors that have influenced the failure of the indicator to a high degree are: the changed circumstances and obstacles to the implementation of the envisaged activities as a result of containment measures against the COVID-19 outbreak and rising inflation and the concomitant difficulties in the financial provision of the planned activities.

The assessment of the beneficiaries’ representatives under procedures BG05M2OP001-3.001, BG05M2OP001-3.002, BG05M2OP001-3.017, BG05M9OP001-2.018, BG05M2OP001-3.020 and the CLLD procedure for the external factors that influenced the achievement of the indicators set out in the survey responses are laid out in the following figures.

Figure 2 Factor Influence Degree: “Desire to participate on behalf of the target groups”

The importance of the “Desire to participate on behalf of the target groups” factor is assessed with a high degree of 72 % and an average of 28 %, out of a total of 103 evaluations, confirming the role of the motivation and commitment on behalf of the target groups for the success of the envisaged activities and thus the achievement of the planned indicators for the beneficiaries in the scope of the study, irrespective of the procedure under which they are funded.

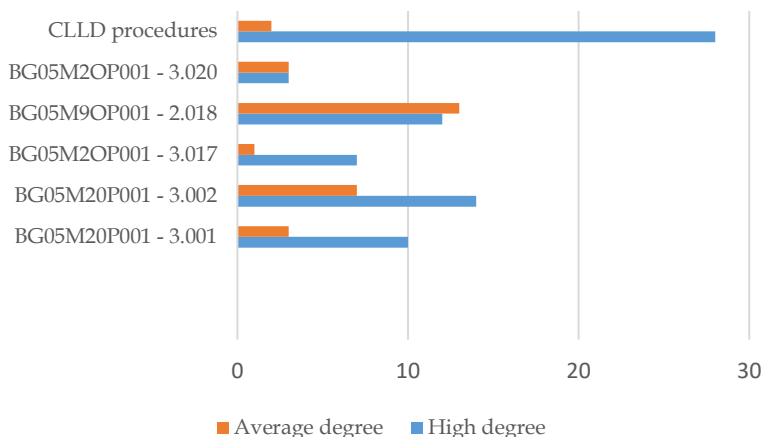


The results of the respondents’ assessment of this factor by type of procedure are presented below:

<sup>8</sup> The texts in italics and quotation marks are quotes of the participants in the survey, interviews and focus groups



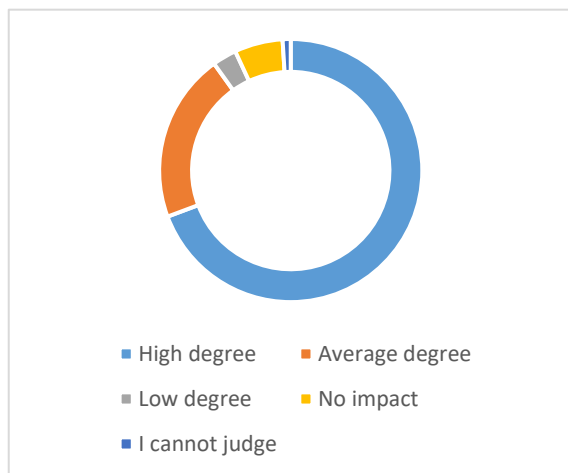
Figure 2 Quantitative distribution of the assessments by type of procedure for factor: "Desire to participate on behalf of the target groups"



Beneficiaries of CLLD procedures give a much more frequent assessment "high degree" of the impact of this factor than the beneficiaries of the other procedures. Beneficiaries under two procedures give a relatively equal number of high and medium impact assessments. These are the procedures BG05M9OP001-2.018 and BG05M2OP001-3.020. In the assessments of the other beneficiaries, the assessments of a high level of influence have a

significant predominance.

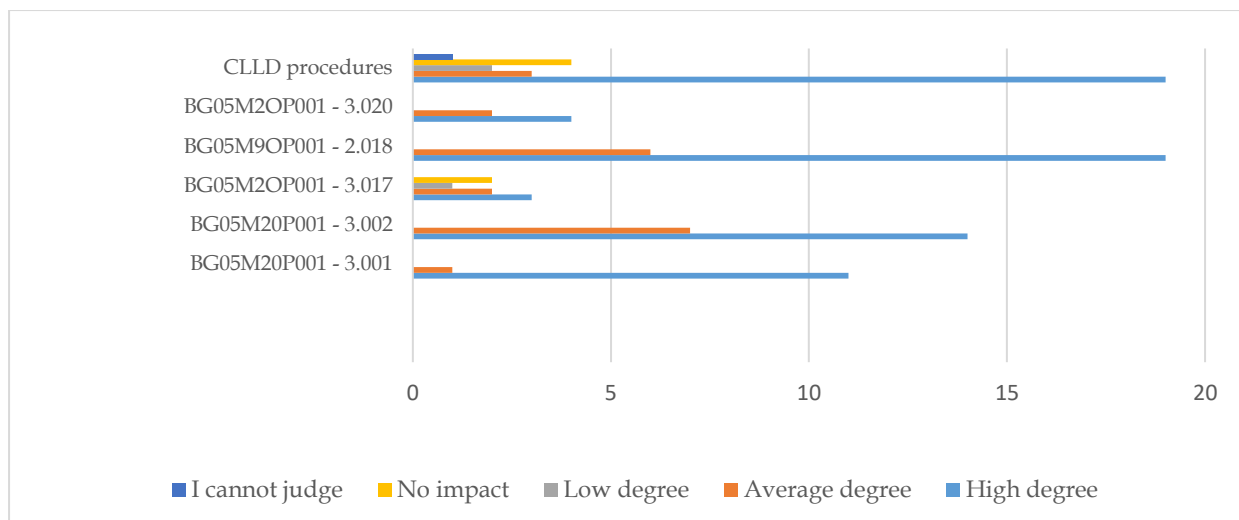
Figure 4 Factor Influence Degree: "Support and assistance from stakeholders, municipal administrations and civil society organisations"



The importance of the "Support and assistance from stakeholders, municipal administrations and civil society organisations" factor was highly assessed in 69 % of the evaluations, with an "average" of 21 % of the assessments, with a "low degree" in 3 % of the assessments, 6 % of respondents indicated that there was no influence and in 1 % of the evaluations (1 score), it was considered that it could not be estimated, out of a total of 101 given estimates of the degree of influence of this factor.

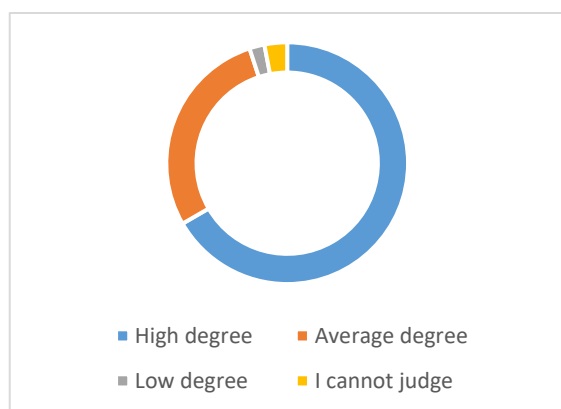
The quantification of the assessments of the degree of influence of the factor by procedures is presented in the figure below:

Figure 3 Quantitative distribution of the assessments by type of procedure for factor: "Support and assistance from stakeholders, municipal administrations and civil society organisations"



It is noteworthy that those who evaluated this factor with “low degree”, “no impact” and “I cannot judge” are among the beneficiaries of two types of procedures: BG05M2OP001-3.017 and CLLD procedures.

Figure 6 Factor Influence Degree: “Adequate regulatory framework, administrative acts and instructions of the MA applicable to the implementation of the activities and the achievement of project results”

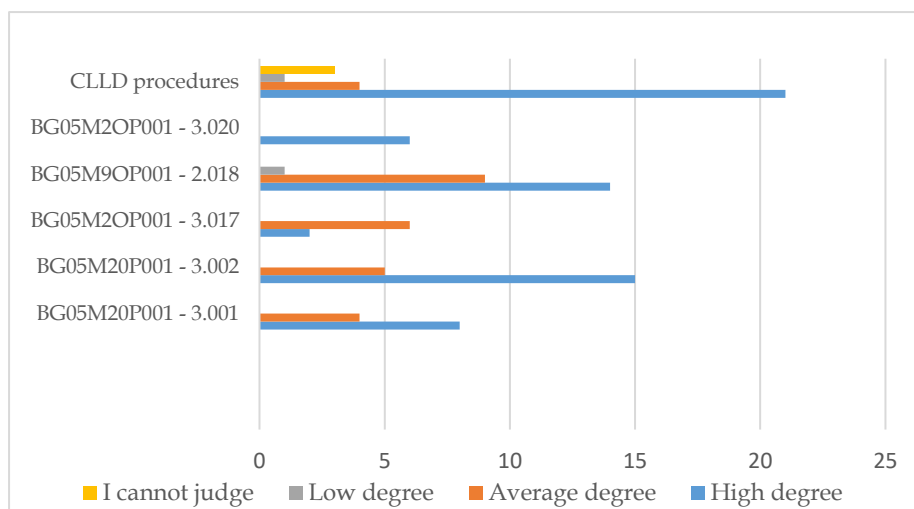


The influence of the factor “Adequate regulatory framework, administrative acts and instructions of the MA applicable in the implementation of the activities and the achievement of project results” was assessed with a high impact of 67 % of the beneficiaries, with an average impact of 28 %, with a low level of 2 %, and with “I can not judge” 3 % of the beneficiaries responded. There is no evaluation “no influence”. The total assessments given for this factor are 99.

The quantification of the assessments of the degree of influence of the factor by procedures is presented in the following figure:

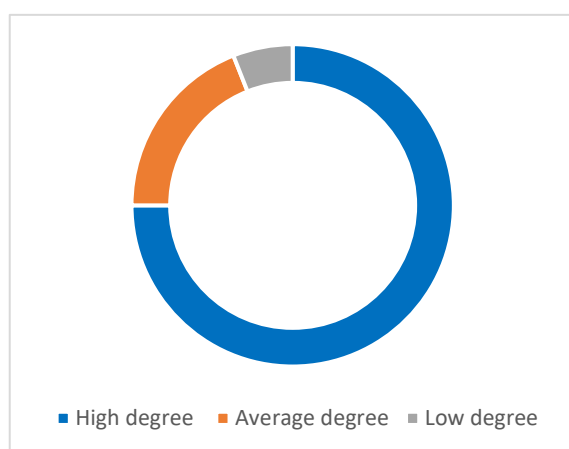
Figure 4 Quantitative distribution of the assessments by type of procedure for factor: “Adequate regulatory framework, administrative acts and instructions of the MA applicable to the implementation of the activities and the achievement of project results”





It is noteworthy that those who assessed this factor with a “low degree” of influence and “I cannot judge” are again among the beneficiaries mainly in CLLD procedures. This factor was also given an assessment “low degree” by one of the beneficiaries under BG05M9OP001-2.018.

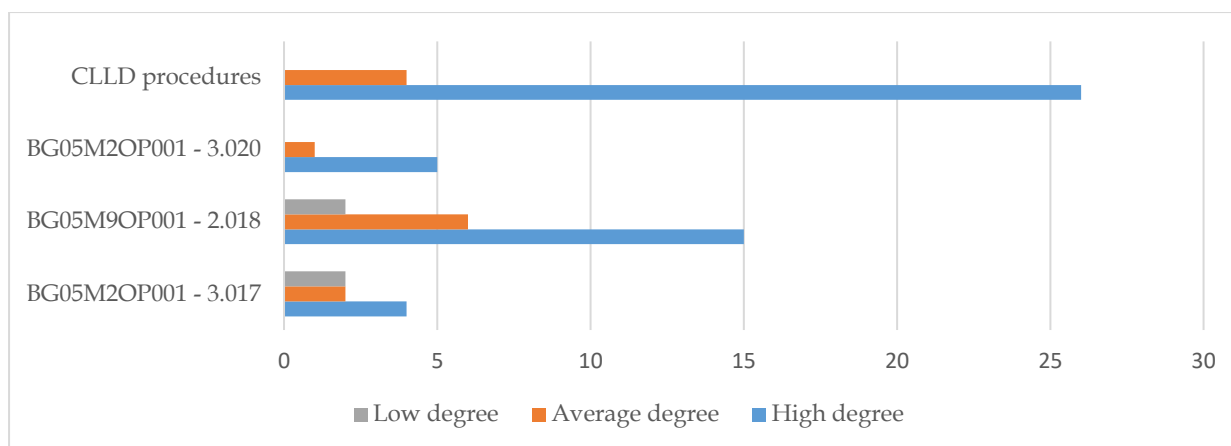
Figure 8 Factor Influence Degree: “Adequate response of the MA, other institutions and/or partners involved, enabling the implementation and adaptation of the envisaged activities to the changed environment following the introduction of containment measures against the COVID-19 outbreak”



In terms of the impact of the MA’s response, the other institutions and/or partners involved, enabling the implementation and adaptation of the envisaged activities to the changed environment following the introduction of containment measures against the COVID-19 outbreak, 75 % of respondents reported a “high degree” of influence, 19 % average and 6 % low from a total of 67 assessments. The beneficiaries of the procedures BG05M2OP001-3.017, BG05M9OP001-2.018, BG05M2OP001-3.020 and the CLLD procedures, the duration of preparation or implementation of whose projects overlaps with the start of the pandemic, expressed their views on this factor. Opinions “no influence” and “I can't judge” have not been noted.

The quantification of the assessments of the degree of influence of the factor by procedures is presented in the following figure:

Figure 5 Quantitative distribution of the assessments by type of procedure for: “Adequate response of the MA, other institutions and/or partners involved, enabling the implementation and adaptation of the envisaged activities to the changed environment following the introduction of containment measures against the COVID-19 outbreak”



In addition to the survey among beneficiaries, interviews were conducted with participants in the project management teams of the Ministry of Education and Science, beneficiary of three of the procedures: BG05M2OP001-3.004 “Adult literacy – Phase 1”, BG05M2OP001-3.005 “Active inclusion in the pre-school education system” and BG05M2OP001-2.011 “Support for success”. Regarding external factors, one of the main ones mentioned in the context of the project “New Chance for Success” under BG05M2OP001-3.004 was the one related to the specificities of the target group: *“Some of them found a job in the course of the project and preferred to support their families rather than attend the courses. Some of them found a way to balance, of course. Some of them went abroad. This is a very mobile target group... People who are also of an active working age, which suggested when they find a job to prefer to support themselves.”*<sup>9</sup> In the context of the project “Support for success” under BG05M2OP001-2.011, the main external factor mentioned was COVID-19: *“In reality, part of the trainings that were planned for the children and part of the interest activities failed to be fully realised. Especially in 2020, concerning the interest activities... This can be noted as a difficulty, but not substantial”, “We can say rather that despite Covid we have achieved the expected results. The same applies to career guidance. During Covid, you can't do career guidance online because it's not always possible. But in the end, this activity is also successfully implemented.”* As for whether they have received assistance from the MA in overcoming the difficulties: *“Yes, certainly, because even before the introduction of online learning elsewhere, we had their permission. Of course, with parameters guaranteeing the implementation of activities, such as recordings during training and interest activities, because it is more specific there. They gave it to us, and we were prepared. Where possible, it was carried out with their permission and assistance, because so far no such thing has been done and schools had concerns about whether if they carry out certain activities online and remotely, costs will be recognised.”, “Similarly, we received support for the training of pedagogical specialists for the implementation of the toolkit.”, “They prepared other unit costs tailored to the needs of online learning. Accordingly, with reduced amounts, but still with the possibility to carry out this activity.”*<sup>10</sup>

The degree of influence of the external factors to achieve the indicators set can be ordered as follows, based on the “high degree” assessments of the survey carried out among beneficiaries: The most influencing factor is the adequate response of institutions, including MAs and other stakeholders, during the exceptional containment measures put in place against the COVID-19 pandemic (75 %). Next, but with almost the same degree of influence is the motivation of the target groups to participate in project activities (72 %). Immediately afterwards, again with a similar and also high degree of influence is the presence of

<sup>9</sup> Interview held with representatives of the Ministry of Education and Science on 13.1.2023

<sup>10</sup> Interview held with representatives of the Ministry of Education and Science on 12.1.2023

support and assistance from municipal administrations and civil society organisations (69 %) and the existence of adequate regulations, administrative acts and instructions of the MA applicable in the implementation of the activities and the achievement of project results (67 %).

A relatively small number of beneficiaries have noted that they have not achieved, or will not achieve, a planned indicator, and the external factors identified by them that have influenced this are related to: unclear regulations and administrative acts leading to the absence of a planned target group, a lack of willingness to participate on behalf of the target groups, obstacles to the implementation of the envisaged activities as a result of the containment measures against the COVID-19 outbreak and rising inflation and the concomitant difficulties in the financial provision of the planned activities.

#### 4.3. Is the selection of target groups adequate in the grant award procedures under evaluation and are they in line with the indicators set out?

For the purpose of this evaluation question, a detailed analysis of the underlying intervention logic in the MCSO and the Conditions/Guidelines for applicants falling within the scope of the evaluation was carried out, i.e. what are the needs or problems identified, the objectives to be achieved in order to decide what resources are envisaged or used, what activities are planned or implemented, and what performance and result indicators set or achieved.

The results of the documentary analysis of the adequacy of the selection of target groups are summarised in the following table.

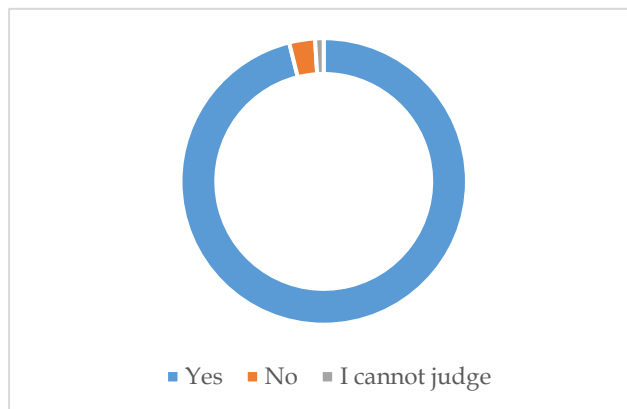
*Table 7 Results of the analysis of the adequacy of the selection of target groups*

Procedure	Results of the analysis
BG05M20P001-3.001 "Support for pre-school education and preparation of disadvantaged children"	The target groups are adequately selected according to the problems identified and the objectives set. The activities are largely targeted at the selected target groups, which in turn are overall in line with the indicators set in the necessary way to achieve the objectives. An exception is made by "children from marginalised groups" from the target groups, who do not necessarily enter the included in activities groups, respectively the change is not tracked in the output indicator, given that its corresponding indicator at programme level is 3211 "Children, students and youths from marginalised communities (including Roma) involved in measures for educational integration and reintegration".
BG05M20P001-3.002 "Educational integration of students from ethnic minorities and/or seeking or receiving international protection"	The target groups are largely adequately selected according to the problems identified and the objectives set. The activities are aimed at the selected target groups, which in turn are overall in line with the indicators set in the necessary way to achieve the objectives.
BG05M20P001-3.004 "Adult literacy – Phase 1"	The target groups are selected according to the problems identified and the objectives set. The activities are aimed at the selected target groups, which in turn correspond generally to the indicators set in the manner necessary to achieve the objectives. However, it is noticeable that target groups are defined without a lower age limit, unlike the output indicator.

BG05M9OP001-2.018 "Social-economic integration of vulnerable groups. Integrated measures to improve access to education – Component 1"	The target groups are adequately selected according to the problems identified and the objectives set. The activities are aimed at the selected target groups, which in turn are overall in line with the indicators set to achieve the objectives. Again, "children and students from marginalised groups" is part of the target groups that are not excluded from participation in the activities but are not included in the output indicator.
BG05M2OP001-3.005 "Active inclusion in the system of pre-school education"	The target groups are adequately selected according to the problems identified and the objectives set. The activities are aimed at the relevant target groups, which in turn correspond to the set result indicators, but in the output indicators are set out "Kindergartens supported under the OP to provide an environment for active inclusion in the pre-school education system (including for early prevention of learning difficulties)", which are subsequently missing in the result indicators. Although, probably part of the indicator is related to output and result indicator under IP 9i. In addition, in the Application Conditions, a breakdown was made with set target values of some of the indicators, which directly correspond to indicators in the OP SESG and for which particular targets were set.
BG05M2OP001-3.017 "Increasing the capacity of pedagogical specialists to work in a multicultural environment"	The target groups are adequately selected according to the problems identified and the objectives set. The activities are aimed at the selected target groups, which in turn correspond to the indicators set. However, it is noticeable that no result indicator related to the educational mediators is provided, but that the output indicator includes elements of such as one for a result.
BG05M2OP001-2.011 "Support for success"	The target groups are adequately selected according to the problems identified and the objectives set. The activities are aimed at the selected target groups, which in turn correspond to the result indicators set.
BG05M2OP001-3.020 "Adult literacy – 2"	The target groups are adequately selected according to the problems identified and the objectives set. The activities are aimed at the selected target groups, which in turn correspond to the result indicators set. In the output indicators there is an additional indicator for the procedure: "Persons who have acquired basic education in the framework of the operation and continued in the first upper secondary education or vocational training and/or started/remained in employment within six months of their participation in operations". Part of this indicator has the characteristics of a long-term result indicator according to the ESF Regulation.
Grant awarding procedures under the CLLD approach with funding under the OP SESG.	The target groups are adequately selected according to the problems identified and the objectives set. The activities are aimed at the selected target groups, which in turn correspond to the result indicators set.

In addition, in the framework of the survey conducted, 96 % of the responding representatives of beneficiaries (in total 103) considered that the selection of target groups in the procedures was adequate and they are in line with the indicators set, 3 % considered that it is not adequate and not in line with the indicators set, and 1 % (one beneficiary) noted that it could not judge.

Figure 6 Answers to the question: “In your opinion, is the selection of target groups in the procedures adequate and are they consistent with the indicators set?”



Respondents who consider that the selection of target groups is not adequate justify their opinion by the lack of educational mediators, where target groups of the project are pedagogical specialists and educational mediators and the view that the target group can be expanded – one of the beneficiaries under the CLLD procedure.

In conclusion, it can be summarised that the selection of target groups under the procedures that are in the scope of the evaluation is adequate and they comply with the indicators set out, with some exceptions:

Target groups (“children from marginalised groups” and “children and students from marginalised groups” – in the second case) are not part of the groups expected to be obligatory included in the activities under procedures BG05M20P001 -3.001 and BG05M9OP001-2.018 and are therefore not included in output indicator. On the other hand, the change is monitored by the output indicator at the level of OP 3211 “Children, students and youths from marginalised communities (including Roma) involved in measures for educational integration and reintegration (number)”.

Adequately defined target groups, including “children and students seeking or receiving international protection” or similar, definition of activities addressing this target group and subsequently linking to performance and result indicators that do not seem to include this specific target group foreseen under the specific operation (BG05M20P001-3.001, BG05M20P001-3.002 and BG05M9OP001-2.018). In this case, the definition set of the indicator P3211<sup>11</sup> “Children, students and youths from ethnic minorities (including Roma) integrated in the education system (number)” in OP SESG also includes “All activities will also be aimed at children and students seeking or receiving international protection” and this is probably the reason why they are not explicitly included in the relevant indicator.

In one case (under procedure BG05M2OP001-3.004) the target groups are defined without an age limit, as opposed to the output indicator.

Output indicators that track the change in the situation of the target group as a result rather than as output (BG05M2OP001-3.020).

It is noteworthy that the result indicator at programme level P3211 “Children, students and youths from ethnic minorities (including Roma) integrated in the education system (number)” does not appear to be specifically defined in terms of the change in the situation related to the supported participants, which should be achieved as a result of the activities carried out under the operations that contribute to its achievement.

<sup>11</sup> <https://monitorstat.nsi.bg/bg/Report/Info?id=708121d6-326a-4f26-89b5-099efa3963f6>

#### 4.4. To what extent are the data collected for the calculation of indicators reliable and qualitative? What should be the parameters of the collected data?

The ESF monitoring in the 2014-2020 programming period is carried out through common indicators, which are set out in Annex I of the ESF Regulation (1304/2013) and programme-specific indicators that are not mandatory. Besides that, it is possible to introduce additional indicators for the operation itself if the intervention logic implies it.

The monitoring of the programmes is based on three types of indicators – financial, implementation, and result<sup>12</sup>.

The financial indicators relate to the total amount of eligible expenditure entered into the accounting system of the certifying authority and certified by it, in accordance with point (c) of Article 126 of Regulation No 1303/2013. They may be used to monitor progress in terms of the payment of the funds available for any operation, measure or programme in relation to its eligible cost. They are compulsory in the Performance Framework.

Output indicators relate to operations supported. An output is considered what is directly produced/supplied through the implementation of an ESF operation, measured in physical or monetary units. Outputs are measured at the level of supported people, supported entities (entities are defined as organisations – a group of people formally organised to pursue a collective objective that can both implement and be supported through projects, and should only be taken into account if they benefit directly from ESF support that leads up to costs), provided goods or services delivered. They are set at the level of investment priorities or specific objective.

Result indicators capture the expected effects on participants or entities brought about by an operation. Result indicators should correspond to the specific objectives set out for each investment priority selected. They go beyond output indicators in so far as they capture a change in the situation, in most cases related to supported entities or participants. They must be set as closely as possible to the activities carried out under the relevant investment priority in order to minimise external factors that could affect the reported value of result indicators.

The general ESF indicators are a limited set of output and result indicators set out in Annexes I and II of the ESF Regulation<sup>13</sup> and they represent the minimum set of indicators for each OP co-financed by the ESF, with Annex I relevant to the SESG OP.

The Regulation requires that detailed data on each participant be collected and stored without setting specific requirements on how or at what level this information should be maintained. The data collected cover personal information, such as gender, age, labour market status, level of education, etc., including certain data relating to special categories of personal data pursuant to Regulation (EU) 2016/679.

Cases where the information may not be complete are limited to data indicators relating to special categories of data.

Data relating to long-term result indicators relating to the situation of participants 6 months after leaving the operation, where they are more likely not to be in direct contact with the beneficiary, as well as for some

---

<sup>12</sup> Monitoring and Evaluation of European Cohesion Policy, European Social Fund, Guidance document, August 2018

<sup>13</sup> Regulation (EU) No 1304/2013 of the European Parliament and of the Council of 17 December 2013 on the European Social Fund and repealing Council Regulation (EC) No 1081/2006



other indicators, including implementation, are not necessary for all participants, but for a representative sample of the participants under the investment priority.

The general output indicators refer to both individuals (individuals benefiting directly ESF support) and entities.

Article 125 (2) (e) of the General Regulation requires the MA to establish a computerised system for recording and storing data on each operation necessary for monitoring, evaluation, financial management, verification and auditing, including data on individual participants in operations, where applicable.

At a national level, in particular for the OP SESG, the approach is centralised and is regulated by Council of Ministers Decree No 243 of 20 September 2016. This Ordinance<sup>14</sup> lays down the terms, conditions and mechanism for the functioning of the UMIS and for the conduct of proceedings before the managing authorities through the UMIS. The Ordinance ensures that the structure and content of the information introduced under programmes using UMIS comply with the minimum requirements of Annex III of Commission Delegated Regulation (EU) 480/2014 of 3 March 2014 supplementing Regulation (EU) 1303/2013. The data is entered by the beneficiaries in the UMIS.

For the purposes of the annual reports and data reporting to the EC, for the time being there is no automatic generation of the reports in the UMIS, but such functionality is planned according to data from the MA of the OP SESG<sup>15</sup>. As a result, to prepare the data for these purposes, they are extracted aggregated by the UMIS and are subject to further validation and processing in the MA.

The National Statistical Institute (NSI) has developed a unified metadata document in accordance with the Eurostat Reference Metadata Structure (ESMS).

The data on the result indicators of the operational programme under the general ex-ante conditionalities in Annex II to Regulation (EU) No 1303/2013 are automatically accessed by the NSIs in the UMIS for their follow-up.

The metadata of the result indicators are available on the website of the information system Monitorstat<sup>16</sup>, maintained by the NSI.

In two of the projects of DB MES (BG05M2OP001-2.011 and BG05M2OP001-3.005) internal information systems were established to facilitate the monitoring and reporting of projects.

In carrying out expenditures verification, the MA performs validation of participants' data through the National Electronic Information System for Pre-School and School Education (NEISPSE)<sup>17</sup> and verification for the purposes of demarcation between different operations, including at the level of participant<sup>18</sup>, which provides reasonable guarantees regarding the quality of the data collected. These additional checks at the

---

<sup>14</sup> Council of Ministers Decree 243 of 20 September 2016 laying down the conditions, procedure and mechanism for the functioning of the Information System for the Management and Monitoring of the Funds from the European Structural and Investment Funds (ESIF) and on the conduct of proceedings before the managing authorities through the UMIS, <https://lex.bg/en/laws/ldoc/2136906184>

<sup>15</sup> Focus group of representatives of the MA held on 19.12.2023

<sup>16</sup> <https://monitorstat.nsi.bg/>

<sup>17</sup> <https://cioo.mon.bg/>

<sup>18</sup> Interview with the MA on the CLLD approach, held on 26 January 2023

time of this evaluation are hampered due to a change in the procedure for accessing NEISPSE data resulting from the requirements of Regulation (EU) 2016/679 and the access is restricted on the basis of a “concrete data request” principle, which requires additional administrative efforts on behalf of the administration in the MA.

In the programming period 2014-2020, indicators related to minorities and people of foreign origin are subject to specific definition at national level. This is done for OP SESG.<sup>19</sup>

Information on minority/migrant status is one of the special categories of data under Regulation (EU) 2016/679. This indicator also covers some of the most marginalised groups and it is possible that some of the supported individuals are reluctant to provide not only sensitive personal data, but also basic personal data which is subject to the requirement of completeness of the data. The Practical Guide<sup>20</sup> for Data Collection and Validation, in point 5.6.2, states that such persons must be supported if they meet the eligibility criteria, but should not be calculated as participants for monitoring purposes. An exception and described approach is also envisaged in cases where e.g. persons from ethnic minorities such as Roma are reluctant to qualify as such.

With regard to the criterion of quality of the data collected for the calculation of the indicators of the evaluation question, in line with the understanding of this concept according to the Guide<sup>21</sup>, the following aspects are analysed:

- Accuracy, which refers to the correct recording of the current situation and requires the monitoring systems to have the capacity to allow retroactive correction of data in cases of recording errors.
- Comparability, which refers to comparisons in time and across countries and therefore depends on the adoption of common definitions regarding the collection and treatment of data.
- Coherence, which refers to the adequacy of the data to be reliably combined in different ways.

Based on UMIS functionalities that allow adjustments to data where necessary, the existence of common definitions for the majority of indicators (the common for ESF, without the exceptions foreseen) and the metadata of OP SESG indicators can have reasonable assurance that the three main data quality criteria are met.

In order to ensure data quality, the Regulation requires the availability of values of all indicators for all selected investment priorities and comprehensive validation – all data should be subject to a validation procedure as to whether they are complete and internally consistent.

The validation of the data should be in two levels, at the individual record level and at the aggregate level.

At the participant’s individual record level, in order to ensure completeness and internal consistency before data aggregation, in essence, each individual record should contain at least the general output indicators covering insensitive personal data (e.g. gender, labour market status, level of education, etc.). Immediate results should cover the same population of participants as the output indicators, only when exiting the operation. Long-term common indicators should cover a smaller population of participants, as long as each

---

<sup>19</sup> <https://monitorstat.nsi.bg/bg/Report/Info?id=708121d6-326a-4f26-89b5-099efa3963f6>

<sup>20</sup> Annex D – Practical guidance on data collection and validation, monitoring and evaluation of European Cohesion Policy, European Social Fund, Guidance

<sup>21</sup> Monitoring and Evaluation of European Cohesion Policy, European Social Fund, Guidance document, August 2018



is based on a representative sample of the relevant participants. In this case, the sample size and number of replies completed shall be reported together with the annual implementation report. The completeness of the records is monitored during the expenditures verification, as already indicated, and the risks are reduced by the design of UMIS functionalities.

Verification of the internal consistency of participation records means ensuring that the links between the different related variables are compatible and consistent – to a large extent this risk is reduced by the possibility of only one variable being introduced in the UMIS for a type of indicator to be used for the calculations, and the additional checks carried out by the MA during the verification of expenditures provide a reasonable assurance of the quality of the data.

The checks at an aggregate level are carried out by the MA in the preparation of the annual report, with aggregated data on operations being extracted from the UMIS and their preparation for the purpose of the report is carried out by the MA of the OP SESG.

The Practical Guide<sup>22</sup> for Data Collection and Validation recommends, in addition to common definitions and guidelines, that common standards and procedures be followed by all organisations involved in data collection to ensure data quality. It is observed that the MA of the OP SESG applies a rather procedurally based approach, where clarifications about the indicators are provided specifically – for the specific operation, possibly dictated by the different operation-specific indicators, and a large part of the specifics in data collection are unified by default according to the standard functionalities of the UMIS used. There is no separate part/section dedicated to indicators in the Management Manual of the OP SESG.

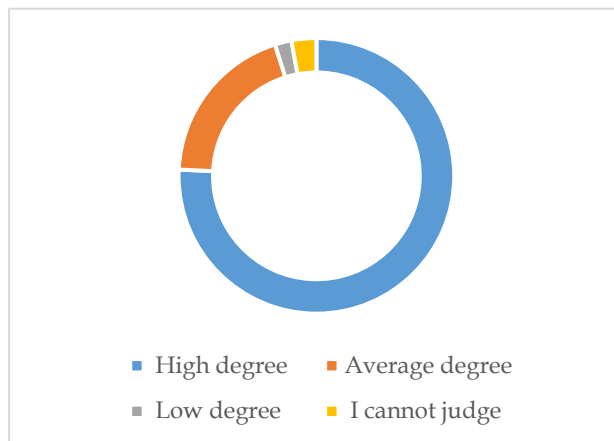
With regards to the reliability of the data, it should be borne in mind that microdata are submitted to the UMIS by the beneficiaries who are committed to the data reliability. They are checked by the MA during the verification of expenditure, including through NEISPSE and, if necessary, corrections are made. The information system for monitoring and management (UMIS) is centralised and has the possibility to provide aggregated data. From this perspective, it could be argued that the data collected and stored for the indicators are guaranteed through reliable procedures and an automated information system.

In the framework of the survey conducted among the beneficiaries, the question “To what extent are the data collected by the MA for calculating the indicators reliable and qualitative?” was included. The answers are presented in the following figure.

---

<sup>22</sup> Annex D – Practical guidance on data collection and validation, monitoring and evaluation of European Cohesion Policy, European Social Fund, Guidance

Figure 7 Answers to the question: “To what extent is the data collected by the MA to calculate the indicators reliable and qualitative?”



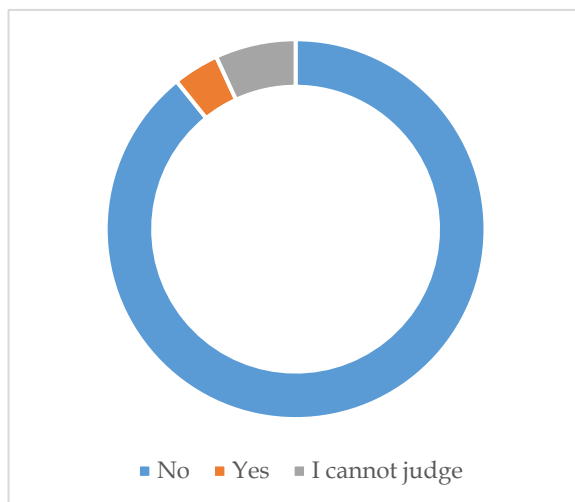
Around 76 % of the 103 representatives of beneficiaries indicated a “high degree” response, slightly above 19 % indicated an “average degree” response, about 2 % “low degree”, and around 3 % cannot judge.

The answer to this question should be seen to a large extent as an assessment by the beneficiaries of the system used to collect and calculate the data on the indicators of the procedures covered by the evaluation, rather than as a compliance with the applicable requirements.

The parameters of the data collected are detailed in the Guide “Monitoring and evaluation of the European Cohesion Policy, ESF, 2018” and detailed in its Annex D: “Practical Guide to Data Collection and Validation”.

In the framework of the survey conducted among the beneficiaries, the following question was included: “Do you have any suggestions for changes in the parameters of the data collected?”.

Figure 8 Answers to a question: “Do you have any suggestions for changes to the parameters of the data collected?”.



About 89 % of the total 102 representatives of beneficiaries did not propose changes in the parameters of the data collected. About 4 % have, and about 7 % cannot judge.

The answers to this question include suggestions for changes in the following directions: “To pay more attention to qualitative and not just quantitative dimensions. To carry out an impact assessment”, “Simplify the microdata tables” (both proposals are from beneficiaries under procedure BG05M20P001-3.017), ‘Request the result indicator for performance on the basis of what has been submitted as an interim report and not as in the final report where it is expected from us to look for where all children and

students are studying and where they are enrolled’ (proposal by a beneficiary under procedure BG05M9OP001-2.018). The following finding was made by a beneficiary under the CLLD procedure “The specific indicator of children and students from ethnic minorities can not always be reached due to the annual decrease in the number of students”.

During the interviews with representatives of DB MES was shared the view that it is good for projects, such as “New chance for success” to track, as difficult as it may be, the realisation of the participants who are involved in the project, which would be a good indicator of the practical success of such a project.

During the focus group with representatives of the MC, it was noted that overall the system of established indicators did work in terms of monitoring progress, despite a number of imperfections of some of the indicators, including general imperfections, unresolved at European level. The need to introduce new

indicators to monitor the qualitative change resulting from the activities carried out in relation to the participants in the operations was underlined.

Based on the documentary analysis carried out and the analysis of the results of the survey, it can be argued to a high degree that the data collected for the calculation of the indicators are reliable and qualitative. The analysis highlighted several directions in which it is necessary to carry out actions to improve the processes that guarantee reliability and quality, such as improving the possibilities for carrying out further validation of the microdata in the NEISPSE, establishing a procedure in the Manual for the management of the OP SESG, concerning the way data is collected and processed for the purpose of reporting under the programme, including with regard to common long-term result indicators, for the procedures for which it is applicable.

The parameters of the data collected derive from the applicable regulations and are set out in detail in the Guide “Monitoring and evaluation of the European Cohesion Policy, ESF, 2018” and detailed in its Annex D: “Practical Guide to Data Collection and Validation”.

With regards to proposals for changes to the parameters of the data collected, in the context of such data beyond the minimum mandatory, the proposals from stakeholders may be limited to the following: introducing new indicators to track the qualitative change resulting from the activities carried out in relation to participants in operations and making further efforts to better define the main indicators related to the integration of vulnerable groups.

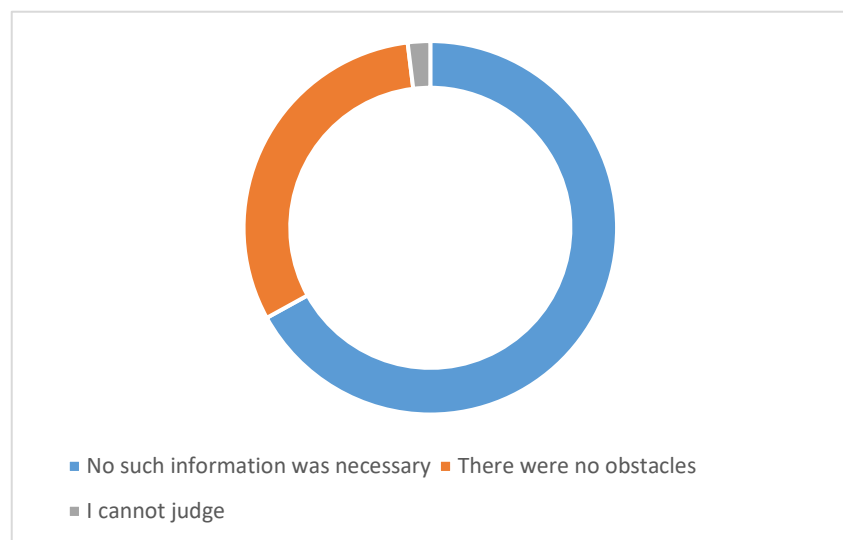
**4.5. Is it necessary to introduce additional data collection from other sources such as administrative registers, sociological surveys, etc.? Have any obstacles been identified to the use of information from administrative registers for the purposes of the implementation of projects under the OP SESG, aimed directly or indirectly at marginalised groups, including Roma, and what are the possible solutions for overcoming them?**

The type of mandatory data collected and processed for monitoring purposes directly stems from the applicable data collection and processing requirements for indicators under Regulations 1303/2013 and 1304/2013, as well as from the requirements specifically applicable to the general indicators set out in Annex I of the ESF Regulation (1304/2013). Data relating to long-term result indicators, for operations to which it is applicable, relating to the situation of participants 6 months after leaving the operation, where they are more likely not to be in direct contact with the beneficiary, as well as for some other indicators, are not necessary for all participants, but for a representative sample of participants under the investment priority. Accordingly, they may be collected through a sociological survey or other type of survey, including data from national registries, if applicable, and maintain compatible data. For example, for tracking a common long-term result indicator related to the labour market status 6 months after the participant’s exit from the operation, data from a survey or national registers could be used (e.g. in BG05M2OP001-3.020, but a different approach has been taken). The Guidance on Monitoring and Evaluation of European Cohesion Policy, ESF, 2018 and its Annex D sets out what criteria the sample and data collection requirements for common long-term indicators should comply with and how data from existing national registers could be used. With regards to specific indicators and those general ones whose definition is national responsibility, the type of data required is directly related to the definitions of the indicators and data by which it is determined to be reported.

When it comes to the type of data required for evaluation purposes, it is in most cases necessary to conduct sociological surveys in order to establish the effect of change from the interventions implemented or to answer evaluation questions, by identifying data that could be described mainly by qualitative

characteristics and, in some cases, by quantitative ones. To a large extent, their type and scope is determined by the evaluation questions asked and the availability or non-availability of accessible administrative data. Of course, the sociological studies are an essential tool for impact evaluation. Where a counterfactual impact evaluation is applied, it is advisable, regardless of which approach is used to step on quantitative data that could be administrative data or data from targeted studies. Such data in the case of PA 3 of the OP SESG could, for instance, be data on educational attainment, matriculation exam results, etc., for both the surveyed group and the control group, if applicable, etc.

Figure 9 Answers to the question: “Have you identified any obstacles to the use of information from administrative registers during the project?”



In the framework of the survey conducted among the beneficiaries, the question of whether there were obstacles to the use of information from administrative registers was included. Around 67 % of 103 respondents indicated that no such information was needed, around 31 %, that there were no obstacles and around 2 % that they could not judge. No one replied that he had difficulties.

During the interviews with representatives of the DB Ministry of Education and Science, no information on obstacles to the use of information from administrative registers was received. It was specified that data from NEISPSE is mainly used.

During the focus group with MA, difficulties were shared with regard to the use of NEISPSE information, insofar as access is restricted on the basis of a “data request” principle, which requires additional administrative efforts by the administration in the MA.

Beyond the necessary data resulting from the requirements of the relevant Regulations, the Guidance on Monitoring and Evaluation of European Cohesion Policy, ESF, 2018 and detailed in its Annex D: The ‘Practical guide on data collection and validation’, as well as those resulting from the definition of the relevant indicator, the need for additional data and the use of additional sources, such as administrative registers and sociological surveys, shall be determined by the needs for the purpose of the evaluations of the operations and the specific evaluation questions.

Based on the survey and analysis carried out, it can be argued that no obstacles have been identified to the use of information from administrative registers for the purpose of the implementation of projects under the OP SESG, with one exception: difficulties experienced by the MA with regard to the use of information from NEISPSE . Accordingly, overcoming this difficulty is related to bringing the mechanism of access to

the information system in line with the requirements of Regulation (EU) 2016/679 and the Personal Data Protection Act<sup>23</sup>.

#### **4.6. To what extent do the operations under the OP SESG which are the subject of this evaluation achieve the planned results in the short, medium and long term?**

For the purpose of the evaluation covered by this procurement, including the answer to this evaluation question, a detailed analysis of the procedures assessed was carried out in terms of the target and reporting values of the defined indicators of the operations. The main objective of the analysis was to assess the extent to which the planned results are achieved, both against the targets set under the MCSO and the Guidelines/Conditions for Application and the target values set by the projects in the evaluated procedures. The results of the analysis are set out in Annex 17 to this report – Reference of the planned and achieved values of the indicators under the assessed procedures under PA 3.

As already mentioned in the answer to the evaluation question *“What is the progress (including the achievement of the final targets) in the implementation of Priority Axis 3 indicators aimed directly or indirectly at marginalised groups such as Roma, including milestones and targets in their performance framework?”*, only in procedure BG05M2OP001-3.005 “Active inclusion in the pre-school education system” are included measures under both investment priorities of PA 3. All other operations have programmed activities under Investment Priority 9ii focused on the integration of marginalised communities.

In assessing the results of the analysis carried out, the following limitations and assumptions should also be taken into account with regard to the data collected:

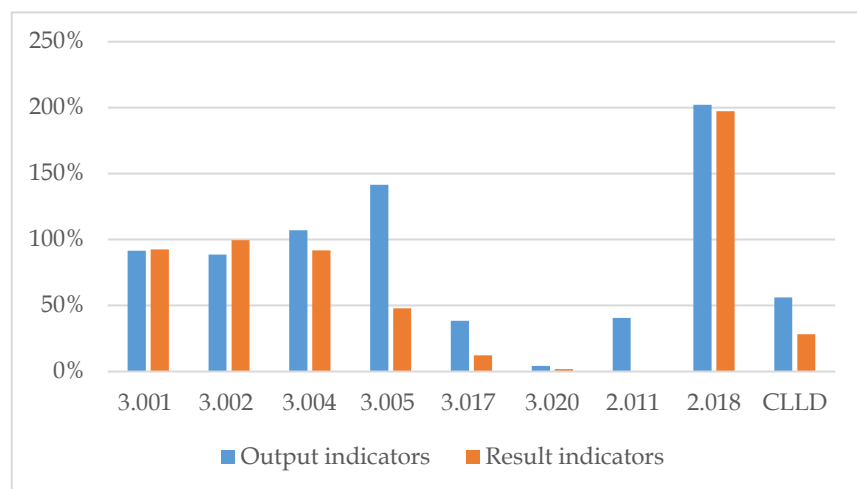
- Data provided by the MA were used as the main source of information on the values of the indicators of the operations under evaluation. The analysis of the data revealed that in some cases the discontinued projects had availability of target or reporting values of the indicators. Consultation of the UMIS public module for the same projects found that for some of them the values were not reported and for others they were zeroed. In this regard, and in order to avoid distortion of the results of the analysis, the availability of target and reporting values of the indicators of discontinued projects has not been taken into account in this report;
- According to the Technical Specification, *“The evaluation must cover all grant award procedures which, at the time of conclusion of the contract under this procurement, have completed their implementation under Priority Axis 3 or have a critical mass of performance and result indicators implemented – for example, after one academic year from the start of the implementation of the project activities.”* Part of the operations under assessment are still in implementation, another part has been completed, but the final results of the project implementation have not yet been reported. In this regard, the assessment of the progress of the implementation of the indicators and the achievement of the results reported by them at the time of drafting this report should not be absolutised;
- Procedure BG05M2OP001-2.011-001 “Support for success” is implemented under two priority axes – Priority Axis 2 and Priority Axis 3. For the purposes of this evaluation, only data on the achievement of the results under Priority Axis 3 have been taken into account.

---

<sup>23</sup> <https://lex.bg/laws/ldoc/2135426048>

The next few figures show the percentage ratio of the output and result indicators achieved under the evaluated procedures, compared to the targets of the MCSO indicators and the Guidelines/Instructions for Applicants and of the target values indicated in the projects.

Figure 10 Percentage ratio of the verified values of indicators to the target values set in the MCSO and the Guidelines/Conditions for Applicants



According to the data, the highest rate of implementation of both types of indicators was observed in procedure BG05M9OP001-2.018 "Socio-economic integration of vulnerable groups. Integrated measures to improve access to education – Component 1", where the targets are almost doubled. The result indicator 'Group net enrolment coefficient in the different stages of education – initial

stage' is not included in the calculations as it is yet to be reported. The first three procedures indicated in the figure were completed with almost full achievement of the set results.

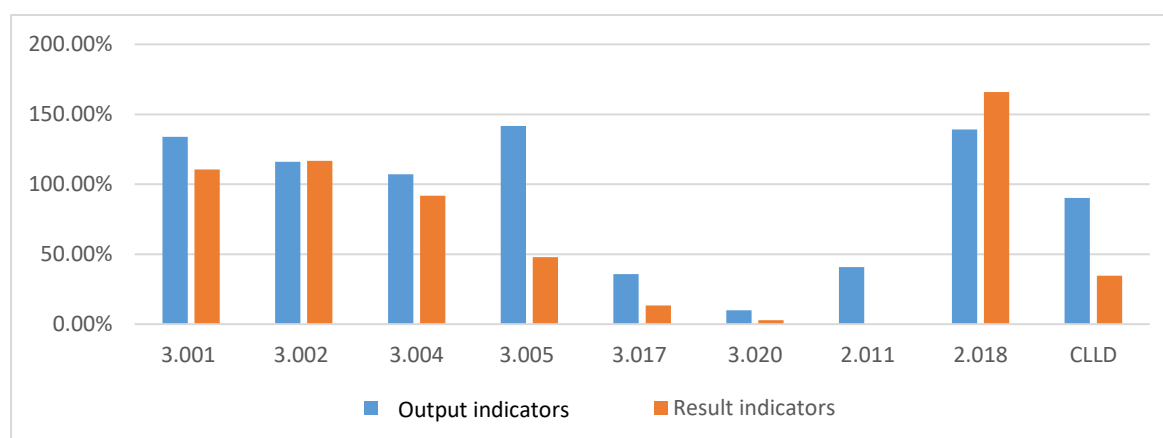
With regard to procedure BG05M2OP001-3.005 "Active inclusion in the pre-school education system" it should be noted that the performance indicators were achieved above 140 %. Two of the indicators (Number of national motivation campaigns for parents in the target group and Number of national campaigns to overcome negative public attitudes and non-discrimination), which are currently zero, are not included in the calculations. According to data from the interview held on 13.1.2023 with a representative of the DB Ministry of Education and Science, the campaigns have been conducted and are about to be reported with the final report. Of the result indicators under the procedure, non-performance is observed in the indicator "Group net enrolment coefficient in kindergartens", for which with a base value 78.40 % and a target value set – an increase of 2 %, for the period of the operation it was reported 78.70 %.

The lowest values of the indicators were observed in BG05M2OP001-3.020 "Adult literacy – 2" and BG05M2OP001-2.011-001 "Support for success", which at the time of preparation of this report are still in implementation. Characteristic of the procedure "Adult Literacy – 2" is that in the Instructions for application<sup>24</sup> to the output indicator I3213 "Persons over 16 (including Roma) involved in literacy courses or courses for mastering the learning content intended for the lower secondary stage of basic education under the OP" with a target value of 12 000 pcs. are included four indicators, respectively I3213-1, I3213-2, I3213-3 and I3213-4, for which no separate target values were defined, whereas the verified values of the four indicators were compared to the target value of the main indicator I3213.

Under the procedure 'Support for success' no values of result indicators have been reported and such should be expected in the future given that the operation is still in execution.

<sup>24</sup> <http://sf.mon.bg/?go=news&p=detail&newsId=917>

Figure 11 Percentage ratio of the verified values of indicators to the target values set in projects



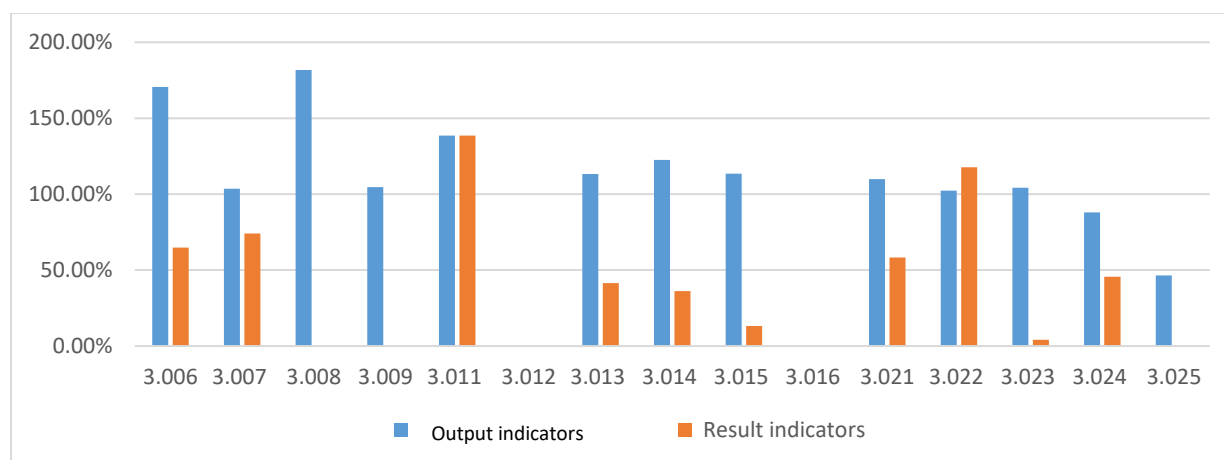
The data show that overall the project targets for the indicators are closer to those reported and verified. The ratios of both incisions of the analysis do not deviate significantly except for some differences that merit comment. For example, under procedure BG05M9OP001-2.018 "Social economic integration of vulnerable groups. Integrated measures for improving access to education – Component 1 – The target value of the performance indicator "Children, students, and youths from marginalised communities (including Roma) involved in measures for educational integration and reintegration" under the Instructions of Application<sup>25</sup> is set at 6 000 persons from the target groups, while set under the projects it amounts to 8 720, respectively for the result indicator "Children, students and youths from ethnic minorities (including Roma) integrated in the education system" – 4 800 and 5 709. In both cases, the reporting and verified values significantly exceed the target values. One of the possible reasons is rooted in the process of programming the operation, the analysis of the changes in which shows that the target values of the indicators are underestimated in view of the extension of the implementation period and the increase in the budget, without having a proportionate or sufficiently justified reflection on the increase in the values of the indicators.

Particular attention deserves the difference in the values set in the CLLD grant award procedures. The target value of the MCSO performance indicator for "Children, students, and youths from marginalised communities (including Roma) involved in measures for educational integration and reintegration" is 7,500, while for individual LAG projects the total target is 4,670. As a result, the percentage of performance of the indicator in both cases is 56, 23 % and 90.30 %. At the same time, it should be noted that in essence the verified value of the indicator can be interpreted as an overachievement, given the budget set in the MCSO to achieve the target values of the indicator. That is, with only about 5 % of the planned funds have been achieved over 56 % of the planned values of the indicator.

<sup>25</sup> <http://sf.mon.bg/?go=news&p=detail&newsId=533>



Figure 12 Percentage ratio of the reporting values of indicators to the target values set in projects under separate CLLD grant award procedures



Here it should be noted that under procedures BG05M2OP001-3.012 “LAG Karlukovski Karst – Cherven Bryag-Iskar” – Measure 7 “Access to quality education through integration into the education system of children and students from marginalised communities, including Roma” and BG05M2OP001-3.016 “Struma – Simitli, Kresna and Strumyani” measure 3.9ii “Integration through education” implementation has not been reported. The majority of the procedures are in implementation, with data showing that massively the output indicator has been achieved, while with few exceptions (procedures 3.011 and 3-022) the result indicator is far from reaching the target value.

With regard to the analysis of the achieved values of the indicators in the evaluated procedures, it can be concluded that, with some exceptions, the indicators achieve their target values, with significant exceedances of the target values in some cases. One of the reasons could be the underestimation of the objectives to be achieved, expressed by setting in the MCSO and the Instructions/Guidelines for Application target values for the indicators of the procedures. Another reason may be sought in the legislative changes made in the field of education and the implementation of a systematic approach to mobilise the educational institutions to include them in measures under the Programme. This view was expressed by the participants in the focus group held on 19 December 2022 with representatives of the MA.

There is a failure to achieve the operation-specific result indicators “net enrolment coefficient in kindergartens – 84 %” according to BG05M2OP001-3.001 and the similar one under BG05M2OP001-3.005 “Group net enrolment coefficient in kindergartens – 2 % increase for the period of the operation”. For the similar indicator under BG05M9OP001-2.018 data are not reported yet. The data on non-achievement are final for BG05M2OP001-3.001, and for BG05M2OP001-3.005 current. The causes and extent of the intervention’s impact on this type of indicators should be carefully analysed or whether too ambitious targets are set. In addition, when assessing the achievements under this indicator at the level of the final report under the last procedure, it is also necessary to take into account the normative changes leading to mandatory inclusion in the system of pre-school education of children from 4 years of age and the abolition of kindergarten fees.

For result indicators at the level of operations that are directly related to corresponding indicators at the OP level, the following can be found:

In the short term, the operations under OP SESG which are subject to this evaluation achieve the planned results. The operations completed (BG05M2OP001-3.001, BG05M2OP001-3.002 and BG05M2OP001-3.004) as a whole, achieved the planned results to a high extent. In the medium term, operations under



implementation based on the progress of output indicators and data on contracted result indicators — are achieving at an expected pace the planned results. In the longer term these operations are expected to achieve the planned results at the end of the programming period and, in some cases to significantly exceed them, such as the result indicator P3211 “Children, students and youths from ethnic minorities (including Roma) integrated in the education system”.

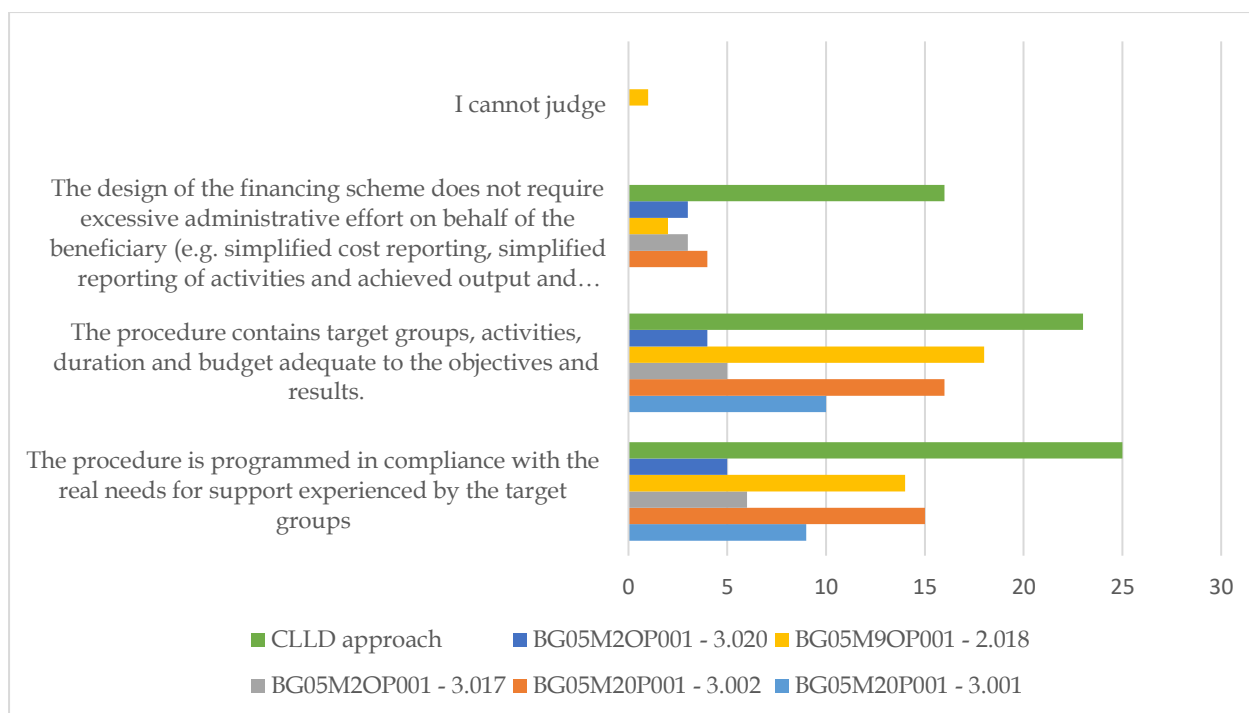
#### **4.7. What helps or hinders the achievement of the objectives and results of the operations under the OP SESG subject to this evaluation?**

Some of the factors, and in particular external factors that help or hinder the achievement of the objectives and results of operations, are addressed in the response to evaluation question 4.2., in the context of achieving/failing to achieve the indicators set.

Within the framework of the survey conducted with representatives of the beneficiaries, their opinion on what they believe contributes to the achievement of the objectives and results of the procedure under which they are implementing or implemented a project was examined and external factors were excluded from the questions. The study also included a question of what hinders the achievement of goals and results.

To the first question, out of 105 respondents who participated in the survey, about 72 % answered that the greatest contribution to achieving the objectives and results, have the included in the procedure adequate to the objectives and results target groups, activities, duration and budget. Almost as much — 70 % — consider that it contributes to achieving the objectives and results that the procedure is programmed in line with the real needs for support to the target groups and around 27 % note that a contribution is made by the fact that the funding scheme has a design that does not require excessive administrative effort on behalf of the beneficiary (e.g. simplified cost accounting, easy reporting of activities and output and result indicators, etc.). One beneficiary replied, “I can't judge.” The distribution of views by procedures is set out below.

*Figure 13 Answers to a question: “What do you think contributes to achieving the objectives and results of the procedure under which you are implementing/implemented a project?”*



During the interviews with DB MES, the following prerequisites for achieving the goals and results were outlined: adequately selected target groups; the existence of an information system facilitating the administration of the project; availability of simplified cost options; a systematic approach with established and working inter-institutional links and an established role of educational mediators; easing schools and kindergartens from administrative burden in projects implemented by the Ministry of Education, compared to participation under grant schemes through selection procedures. In addition, during the COVID-19 containment measures, the main supporting role in reducing the damage to the educational process was played by the educational mediators (for projects to which it is relevant). The motivation of educational mediators, career consultants (in “Support for Success”) and pedagogical specialists is perceived as a major factor in achieving the results.

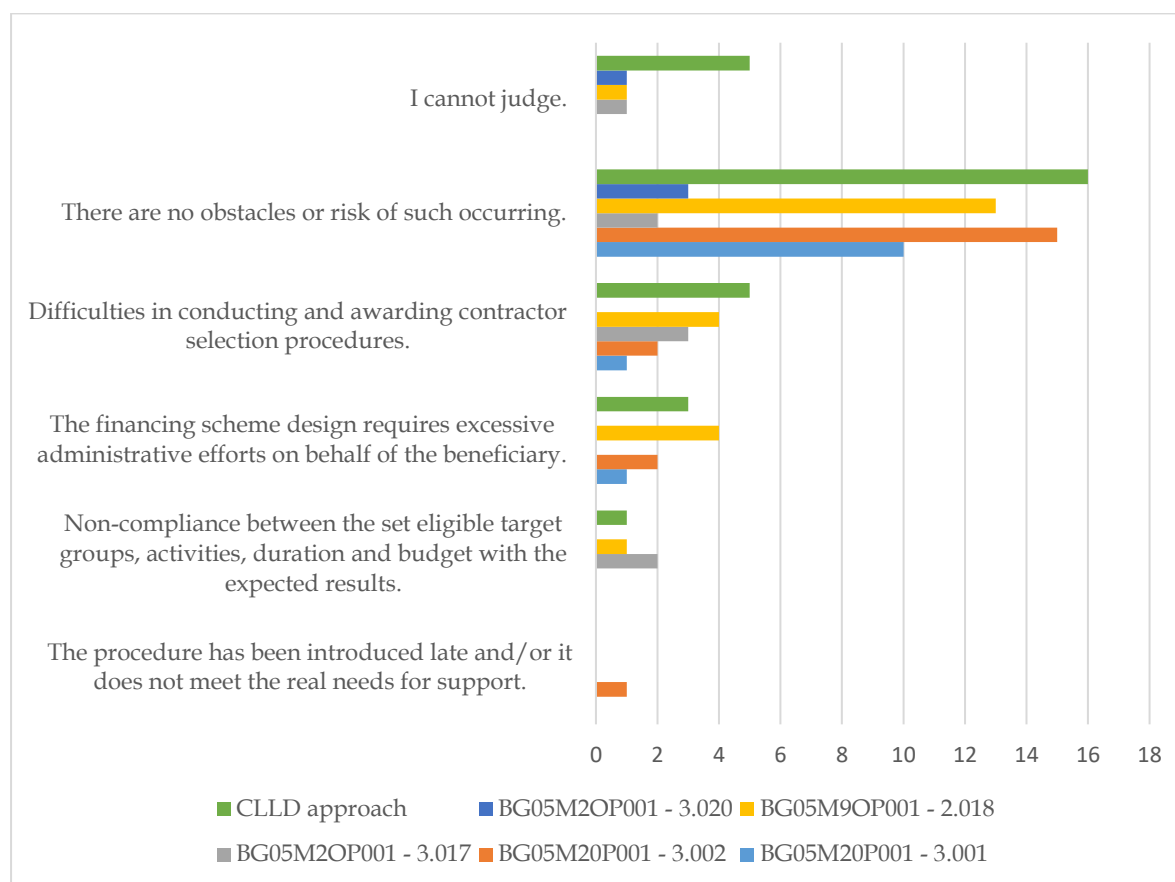
During the focus group with the MA, it was shared the view that projects such as “Support for Success” and “Active Inclusion” could be considered successful, contributing to the following factors: a systemic approach, a contribution to a paradigm shift in education, insofar as they were created in response to the new challenges arising from the new legislation adopted at that time (Law on Pre-School and School Education of 2016, regulations, etc.), including even changing key concepts, territorial scale, ability to mobilise educational institutions and all actors involved: teachers, parents, pedagogical and non-pedagogical specialists, etc.

During the focus group with representatives of the MC, the following views were shared, which could be accepted, as such with regard to the factors contributing to the achievement of the objectives and results of the operations subject to this evaluation: adequately selected target groups; a correct approach to the defined indicators to the extent possible (despite a number of concomitant difficulties, including ambiguities at European level); the introduction of simplified cost options; reducing the time of verification of expenditures; overall, the implementation of a systematic approach to kindergartens and schools with a focus on the activities carried out by the educational mediators (procedures BG05M2OP001-3.005 and BG05M2OP001-2.011), despite some remarks regarding the source of funding (Priority Axis 3 for

BG05M2OP001-3.005 and partly for BG05M2OP001-2.011) and other comments and proposals for future similar projects.

When asked “What do you think is/was an obstacle to achieving the objectives and results of the procedure under which you are implementing/implemented a project?”, around 56 % of the 105 participants in the survey indicated that they did not identify obstacles to the achievement of the objectives and results of the procedure under which they were implementing or are implementing a project. Around 14 % experienced difficulties in conducting and awarding procedures for selecting a contractor. For 10 %, the design of the funding scheme requires excessive administrative effort on behalf of the beneficiary. For 4 %, there is a non-compliance between the eligible target groups, activities, duration and budget with the expected results, and one beneficiary considers that the procedure is late and/or does not meet the actual support needs. 8% said they couldn't judge. The following figure shows the distribution of opinions by procedure.

Figure 14 Answers to a question: “What do you think is/was an obstacle to achieving the objectives and results of the procedure under which you are implementing/implemented a project?”



The views of beneficiaries on other obstacles to the achievement of objectives and results in the procedures under evaluation are to be noted. Some of them are: “The preparation of project proposals, approval, conclusion of a contract and subsequent implementation is sometimes carried out in a time frame where it is difficult to plan the dynamics of the movement of children and students. Migration, which is linked to the employment of parents and a change of residence in/out of the country. In addition, budgeting lacks a mechanism/opportunity to plan budgets with “reserve”, taking into account inflation/force majeure” (beneficiary under BG05M2OP001-3.001), “The conditions of the procedure require training of pedagogical specialists with full attendance. The project was launched at the end of 2022 and given the COVID – limitations, it was difficult to consider how and in what way we could succeed with

*the implementation. Another major challenge is the provision of educational mediators, which is a variable in each new school year. Thirdly, inflation is a serious problem and may be an obstacle to the implementation of activities” (BG05M2OP001-3.017), “Under the current scheme, target groups, activities, results are well planned, but budget constraints, in this case the low flat rate, do not allow a high quality of implementation without the beneficiaries of the projects investing their own resources” (BG05M2OP001-3.017), “Inability to implement the project activities due to containment measures in place, coinciding with the time of implementation of activities” (BG05M2OP001-3.020), “The project was implemented in a long period of complex exceptional epidemic situation and introduced in relation to COVID – 19 health measures and restrictions, which is why some of the activities have been postponed and others have been carried out with interruption periods” and “Difficulties in working with the project partner” (beneficiaries of CLLD procedures).*

It is clear that the other difficulties mentioned can, in summary, be summarized to the following: difficulties in planning the dynamics of the movement of children and pupils related to the mobility or migration of parents resulting from employment opportunities; the provision of educational mediators in procedures which provide measures for them due to unpredictability of their availability; low unit costs, barriers caused by COVID-19 containment measures and difficulties in working with partners.

In order to further refine the degree of seriousness of the obstacles encountered, the survey included a question to the beneficiaries whether they had significant difficulties in the implementation of the project activities which led to: substantial modification of the financing contract, significant delays in the implementation of activities, failure to achieve planned indicators, financial corrections, etc.

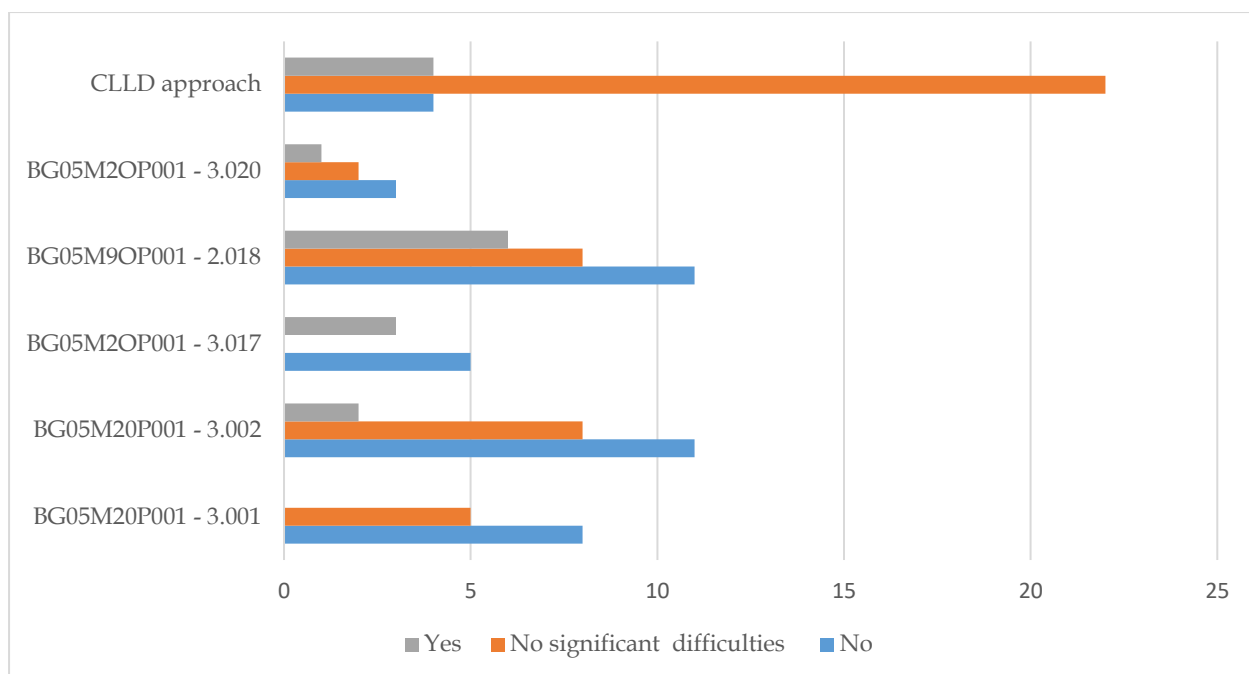
To this question out of 103 respondents, only around 41 % noted that they had no difficulties, around 44 % that they had no significant difficulties and around 15 % that they had substantial ones.

The groups of reasons invoked which led to significant difficulties, in the opinion of the beneficiaries, are as follows:

- Difficulties and delays in the implementation of activities due to the COVID-19 containment measures put in place (9 beneficiaries).
- Problems in conducting procedures for the designation of a contractor/public procurement (2 beneficiaries).
- Delays caused by budget changes during the evaluation or as a result of a legal dispute between the beneficiary and the MA (2 beneficiaries).
- Difficulties with partners requiring changes to the funding contracts (2 beneficiaries).
- Difficulties in providing participants from the target group (1 beneficiary).

The distribution of responses by procedures is presented in the figure below:

*Figure 15 Answers to a question: “Have you experienced any significant difficulties in the implementation of the project activities that led to: substantial modification of the financing contract, significant delays in the implementation of activities, failure to achieve planned indicators, financial corrections, etc.?”*



During the interviews with the DB MES, the following difficulties were identified:

In the performance of “A New Chance for Success”: delays caused by public procurement procedures, delays due to preparatory activities, difficulties in achieving indicators (which were nevertheless achieved) caused by the dynamics of the target group, lack of simplified cost options, resulting in excessive administrative difficulties and a lack of information system facilitating administration, again led to difficulties in collecting and processing data.

For the three projects with DB MES, difficulties were identified as a result of the containment measures put in place against the COVID – 19 outbreak.

During the focus group with the MA, it was shared the view that “Adult literacy – Phase 2” (BG05M2OP001-3.020) faces the biggest difficulties at the moment and the opinions about the reasons are that:

- Such a procedure is very difficult to implement when it is on the principle of awarding grants with selection of project proposals. In Phase 1, the results according to the representative of the MA were very good when MES was the Direct Beneficiary. Such a resource and such mobilisation, according to the shared opinion, is only according to the competences and capabilities of an institution as the Ministry of Education and Science, and the beneficiaries are now experiencing difficulty to cope with it.
- Another opinion is that the reason Phase 2 is not so successful is due not to the fact that the schools themselves do not know how to work, but simply the scheme is quite different. They are accustomed to working on a standard that is given to them by the Ministry of Education, where they have to simply perform it. Now it is a little more difficult for them, as they can not and purely technically do not know how to report, and consequently much fewer schools in the country are covered.
- The demographic factor, according to a representative of the MA, also has a great influence, because if the procedure had been implemented with a Direct beneficiary MES, it would have been possible

to react and involve other schools with more participants from the target group, while when there is a fixed number of participants, there is no possibility to react. These are factors that cannot be influenced, given demographic factors and especially migration processes.

- In addition, under the procedure there are initially fewer contracts than expected, and according to one opinion, the submitted project proposals were very few because the NGOs themselves have a number of limitations related to State aid. Therefore, it is also expected that there will be a lower achievement of the indicators under this procedure.

During the focus group with representatives of the MC, the following views were shared with regard to the factors that make it difficult to achieve the objectives and results of the operations subject to this evaluation. They can be summarized as follows:

- It is difficult to translate the achieved good practices into systemic change. Doubts about the degree of analysis of studies and their consideration in the design of new procedures.
- Change of the practice with regard to the application of State aid or De minimis to the participation of NGOs and to educational integration operations. In the first programming period OP HRD and at the beginning of the programming period 2014-2020 in the first three procedures for awarding grants through selection of project proposals, OP SESG did not apply De minimis to educational integration activities carried out by NGOs. As of 2019, this approach has changed and for NGOs carrying out educational integration activities, a De minimis starts to apply (following new requirements set by the Ministry of Finance, according to information from the MA). The accumulation of aid under the De minimis for the majority of experienced NGOs also explains the low level of negotiation under procedure BG05M2OP001-3.020, which was preceded by BG05M2OP001-3.017, where most experienced NGOs have already been approved for funding. *"Schools prefer, smaller schools, that organisations should take the bureaucratic burden of project preparation, reporting, etc., and schools only carry out activities and therefore did not apply."*
- Amount of advance payment in case of a grant agreement. *"Another serious problem that has always been the case under the OP SESG and all other programmes, these are the low advances. A 20 % advance payment means that every organisation has to put a lot of money into the implementation of these projects."...And that's a stumbling block for many of the smaller organisations. They are practically unable to implement these projects because they do not have the necessary financial resources."*
- Financial corrections imposed not at the cost recovery stage but after the completion of the project. *"Financial corrections are imposed not immediately upon reimbursement of expenditures, but after expenditures have been reimbursed, once the project has been completed and ex-post review and financial corrections are applied. That is, the organisation has entered money, it has been cashed and recovered, and then financial corrections are imposed. For example, this is not a problem for municipalities. Municipalities often have financial corrections, but they have a place to get funds to use for these corrections. In the case of NGOs, this has nowhere to come from and organisations face bankruptcy in practice."*
- Amounts of simplified cost options are inadequate to the current conditions: where hotel accommodation is included, where unit costs for lecture hours are foreseen, etc. The reason is the increase in prices due to inflation.

In conclusion, it could be summarised that the most relevant factors contributing to the achievement of the objectives and results of the procedures are those contained in the procedures: adequate to the objectives and results target groups, activities, duration and budget, and that the procedures are programmed in line with the real needs for support to the target groups. The interviews and focus groups emphasise the key

role of the motivation of the professionals involved in the implementation of activities, as well as the managers<sup>26</sup> of/from the relevant institution/organisation, which is committed to the implementation of the specific project.

With regards to the obstacles encountered to achieve the objectives and results of the procedures, the beneficiaries mostly did not respond to having met them, and around 14 % had a problem with the implementation of procedures for selection of a contractor and for about 10 % the design of the procedure required excessive administrative effort during implementation. For more than twice as many of them, there is a non-compliance between some of the set components: eligible target groups, activities, duration and budget with the expected results. Other difficulties encountered were caused by COVID-19, accompanying containment measures and the resulting changes in the educational process. Other common difficulties identified are the mobility of target groups and the size of simplified cost options. In particular, NGOs are also directly affected by a change in the practice with regard to the application of a State aid or a De minimis to the implementation of educational integration activities by NGOs. This, according to their representative in the MC, leads to the impossibility of participating in the procedures due to cumulation of aid under the De minimis and has a direct impact on the degree of negotiation of the latter procedures, such as BG05M2OP001-3.020. In addition, a number of project or procedure-specific obstacles identified above have been noted.

#### **4.8. What factors determine the better performance of certain operations than others financed under the Programme?**

Evaluation Question 2 has already analysed the external factors and the extent to which they have influenced the achievement/non-achievement of the indicators set, and in evaluative question 7 – the factors that help or hinder the achievement of the objectives and results of the operations under the SESG OP, which are the subject of this evaluation, have already been analysed.

In order to answer this evaluation question, it is first necessary to identify at least a relatively objective method by which to determine which operations are better performing, in order to be able to carry out an analysis according to their characteristics, which might be the factors which contributed to this.

The method we set out to identify procedures that can be claimed to deliver better results consists of two combined approaches: identification of the procedures that can be claimed to have achieved the intended output and result indicators or from the progress up to date are expected to achieve them and identification of the procedures that achieve a higher level of cost efficiency per unit of like product.

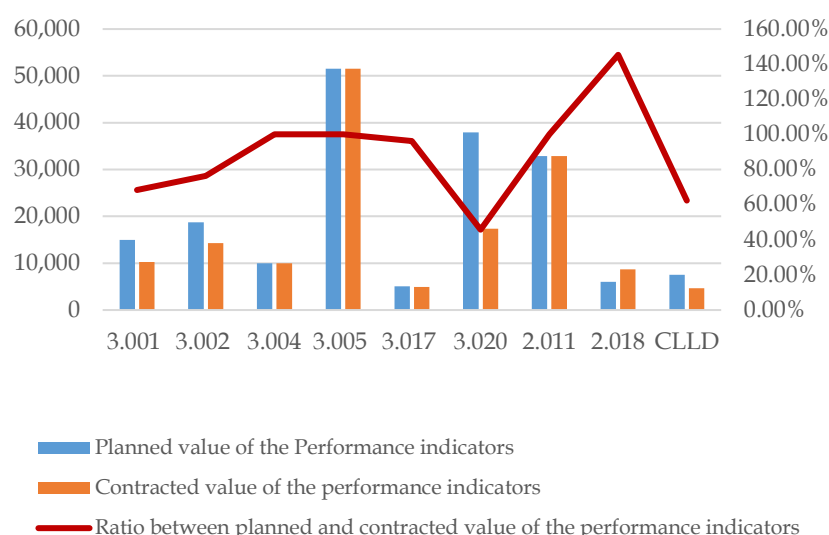
Overall, all procedures in the scope of the evaluation are expected to achieve the planned output and result indicators, except for one “Adult literacy – 2” (BG05M2OP001-3.020), where around one third of the programme-specific output indicator was contracted, and in some procedures, such as BG05M9OP001-2.018 and BG05M2OP001-3.005 and BG05M2OP001-2.011 result indicators are likely to be significantly exceeded.

---

<sup>26</sup> Focus group with representatives of the MC of OP SESG, held on 30.1.2023



Figure 16 Target values of planned MCSO output indicators and such contracted under projects presented by procedures

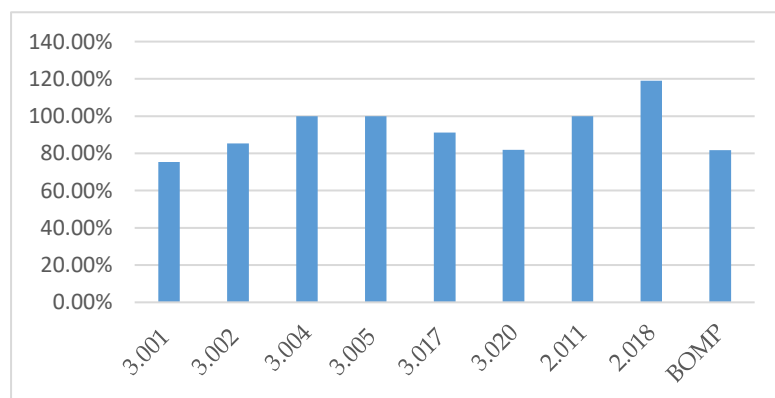


This means that under procedure BG05M2OP001-3.020, the programme-specific output indicator 3213 “Persons over 16 (including Roma) involved in literacy courses or courses for mastering the learning content intended for the lower secondary stage of basic education under the OP” is seriously jeopardised. The possible reasons for this are set out in the answer to evaluative question 4.7.

As regards CLLD procedures, the MCSO sets a framework against the expectations of LAG activity, but the planning approach is “bottom-up” through the strategies of the Local Action Groups, which defines different funding parameters and indicators. However, the MCSO has not been updated according to what is set out in the strategies, both in terms of indicators and the budget allocated to the operation.

In terms of results, the figure below may give orientation for the procedures to be executed, which are at risk of not achieving the result indicators and which are not, according to the level of contracted indicators, compared to those laid down in the MCSO.

Figure 17 Ratio between target values of result indicators contracted by projects to the target values of MCSO result indicators



For some of the procedures, result indicators should be monitored with caution and along with the outputs from the implementation, insofar as they report a share of participants involved in an activity that have successfully completed it (e.g. BG05M2OP001-3.004, BG05M2OP001-3.020 and BG05M2OP001-3.017) and not a number of such participants.

It is apparent from the figure that there does not appear to be a procedure that is at real risk of failure to achieve the result indicators, as for BG05M9OP001-2.018, overachievement is already guaranteed by the projects-contracted result indicators.

The result indicators of the completed procedures look as follows:

Table 8 Implementation of result indicators for completed procedures against MCSOs

Procedure	Execution of result indicators
BG05M20P001-3.001 "Support for pre-school education and preparation of disadvantaged children"	"Children, students and youths from ethnic minorities (including Roma) integrated in the education system" – implementation of 93.17 % "Net enrolment coefficient in kindergartens" – from a planned achievement of 84.00 % of the coefficient was achieved 77.17 %.
BG05M20P001-3.002 "Educational integration of pupils from ethnic minorities and/or applicants or beneficiaries of international protection"	"Children, students and youths from ethnic minorities (including Roma) integrated in the education system" – implementation of 99.51 %
BG05M20P001-3.004 "Adult literacy – Phase 1"	"Share of persons (including Roma), who have received certificates for successfully completed literacy courses or courses for mastering the learning content intended for the lower secondary stage of basic education under the OP." – 91.84 %.

Since the individual indicator for the procedure BG05M20P001-3.001 'Net enrolment coefficient in kindergartens' is not defined as a change compared to a baseline level, it can be formally concluded that it is 91.87 %, but the figure thus derived does not provide information on the specific contribution of the evaluated procedure.

The results reported show that the completed procedures achieved to a large extent, almost at 100 %, the planned result indicators related to the programme.

Among the other procedures, as already indicated, in a serious risk of failure to achieve the planned output indicators is only "Adult literacy – 2" (BG05M20P001-3.020), where is contracted around one third of the programme-specific output indicator and at formal risk the CLLD.

According to the second approach, although relatively justified, it can be assumed that operations that achieve better results are those that achieve greater efficiency per unit of like product (output indicator), provided, of course, that the products and results of the operations are at least substantially similar, the target groups and activities also.

From this point of view, on the basis of the analysis carried out, the following sets of procedures can be identified as comparable:

- BG05M20P001-3.004 and BG05M20P001-3.020;
- BG05M20P001-3.001 and BG05M20P001-3.005;
- BG05M20P001-3.002 and BG05M20P001-2.011;
- BG05M9OP001-2.018 and CLLD procedures.

The benchmarks and the comparative analysis of the cost efficiency of similar products under these procedures is described in point 4.1.3 of the evaluation report under the thematic strand "Efficiency of the operations: Achieving an optimal ratio between inputs and outputs (output indicators) and adequacy of the applied simplified cost reporting methodologies'.

When considering the above procedures, it should be borne in mind that only procedures BG05M20P001-3.004, BG05M20P001-3.001 and BG05M20P001 -3.002 have been completed. I.e. final performance data for the rest are not yet available and the comparison for the purpose of establishing cost efficiency is based on the planned output indicators and reported ones available at the time.

For the first pair of comparable procedures BG05M2OP001-3.004 and BG05M2OP001-3.020, it is questionable where the higher cost efficiency of similar products was achieved, since the reported costs reached for the participation of a person from the targeted group under the first procedure were almost similar to those contracted under the second one. The second procedure is still ongoing and when the verified expenditures data becomes available, it will be possible to assess the cost efficiency of similar products and for which one is higher.

Table 9 Macrocharacteristics of BG05M2OP001-3.004 and BG05M2OP001-3.020

The Criteria	BG05M2OP001-3.004	BG05M2OP001-3.020
Territorial scope	National.	National, but given that it is a selection procedure for project proposals, as a result there is no full national coverage.
Way of implementation	Procedure for granting a grant directly with DB MES.	Procedure for selection of project proposals for awarding a grant.
The target group	Similar.	Similar.
Eligible activities	Partly similar.	Partly similar.
Eligible costs	Partly similar.	Partly similar.
Result Indicators	Similar.	Similar.
Applicability of simplified cost options	No.	Yes.

After the closure of procedure BG05M2OP001-3.020, it may prove to be more cost-effective for similar products, but on the other hand it will not be able to achieve the programme-specific output indicator, although the reasons for this are unlikely to lie in the macro-parameters of the procedure.

In this case, the macro-characteristics are as follows: National scale, but given that it is a selection procedure for project proposals, as a result there is no full national coverage. Procedure for the selection of project proposals for awarding grants. Availability of simplified cost options.

For the second pair of comparable procedures BG05M2OP001-3.001 and BG05M2OP001-3.005, it can be concluded that, at least on the basis of the data available, the second procedure achieves greater cost efficiency for similar products.

Table 10 Macrocharacteristics of BG05M2OP001-3.001 and BG05M2OP001-3.005

The Criteria	BG05M2OP001-3.001	BG05M2OP001-3.005
Territorial scope	National, but given that it is a selection procedure for project proposals, as a result there is no full national coverage.	National.
Way of implementation	Procedure for selection of project proposals for awarding grants.	Procedure for granting a grant directly with DB MES.
The target group	Similar.	Similar.
Eligible activities	Partly similar.	Partly similar.
Eligible costs	Partly similar.	Partly similar.
Result Indicators	Similar.	Similar.
Applicability of simplified cost options	No.	Yes.

In this case, the macro-characteristics are as follows: It's a national scale. Procedure for awarding a grant directly with DB MES. Availability of simplified cost options.

For the third pair BG05M20P001-3.002 and BG05M20P001-2.011 it can be concluded that, at least on the basis of the data available, the second procedure achieves greater cost efficiency for similar products.

Table 11 Macrocharacteristics of BG05M20P001-3.002 and BG05M20P001-2.011

The Criteria	BG05M20P001-3.002	BG05M20P001-2.011
Territorial scope	National, but given that it is a selection procedure for project proposals, as a result there is no full national coverage.	National.
Way of implementation	Procedure for selection of project proposals for granting a grant.	Procedure for granting a grant directly with DB MES.
The target group	Similar.	Similar.
Eligible activities	Partly similar.	Partly similar.
Eligible costs	Partly similar.	Partly similar.
Result Indicators	Similar.	Similar.
Applicability of simplified cost options	No.	Yes.

In this case, the macro-characteristics are as follows: It's a national scale. Procedure for awarding a grant directly with DB MES. Availability of simplified cost options.

For the fourth pair of comparable, albeit only to a certain extent, procedures BG05M9OP001-2.018 and CLLD procedures, the values of the contracted and verified expenditures per person from the target groups under both procedures are quite similar, and as evidenced by the data, the CLLD grant procedures are more efficient than procedure BG05M9OP001-2.018.

Table 12 Macrocharacteristics of BG05M9OP001-2.018 and CLLD procedures

The Criteria	BG05M9OP001-2.018	CLLD procedures
Territorial scope	Local, at the level of a specific municipality.	Local, in the area of operation of the LAG.
Way of implementation	Direct grant award procedure with DB municipalities.	Procedures for selecting project proposals for awarding grants.
The target group	Similar.	Similar.
Eligible activities	Partly similar.	Partly similar.
Eligible costs	Partly similar.	Partly similar.
Result Indicators	Identical + additional	Identical
Applicability of simplified cost options	Partly	Partly

Characteristic of both procedures is the specifics of the way of implementation. Procedure BG05M9OP001-2.018 was programmed as direct delivery with specific beneficiaries municipalities/regions of municipalities/ with updated municipal plans for Roma integration for the period 2015-2020, in accordance with the National Strategy for Roma Integration 2012-2020. The CLLD procedures are programmed for implementation through selection of projects to a CLLD strategy implemented by the LAG/FLAG, agreed

with the MA of the SESG OP and approved Instructions for Application, including specific criteria set out in the approved CLLD strategies, in accordance with the instructions of the MA.

Unlike the other procedures under assessment and procedure BG05M9OP001-2.018 and those under the CLLD approach are implemented at local level. The scope of procedure BG05M9OP001-2.018 is the territory of municipalities with updated municipal plans for Roma integration for the period 2015-2020, in accordance with the National Strategy for Roma Integration 2012-2020, which have approved concepts, after pre-selection by the CCU. The CLLD approach procedures are implemented in the territories eligible under Article 4 of Council of Ministers Decree No 161/2016 – the LAG/FLAG territories approved for implementation of CLLD strategies.

The comparative analysis of the planned value of one person from the target group is irrelevant due to the fact that the planned funds under the CLLD procedures have not been updated following the agreements concluded to implement CLLD strategies towards a reduction. Detailed analysis in this regard has been carried out and described in point 4.1. of the Report on thematic strand Efficiency<sup>27</sup>.

In CLLD procedures, the macro-characteristics are as follows: Local territorial scope, on the territory of the LAG concerned. Procedures for the selection of project proposals for the award of grants carried out by the relevant action group. A higher degree of possibilities for applying simplified cost options than for BG05M9OP001-2.018.

During the focus group with representatives of the MA, it was shared the view that projects such as “Support for Success” BG05M2OP001-2.011 and “Active Inclusion” BG05M2OP001 -3.005 can be considered successful, as the following factors contributed to this: a systematic approach; contributing to a paradigm shift in education insofar as they are created and responding to the new challenges resulting from the new legislation adopted at that time (Law on Pre-School and School Education of 2016, regulations, etc.), including even changing key concepts; territorial scale, ability to mobilise educational institutions, all participants through teachers, parents, pedagogical and non-pedagogical specialists, etc.

On the other hand, the benefits of the selection procedures for awarding a grant are also taken into account: *“Their achievement is extremely important for something else. They enter places where the state does not even know they exist.”*

Similar is the view on the role of “Support for Success” BG05M2OP001-2.011 and “Active Inclusion” BG05M2OP001 -3.005, expressed during the interviews conducted with the representatives of the Ministry of Education and Science involved in the management of the two operations.

During the focus group with representatives of the MC it was expressed the opinion that in general the procedures announced had contributed to the objectives of the related strategic documents and OPs, but a perplexity was expressed from the redirection of the funds under PA 3 after the first grant schemes, mainly to projects with DB MES. It was noted that under PA 3 there are good procedures for awarding grants. A participant in the discussion on behalf of the MC also shared the following: *“There were some good projects in which indeed, the children improved their school behavior and the relations between children of different ethnicities.”...Whether this happened under systematic projects such as “Support for preschool education” and “Support for success”, there I can no longer say. It’s probably somewhere yes, and somewhere not. But especially on systemic projects, I think that this impact has been achieved to a lesser extent than on some of the projects under the*

---

<sup>27</sup> Report under the thematic strand "Efficiency of operations: Achieving an optimal ratio between inputs and outputs (output indicators) and adequacy of simplified cost reporting methodologies applied"

*grant procedures. A lot depends on how much you do the activities with your heart and with an innovative thought. System projects do not imply doing them with an innovative thought. There it is enough just to do some hours of additional training, to provide the reporting documents and that's it. While on some of the grant projects, certainly not all projects, there is always this danger that some projects are realised meaningfully and others are completely meaningless. But some of the grant projects certainly had a change in impact."*

The operations in the scope of the evaluation generally achieve or are expected to achieve the planned results or even exceed them in some cases. This for the purpose of the evaluation question can be defined as good results. Some are more cost-effective for a like product than others, but this is not sufficient to conclude that they perform better than others, even on formal criteria. Whether the results of a procedure are good directly depends also on the extent to which they have satisfied an identified need or have solved a particular problem and achieved the objectives set. Accordingly, depending on the nature of the need or problem, as well as the objectives set, one instrument is more appropriate than another.

Based on the analysis carried out, it can be concluded that, in addition to the external and internal factors already discussed in the answers to other evaluation questions contributing to the achievement of the planned indicators, a common factor in the analysed operations with better cost efficiency per unit of like product and which achieve the planned results is the existence of simplified cost options. The full national coverage in combination with the implementation of operations by the DB is a serious prerequisite for achieving better performance of operations in cases where the objectives set imply a systemic approach. Funding schemes through project selection procedures shall be assessed as a prerequisite for achieving better results where a local approach, a targeted approach or an individualised design and approach to the implementation of activities is needed and a high degree of pro-activity or innovation is expected to solve problems and achieve the objectives of operations.

#### **4.9. To what extent have the operations implemented under the Operational Programme SESG, subject of this evaluation, contributed to the achievement of the objectives of the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020) and of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020)?**

The answer to the evaluation question presupposes, first of all, a fine-tuning of the operations of the OP SESG in relation to the period of validity of the two strategic documents examined. For the period of operation of the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020) and the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020), the following procedures under Priority Axis 3 of OP SESG have been implemented: BG05M9OP001-2.018 'Integrated measures to improve access to education', BG05M20P001 -3.001 'Support for pre-school education and training of disadvantaged children', BG05M20P001-3.002 'Educational integration of students from ethnic minorities and/or seeking or receiving international protection', BG05M20P001-3.004 'Adult literacy – Phase 1', BG05M20P001-3.005 "Active inclusion in the pre-school education system", BG05M20P001-2.011 "Support for success" and procedures for awarding grants under the CLLD approach.

The strategic objective of *the National Strategy for Roma Integration (2012-2020)* <sup>28</sup> is to create conditions for equal integration of Roma and Bulgarian citizens in vulnerable situation from in the social and economic life by ensuring equal opportunities and equal access to rights, goods, goods and services, participation in all public spheres and improving the quality of life in compliance with the principles of equality and discrimination. In connection with this strategic objective, the Strategy considers the various priority areas

---

<sup>28</sup> Source: <https://www.strategy.bg/StrategicDocuments/View.aspx?lang=bg-BG&Id=726>



such as education, health, housing, employment, rule of law and non-discrimination, culture and media, as fundamental to Roma integration. For the purposes of this evaluation, the measures under the Education Priority, which are linked to funding from the OP SESG, are examined.

Table 13 shows the contribution of the operations under Priority Axis 3 of OP SESG, which is assessed on the basis of a study and analysis of the monitoring reports for the implementation of the NSRIRB for 2016<sup>29</sup> and 2017<sup>30</sup>, of the measures and sources of funding set out in the National Action Plan 2015-2020 for the implementation of the NSRIRB 2012-2020<sup>31</sup> and by analysing the objectives, activities and target groups set out in the above procedures. The analysis of the contribution shows that out of 26 measures under the “Education” priority in the NSRIRB 2012-2020, 13 are implemented mainly through the implementation of the evaluated procedures, and 3 out of the 26 measures set out in total do not require funding.

The evaluation question presupposes the examination of the extent to which the operations carried out under the OP SESG, subject to this evaluation, contribute to the achievement of the objectives of the NSRIRB 2012-2020. For this purpose, the comparability of the results set out in the National Implementation Plan of the NSRIRB 2012-2020 is analysed, which takes into account the achievement of the results set out in the Strategy on the implementation of the measures, with the results reported on the operations under evaluation of the OP SESG. The achievements of the OP SESG are reported through output and result indicators concerning the overall scope of the interventions against the target groups, the expected result and the implementation of the specific objectives for the priority axis and investment priority concerned. Our analysis shows that they are not comparable to the indicators set in the NIP of the NSRIRB 2012-2020. This is also reflected in the 2017 Administrative Monitoring Report on the implementation of the “National Strategy for Roma Integration of the Republic of Bulgaria” (2012-2020), where to the corresponding measures under NRIS 2012-2020 is indicated the total number of participants in the applicable indicators of the corresponding OP funded procedure. For example in the NIP of NSRIRB 2012-2020 under Measure 1.2.2. “Support for Roma children and pupils to equalise their starting positions when entering kindergarten /school” result is “Supported Roma children and pupils to equalise their starting positions when entering kindergarten/school”, result indicator is “Number of supported children and students”, target value of 3 500, and the set result indicators under the procedures that contribute to achieving the result of this measure 1.2.2 are as follows: under procedure BG05M20P001-3.001 “Support for pre-school education and training of disadvantaged children” – “Net enrolment coefficient in kindergartens – 84 %” and “Number of children from ethnic minorities (including Roma) integrated into the educational system – 12 000”; under procedure BG05M20P001-3.002 “Educational integration of students from ethnic minorities and/or seeking or receiving international protection” – “Number of students and youths from ethnic minorities (including Roma) integrated into the education system – 15 000” and under procedures for granting a grant under the CLLD approach – “Number of children, students and youths from ethnic minorities (including Roma) integrated into the education system – at least 5000”. In the 2017 administrative monitoring report on the implementation of the NSRIRB 2012-2020 for measure 1.2.2, the following is specified: “The procedure started on 27.7.2016, 52 projects were funded for 2016, of which 1 was terminated, for 2017 another 3 projects were funded, and the number of children from ethnic minorities (including Roma) involved in educational integration measures is 7 055”.

In addition, at the macro level, it should be noted that the implementation of the measures under the priority “Education” of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020)

---

<sup>29</sup> 2016 Administrative Monitoring Report on the Implementation of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020), source: <https://www.strategy.bg/StrategicDocuments/View.aspx?lang=bg-BG&Id=726>

<sup>30</sup> Administrative Monitoring Report 2017 on the implementation of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020), source: <https://www.strategy.bg/StrategicDocuments/View.aspx?lang=bg-BG&Id=726>

<sup>31</sup> The source: <https://www.strategy.bg/StrategicDocuments/View.aspx?lang=bg-BG&Id=726>



contributes to the implementation of National Goal 4 “Share of early leavers of the education system of 11 % by 2020 and share of 30-34 year olds with tertiary education – 36 % by 2020” and indirectly contributes to the achievement of National Goal 5 “Reduction of the number of people living in poverty by 260 thousand”. The national targets are set out in the [National Reform Programme implementing the Europe 2020 strategy](#). In this sense, it can be stated that the operations under Priority Axis 3 of the SESG OP also contribute to the achievement of these national objectives.

Table 13 Contribution of the evaluated procedures under Priority Axis 3 of OP SESG to achieve the objectives of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020)

National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020)	Operations under Priority Axis 3 of OP SESG that contribute to achieving the objectives of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020)						
Objectives, tasks and measures under the NSRIRB 2012-2020 in pursuit of an operational objective: “Covering and retaining Roma children and students in the education system. Ensuring quality education in a multicultural educational environment”	BG05M9OP001-2.018	BG05M2OP001-3.001	BG05M2OP001-3.002	BG05M2OP001-3.004	CLLD	BG05M2OP001-3.005	BG05M2OP001-2.011
<b>Goal 1: Ensuring the right to equal access to quality education, including through the integration of Roma children and students in ethnically mixed kindergartens and schools</b>							
<b>Task 1.2: Providing conditions for maximum coverage and early adaptation in the pre-school and school education system for Roma children and students</b>							
Measure 1.2.2. Support for Roma children and students to equalise their starting positions when entering kindergarten/school		✓	✓		✓	✓	
<b>Goal 2: Improving the quality of education in the separate kindergartens and schools in the large Roma neighbourhoods and in rural regions where Roma children and students are studying mainly</b>							
<b>Task 2.1: Increasing school readiness and providing a supportive environment and differentiated care for each child and student</b>							
Measure 2.1.1. Provision of additional training in Bulgarian language for pre-school children for whom the Bulgarian language is not a mother tongue if necessary	✓	✓			✓	✓	
Measure 2.1.2. Provision of additional training in Bulgarian language if necessary for students for whom the Bulgarian language is not a mother tongue	✓		✓		✓		
<b>Goal 3: Training in a spirit of tolerance and non-discrimination in kindergartens and schools. Preservation and development of the cultural identity of Roma children and students</b>							
<b>Task 3.1: Formation of knowledge of the culture, traditions and values of different ethnic groups to build conscious tolerance</b>							
Measure 3.1.2. Overcoming discriminatory attitudes towards Roma children and students through integration activities (excursions, events to mark dates from the holiday calendar, campaigns)	✓	✓	✓		✓	✓	

Measure 3.1.3. Working with school boards and parent associations to overcome negative stereotypes and discriminatory attitudes	✓	✓	✓		✓	✓	
<b>Task 3.2: Development of various forms of intercultural education aimed at preserving and developing the cultural identity of Roma</b>							
Measure 3.2.1. Support activities aimed at preserving and developing the cultural identity of Roma children and pupils	✓	✓	✓		✓	✓	
<b>Objective 4: Prevention of school drop-out and literacy of illiterate and illiterate Roma adults</b>							
<b>Task 4.1: Prevention of dropping out of school for Roma children and students</b>							
Measure 4.1.1. Inclusion of Roma children and students in a variety of extracurricular and out-of-school activities to overcome learning difficulties and school retention	✓	✓	✓		✓	✓	✓
Measure 4.1.2. Introduction of measures for coverage and prevention of dropping out of the education system	✓	✓	✓	✓	✓		✓
<b>Task 4.2: Inclusion of Roma adults in further education</b>							
Measure 4.2.1. Literacy and training of illiterate and illiterate Roma people who have not completed an initial stage or a completed grade from the lower secondary stage				✓			
<b>Purpose 5: Implementation of various forms and programs for working with children with gaps in mastering the educational content and for drop-outs in order to reintegrate them</b>							
<b>Task 5.1: Increasing the flexibility and permeability of different education models</b>							
Measure 5.1.1. Introduction of a system for validating knowledge, skills and competences acquired through non-formal learning and informal learning				✓			
<b>Goal 6: Inclusion of parents of Roma children and students in the educational process and strengthening their participation in school life</b>							
<b>Task 6.1: Increasing the commitments of parents of Roma children and students to their children's education</b>							
Measure 6.1.1. Participation of parents of Roma children and students in parent clubs/school boards	✓	✓	✓		✓	✓	
Measure 6.1.2. Joint activities between parents, including parents of Roma children, to overcome negative societal attitudes is related to joint activities between parents, including parents of Roma children, to overcome negative public attitudes, to create partnerships	✓	✓	✓		✓	✓	

between kindergartens, schools and parents							
Measure 6.1.3. Activities to raise the awareness of parents of Roma children and students about the benefits of education is specific, aimed at parents of children and students from ethnic minorities, including Roma	✓	✓	✓		✓	✓	✓

*The Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020)* <sup>32</sup> is a document that is in line with international documents and standards in the field of children's rights and the rights of persons belonging to ethnic minorities and its objectives are prioritised in the following areas: "Full socialisation of children and students from ethnic minorities", "Ensuring equal access to quality education for children and students from ethnic minorities", "Promoting intercultural education as an integral part of the process of modernisation of the Bulgarian educational system" and "Conservation and development of the cultural identity of children and students from ethnic minorities". Table 14 shows the contribution of operations under Priority Axis 3 of the OP SESG to SEICSEM 2015-2020 and is assessed on the basis of an analysis of the <sup>33</sup> activities set out in the Action Plan for the implementation of the Strategy, as well as by analysing the objectives, activities and target groups set out in the above procedures. The analysis of the contribution shows that out of the 21 actions planned under the 4 strands, 6 are mainly implemented through the implementation of the evaluated procedures, and 3 of the 21 measures set out in total do not require funding.

Apart from the above, there is an overlap between the activities set out in the Implementation Plan of SEICSEM 2015-2020 and the measures for the implementation of the objectives of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020), in particular: activity 1.4. "Working with school boards and parent associations to overcome negative stereotypes and discriminatory attitudes towards different ethnic groups" is identical to measure 3.1.3. "Work with school boards and parent associations to overcome negative stereotypes and discriminatory attitudes"; activity 2.3. "Providing if necessary additional training in Bulgarian language for children and pupils for whom the Bulgarian language is not a mother tongue" is identical to measures 2.1.1. "Providing, if necessary, additional training in Bulgarian for pre-school children for whom the Bulgarian language is not a mother tongue" and 2.1.2. "Providing, if necessary, additional training in Bulgarian language for students for whom the Bulgarian language is not a mother tongue"; activity 4.4. "Conservation and development of the cultural identity of children and students from ethnic minorities in the educational process, including in optional and mandatory selection classes" – with measure 3.2.1. "Supporting activities aimed at preserving and developing the cultural identity of Roma children and students". The set result indicators and target values for these activities/measures are almost identical/under activity 2.3 of the Implementation Plan of SEICSEM 2015-2020. The set result indicator is "Number of supported children and students" with a target value of 5 000, and the set result indicators under measures 2.1.1. and 2.1.2 of the NAP of the NSRIRB 2012-2020 are "Number of children involved in the education, including with Roma background" with a target of 2 500 and "Number of students included in training, including with Roma background" with a target value of 5 000/.

The reference to the overlap of the activities and measures under the plans for the implementation of the two strategies under evaluation supports the above conclusion regarding the examination of the extent to

<sup>32</sup> The strategy builds on the strategy approved by the Minister of Education and Science in 2004 and updated in 2010 with the same name, which is the first sectoral document contributing to the development of Bulgarian education in the context of the educational integration of children and students from ethnic minorities.

<sup>33</sup> Source: <https://web.mon.bg/bg/10068>

which the operations implemented under the OP SESG, which are the subject of this evaluation, contribute to the achievement of the objectives of the Strategies. For SEICSEM 2015-2020, the conclusion is similar to that made in the study of the same issue concerning the NSRIRB 2012-2020, not only because the two strategies have identical measures/activities and indicators for implementation, but also because the Implementation Plan of SEICSEM 2015-2020 sets out indicators for the implementation of the planned activities, which are not comparable to output and result indicators set by the OP SESG.

In addition, the participants in the focus group with representatives of the MC of OP SESG share that the procedures under Priority Axis 3 are in full compliance with the National Strategy of the Republic of Bulgaria for Roma Integration 2012-2020 and the Strategy for Educational Integration of Children and Students from Ethnic Minorities 2015-2020.<sup>34</sup>

*Table 14 Contribution of the evaluated procedures under Priority Axis 3 of OP SESG to achieve the objectives of the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020)*

Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020)	Operations under Priority Axis 3 of OP SESG that contribute to achieving the objectives of the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020)						
Objectives and activities set out in the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020)	BG05M9 OP001- 2.018	BG05M20 P001-3.001	BG05M20 P001-3.002	BG05M20 P001-3.004	CLLD	BG05M20 P001-3.005	BG05M20 P001-2.011
<b>Strategic Objective 1. Full socialisation of children and students from ethnic minorities</b>							
Activity 1.4. Working with school boards and parent associations to overcome negative stereotypes and discriminatory attitudes towards different ethnic groups	✓	✓	✓			✓	
<b>Strategic Objective 2. Ensuring equal access to quality education for children and pupils from ethnic minorities</b>							
Activity 2.3. Provision of additional training in Bulgarian language for children and students for whom the Bulgarian language is not a mother tongue if necessary	✓	✓	✓		✓	✓	
Activity 2.4. Providing additional qualification of pedagogical specialists to work in a multicultural educational environment, including specialised teaching in Bulgarian to children for whom the Bulgarian language is not a mother tongue						✓	

<sup>34</sup> Focus group with representatives of the MC of OP SESG, held on 30.1.2023

Activity 2.7. Additional work with students from ethnic minorities at risk of dropping out and/or early school leaving	✓		✓		✓		✓
Activity 2.8. Supporting students from vulnerable ethnic communities to continue high school education	✓		✓	✓			✓
<b>Strategic Objective 4. Preserving and developing the cultural identity of children and students from ethnic minorities</b>							
Activity 4.4. Preserving and developing the cultural identity of children and students from ethnic minorities in the educational process, including in optional and mandatory selection classes	✓	✓	✓		✓		

In conclusion, it should be noted that Priority Axis 3 procedures BG05M9OP001-2.018 “Integrated measures to improve access to education”, BG05M20P001-3.001 “Support for pre-school education and preparation of disadvantaged children”, BG05M2OP001-3.002 “Educational integration of students from ethnic minorities and/or seeking or receiving international protection”, BG05M2OP001-3.004 “Adult literacy – Phase 1”, BG05M2OP001-3.005 “Active inclusion in the system of pre-school education”, BG05M2OP001-2.011 „Support for success“, as well as grant award procedures under the CLLD approach have a significant contribution to the achieving of the objectives of the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020) and the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020) however, a concrete degree to which they contribute cannot be provided due to non-comparability between the set results in the Implementation Plans of the two strategies, with the results that are reported under the OP SESG evaluated operations.

#### 4.10. Is there a causal link between the intervention(s) carried out under the operations under Priority Axis 3 and the results achieved?

To the extent that the result indicators achieved under the operations covered by the evaluation are expected to capture the expected effects for the participants or entities resulting from the implementation of the operation, to correspond to the specific objectives set for each investment priority selected and be directly linked to the activities, a detailed analysis of the underlying intervention logic in the MCSO and the Instructions/Guidelines for Application was carried out in order to respond to the question thus asked, within the scope of the assessment, i.e. what are the needs or problems identified, what are the objectives to be achieved, what resources are envisaged or used, what activities are planned or implemented, whether they contribute to the achievement of the output and result indicators set or achieved. The following are the findings of the analysis of compliance of intervention with result indicators by procedures:

Table 15 Results of causation analysis between intervention and results achieved

Procedure	Results of the analysis
BG05M20P001-3.001 “Support for pre-school education and preparation of disadvantaged children”	There is a causal link between intervention and results achieved, except for an unclear link between the activities and the individual result indicator for the procedure, defined as “Net enrolment coefficient in kindergartens” – 84 %. As such, this indicator is not

	defined as a change from a baseline value, is not linked to the location of the implementation of the projects and it is questionable to what extent its dynamics do not depend more on external factors than is a consequence of a change as a result of the activities of the funded projects.
BG05M20P001-3.002 "Educational integration of students from ethnic minorities and/or seeking or receiving international protection"	There is a causal link between intervention and results achieved.
BG05M20P001-3.004 "Adult literacy – Phase 1"	There is a causal link between intervention and results achieved.
BG05M9OP001-2.018 "Social economic integration of vulnerable groups. Integrated measures to improve access to education – Component 1"	There is a causal link between intervention and planned results.
BG05M20P001-3.005 "Active inclusion in the system of pre-school education"	There is a causal link between intervention and planned results. Under this operation is set a quantifiable operation-specific result indicator measuring qualitative change for children from vulnerable groups, which is directly related to the activities carried out: "Relative share of children from vulnerable groups with progress in Bulgarian language from their participation in the operation – 85 %."
BG05M20P001-3.017 "Increasing the capacity of pedagogical specialists to work in a multicultural environment"	There is a causal link between intervention and planned results.
BG05M20P001-2.011 "Support for success"	There is a causal link between intervention and planned results. Under this operation is set a quantifiable operation-specific result indicator measuring qualitative change for students from vulnerable groups, which is directly related to the activities carried out: "Improved educational outcomes of students from marginalised groups such as Roma, after completion of a school term or school year within the project implementation period – 10 %."
BG05M20P001-3.020 "Adult literacy – 2"	There is a causal link between intervention and planned results.
Procedures for grant awarding under the CLLD approach with funding under OP SESG	There is a causal link between intervention and planned results.

As a result of the analysis, a causal link between interventions (including activities) and achieved results of the operations within the scope of the evaluation was identified however, with one exception.

In some of the operations, new operation-specific quantifiable indicators were introduced for this type of participants which track qualitative changes in the situation related to the participants when exiting the operation.

## V. FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS

### 5.1. Methods and approach to reflect conclusions and recommendations

The presentation of the conclusions and recommendations in this report is based on an analysis that clearly shows causal links. The conclusions of the implemented evaluation are based on the following elements:

- A condition assessed by a criterion is a fact (or several facts) that the Contractor has established (actual status). This objective reality has been established by carrying out various evaluation procedures and is supported by evidence.
- Reason — the reason for the discrepancy between the criterion and the condition will be identified and indicated (why the difference exists). The reason is the link, supported by evidence, between the observed unacceptable state and the desired state.

The conclusions derive directly from the analyses and the recommendations are based on the conclusions. With regards to the quality of the recommendations, we have followed the following quality elements:

- the recommendations are specific, i.e. specify exactly what, how and by whom it should be carried out;
- the recommendations shall be understandable, clear and unambiguous;
- the recommendations are motivated;
- the recommendations are addressed (proposing a specific vision of the responsibilities of the relevant implementing institutions);
- provide an indication of the possible period of application;
- specify the target groups to which information is to be disseminated and the appropriate channels of communication;
- propose a methodology and approach to reflect in the applicable procedures and processes that the MA of OP SESG uses in the management and implementation of the Programme and/or in its change.

During the preparation of this assessment the following requirements set out in the technical specification of the Contracting Authority are met:

- 1) Compliance to needs: Adequate addressing the need for information formulated by the Contracting Authority;
- 2) Appropriate scope: Careful examination of the rationale of the Programme, its products, results and impact, interaction with other policies and unexpected effects;
- 3) Openness of the process: Identification of all stakeholders; involving stakeholders and target groups in the preparation of the evaluation and in the discussion of results to take account of different perspectives;
- 4) Reliability of data: Primary and secondary data collected are appropriate and reliable in view of their expected use and analysis;
- 5) Depth of analysis: Quantitative and qualitative data are analysed in accordance with established practices and in a way that provides relevant answers to all evaluation questions;
- 6) Plausible and well-founded results: The conclusions and results are logical and justified in terms of data analysis and interpretation, including appropriate explanations and hypotheses;
- 7) Impartial conclusions: The soundness and impartiality of the conclusions and recommendations of the evaluation;



- 8) Clear and credible report: The report shall describe the context and purpose and the organisation and results of the evaluation in such a way that the information provided is easily understandable and verifiable;
- 9) Objective and applicable conclusions and recommendations: The findings stem from the evaluation analysis; the conclusions stem from the findings made; the recommendations made are relevant to the findings and conclusions; the evaluation provides useful recommendations for the Contracting Authority and other stakeholders, and they are applicable in practice and are sufficiently detailed and clear to be implemented.

## 5.2. Findings, conclusions, and recommendations

As required by the Technical Specification, findings, conclusions and recommendations are structured in the following table.

Table 16 Findings, conclusions and recommendations under the “Effectiveness” direction

NO.	The Findings	Reference to the analyses in the report	Conclusions	Recommendations
1.	<p>The procedures subject to this evaluation show progress in their contribution to achieving the objectives of the OP SESG, in particular PA 3 of the programme, expressed by the output and result indicators. In some cases, the contribution of the evaluated operations to the achievement of the target values of the indicators under the Programme is in the order of 75 % to 85 %. An exception is observed in the indicators related to adult literacy, and due to the low size of the contracted value of the output indicator under procedure BG05M2OP001-3.020 “Adult literacy – Phase 2 there is a serious risk of non-achievement of the value of the indicator set in the Programme.</p> <p>With regard to the indicators in the Performance Framework for PA 3 of the OP SESG can be concluded that the milestones of the indicators included in the 2018 Performance Framework have been achieved as evidenced by the reported in the Annual Implementation Report of the OP SESG.</p> <p>Under indicator I3211 “Children, students and youths from marginalised communities (including Roma) involved in measures for educational integration and reintegration” the final target for 2023 has already been reached and almost doubled.</p>	Question 4.1.	<p>The procedures subject to this evaluation show progress in their contribution to achieving the objectives of the OP SESG, in particular PA 3 of the programme, expressed by the output and result indicators. In some cases, the contribution of the evaluated operations to the achievement of the target values of the indicators under the Programme is in the order of 75 to 85 %. An exception is observed in the indicators related to adult literacy, and due to the low size of the contracted value of the output indicator under procedure BG05M2OP001-3.020 “Adult literacy – Phase 2” there is a serious risk of non-achievement of the value of the output indicator set in the Programme.</p> <p>With regard to the indicators in the Performance Framework under PA 3 of the OP SESG, it can be concluded that the milestones of the indicators included in the Performance Framework for 2018 have been achieved, as reported in the Annual Implementation</p>	No recommendation

			Report of the OP SESG for 2018. Under indicator I3211 “Children, students and youths from marginalised communities (including Roma) involved in measures for educational integration and reintegration” the final target for 2023 has already been reached and almost doubled.	
2.	According to the Methodology and Criteria for the selection of operations under procedure BG05M2OP001-3.005, operation-specific indicators have been defined in its planning, which include indicators relevant to OP-level indicators to measure the contribution of the operation to the achievement of the objectives of the individual investment priorities (9i and 9ii) of PA 3. Subsequently, in the Application Conditions, the MCSO indicators are broken down and additional target values are set for the indicators that directly refer to indicators at programme level for which no reporting data are available at the date of issue of this report.	Question 4.1.	The absence of specified target values of programme-relevant MCSO indicators and, accordingly, the setting of those in the Conditions or Guidelines for Application, which are reported at the end of the projects, leads to the impossibility of an objective ongoing assessment of the contribution of the measures under an operation to the achievement of the objectives of the Programme. In addition, in so far as the indicators are part of the MCSO, they should be amended, including the	When programming operations, the MA to provide in the MCSO to be set target values for the indicators referring to OP indicators, as well as not to allow by Application Conditions or Guidelines to be set targets defined at the level of Conditions or Guidelines for Application, which are to be reported at the end of the projects.

			setting of target values, by the MC, in accordance with Article 11(1)(1) of Council of Ministers Decree No 79 of 10 April 2014.	
3.	The degree of influence of the external factors to achieve the indicators set can be ordered as follows, based on the “high degree” assessments of the survey carried out among beneficiaries: The most influencing factor is the adequate response of institutions, including MAs and other stakeholders, during the exceptional containment measures put in place against the COVID-19 pandemic (75 %). Next, but with almost the same degree of influence is the motivation of the target groups to participate in project activities (72 %). Immediately afterwards, again with a similar and also high degree of influence is the presence of support and assistance from municipal administrations and civil society organisations (69 %) and the existence of adequate regulations, administrative acts and instructions of the MA applicable in the implementation of the activities and the achievement of project results (67 %).	Question 4.2.	The following external factors had the greatest influence to achieve the indicators set under the operations: the adequate response of the institutions, including the MA during the lockdown measures imposed as a consequence of the COVID-19 pandemic and the motivation for participation of the target groups in the project activities. The presence of support and assistance from municipal administrations and civil society organisations and the availability of adequate regulations, administrative acts and instructions of the MA, applicable in the implementation of the activities, are also of high influence.	No recommendation
4.	A relatively small number of beneficiaries have noted that they have not achieved or will not achieve a planned indicator. The assessment of the external factors that influenced the failure of beneficiaries to achieve indicators, as well as their shared opinion, identified three main groups of external factors related to the failure to achieve planned indicators: those related to the absence or lack of motivation of the target groups; those linked to difficulties resulting from obstacles to the implementation of the	Question 4.2.	The only example of non-availability of a target group is given by a beneficiary under BG05M2OP001-3.017 and refers to a lack of sufficiently appointed educational mediators in the project partners. From one case, it is difficult to assess whether it is a deficit in the planning of the	No recommendation

	<p>envisaged activities as a result of containment measures against the COVID-19 outbreak and those linked to financial challenges stemming from the rising inflation.</p>		<p>specific project proposal or the obstacle that has arisen is a consequence of the link between the presence of educational mediators and the implementation of other operations, which could have been foreseen by the MA in planning the operation, insofar as it monitors the implementation of other operations related to educational integration and reintegration. The lack of motivation of the target groups has been identified as a factor by another beneficiary under the same procedure, but in combination with the others mentioned in the finding and does not appear to have alone led to a risk of non-fulfilment of indicators.</p> <p>Overcoming the bottlenecks resulting from obstacles to the implementation of the envisaged activities as a result of containment measures against the spread of COVID-19 have been largely addressed through the necessary assistance and flexibility from the MA. As regards the difficulties associated with financial challenges stemming from the rising inflation, they are addressed with measures</p>	
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

			that respond to the emerging challenges and are identified in the Efficiency Strand report.	
5.	Overall, it can be concluded that the selection of target groups for the procedures covered by the evaluation is adequate and they comply with the indicators set out, with some exceptions: In one case (BG05M2OP001-3.004) target groups are defined without an age limit, unlike the output indicator. In another case, target groups are not part of the groups that are expected to be necessarily included in activities and are therefore not included in an output indicator if there is a corresponding such on OP level.	Question 4.3.	The selection of target groups for the procedures in the scope of the evaluation is adequate and they correspond to the indicators set out, with some exceptions.	When planning future operations, the MA should ensure close monitoring of the intervention logic so as to ensure that the target groups comply with the indicators set.
6.	Based on the documentary analysis carried out and the analysis of the results of the survey, it can be argued to a high degree that the data collected for the calculation of the indicators are reliable and qualitative. The analysis highlighted several directions in which it is necessary to carry out actions to improve the processes that guarantee reliability and quality, such as improving the possibilities for carrying out further validation of the microdata in NEISPSE, establishing a procedure in the Management Manual of the OP SESG concerning the way data is collected and processed for the purpose of reporting under the programme, including with regard to the common long-term result indicators, for the procedures for which it is applicable.	Question 4.4.	Based on the documentary analysis carried out and the survey carried out, it can be argued to a high degree that the data collected for the calculation of the indicators is reliable and qualitative, but further actions are possible to improve the processes that guarantee reliability and quality.	<p>1. To carry out the necessary coordinated actions by the units responsible in the MES system to improve the possibilities for carrying out additional validation of the microdata in NEISPSE. This recommendation should be implemented as soon as possible.</p> <p>2. To complement the procedure in the Management Manual of the OP SESG describing the approach, steps and units responsible for collecting and processing the data for monitoring and reporting purposes under the programme, with a description of the definitions of the indicators, the data sources for their tracking and a mechanism for verification and further validation for the purpose of monitoring and annual reports to the EC. To the extent that the operations under OP SESG</p>

				complete their implementation by the end of this year at the latest and given the expected introduction of functionalities in the UMIS for aggregating the data for indicators for the purpose of reporting under the programme, the MA should assess to what extent and whether it is not appropriate to take this recommendation into account in relation to the management manual of the Education Programme.
7.	Proposals for changes of the parameters of the data collected by stakeholders may be summarized as follows: introducing new indicators to track the qualitative change resulting from the activities carried out in relation to participants in operations and making further efforts to better define the main indicators related to the integration of vulnerable groups.	Question 4.4	There is an identified need to change the parameters of the collected data by changing the definitions of existing indicators or adding new ones tracking qualitative change in relation to the participants.	For further operations, it would be appropriate for the MA to take into account the proposal to make greater use of indicators to monitor the qualitative change resulting from the activities carried out in relation to the participants in operations and to make further efforts to better define the main indicators related to the integration of vulnerable groups. As a good example of quantifiable indicators that reflect qualitative change can serve the operations: BG05M2OP001-3.005, BG05M2OP001-2.011 and BG05M2OP001-3.020, where the established system of indicators is also used in the methodology for the assessment of project proposals, and the commitment to the different achievements is taken into account with different weight, according to the importance of the



				indicator for achieving the policy which the operation is contributing to.
8.	Based on the survey and analysis carried out, it can be argued that no obstacles have been identified to the use of information from administrative registers for the purpose of the implementation of OP SESG projects, with one exception – difficulties of the MA with regard to the use of information from NEISPSE.	Question 4.5.	Based on the survey and the analysis carried out, it can be argued that no obstacles have been identified to the use of information from administrative registers for the purpose of the implementation of OP SESG projects, with one exception.	See recommendation 6.1 to point 4.4.
9.	In the short term, the operations under OP SESG which are subject to this evaluation achieve the planned results. The operations completed (BG05M20P001-3.001, BG05M20P001-3.002 and BG05M20P001-3.004) as a whole, achieved the planned results to a high extent. In the medium term, operations under implementation based on the progress of output indicators and data on contracted result indicators – are achieving at an expected pace the planned results. In the longer term these operations are expected to achieve the planned results at the end of the programming period and, in some cases to significantly exceed them, such as the result indicator P3211 “Children, students and youths from ethnic minorities (including Roma) integrated in the education system”.	Question 4.6.	The observed in some cases a drastic exceedance of the target values of the indicators leads to a suspicion of underestimating the objectives set in the programming of both the operations assessed and the OPs as a whole.	The MA should ensure that the target values of the indicators of operations are preceded by precise analyses of the expected results of the interventions.
10.	The analysis found a failure to be achieved the operation-specific result indicators “net enrolment coefficient in kindergartens – 84 %” according to BG05M20P001-3.001 and the similar one under BG05M20P001-3.005 “Group net enrolment coefficient in kindergartens – 2 % increase for the period of the operation”.	Question 4.6.	The use of result indicators for which are set too ambitious targets or are susceptible to influence factors beyond the effect of the operation activities are an indication of a risk to the quality of planning or monitoring of interventions. In this case, the risk is not	The MA should carefully analyse whether these indicators have not set too ambitious targets or whether the reasons for non-achievement are linked to a limited degree of impact of the interventions on this type of indicators, with a view to their future use.

			significant, because they are additional indicators specific to the operation.	
11.	Contribution to the achievement of the objectives and results of the procedures covered by the evaluation have the following factors contained in the procedures: adequate to the objectives and results target groups, activities, duration and budget, and that the procedures are programmed in line with the real needs for support to the target groups. Interviews and focus groups highlight the key role of the motivation of the professionals involved in the implementation of activities, as well as the managers of/from the relevant institution/organisation, which is committed to the implementation of the specific project.	Question 4.7.	The adequate to the objectives and results target groups, activities, duration and budget and that the procedures are programmed in line with the actual needs for support to target groups, make a significant contribution to the objectives and results of the procedures.	No recommendation
12.	In line with the views of beneficiaries, representatives of the MC and representatives of the MA, no serious obstacles have been identified which negatively affect the achievement of the objectives and results of the procedures in the scope of the evaluation, with some exceptions and the effects of the COVID-19 pandemic, which were addressed in answer to evaluative question 2.	Question 4.7.	No serious obstacles negatively affecting the achievement of the objectives and results of the procedures within the scope of the assessment have been identified, with some exceptions and the effects of the COVID-19 pandemic considered in answer to evaluation question 2.	No recommendation
13.	The focus group of representatives of the MC under the SESG OP, held on 30 January 2023, shared an opinion that since 2019, for selection procedures for project proposals for the award of grants to NGOs for educational integration activities, a De minimis aid started to apply within the meaning of Commission Regulation (EU) No 1407/2013 of 18 December 2013 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union (TFEU) to De minimis aid published in the Official Journal of the EU L 352 of 24 December 2013	Question 4.7.	Considering educational integration activities carried out by NGOs as activities of an economic nature and, accordingly, the application of the rules for granting aid under De minimis leads to a limitation of the participation of experienced NGOs in selection procedures due to the accumulation of aid. The check	The MA should, if necessary, carry out a further review with regard to the definition of the applicable aid rules for NGOs implementing activities/projects related to educational integration. If deemed appropriate, to review the experience of other Member States or consult the MF and DG Competition with a view to exploring how to overcome this

	for activities deemed to be of an economic nature. The same issue was also mentioned in the focus group with representatives of the MA, in the context of a possible reason for the small number of applicants for funding under BG05M2OP001-3.020, due to the accumulated aid under de minimis from some of the more experienced NGOs, which makes their participation impossible.		of whether a grant confers a competitive advantage is multifactorial and should be made on case by case basis, taking into consideration different circumstances, including the type and economic benefits of the entity that entered into the grant agreement and who is the final beneficiary of the aid.	obstacle. The recommendation should be taken into account in the programming of subsequent operations.
14.	In addition to the external and internal factors already discussed in the replies to other evaluation questions contributing to the achievement of the planned indicators, a common factor in the analysed operations with better cost efficiency per unit of like product and achieving the planned results is the existence of simplified cost options. The full national scope and implementation of the operations by DB is a serious prerequisite for achieving better performance of the operations in cases where the objectives set imply a systemic approach. Funding schemes through project selection procedures shall be assessed as a prerequisite for achieving better results where a local approach, a targeted approach or an individualised design and approach to the implementation of activities is needed and a high degree of pro-activity or innovation is expected to solve problems and achieve the objectives of the operations.	Question 4.8.	The full national scope and implementation of the operations by DB is a serious prerequisite for achieving better performance of the operations in cases where the objectives set imply a systemic approach. Funding schemes through project selection procedures shall be assessed as a prerequisite for achieving better results where a local approach, a targeted approach or an individualised design and approach to the implementation of activities is needed and a high degree of pro-activity or innovation is expected to solve problems and achieve the objectives of the operations. A common factor in the analysed operations with better cost efficiency per unit of like product and achieving the planned results is the existence of simplified cost options.	No recommendation

15.	Procedures under PO3 BG05M9OP001-2.018 "Integrated measures to improve access to education", BG05M20P001-3.001 "Support for pre-school education and preparation of disadvantaged children", BG05M2OP001-3.002 "Educational integration of students from ethnic minorities and/or seeking or receiving international protection", BG05M2OP001-3.004 "Adult literacy – Phase 1", BG05M2OP001-3.005 "Active inclusion in the system of pre-school education", BG05M2OP001-2.011 „Support for success“, as well as grant award procedures under the CLLD approach have a significant contribution to the achieving of the objectives of the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020) and the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020) however, a concrete degree to which they contribute cannot be provided due to non-comparability between the set results in the Implementation Plans of the two strategies, with the results that are reported under the OP SESG evaluated operations	Question 4.9.	The operations under Priority Axis 3 of OP SESG have made a significant contribution to achieving the objectives of the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020) and of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020).	No recommendation
16.	As a result of the analysis, a causal link between intervention and achieved results of the operations within the scope of the evaluation was found to exist, with one exception.	Question 4.10.	An operation-specific result indicator is planned, where it is questionable to what extent its dynamics do not depend more on external factors than on a change resulting from the activities of the funded projects.	When planning further operations, the MA should ensure that operations-specific result indicators are defined as close as possible to the planned activities below the relevant operation in order to minimise external factors that could affect their reported value.
17.	In some of the operations, new operation-specific quantifiable indicators were introduced for this type of participants which track qualitative changes in the situation related to the participants when exiting the operation.	Question 4.10.	The definition of quantifiable result indicators that measure new qualitative changes in the situation of the participants	No recommendation

			when exiting the operation can be defined as good practice.	
--	--	--	-------------------------------------------------------------	--

## USED LITERATURE

1. Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013 laying down common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund and laying down general provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund and the European Maritime and Fisheries Fund and repealing Council Regulation (EC) No 1083/2006;
2. Regulation (EU) No 1304/2013 of the European Parliament and of the Council of 17 December 2013 on the European Social Fund and repealing Council Regulation (EC) No 1081/2006;
3. Commission Implementing Regulation (EU) 2015/207 of 20 January 2015 laying down detailed rules for the implementation of Regulation (EU) No 1303/2013 of the European Parliament and of the Council as regards the models for progress report, submission of information on a major project, joint action plan, implementation reports under the Investment for growth and jobs goal, management declaration, audit strategy, audit opinion and annual control report, as well as a cost-benefit analysis methodology and, in accordance with Regulation (EU) No 1299/2013 of the European Parliament and of the Council, as regards the model implementation reports for the European territorial cooperation goal;
4. Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012 (the Financial Regulation);
5. Commission Delegated Regulation (EU) 2015/2195 of 9 July 2015 supplementing Regulation (EU) No 1304/2013 of the European Parliament and of the Council on the European Social Fund as regards the definition of standard scales of unit costs and lump sums for the reimbursement of expenditure by the Commission to the Member States;
6. Guidance Document on Evaluation Plans, Terms of Reference for Impact Evaluations, Guidance on Quality Management of External Evaluations, European Commission, (February 2015) – Guidance Document on Evaluation Plans, Terms of Reference for Impact Assessments, Guidance on Quality Management of External Evaluations, European Commission (February 2015);
7. EVALSED: The resource for the evaluation of Socio-Economic Development; EVALSED Sourcebook: Method and Techniques – European Commission Guidelines for the Assessment of Socio-Economic Development;
8. Monitoring and Evaluation of European Cohesion Policy – Guidance documents for ESF, 2018 – Guidance documents for ESF, 2018;
9. Guidance on Simplified Cost Options – Guidance on Simplified Cost Options;
10. Law on the management of European funds under shared management;
11. Pre-school and school education law;
12. Ordinance on Inclusive Education;
13. Council of Ministers Decree No 100 of 8.6.2018 establishing and functioning a mechanism for the joint work of institutions for the inclusion and inclusion in the education system of children and pupils of compulsory pre-school and school age;
14. Regulation on the financing of institutions in the system of pre-school and school education;
15. Regulation No 15 of 22 July 2019 on the status and professional development of teachers, directors and other pedagogical specialists;

16. Council of Ministers Decree No 161 of 4 July 2016 laying down rules for coordination between the managing authorities of the programmes and the LAGs and the Fisheries Local Action Groups in relation to the implementation of the Community-led Local Development approach for the period 2014-2020;
17. Council of Ministers Decree No 162 of 5 July 2016 laying down detailed rules for the award of grants under the programmes financed by the European Structural and Investment Funds for the period 2014-2020;
18. Council of Ministers Decree No 189 of 28 July 2016 laying down national rules for eligibility of expenditure under programmes co-financed by the European Structural and Investment Funds for the programming period 2014-2020;
19. Public portal of the EUMIS 2020 system;
20. Official statistics from NSI, Eurostat, etc.;
21. European Social Scoreboard – The Social Scoreboard of the European Pillar of Social Rights;
22. Studies, information and documents provided by the MA of the OP SESG – Methodologies and Criteria for the selection of operations, Packages for application under the procedures announced under the OP SESG and annexes thereto, Instructions to beneficiaries;
23. EAPE website – <http://opnoir.bg/>;
24. Website of the Single Information Portal of the European Structural and Investment Funds – <https://www.eufunds.bg/>;
25. A Europe 2020 strategy for smart, sustainable and inclusive growth;
26. National Development Programme Bulgaria 2020;
27. Operational Programme “Science and Education for Smart Growth” 2014-2020;
28. Partnership Agreement of the Republic of Bulgaria outlining the assistance from the European Structural and Investment Funds for the period 2014-2020;
29. The National Reform Programme, the Council specific recommendations for the education sector 2015-2021;
30. Strategy for effective implementation of information and communication technologies in education and science of the Republic of Bulgaria (2014-2020);
31. National Strategy for the Promotion and Improvement of Literacy (2014-2020);
32. National strategy for the development of pedagogical staff;
33. National Strategy for Lifelong Learning 2014-2020;
34. A strategy to reduce early leavers from education (2013-2020);
35. Strategy for educational integration of children and pupils from ethnic minorities (2015-2020);
36. Draft National Strategy for Roma Equality, Inclusion and Participation 2021-2030;
37. The strategic framework for the development of education, training and learning in the Republic of Bulgaria (2021-2030);
38. OP “Science and Education for Smart Growth” 2014-2020 (OP SESG), <http://sf.mon.bg/?go=page&pageId=32> - version 5.0/ approved by the EC on 07.05.2021/;
39. Information system for management and monitoring of EU funds in Bulgaria 2020, [https://2020.eufunds.bg/bg/7/0](https://2020.eufunds.bg/bg/7/0;);
40. Annual report on the implementation of the OP SESG for 2021;
41. World Bank Report "Bulgaria: Early childhood education and care, general education and inclusion: situational Analysis and Policy Direction Recommendations, <http://sf.mon.bg/?go=page&pageId=451>



42. 'Distance learning in electronic environment 2020-2021: Consequences and looking ahead' – Main trends in the education system during the COVID-19 pandemic and recommendations for an effective and safe course of the 2021/2022 school year, July 2021, <https://www.mon.bg/bg/news/4268>;
43. The Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria (2021-2030)";
44. Council of Ministers Decree 243 of 20 September 2016 laying down the conditions, procedure and mechanism for the functioning of the Information System for the Management and Monitoring of the Funds from the European Structural and Investment Funds (ESIF) and for conducting proceedings before the managing authorities via EUMIS, <https://lex.bg/en/laws/ldoc/2136906184>;
45. Commission Delegated Regulation (EU) 480/2014 of 3 March 2014 supplementing Regulation (EU) No 1303/2013;
46. Monitoring and Evaluation of European Cohesion Policy, European Social Fund, Guidance document, August 2018;
47. Annex D – Practical guidance on data collection and validation, monitoring and evaluation of European Cohesion Policy, European Social Fund, Guidance;
48. Commission Notice on the notion of State aid referred to in Article 107(1) of the Treaty on the Functioning of the European Union([https://eur-lex.europa.eu/legal-content/BG/TXT/HTML/?uri=CELEX:52016XC0719\(05\) and from=EN](https://eur-lex.europa.eu/legal-content/BG/TXT/HTML/?uri=CELEX:52016XC0719(05) and from=EN));
49. National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020);
50. National Action Plan 2015-2020 for the implementation of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020);
51. Administrative monitoring report for 2016 on the implementation of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020);
52. Administrative Monitoring Report 2017 on the implementation of the National Strategy for Roma Integration of the Republic of Bulgaria (2012-2020);
53. Strategy for educational integration of children and pupils from ethnic minorities (2015-2020);
54. Action Plan for the Implementation of the Strategy for Educational Integration of Children and Students from Ethnic Minorities (2015-2020).

## APPLICATIONS

**Annex 1** – Methodology for conducting a survey of beneficiaries' views on the effectiveness, efficiency and impact of procedures directed directly or indirectly at marginalised groups such as Roma under Priority Axis 3 "Educational Environment for Active Social Inclusion" of Operational Programme "Science and Education for Smart Growth" 2014-2020

**Annex 2** – Questionnaire to study the views of beneficiaries on the effectiveness, efficiency and impact of procedures directed directly or indirectly at marginalised groups such as Roma, under Priority Axis 3 "Educational Environment for Active Social Inclusion" of Operational Programme "Science and Education for Smart Growth" 2014-2020

**Annex 3** – Results of an online survey of beneficiaries

**Annex 4** – Methodology for carrying out a study, through an interview with specific beneficiaries under Priority Axis 3 "Educational Environment for Active Social Inclusion" of Operational Programme "Science and Education for Smart Growth" 2014-2020, on the effectiveness, efficiency and impact of procedures directed directly or indirectly at marginalised groups such as Roma

**Annex 5** – Main questions for conducting an interview for the opinion of project management participants with MES beneficiary on the effectiveness, efficiency and impact of procedures directed directly or indirectly at marginalised groups such as Roma, under Priority Axis 3 "Educational Environment for Active Social Inclusion" under Operational Programme "Science and Education for Smart Growth" 2014-2020

**Annex 6** – Scenario of an interview with representatives of the project management teams with MES beneficiary (project BG05M2OP001-2.011-C04 "Support for success")

**Annex 7** – Scenario of an interview with representatives of the project management teams with MES beneficiary (project BG05M2OP001-3.005-0004-C03 "Active inclusion in the system of pre-school education" and project BG05M2OP001-3.004-0001-C04 "New chance for success")

**Annex 8** – Key questions for conducting an interview on the CLLD approach on the effectiveness, efficiency and impact of procedures directed directly or indirectly at marginalised groups such as Roma, under Priority Axis 3 "Educational Environment for Active Social Inclusion" under Operational Programme "Science and Education for Smart Growth" 2014-2020

**Annex 9** – Scenario of an interview with representatives of the MA on the CLLD approach

**Annex 10** – Methodology for carrying out a study, through a discussion in a Stakeholder Focus Group on Priority Axis 3 "Educational Environment for Active Social Inclusion" of Operational Programme "Science and Education for Smart Growth" 2014-2020, on the effectiveness, efficiency and impact of procedures directed directly or indirectly at marginalised groups such as Roma

**Annex 11** – Main issues for conducting a focus group to study the opinion of members of the OPSPIS on the effectiveness, efficiency and impact of procedures directed directly or indirectly at marginalised groups such as Roma, under Priority Axis 3 "Educational Environment for Active Social Inclusion" under Operational Programme "Science and Education for Smart Growth" 2014-2020

**Annex 12** – Scenario of a focus group with representatives of the MC of the OP SESG

**Annex 13** – Main issues for conducting a focus group to study the opinion of representatives of the MA of OP SESG on the effectiveness, efficiency and impact of procedures directed directly or indirectly at

marginalised groups such as Roma, under Priority Axis 3 “Educational environment for active social inclusion” under Operational Programme “Science and Education for Smart Growth” 2014-2020

**Annex 14** – Scenario of a focus group with representatives of the MA of OP SESG

**Annex 15** – Scenario of an interview with representatives of the CCU

**Annex 16** – Scenario of an interview with representatives of the MA of OP HRD

**Annex 17** – Reference of the planned and achieved values of the indicators under the evaluated procedures PA 3 as at 30.9.2022