# Best practice related to the use of art. 96.3.d CPR – 2014-2020

**The pioneer experience of Basilicata Region (ITALY)**
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# Report


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**Interview with the Managing Authority – ERDF OP Basilicata 2014-2020**

**Info Box**

All procedural documents related to this practice (Call, Application form, selection criteria and FAQs) are available here (Italian): https://portalebandi.regione.basilicata.it/PortaleBandi/detail-bando-altri.jsp?id=6557.

Detailed Presentations about the features of the Call and its first results are available here (English): https://www.interact-eu.net/download/file/fid/20736
https://www.interact-eu.net/download/file/fid/20409

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**1) What was the need and the reason why the Basilicata Region started this course of action?**

- From one side, the need came from both the regional administration and local actors' needs: bottom-up approach has been considered only for one specific sector of beneficiaries (see section A of the Call), mainly related to the field of research that represents a very active sector in the region, National Research Centre and University research institutes. Thanks to the presence of relevant experiences related to S3 and smart specialization clusters, there was a clear need for calls related to the S3 strategy, and therefore the need for cooperation actions with external subjects, both European and non-European, with specific specialisation (energy, bioeconomy, etc.). The S3 strategy and framework provided hints for on-going networks and projects. The Region also has a relevant maturity in this field thanks to other investments' frameworks and initiatives, such as Horizon 2020. There was also some experience coming from the previous 2007-2013 period: in this regard, on the previous ROP a few similar approaches and calls were experimented, even if the performance and some delays did not produce relevant results. Thus, there was a clear path for further opportunities for networking and strengthening existing networks, and the exploitation of the S3 strategy.

- From the other side, as regards the other set of beneficiaries (municipalities, schools, public service management bodies), they had highlighted their willingness to participate in direct and simplified calls due to lack of administrative capacity, skills and staff. Furthermore, there was a relevant presence of very active municipalities in certain sectors (culture, territory, etc.), and this led us to envisage a top-down approach with some characteristics aimed at boosting proximity (language, management under the responsibility of the regional administration), with the idea of bringing the beneficiaries closer to the regional level. In this regard, there was the need for a better definition of specific selection criteria, already defined by the Monitoring Committee in 2016, as well as other criteria related to experimental virtual actions and use of residual funds, for embedding S3 and integrated programming by local bodies, through the use of ITIs.

- There was a growing need for providing interregional cooperation opportunities to small municipalities, even with a relatively small experience also in Interreg (and Horizon2020), to recover and strengthen existing partnerships. Through this, the need for territorial cooperation was very clear and robust, even if, it was aimed at exploring new themes or thematic objectives, different from the ones under the first Line of action (Research & Innovation). New perspectives where also emerging in the health sector (partnerships and/or existing contacts between Italian and French structures, *omniceutics and oncology research*). Furthermore, the Region detected an increased interest in cultural networks among municipalities, with a clear interest to cooperate with non-neighbouring ones (Basilicata-Calabria-Sicily). Thus, there were also a few cases, related to the exploitation of previous Interreg experiences: Craco municipality's foundation has some staff members with Interreg experience, who are available, if needed, to support partnerships for the whole community belonging to the Municipality area. Another need was expressed by Filiano Municipality, that had experienced some Interreg partnership before and aimed at re-establishing contacts with its previous network.

- Positive feedback and interaction with local bodies and potential beneficiaries to identify local needs and knowledge of territorial needs.

**2) Did you perform an exploratory analysis? From what need or political force/technical guidance did the idea originate?**

- In fact, we didn't perform a specific exploration, because there was a path that we had built before, with the purpose of using the 5% of ERDF resources. To prevent financial resources from being "drained", as it usually happens, we decided to safeguard cooperation by including a specific item in the programme budget. We allocated specific resources to all axes, as a cross-cutting action. In this way, we ensured the availability of a budget earmarked exclusively to carry out this operation. Otherwise, the risk was that—by the time we finally succeeded in achieving the result—those resources would have "disappeared". The action was protected and placed under the aegis of the Managing Authority (MA), instead of entrusting a specific department with responsibility over it. In this way, we safeguarded it. The opportunity offered by such a call for proposals was then presented to all political representatives, who embraced it. Initially, political representatives were not overly enthusiast about this call; however, the MA presented it to them in such a way that they eventually accepted it willingly. The Managing Authority emphasized the fact that some entities in Basilicata are partners—and in some cases even act as Lead Partners—in Interreg projects. Because Basilicata has a history of participation in projects, as well as in twinnings with ministries. Thanks to the partnerships set up with other entities for Interreg projects, Basilicata Region succeeded in venturing outside its borders and promoting the Region abroad. In some cases, the Region actually acted as Lead Partner, as in the CRE-HUB project carried out together with Friuli Venezia Giulia Region and other European partners. In this way, Basilicata Region aims at promoting its entire territory and freeing it from "provincialism" by providing a cooperation experience. As statistics show, the participation rate of Basilicata-based entities in direct-management programs is very low. In this regard, calls for proposals on cooperation can have a driving effect, for example, to promote a Basilicata Lead Partner so that maybe, in the future, other European entities may decide to contact it and ask it to become a partner in an Interreg network or in another network. Basilicata Region promoted this call, and all political groups embraced its relevance, which actually allowed the whole operation to be carried out. The call was anchored on the policies and thematic objectives, consistently with the end beneficiaries and the relevance of activities. It is very hard to match the cross-cutting nature of cooperation to the rules on expenditure categories divided by action and by axis that govern a programme. It therefore becomes clear that cooperation needs to have a specific framework, with specific expenditure categories and rules. We would need to have a template with ad hoc rules in the Regional Operational

Program (ROP) to cater for cooperation actions. Because, as things now stand, due to the technicality of the procedure, the decision on the specific action to which a project will be assigned is made by the Managing Authority (MA) when analysing the selected project.

**3) What did inspire you and motivated towards this kind of cooperation, and was it worth it?**

- In general, it is a positive result, it was worth it. Thanks to this experience, we developed awareness of the following two aspects:
  1. a call proposed by a region that promises beneficiaries to finance all projects, as long as they set up partnerships and comply with the rules, is nice and fair, even though it does have an intrinsic limitation: there are no resources available for other partners (outside Basilicata Region). For this reason, we first need to establish alliances with European regions or bodies in the form of protocols or agreements, on specific policies in which we have a matching strategic approach (mirror cooperation). Otherwise, it is impossible to create programmes that are financially sourced from one side and from the other. We received many questions on these topics. Because partners are willing to set up partnerships, but they are faced with the challenge of finding funds and adapting to participation terms. Basilicata Region was well aware of this limitation that implies a certain lack of fairness, because those bodies that manage to find partners with the highest self-funding capacity are favoured. However, since we at Basilicata Region felt that it was important to carry out this very first experience, we decided to go ahead with the call in any case. For the future, we will need to take a step forward by fostering more fluid communication among EU regions, to find geographical or sectoral areas in which to create partnerships, first among regions and public administrations, and then within our Region, with our research bodies, with our potential beneficiaries (S3 networks).
  2. when preparing the call, we did not specify that each Lead Partner could submit only one project and that each project could only have one Lead Partner. Later on, due to the pressure exerted by beneficiaries—particularly in the form of many clarification questions—we allowed the submission of projects with multiple Lead Partners. However, this decision placed on the Region a burdensome selection task that could and should have been undertaken by beneficiaries prior to project submission, based on a self-evaluation that would have turned out to be easier and more precise when performed by them. The Region had to use moral suasion by emphasizing the fact that the Lead Partner takes full responsibility for ensuring conclusion of all activities in all projects in which it acts as Lead Partner (Lead Partner Principle). Therefore, we drew the beneficiaries' attention to the challenge potentially posed by managing more than one project at the same time for 24 months, in case of admission of more than one project with the same Lead Partner. This invitation to capacity building was clearly explained in one of the FAQs.

**4) How did you establish the goals for this procedure and approach?**

- See the answer to question 1.

- Unlike other Italian regions, in Basilicata Region the Council plays an important role in the initial phase of programmes such as the Regional Operational Programme (ROP), while the Council's role somewhat fades out in the course of programme implementation. After the call was first announced, its implementation procedure experienced a slowdown due to regional elections that led to a political alternation. The outgoing President had already been informed about this call and had given clear indications that he was willing to support it. A certain degree of political maturity had already been reached. After the elections, we had to start all over again, to create the same level of awareness in the new ruling class, in particular the new President and the Regional Minister for Work Development, Education, and Research Policies, who oversees almost all policy areas. Then, the General Director of the Programming Department also changed. The new Director immediately embraced this project and provided support in communicating with the political groups. The implementation procedure of the call resumed, and its objectives were safeguarded.

- The Regional Government formally approved the call with a specific resolution, because unlike other Italian regions, in Basilicata calls are approved by the Regional Executive Board. This approval is the moment that seals the support given by political groups, because it means that the entire Regional Government adopts a resolution to approve the call. All formalities preparatory to approving the call are of technical nature. Selection criteria had already been approved by the Monitoring Committee, an essential point of reference.

- There are two other important elements. The first one is that Basilicata Region has a financial plan approved by the Regional Government that details the financial plan per Priority Axis of the ROP. This financial plan—which we and our European Commission colleagues playfully call "shadow plan" (because it is not mandatory but you need to have it)—has always included the cooperation action in a visible way. Over the years, this plan has been amended, yet the amount allocated to cooperation has always remained unchanged. The second formal element is budget approval by the Regional Council, because it includes the approval of specific ERDF ROP budget chapters, and there is an item with an amount of about € 3,300,000 allocated to cooperation, with two specific budget chapters.

**5) How did you define the operational concept and methodology as well as the type of procedure?**

- We attentively listened to partners, and this allowed us to embrace the idea of creating this call, and to understand how we had to do it. However, the Region did not engage in an active exchange of ideas with the partners on the call. We did not invite all or a part of the group of partners to meet with us to discuss about the call we intended to publish. It was rather an awareness built over time. We wanted to propose this call because we thought it was the right one.

- Since the beginning, the call had some solid foundations, i.e. S3, territorial policies, and especially consistency with the strategy on inner areas and ITIs at territorial level.

- Therefore, we did not perform any ad hoc action targeted directly to partners.

**6) How did you define the relevant administrative steps as well as the necessary internal procedures and activities?**

- See the previous answers.

**7) How did you define the contents of the call? How did you draft it?**[1]

- The task of creating the call was entirely carried out within the Department headed of the Management Authority for ERDF Operational Programs, with strong personal contribution, commitment of the team. We created a small working group with people who have specific skills. Some staff member has specific knowledge on Axis 1 topics (Research, technological development, and innovation) and Smart Specialisation Strategy (S3). This staff members also work on cooperation projects in which we act either as partner or Lead Partner in Interreg and Interreg Europe. Our in-house financial company, Sviluppo Basilicata S.p.A., also collaborates with us. However, it is not involved in this call. Regarding the other staff members (2 people): one has skills on topics regarding local bodies, territorial policies, ITI "Urban Development" strategies, and inner areas. The other has skills on aids to companies in general, aids for Axis 3 Competitiveness, and research.

- Since it was a "pioneering" call, we held many, many meetings on the various drafts. To better understand if what we were writing would work fine, we used role playing; we simulated situations. We questioned ourselves many times, we changed, changed again, improved, for example the annexes, the Application Form, etc.

- According to Director's suggestion, the staff involved took some texts of other calls as reference, for example some Interreg calls, some manuals, to create a sort of benchmark, particularly for those matters that are not covered by the ROP's working tools. We applied this method to regulate expenditure eligibility, some types of intervention, expenditure reporting methods. We borrowed these procedures, then we wrote them down and tried to ensure that they complied with our guidelines that range from Regulation (EU) 1303/2013, to our Management and Control System (Si.Ge.Co.), Presidential Decree no. 22 of 5 February 2018 on expenditure eligibility, and the rules provided by the Regulation on European Territorial Cooperation (Regulation (EU) 1299/2013), that we often cited by analogy. When we answered some clarification questions, we always used the phrase "by analogy to". In fact, we

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always thought by analogy, because we had to take those rules, borrow them, and turn them into our own regulatory corpus.

- Another important choice, which had an impact on the time required to publish the call, was the decision to create a single (though lengthy) document that contained all the rules, as opposed to publishing the call first and then making an explanatory manual available to all applicants. We devoted time to describe all eligible items of expenditure in great detail, specifying their maximum amounts, the expenditure documents to be submitted afterwards, the expenditure reporting rules. We did it this way because we know that beneficiaries are inexperienced and are frightened by the large number of reference documents they need to look at.

- We had received support from DG REGIO - Unit in charge for Italy.

- As far as the documents to be used as reference are concerned, we looked at the projects where our Region acts as partner. Then, we considered the rules of our Management and Control System, our expenditure reporting method, and our information systems.

- As far as the structure of interventions/actions/operations is concerned, we strived to simplify the menu options, to describe the actions within the scope of the Axes from which the applicants could choose in the easiest possible way, and to provide specific information regarding consistency with the European Union Strategy for the Adriatic-Ionian Region (EUSAIR) and the link to the relevant manuals. These aspects are not easy to explain to the less experienced beneficiaries. In this way, it became easier for them to find their way around. We did the same thing with S3. We included the specialisation areas; in the structure, beneficiaries were invited to indicate the specialisation area chosen for their projects. We supplied a reference grid for each intervention area to help them in this choice. We provided a brief description of each keyword. We tried to work on the structure in order to make the answer mode easier for beneficiaries.

- In addition, we standardised the letters of intent with the minimum information to be provided by applicants, for example the list of participating partners.

- The only document that was purposely excluded from the call specification is the partnership agreement form, that is signed after the project is admitted for funding. However, since all the rules applicable to potential partner or Lead Partner beneficiaries, either from Basilicata or abroad, are already clearly specified in the call specification, the partnership agreement will be just a structured copy-and-paste of the call specification.

- We stood firm in our request that applicants supplied all mandatory information, including the list of partners, the co-financing rate to be provided by each partner, and demonstration of full awareness of the total project amount.

- Let us add another piece of information: we decided to allocate full responsibility for all OP actions to me as head of the Department called “Managing Authority for ERDF Operational Programmes”, in full compliance—of course—with the administrative procedure rules laid down by Law 241/90 and as provided for in our Management and Control System. This means that, in some cases, when there are cross-cutting matters, such as ITIs, I can act as a “concentrator” during the initial phase, and afterwards the administrative procedures continue in the relevant departments. Our Department is actually within the Planning Department and it is already in charge of coordinating the various departments. Our Department is responsible for ERDF Operational Programmes (07-13, 14-20, 21-27).

- That’s why we submitted the draft resolution to approve the call to the Regional Government. The draft resolution followed the normal approval process: it was first forwarded to the Secretary’s Office of the Regional Government to undergo all legality checks, and then to the Accounting Department to undergo all financial checks, confirmation of financial coverage, etc. The Regional Executive Board finally approved the resolution.

- There is no formal approval by the Monitoring Committee. In our case, the MC establishes the selection criteria and then, in the call specification, these criteria are weighed, and values are attributed to them.

- After being approved, the call was published on the Official Gazette of Basilicata Region (BUR, Bollettino Ufficiale della Regione Basilicata), on the ERDF OP website, under Notices and Calls. In addition, we sent a bulk e-mail campaign by certified e-mail to the 131 municipalities in Basilicata, to all schools in Basilicata (through the Regional Education Department), to all members of the research committee, to all research centres, to all bodies involved with Priority Axis 1. We made every possible effort to reach all potential beneficiaries.

- After advertising the call, we activated some phone numbers to provide information, we organised meetings, we welcomed people to our offices. Towards the middle of the procedure, we organised an information day to briefly illustrate those aspects that were more frequently mentioned in clarification questions, and we answered many questions in a plenary session. This was an important occasion because it gave us a sign of participation. Attendance was about 140 people. All answers given during the plenary session were included in the FAQs. After the meeting, we published the presentation slides online, as requested by attendees.

**8) How did you set up all the necessary call-related procedures? (submission, assessment, selection, contracting)**

- All applications had to be submitted through certified e-mail (PEC).

- The call specification provides for an evaluation to be performed by the Managing Authority. To that end, we will be setting up a Committee composed of three individuals:
    - President
    - Organisational Position in Implementation procedures of the Programme
    - Organisational Position in the area of Monitoring and Reporting of the Programme
    - one secretary.

  The Committee may be materially supported on specific issues concerning in-depth analysis and desk evaluation of documents by some office staff members who have acquired the necessary skills on more specific topics, such as the relevance of proposals to policy objectives.

- All eligibility requirements are clearly defined in the call specification. We will be using a checklist to verify such requirements.

- The selection criteria are those approved by the Monitoring Committee. We will perform a substantive and comparative assessment and we will create a ranking.

- Lastly, a specific administrative act will be issued. The "granting provision" whereby the project is admitted for funding before signing the Subsidy Contract. Through this document, the applicant is informed that the project has been admitted for funding. This document must be signed by the Lead Partner for acceptance of all terms and conditions and then returned to the MA.

**9) What kind of project implementation and follow-up procedures have you set-up?**

- For expenditure reporting purposes, we decided to use Real Costs instead of Standard Unit Costs (Simplified Cost Options). For this reason, we provided a detailed list of all documents required to justify expenditure that beneficiaries must keep (e.g., boarding pass, ticket, payment, bank transfer). Beneficiaries need to submit a so-called "Application for reimbursement" to which all justifying documents have to be attached. We have provided for the possibility that the Lead Partner requests a 20% advance payment during the admission phase. Later on, the Lead Partner will have to submit the corresponding expenditure reports and applications for reimbursement. However, we did not establish a specific periodicity or deadline for such submissions, to make things easier for beneficiaries. In fact, we know that some organisations may experience cash-flow difficulties. The Region reimburses the ERDF quota (i.e., 100%) to the Lead Partner beneficiary. The Programme, in turn, has a European co-financing rate of 75% (ERDF), with a 25% of national and regional financing. We decided to ban private parties from taking part in the call, to avoid aid-related issues. However, in the FAQs we emphasised a part of the call specification where we explained that private parties acting as stakeholders may take part, for example, in missions, as long as such possibility is provided for in the project. Because we thought that it was right for a university or research centre to take the president or representative of a cluster or business with them. In this way, we are not giving a direct aid or a competitive advantage to anyone. We are just allowing an exchange activity supervised by a public body.

- There is one more thing that I would like to point out: it is a practice that we use and is very important to make sure that beneficiaries always have sufficient cash flow, and to prevent the project from getting blocked. This practice is regulated under article 12, paragraph 3, subparagraph b). We usually adopt this procedure with public administrations in the ROP. If a partner has incurred expenses and does not have enough cash flow to cover them, they can send to the Region the documents justifying expenditure, together with an Application for reimbursement. The Region will pay the amounts shown on the documents and then the Lead Partner and all other partners will have to submit the corresponding proofs of payment showing that those expenses were actually paid, not later than 30 days from the date when the amounts were paid out.

- Our Department is responsible for all management activities, including monitoring during the implementation phase. In a clause of the call we have provided for the possibility that a beneficiary may specify in the application that it intends to involve the Region or an in-house company competent on the specific subject matter. Particularly for Action B projects, we thought that local bodies that want to set up partnerships with external European administrations may find the presence of a Department with specific skills on those topics (waste, energy, etc.) useful, and may feel reassured by the fact that Region representatives may join them in meetings or missions. When we talk about in-house companies, we are referring to Società Energetica Lucana, a company expert in energy topics, and Sviluppo Basilicata, a regional finance company involved with development projects. For this possible participation of the Region and the in-house companies in projects, we have provided a specific budget (about € 20,000). With this procedure, we intend to provide real, implemental support to those beneficiaries that have the necessary far-sightedness to take advantage of this opportunity.

- The Managing Authority Department has about 20-25 staff members. This means that among our staff members, we have skilled human resources that can provide support for monitoring and expenditure reporting activities. We would like to create a small working group that undertakes the most specific tasks, such as Applications for reimbursement. There is a plan to increase the Department's staff by adding one member that has skills on interregional cooperation, if necessary. An ad hoc budget could be used to that purpose.

- First and second level controls are not described in the call specification, but we can refer to the rules provided for by our Management and Control System: when the beneficiary is the Managing Authority, first-level controls are performed by another independent unit, while second-level control is performed through audits carried out by a specific independent Audit Authority. Some of the projects will probably be extracted in the audit sampling and will therefore undergo second-level controls. Returning to first-level controls, when the Managing Authority is not a beneficiary, the rules of our Management and Control System provide that such controls may be performed by the MA Department, as long as a certain level of segregation of functions is ensured. Within the Managing Authority, there is an area that performs first-level controls and another one that certifies expenditure. Despite all this, in the future controls could also be delegated to a third-party organisation.

**10) How do you intend to use the projects' results, after their closure?**

- Projects will be completed by 2023. Therefore, the first results identified from the proposals that will arrive will allows us to understand how to set up certain procedures in time for the 2021-2027 programming period, by analysing the quality of project proposals and outputs/results.

- We applied a mitigated top-down approach, which means that we made it clear to beneficiaries that they had to achieve a result. We included informational, non-mandatory lists detailing what was meant by result and project output. Among these, there is the possibility to propose projects generated by these partnerships that could be financed by the Region under the ROP ERDF or proposed for financing in the next programming period.

- We didn't want to use the same mechanism as Interreg, i.e. the action plan, because we wanted to quickly get to an activity aimed at identifying and producing best practices to be financed at a later stage.

**11) What is your overall evaluation of this experience: what worked well and made you feel proud?**

- We need to have specific expenditure categories and specific rules governing expenditure eligibility and thematic eligibility of actions.

- We are proud to have devised this call and its opportunities for our Region, in spite of the political and administrative alternation due to elections. Full alignment and commitment of all parties involved, both political groups and technical staff, was a great achievement that led to publication of the call for proposals.

- We gave excessive weight to ITIs. Unfortunately, or luckily, the choice to favour S3 thematic priorities and ITIs among cooperation actions was made during the programming phase, i.e. back in 2014 and then in 2015, when the decision was taken. In 2019, when we were closing the call, we realised this, but we were also aware that making such a change in the programme would have meant that we had to start again from scratch. We are sorry that the call was not as open and fair as we would have wanted it to be. In our Region, we have few local bodies (131 municipalities in total), and those inclined to take advantage of these opportunities are even less. The fact that we attributed a higher score to 42 municipalities in the inner area and to the cities of Matera and Potenza, is something that I regret. What would I have changed? I would have given a greater opportunity to all bodies, and favoured project quality, regardless of the geographical area to which the beneficiary belongs.

**12) What would you do differently if you started all over again?**

- The problem of the financial contribution made by the foreign partner has an impact on call structure, expenditure eligibility, and call management. The regulation establishes that the foreign partner must ensure a technical and financial contribution. We were afraid that there could be a risk that the chosen foreign partner would not have available funds. Since cooperation was activated by the Basilicata Region, we assume that it is the Basilicata system that has the greatest need to include a foreign partner in the partnership, and that benefits from borrowing something from another body. We didn't want the partnership to fail due to lack of available funds, and we didn't want to derogate from the regulation either. For this reason, we allowed foreign partners to provide their technical contribution in the usual manner, with specific sections to be filled out in the Application Form, whereas regarding the financial contribution, we provided for the possibility of using in-kind resources. If the local partner needs to invite the foreign partner to travel to Basilicata, the corresponding travel, board, and lodging expenses will be borne by the Basilicata partner, that will cover them with funds from its own budget. Therefore, the project budget will need to include these expenses to offer hospitality to the foreign partner.

- Another simplification that we introduced is that we do not require a mandatory Work Package (WP) structure. The logical and temporal phases in the development of a project can be customised by the Lead Partner.

- Establish a maximum number of projects that a single Lead Partner may submit.

- When creating programmes, Member States should include the methods to implement cooperation. Create networks of regions based on thematic objectives or geographical areas. Establish strategic objectives on which to favour the creation of cooperation. This will enable us to reach framework agreements between networks of regions and states.

- In Action B, we made public the list of partners with which the Basilicata Region usually creates partnerships on cooperation projects. This means that we made available to beneficiaries the partnerships that the Region has set up over time. Putting at their disposal this partnership network was a useful, yet not sufficient, measure. It would be necessary to provide more support in the search for foreign partners, something that we failed to do. The search for partners is the most time-consuming activity for beneficiaries. When carried out in a serious manner, a partnership building activity entails not only telephone costs, but also videoconferences, e-mails and, sometimes, even the need to take a plane. It therefore requires an initial investment from the beneficiaries. In doing this, those bodies that can count on their own funds get ahead, and those that risk get even farther ahead. It would be nice to have a “rotary fund for projects”, that would allow us to give non-returnable grants that beneficiaries could use to structure and build partnership networks, regardless of the effectiveness of such networks.

- Give a greater opportunity to all bodies and favour project quality, regardless of the geographical area to which the beneficiary belongs.