

ANNEX

Observations on the Operational Programme Employment (OPE)

CCI 2014CZ05M9OP001

The following observations are made in reference to Article 29(3) of Regulation (EU) No 1303/2013 of the European Parliament and of the Council (CPR). The Czech Republic is asked to provide to the Commission any necessary additional information and, where appropriate, revise the Operational Programme.

GENERAL OBSERVATIONS

1. The intervention logic has to be improved for all priority axes/investment priorities. The investment priorities are not precise enough and it is often unclear what the scope of planned measures will be. The specific objectives have to be more precise and define the change which is planned to be achieved. The OP needs to provide relevant result and output indicators for all the specific objectives and set targets for them. Output indicators have to cover most proposed actions under each investment priority. All the proposed actions need to directly contribute to the specific objectives under the investment priority.
2. Linking precisely the OP with the Europe 2020 Strategy and the National Reform Programme (NRP) is of crucial importance. In this respect, the relevant 2014 CSRs addressed to the Czech Republic within the Europe 2020 process need to be translated into investment priorities.

As regards older workers - while noting the reasons for not selecting the IP on active and healthy ageing - in this specific case there is a need to introduce at least a specific objective together with indicators in this area under the PA 1.

3. It needs to be demonstrated that a critical mass of funding is allocated to actually supporting the relevant CSRs: the OP focus on childcare facilities has to be more visible and in this sense an indicative allocation within the axis need to be specified. The general funding distribution does not fully reflect the prioritisation following the CSRs: more financing has to be dedicated to childcare/reconciliation and PES and e.g. less for adaptation of workers/retraining etc. In this context it is not justified to allocate to the Specific objective 2.2.2 almost twice as much as to the Specific objective 1.2.1.

Moreover, the structure of PA 1 does not ensure due concentration of resources on key areas of funding (CSR IP). By combining a total of 5 IPs, there is a significant risk that funding might be shifted from key IPs to less relevant IPs (IPs that do not address CSR). This observation is even more important taken into account that 59% of the ESF support is allocated to this priority axis.

The PA 4 Effective public administration is allocated with 5% of the programme which seems low (and the same can be said about the overall allocation on this area dealing with

the administration of the whole country) having in mind great challenges which the Czech public administration faces. It is even more striking when this allocation is compared to the one on the technical assistance for the ESI funds (being only a part of public administration). An argument of a real absorption capacity to be so low used by the Czech authorities confirms the need for more effort in this area.

4. As regards operations implemented outside the programme area, a pro rata is calculated for each investment priority to set out support from both categories of regions to (similar types of) operations supported under these IPs. This calculation is based on so-called proxies (e.g. ALMP financing or number of long-term unemployed in regions) where the Prague's share is taken into account to determine the benefit. Then, one aggregated pro rata is calculated for each PA, weighted by financial allocation of the IPs, and finally one aggregated pro rata for the entire OP, weighted by financial allocation of the PAs, was set at 1:27.2.

The legislative requirements in Article 70 (1) and Article 93 of CPR and Article 13 (2) of Regulation (EU) No 1304/2013 of the European Parliament and of the Council (ESF regulation) apply in this case:

- a) Art. 13(2) ESF regulation allows, as a Fund-specific rule, to implement an operation outside the programme area if it "is for the benefit of the programme area". As a consequence, the benefit has to be assessed at the level of the operation.
- b) As a matter of flexibility to ease implementation on the ground, this benefit can be assessed for similar types of operations, i.e. provided those operations have the same pattern (e.g. in relation to participants) and a pro rata for similar types of operations can be set in advance. This calculation together with the data used has to be formally made available to the Commission to enable verification before the approval of the OP and in future.
- c) However, the flexibility cannot be extended more as this would be in breach of the requirements of Art. 13(2) ESF regulation. Moreover, the approach proposed by the Czech authorities would provide figures which are too abstracted and do not correspond to reality. Having one weighted pro rata for the whole programme (based on weighted pro rata for individual priority axes) and one weighted pro rata for each priority axis (based on weighted pro rata for investment priorities) would breach one of the basic principles of Cohesion policy, i.e. non-transferability of resources between categories of regions enshrined in the Article 93 (1) CPR.

If funds are to be re-allocated from PAs/IPs comprising operations implemented outside the programme area with a certain benefit for the programme area to PAs/IPs comprising operations with a different benefit, using one/the same pro rata for those operations would support the other category of region more or less compared to what had been assessed and set ex-ante. The argument used in the OP for having one pro rata for the whole OP to ease future re-allocations between PAs does not hold in this respect.

Moreover, one pro rata for the whole OP is not in line with the requirements for the performance framework. According to Art 22(1) CPR, the amount corresponding to the reserve is to be set out by priority axis, ESI fund and category of region. Furthermore, according to Art 22(2) CPR, the Commission will determine the programmes and priority axes that have achieved their milestones. Hence, for a priority axis covering more than one category of region, all the indicators in the performance framework with milestones and targets, as well as their achieved values, have to be broken down by a category of region and properly reflect the achievements in each category of region, rather than being an abstract data.

d) Furthermore, the Commission cannot accept that one pro rata is applied automatically at the level of an IP to all operations implemented under that IP for the following reasons:

- Hardly all operations will be implemented outside the programme area. In case an operation is implemented in a less developed region and this operation is only for the benefit of this region, the general rule of Art. 70(1) CPR applies and no pro rata is to be applied as this operation is to be entirely supported by the less developed region in order to respect the principle of non-transferability of resources. By analogy, the same applies to an operation implemented in a more developed region.
- In accordance with Article 13(2) ESF regulation - and provided that the Member State decides not to apply the general rule of Art. 70(1) CPR - it is only required (and possible) to apply a pro rata in case an operation is implemented outside the programme area and that operation is not only for the benefit of the programme area, but also for the benefit of the region where it is implemented. In case an operation is implemented outside the programme area and the benefit is only for the programme area, there is no requirement (and no possibility) to apply a pro rata. For instance, in case the programme area is the less developed region and the operation is implemented in Prague, then a pro rata should only be applied in case the Czech authorities decide not to apply the general rule of Art. 70(1) CPR (the latter would imply that the funding for the operation is to be drawn entirely from the Prague budget) and in case the operation (which is for the benefit of the less developed region) is also for the benefit of Prague. In case the operation is only for the benefit of the less developed region, there is no need (and no possibility) to apply a pro rata either. By analogy, the same applies to an operation implemented in a less developed region.

As pro ratas for each IP (and thus the financial allocations for categories for regions) were not set following the logic above, re-calculations are needed. Especially the proxy for public administration (the number of regions) does not reflect properly the benefit in different programme areas; the number of inhabitants needs to be used instead. For some

other IPs it seems that not all less developed regions have to be counted as benefits for them are marginal.

In this respect, the argument used in the OP about making things simpler for the beneficiaries seems false as the calculation of pro rata has to be done at the level of the managing authority at the beginning and then a pro rata has to be applied automatically in the monitoring system for (type of) operations assessed ex-ante as the relevant ones.

In light of the above one weighted pro rata co-efficient for the whole programme and for each priority axis is not acceptable for the Commission as it does not comply with Article 70 (1) and Article 93 of CPR and Article 13 (2) of ESF regulation.

5. The description of specific objectives has to be more concrete and precise as to the results and change they aim at. The results have to be clearly separated and defined. These sections need to provide a clear understanding of how the objectives will be pursued and the results attained in practice, with the types of actions planned. Currently the description often describes the general goals to which the OP will contribute but obviously will not fulfil because of its limited scope. Example: under the specific objective 1.1.1 it is claimed that its activities are aimed at resolving the causes of the low employment rate and the increasing unemployment rate, which is obviously too far-fetched and not realistic.
6. The formulation of the type and examples of actions need to be considerably amended to respect the Article 96(2) point (b)(iii) of CPR and point 2.A.6.1 of the Commission Implementing Regulation (EU) No 288/2014. The description does not provide information of the expected contribution of actions to specific objectives; actions have to be assigned to each specific objective.

The actions have to be formulated in a concrete and precise way. The programme has to present the consistent list of actions to be supported under each investment priority which means all the activities to be taken with their concrete examples and not – as it is the case currently – indicative lists of supported activities to achieve the specific objectives. The actions have to clearly demonstrate planned scope of interventions.

7. 'Promotion' of various issues (instead of the implementation of the concrete activities to tackle these issues) has to be removed and reformulated to show concrete effect aimed at. Similarly, 'developing' concrete tools without 'implementing' them, 'increasing' to a non-known level, awareness-raising activities etc. cannot be planned as being inefficient. Example from among activities supported under Investment Priority 1.1: *Promoting activities related to job seeking for a job-seeker (...)* has to be replaced with concrete activities supporting job seekers.
8. As regards the financial instruments we note that they are potentially planned to be used for the PA 1 and PA 2, but no decision was made. The Commission needs to be informed about the ex-ante assessment at the latest at monitoring committees.

9. As regards result indicators:

It is welcomed that some common result indicators will be measured in a period of time 0 to 36 months after the participants left intervention. Nevertheless, it should be kept in mind that only the relevant value (either upon leaving or 6 months after leaving) actually refers to the common indicator. The other values will be very useful for monitoring and evaluation purposes.

Baseline values for result indicators are consistently set at 0. This is not acceptable. Baseline serves as a reference value to set targets for ESF result indicators. In normal circumstances if a value can be set for a target, it should be possible to set a baseline. It can be established on the basis of existing or previous similar interventions, be it under ESF, national/regional programme or under similar ESF programmes from other countries. It is possible, though extremely unlikely, that for a proposed intervention, there is no analogous experience of any kind. In case of absence of any analogous experience, studies or research need to be used. In duly justified and exceptional circumstances, a baseline will be zero if the nature of the operation and objectives lead to such a conclusion.

Regarding the tables with result indicators, the column "Common output indicator used as basis for target setting" can be filled-in only in case of common ESF result indicators and only by a relevant common ESF output indicator, according to the drop-down menu. The "total number of participants" is not a common ESF output indicator but a programme-specific indicator and it cannot be inputted in the column through SFC. Moreover, there is an error in the translation of the indicator "participants in employment, including self-employment, six months after leaving", as there is "... until 6 months" and the indicator measures at one moment in time, not in a period.

10. For most investment priorities output indicators cover only a small share of the actions proposed. Baselines for numerous result indicators are set at 0, even in cases where similar types of activities were supported in the past. Information on measurement unit for baselines and targets needs to be completed.
11. The milestones need to be revised and made more adequate. Since the financial plan is spread equally across the years it is not justifiable to set milestones at only 1/5 of the final target (for example in PA4).
12. As regards the selection of projects, the chapters contain the same and very general text. It needs to be indicated at least shortly what kind of projects will be implemented (national, grant projects) and what differences will be applied in the selection procedure. There has to be a plan in place for systemic national projects. They have to be approved and evaluated by the monitoring committee on the annual basis to make a process of proposed reform steps and projects selection transparent and to avoid ad-hoc creation of projects not corresponding to the needs identified or driven by political influence as it was the case in the past.

13. In order to be able to assess the performance framework, an explanation of the underlying calculations has to be provided, including the level of the unit cost and the basis for setting this level. Please see page 11 of the Guidance on the Performance Framework for more detail on the information needed. Particular issues on the performance framework are raised below for some priority axes.
14. As regards reinforcing the administrative capacity of the managing and control authorities and of beneficiaries, description provided lacks a clear identification of the gaps and specification of actions planned to address them.
15. The Commission draws the attention of the Czech authorities to the fact that the Decision approving the operational programme is without prejudice to the Commission position regarding compliance of any operation supported under that programme with the procedural and substantive state aid rules applicable at the time when support is granted.

The granting of state aid falling within the scope of Article 107(1) TFEU, granted under aid schemes or in individual cases, requires prior approval by the Commission under Article 108(3) of the Treaty on the Functioning of the European Union except where the aid is exempted under an exemption regulation adopted by the Commission under Council Regulation (EC) No 994/98 of 7 May 1998 on the application of Articles 92 and 93 to certain categories of horizontal aid and its amendments (OJ L 7, 11.01.2012, p. 3-10) or under Commission Decision of 20 December 2011 on the application of Article 106(2) of the Treaty on the Functioning of the European Union to state aid in the form of public service compensation granted to certain undertakings entrusted with the operation of services of general economic interest or granted as general *de minimis* aid.

16. The Commission underlines that before it will be able to adopt the Czech operational programmes of the 2014-2020 period, the Czech authorities will have to comply with their commitments included in the Partnership Agreement regarding the Civil Service Act.

SECTION 1 STRATEGY FOR THE OPERATIONAL PROGRAMME'S CONTRIBUTION TO THE UNION STRATEGY FOR SMART, SUSTAINABLE AND INCLUSIVE GROWTH AND THE ACHIEVEMENT OF ECONOMIC, SOCIAL AND TERRITORIAL COHESION

(Reference: Article 27(1) and point (a) of the first subparagraph of Article 96(2) CPR)

17. The analysis is of a good quality. Nevertheless, supporting data needs to be updated so that it covers 2013 figures, if available. In some points the data does not underpin enough identified problems. Examples: an assessment of the demographic trends is missing; employment and unemployment rates of specific groups are well documented, however the text needs to present absolute numbers of unemployed to provide reference data against which the targets for indicators, i.e. the magnitude of change, can be compared.
18. The relevant country-specific recommendations adopted in the framework of the 2014 European Semester have to be taken into account for the final draft of the programme, in

accordance with Article 96 (2)(a) of the CPR. The table 1 needs to be updated accordingly.

19. As regards analysis in the 'Employment Services' section, it is not clear why the part on further education is included there and how it is linked to the challenges related to the employment services. The text has to be made more coherent in this respect.
20. A specific need is specified for “Linkage of employment services and social services, social and healthcare services and other related services”. In compliance with the cross-border healthcare directive (2011/24/EU), an explicit definition of the medical component bundled into such integrated services (i.e. definition and cost to public payer of medical interventions needs to be distinguishable, regardless of precise shape under which service is delivered) has to be included.

SECTION 2 PRIORITY AXES

(Reference: points (b) and (c) of the first subparagraph of Article 96(2) CPR)

21. The above general comments also refer directly to the design of priority axes so they have to be read together with the ones below.

PRIORITY AXIS 1

22. Distribution of funding among the IPs covered by PA 1 does not reflect the priorities set out in the CSR and, thus, it is considered as inappropriate. In particular, it needs to be justified why the IP on adaptation of workers to change (which is not covered by any CSR) was chosen and why it has significantly more funding allocated (419 MEUR in the case of less developed regions) than the CSR-relevant IPs referring to modernisation of labour market institutions and gender equality (119 MEUR each in case of less developed regions). Strong focus has to be put on childcare. Older workers being addressed by the CSR are neither targeted by an IP nor by a specific objective. This is not acceptable - while bearing in mind the reasons for not selecting the IP on active and healthy ageing, there is a need to introduce the specific objective together with indicators.
23. Specific objective 1.1.1 (Employment): The description has to be improved. Example: the statement that the activities under this investment priority aim at resolving the causes of the low employment rate is too far-fetched. The statement that the main prerequisite for achieving the SO's results is to increase the annual volume of resources allocated to the active employment policy is not substantiated. The first paragraph of the SO description of the SO refers in addition to women as to a group that faces low employment rate; this is not specific enough and it has to be specified to which groups of women it is referred, since otherwise half of the population is emphasized by this reference.

The intervention logic under SO is well defined, however the title of SO needs to more emphasize the target groups at which the interventions will focus the most. Moreover, since almost all supported will be unemployed or inactive at the start, it is better to refer

simply to employment and not to "employment rate". The title can be phrased as follows: *Increase employment of participants, especially of older, young, low-qualified and disadvantaged.*

As regards the accompanying actions to allow integration of supported persons in the labour market it is not clear whether these will be somehow limited in time (sustainability issue).

Concerning output indicators, the target has only been set for a programme-specific output indicator "total number of participants" (*nota bene*, this is not a common ESF output indicator) which is clearly insufficient; targets set for other output indicators need to be included. This SO represents indicatively 45% of resources for the PA and it is of strategic importance. The targets have to therefore be set for more common output indicators (reflecting the target groups emphasized): unemployed, including long-term unemployed, inactive, above 54 years of age, below 25, ISCED 1 or 2; and possibly for some programme-specific output indicators.

Concerning result indicators, a new common indicator "participants in employment, incl. self-employment, six months after leaving" has to be added, together with an ambitious target value, to capture the longer-term effects of the programme.

As regards the current indicators C/ESF/27, C/ESF/31 and C/ESF/32, they have to monitor results only on people not being employed when entering an operation, according to the methodology (definitions established in Annex C1 of the Guidance document on ESF Monitoring and Evaluation in 2014-2020 from June 2014). However, as the OP (see the content of the activities, and the word "especially" in the target groups description) leaves open the possibility for targeting also people being employed when starting the participation in an ESF action, alignment with the methodology has to be confirmed by the national authorities. This is very pertinent, taking into account a quite ambitious (and therefore appreciated) "success rate" of people who will be newly employed or self-employed upon leaving as a result of activities under this SO (78 985, i.e. 46% of the total number of supported participants).

24. Specific objective 1.2.1 (Gender balance): the supported activities have to be formulated in a more concrete way. Example: the childcare facilities need to be established and developed on the ground in a tangible and inclusive way which has to be a key activity under this SO. Their "promotion" alone is not sufficient and therefore cannot be a primary activity. It is not clear what is meant under promotion of the implementation of flexible labour forms, promotion activities aiming at involving men in the care responsibilities and accompanying actions to support equal opportunities for women and men in the labour market. It is not clear what kind of actions will be implemented to improve the coordination of local and national policies related to equal opportunities of women and men and their implementation or adjustment.

The goals to be reached with respect to childcare facilities have to be reflected in the indicators.

As regards result indicators, even though target values are not mandatory for gender breakdown, taking into account importance of this SO, target values also for women have to be set for this particular SO/IP.

From the description of SO and actions, it is clear that results are expected not only vis-à-vis participants, but also vis-à-vis entities. Therefore, relevant result indicators (and corresponding output indicators) have to be established to capture these effects, e.g.:

- As for enterprises or employers in general, implementation of flexible working arrangements can be an immediate result of a project (upon the end) as well as number of people working part-time in the entities where flexible working arrangements have been implemented (some time after the end – e.g. 18 months).
- Immediate result indicator "Number of supported facilities providing childcare services, upon leaving" - a result indicator on increased number/capacity of child-care facilities is also to be considered; this can be measured at the end of support and/or sometime after the end of support (e.g. 18 or 24 months).
- A new common indicator "participants in employment, incl. self-employment, six months after leaving" needs to be added, together with an ambitious target value, to capture the longer-term effects of the programme.

25. Specific objective 1.4.1 (PES):

The scope (broadly supporting labour market institutions) seems to promote practices which have been implemented until now and proved to be of limited added value (as stated in the background analysis). Thus, it is necessary to focus the scope on the most important needs and the most effective operations.

Based on the experience of the 2007-2013 programming period and the national assessment of the Public Employment Services' (PES) reform few years ago, a broad, systemic assistance to PES did not bring expected results with regard to high quality of client-oriented services. In this respect, the proposed measures lack justification on how the planned capacity building of labour market institutions will improve the situation of their clients and what change it will bring when compared to the past. Concrete needs have to be spelled out and answered with concrete actions.

We would like to receive an explanation on a methodology used to determine the support for less developed regions (119 MEUR) and more developed regions (4 MEUR) to IP "modernisation of labour market institutions" as it seems not in line with the pro rata proposed. This support "gap" has to be further explained, in particular, taking into account that many of the operations in this IP are to take place in the most developed regions.

The actions need to be divided according to the specific objectives in order to clarify what exactly will be supported under each SO. Moreover, it is not clear how supported activities n.4 and 8 differ. (4/ *Promote and develop cooperation and partnerships ...* and 8/ *Develop cooperation of relevant local actors ...*).

As regards result indicators, the one on new/innovative services is not very well attuned to the result to be achieved. This could be solved by enumerating the services to be established or innovated under the description of the specific objectives.

26. Specific objective 1.4.2 (Further education): the scope of this SO seems to overlap to a great extent with the one for the SO 1.3.1 (e.g. the difference in implementing career counselling under 1.4.2 and 1.3.1 is unclear). This needs to be clarified and more specific indicators for this SO need to be introduced.

As regards result indicators: the one on new/innovative services is not very well attuned to the result to be achieved as it is not clear to which action/-s it refers. This could be solved by enumerating the services to be established or innovated under the description of the specific objectives.

27. Specific objective 1.5.1 (YEI):

The information on YEI provided in the OP is very scarce, in particular with regard to the intervention logic, and, thus, needs to be improved. In particular, the following elements in the OP have to be included: 1/ main challenges that will be tackled and expected to be achieved through the YEI; 2/ justification for extending the support of the YEI to young people under 30 and clarification on whether all or only some different subgroups will be targeted; 3/ a description of type of measures that will be implemented, with reference to the different target groups.

Links with the Youth Guarantee (YG) are not clear. It needs to be clarified which elements of the YG will be implemented within the OP and for which target groups. The description has to be consistent with the Czech Youth Guarantee Implementation Plan (YGIP) as regards YEI. Example: the OP plans to target young people no matter whether registered or not with public employment services. No specific targeting of unregistered NEETs is envisaged. On the other hand, in the YGIP (April 2014 version), Czech authorities declare that YG will only target registered unemployed youth.

The YEI added value to what is already in place and change towards more result-oriented approach is not visible. It needs to be clear what will be achieved through YEI in addition to what is currently in place (e.g. the programme Erasmus +) or not available; what the interactions between different existing and new measures will be and what new measures are to be introduced, if any. It needs to be described whether new measures or YEI itself will boost/replace existing programmes or whether existing schemes will be reformed in parallel, to reflect the personalised policy approach of YEI. It needs to be demonstrated how exactly the measures will help in achieving the SO results.

The SO title needs to be reformulated as it is not appropriate to refer to the decrease of unemployment rate since all supported people under this SO financed from YEI are either unemployed or inactive. The formulation could be as follows: *Increase employment of supported young people not in employment, education or training in region NUTS II North-West.*

The justification for the choice of selecting the targeted group of up to 30 needs to be linked to the needs and demonstrate clearly that adequate financial support per person will be provided. The specific objective under the YEI has to be redrafted to clearly include NEETs under age of 30 (in fact it would be 15-29 as specified in the result indicators).

The actions have to be made more specific as to what is aimed at / what is to be achieved. They need to demonstrate explicitly types of YEI packages/pathways of actions to be applied for particular type of NEETs e.g. measures that will address low-skilled or early school leavers and the ones that will be implemented for graduates.

As regards the result indicators, currently 900 participants are to be employed (incl. self-employed) upon leaving, which indicates a success rate of 29% (as compared to the total number of participants). A more ambitious success rate has to be aimed at.

Other 900 disadvantaged participants are to be employed (incl. self-employed) 6 months after leaving but it is not known out of exactly how many disadvantaged participants. In any case, an ambitious success rate has to be aimed at.

A target value is established for the common result indicator C/ESF/30 "Participants with an improved labour market situation six months after leaving". This is not possible since according to the definition of this indicator, the result of an improved labour market situation is measured only on persons who are employed when entering ESF support. Support under YEI is aimed at young unemployed or inactive not in education or training, it is not aimed at employed people. For indicator C/ESF/30 under YEI, 0 values will be therefore reported by definition.

As regards complementarity with other SOs, it needs to be clarified how the scope will be complemented by other ESF actions (outside YEI). Appropriate coordination with the Ministry of Education and with OP Research, Development and Education (OP RDE) has to be described and ensured notably as regards planned activities for vocational education and training (see also the comment on Section 8).

Please note that all Annex II indicators have to be included in the Table 4a of the OP template (Art. 5(2) ESF Regulation). Targets and baselines must be set for all common result indicators applicable to the YEI. Ambitious target values have to be established for two longer-term result indicators (participants in employment six months after leaving, participants in self-employment six months after leaving) in order to capture the longer-term effects of the programme.

As regards output indicators: since the possibility to extend support to young people below 30 years of age is applied, it is necessary to establish a programme-specific output indicator measuring participants of the age group 25-29.

PRIORITY AXIS 2

28. With regards to social inclusion and combating poverty, the scope of planned intervention is too broad. The planned assistance has to be further elaborated to better reflect the need for concentration. Similarly main target groups are also not precisely described (example: the support shall target 'parents with children and pupils'). It is not clear how exactly these groups will be targeted and with what exact actions.

It needs to be explained how all relevant discriminated groups will be appropriately targeted. In this context, consideration has to be given also to Roma and to multidimensional discriminations such as gender gaps among older people etc.

Actions have to be divided according to the specific objectives in order to ease orientation in what will be supported under each SO.

29. As concerns the IP 2.1:

General remarks to the formulation of actions apply here as well; they have to be more precisely formulated. Examples: the action "Education and training, consultancy, activation, assistance and motivation programmes (to promote parental competencies, participation in the labour market, social inclusion of people exposed to institutionalization, active and healthy ageing, legal and financial literacy, volunteerism, etc.)" covers multiple areas of interventions and have to be split under separate SOs. The anti-discrimination measures need to be described more explicitly and in more detail; the action on fighting all forms of discriminations is too vague and needs to be illustrated with some examples. The action "Secondary and tertiary prevention programmes for people at risk of addiction or addicted to substances and for people with chronic mental illnesses" would better fit under the specific objective 2.2.2.

As regards output indicators, they fail to capture outputs under SO 2.1.1, e.g. in terms of accommodation support.

As regards result indicators: while result for SO 2.1.2 is an increased number of social enterprises, there is no such result indicator (and a corresponding output indicator). This should be added. A result indicator is also missing in terms of increased qualification in the field of social entrepreneurship (please see related action which can contribute to this result).

While targets for result indicators are very low, the target for the output indicator "total number of participants" is at 174.346. This raises a question as to what extent all these participants will receive direct support and whether a large amount of them will not be supported only indirectly. Only people directly supported have to be counted as

participants; please consult the ESF guidance on monitoring and evaluation to see what direct support is. A new common indicator "participants in employment, incl. self-employment, six months after leaving" needs to be added together with an ambitious target value to capture the longer-term effects of the programme.

30. As concerns activities under the IP 2.2:

The scope of activities is so large that there is no clarity on what exactly and how it will contribute to achieving the SO. Some of the described activities do not say much on what exactly will be done (example: "support to transformation and deinstitutionalisation of (...) healthcare services" does not indicate how and by what actions it shall be achieved). Taking into account the fact that the SO refers to mental health, it needs to be demonstrated in which way activities promoting healthy lifestyle can improve the quality of mental healthcare. It needs to be demonstrated what kind of actions are planned to be introduced so as to prevent mental diseases; the description of action encompassing "health and healthy lifestyle promoting activities" is too wide in this respect.

Here also supported activities need to be listed by specific objectives for the sake of precision. Currently they are put altogether (e.g. under point 2.2.6.1 actions for two SOs are mixed) and there is no clarity on what finally will be done under each of them.

The range of supported activities (from the indicative list) is very wide and comprises inter alia prevention programmes for people with chronic mental illnesses while measures aiming at improvement of mental health are under specific objective 2.2.2. It is more appropriate to foresee all support for mental health under the same SO.

The activity "interconnecting the IT systems for evidence, control and evaluation of efficiency of services among all actors..." has to be explained as it is not clear what exactly will be financed and how it fits into the SO. To ensure financial efficiency a clear overview of the activities planned has to be provided together with a financial estimate.

Still insufficient attention is paid to the excluded localities in need of basic health care services; health-social assistants are mentioned only under the subchapter on "specific territories for support", not among the activities.

Concerning result indicators, a new common indicator "participants in employment, incl. self-employment, six months after leaving" has to be added to capture the longer-term effects of the programme, if unemployed or inactive participants will receive direct support under the IP.

31. Specific objective 2.2.2 (mental health care)

As regards the action 'Health and healthy lifestyle promoting activities' the Commission underlines that no health/healthy lifestyle promoting campaigns are to be financed underneath as they do not constitute efficient spending. It needs to be clearly stated in the OP; in this context the action referred to has to be reformulated or deleted.

32. Specific objective 2.2.3 (CLLD)

Concerning result indicators, a new common indicator "participants in employment, incl. self-employment, six months after leaving" has to be added, together with an ambitious target value, to capture the longer-term effects of the programme.

PRIORITY AXIS 3

The scope of planned interventions is too broad. Concrete information on exact interventions to be implemented under the transnational cooperation have to be provided (under what themes, what issues, with which partners etc.). Description of the contribution of the planned actions to the social innovation/transnational co-operation needs to be added. The scope of interventions under the social innovation and transnational cooperation needs to be outlined in a clearer way e.g. thanks to selection of (a) concrete(s) IP(s).

33. As regards Specific objective 3.1.1 (Social innovation and transnational cooperation):

This SO is not that much about increasing effectiveness of social innovations, but rather about increasing qualitative and quantitative capacity for social innovations. Therefore, the title of SO needs to be rephrased (possible wording: *Increase qualitative and quantitative capacity for social innovations and international cooperation in thematic areas of OP Employment*).

PRIORITY AXIS 4

- 34. The PA needs serious redrafting in order to comply with the result-oriented approach and to demonstrate strong intervention logic. Needs are described very vaguely. They have to be presented in a concise but specific manner in order to provide evidence for the appropriateness of the selected approach and the construction of the intervention logic.
- 35. The 2007-2013 experience in implementing this area (not a positive one from the Commission's point of view) has to be taken into account; the results need to be described concretely and followed up in the description of activities/expected results. The statement that many of the current problems were partially solved in 2007-2013 is not substantiated; progress mentioned thanks to outputs/projects is not supported by any figures, evaluations or even practical experience.
- 36. Some specific objectives/activities identified in the Commission's Position Paper are missing in the scope of intervention (such as activities to improve the anti-corruption environment, transparency and accountability of government and public services, fostering growth-friendly business environment and improvement of the efficiency of the tax administration) or they are referred to only in a very general way.
- 37. Current specific objective contains a very broad range of reforms, thus preventing the formulation of good indicators. The SO needs to be broken down into several, more

concrete objectives (e.g. one targeting efficiency, one on HR, one on better regulation). Judiciary could be included either in a separate SO or addressed horizontally, depending on the intended reforms, but in any case reference to the issue needs to be improved as information provided is very scarce. Transparency and anti-corruption can also be addressed throughout all other SOs, but still this has to be explicitly underlined and respective actions identified.

38. The list of activities is rather a list of goals mentioning what and not how results will be achieved. As to the expected results themselves, they are very vague and unclear. For example as regards standardisation of services, it is unclear if all administrative services are covered or only a part of them, which ones, how many, at what level they are provided, how many administrative bodies will be targeted etc. Taking into account that the EAC related to this area is considered both by the national authorities and European Commission as not fulfilled, and thus an action plan will be needed, the activities which will be in the plan have to be presented more in detail, including indicators/timing.
39. The scope of intervention has to be more realistically aligned with expected results (e.g. OP can hardly implement and monitor a system of human resource development in the entire Czech administration). It has to be narrowed to be in proportion to a relatively small allocation for this PA or the allocation for this type of intervention needs to be increased (see the part with general observations above).
40. The activities envisaged to achieve better efficiency seem to be uncoordinated and overlapping, and at a very early stage of planning. Process modelling, use of ICT, systematisation of service authorities, introduction of quality management systems are different aspects of reengineering of working processes that may also involve reorganisation. Therefore it is again necessary to explain which administrations will be targeted, how the process will be organised, how the action will be coordinated and complement each other in order to demonstrate the achievability and consistency of the intended interventions. It should be noted that standardisation of processes can also contribute to overregulation and increase the rigidity of the administrative system instead of removing bottlenecks.
41. The split of actions between the OP and Integrated Regional OP (IROP) as regards ICT remains very problematic, as the development of e-services and e-tools have to be integrated in the above reform activities. Otherwise there will be only a digitalisation of bureaucracy. As there is a risk of a huge waste of resources in both OPs if not well co-ordinated, the mechanism presented only in a very general form at the Partnership Agreement level has to be described much more in detail, especially as regards the institutional system of co-ordination between those OPs. A specific document which clearly defines the co-ordination mechanism and procedural rules should be provided.
42. The HR aspect is very generic and vague. Since the OP is expected to support the enforcement of the Civil Service Act, actions have to be described in more detail. This part has to demonstrate how the enforcement of clear, common and transparent rules will

be achieved and how capacity will be created in the HR units to implement them. Other important challenges as ageing of the staff, attractiveness of the civil service as a workplace and competition with the business sector for qualified staff, ensuring gender balance across the whole administration, but also at managerial levels, representation of disadvantaged groups, especially in local administration, etc., are not mentioned (this is expected to be in the PA strategy still to be received).

43. All indicators need to be revised in order to be clear and measurable, and better link with the specific objective and the activities; currently they capture only a part of effects/outputs to be achieved (e.g. the output indicator on the number of produced and published documents is too formal to capture the essence of this PA). For this purpose consult the Guidance Document on Indicators of Public Administration Capacity Building.
44. "Beneficiaries" and "participants" are used as synonyms, while in the context of TO 11 the former are certainly administrative bodies, not individuals. Also, the appropriateness of the targets needs to be checked (e.g. it needs to be clarified how the indicator C/ESF 19 was calculated).
45. As regards identification of target groups/beneficiaries, it is not clear why judicial bodies and NGOs are not specifically mentioned.
46. Taking into account the significance of systemic projects in this area, specific arrangements have to be envisaged under point 2.4.3.2.
47. It is not clear if the description provided in the specific objective refers to a catalogue of public services (also indicated in the Government and NIFO factsheets of the country for 2014) realised in a central e-administration single contact point. It is important to describe the existing e-services that are provided from the public administration to the citizens and to the businesses. It needs also to be indicated whether these services are organised and provided according to "the approach of life situations" mentioned in the output indicators and further explained which missing services will be implemented with the support of the current OP and what the level of improvement for the services will be.
48. The OP mentions that a "comprehensive methodology of process modelling" has been already developed, describes the types of administrative work, and based on that demonstrates that standardisation and optimisation will be achieved. The success of such methodology depends also on the existence of a thorough catalogue of public services and a networked diagram that depicts the interconnections, dependencies and relationships of these services and the data sources used (base registers). If this is the intention it has to be clearly stated and detailed in the description.
49. It is not clear what the existing developments in the overall e-services strategy of the country and connections of the OP objectives with the Strategic Framework for Public Administration Development 2014+ are. The links with Czech Republic central approach

for the ICT architecture of the public administration e-service infrastructure as well as the overall coordination of the national ICT strategy are missing.

50. When designing e-services one of the essential enablers is interoperability which ensures the efficient use and re-use of the services, guarantees the lack of duplications and gives an overview of the services provided. The Czech Republic does not have a single document describing the national interoperability framework; interoperability is covered by a set of different laws (mainly Act on free access to information and the Act on archiving and records management). When the OP mentions the open data principle it has to refer to the existing legislation, the level of uptake of the open data in the country as well as the implementation reports of the PSI directive. Furthermore the expected benefits from the opening of the data and the open access to base registers need to be described. The measures and the approach to take in opening up of the public data (i.e. use of standards, regulation) need to be described.
51. When adopting new legislation, the ICT impact assessment has to be amongst the other ex-ante and ex-post evaluations of impacts identified in the text. The connections of the new proposed legislation to the existing national programmes for ICT have to be also addressed.
52. In table 25 the indicator "Reduction in the number of steps that need to be taken to resolve a life situation" is not clear since the "life situations approach" of the description of the available public services is not described anywhere in the document. Likewise, the target value of 30150 needs clarification (e.g. "number of problems resolved"). Moreover, this indicator seems not to be directly linked to supported entities, structures or products supplied through ESF-supported projects. There is no corresponding output indicator. It seems rather to be a macro indicator which measures effects which can be brought about by ESF as well as possibly other sources of financing. If CZ authorities find this indicator useful, it can be kept, however other result indicators than "participant gaining a qualification upon leaving" have to be established following the logic of ESF indicators.
53. It is not clear how recommendations of the European Interoperability Framework on the organisational interoperability were taken into account in the planned reorganisation of the public administration, with change of the internal structure based on clear rules and staffing needs.

PRIORITY AXIS 5

54. The indicators have to directly reflect the actions planned (e.g. trainings, evaluations etc.).
55. More qualitative indicators better reflecting the level of service provided by the managing authority to the beneficiaries have to be added. Examples to be considered: 'Share of identified training needs (skills needed) covered by training courses', 'Share of staff involved in OP implementation trained on (public procurement, state aid, environmental

compliance ...) issues', 'Share of electronic applications in total project applications (%)', 'Share of information about funding opportunities on-line in total information about funding opportunities (%)', 'Number of projects contributing to the reduction of administrative burden' 'Number of evaluations discussed in the Monitoring Committee', 'Number of evaluations, studies, surveys, experts, reports, etc.' etc.

56. In the table 16 in the SFC2014 and its equivalent in the OP under point 2.5.4 (Categories of intervention) the code for dimension 3 is 01 (Large urban areas). Taking into account the character of the TA, the code 07 (Not applicable) has to be used.

SECTION 3 FINANCING PLAN

(Reference: point (d) of the first subparagraph of Article 96(2) CPR)

57. All tables need to be checked to be coherent with each other and with the information provided in the latest version of the Partnership Agreement. For example the YEI allocation and its matching ESF part (tab. 30) cannot be taken into account in calculating the performance reserve (which needs to equal 6%); or the technical assistance cannot be under TO 11 (tab. 33).

SECTION 5 SPECIFIC NEEDS OF GEOGRAPHICAL AREAS MOST AFFECTED BY POVERTY OR TARGET GROUPS AT HIGHEST RISK OF DISCRIMINATION OR SOCIAL EXCLUSION

(Reference: point (a) of Article 96(4) CPR)

58. The strategy for addressing specific needs has to precisely describe those and objectives to be achieved in concerned geographical areas. The focus of intervention/approach has to be clear. The section has to present an outline of actions/instruments that are planned to be implemented instead of possible instruments to implement in the future.
59. The data on vacancies is outdated and therefore has to be corrected.

SECTION 7 AUTHORITIES AND BODIES RESPONSIBLE FOR MANAGEMENT, CONTROL AND AUDIT AND THE ROLE OF RELEVANT PARTNERS

(Reference: Article 96(5) CPR)

60. More concrete information needs to be provided on involvement of partners in the preparation of the OP, notably on: how the partners were selected, the main added value of the partnership in the preparation of the OP, in particular instances where the strategic choices have been significantly influenced by partners, the main results of the consultation with partners, including significant concerns, comments and recommendations raised by them as well as involvement of relevant partners in the implementation, monitoring and evaluation of the OP.

61. As regards the list of partners involved in the OPE (Annex 1) the Czech equality body (Veřejný ochránce práv - Office of the Public Defender of Rights) has to be included, in line with the European Code of Conduct on the Partnership Principle following which MS have to include equality bodies and NGOs in the list of relevant partners for the preparation of Partnership Agreements and the implementation of Operational Programmes.
62. Information needs to be provided on how technical assistance will be used to ensure active participation of partners, especially as regards monitoring and evaluation.
63. The allocation (amount) of ESF resources to capacity-building activities and activities jointly undertaken by the social partners and for the non-governmental organisations is referred to only in a very vague way ("appropriate allocation"); it has to be specified.

SECTION 8 COORDINATION BETWEEN THE FUNDS, THE EAFRD, THE EMFF AND OTHER UNION AND NATIONAL FUNDING INSTRUMENTS, AND WITH THE EIB

(Reference: point (a) of Article 96(6) CPR)

64. Complementarity and effective coordination with OP RDE and IROP are of utmost importance and need to be ensured throughout programming and implementation of the OP.
65. As regards further education, the information on the difference in intervention in this area between the OPs (not only OP Research, Development and Education but also IROP needs to be added) is not provided; only a general description that two ministries will co-operate is included. In addition in the table in Annex 2 it is explained that further vocational education in the field of food industry will be financed by the OP RDP, on the other hand such reference is missing from the relevant measure of draft CZ OP RDP. It needs to be clarified.
66. The co-ordination between the programme and Erasmus programmes needs to be clarified as they are very relevant for this OP.

SECTION 9 EX-ANTE CONDITIONALITIES

(Reference: point (b) of Article 96(6) CPR)

67. The self-assessment grids are not complete; each sub-criterion needs to be taken into account in information provided. The latest self-assessments have to be provided.
68. On EAC 8.1:

The Commission agrees with CZ authorities as to non-fulfilment of this EAC. However, more details in the action plan needs to be provided. The self-assessment has to be reviewed.

CZ authorities inform about the measures provided by the legal framework (and not their actual implementation), strengthening of requalification programmes and the Employment Policy Strategy to be ready by end of September 2014 in this respect. The OP Employment reads: 'At present, public employment services can only hardly fulfil their roles, especially in the field of unemployment prevention and career counselling.' (page 12 of the OP). More information needs to be provided on particular sub-criteria (ALMP, early intervention and prevention, inclusive service offer, Individual Action Planning, tailor made support, support for the most disadvantaged, a system for a nationwide collection and analysis of labour market data/labour market intelligence).

69. On EAC 8.3:

The Commission agrees with CZ authorities as to non-fulfilment of this EAC.

No information is provided on particular actions to reform employment services with respect to sub-criteria (evidence-based ALMP, measures for early intervention and prevention, development of tailor made support, development of inclusive service offer, development of Individual Action Planning, development of support for the most disadvantaged, complementary physical infrastructure development).

No information is provided on particular actions to reform provision of information on new job vacancies (except of the pilot project "Jobs vacancies and Monitoring" in implementation) and employment opportunities with respect to sub-criteria (enhanced link to EURES, development of a system for a nationwide collection of vacancies, development of a system for a nationwide collection and analysis of labour market data). CZ only informs that the services and options offered by the information system are gradually being expanded.

As regards the 3rd criterion, CZ authorities inform about the legislative framework for cooperation between Labour Office and stakeholders (advisory boards) and the "Memorandum on Cooperation in the Labour Market" signed between PES and Chamber of Commerce. Information on preparation of Employment Pacts with particular regions is included. No more information on any reform attempts to improve cooperation networks is given.

70. On EAC 8.5:

The Commission agrees with the Czech self-assessment of the 2nd criterion of this EAC (measures to promote the preparation and management of the restructuring processes) as being fulfilled but more information is needed, notably on particular tools for support for redundant employees and the involvement of external actors in the restructuring process.

71. On EAC 8.6:

The Commission disagrees with the Czech self-assessment of this EAC as being fulfilled.

The YGIP does not reflect a comprehensive and strategic policy to promote youth employment. It fails to present modalities for providing all the young people with a good quality 4-month offer.

No information has been provided on:

- A strategic policy framework and its concrete measures as geared to national, regional and local circumstances.
- YGIP evidence-base, notably data aggregation, data coverage and a monitoring system. YGIP fails to present comprehensive evidence background for policies and is not mature enough to form a base to develop targeted policies. YGIP contains only general information on evaluation system to be set to monitor developments.
- Stakeholders' involvement - no information is provided on how exactly the cooperation with social partners (will) function/s. More information is needed on active involvement of social partners (e.g. details on coordination mechanisms, tools/mechanisms assuring partnership network, involvement in evaluation/monitoring etc.).
- Early intervention and activation - it is claimed to be ensured through 9 initiatives focusing on timely intervention and activation as well as information and education events but no operational details are provided. YGIP does not anticipate any outreach of measures except of an information campaign; YGIP will cover only registered unemployed. Increased attention will be put to disadvantaged young people (those with disabilities, from low income/education level households etc.) but specific approach/measures to meeting the needs of disadvantaged youth are not included. Details on how the disadvantaged groups will be addressed are not provided. No specific targeting of inactive/unregistered NEETs is envisaged. CZ self-assessment contains only information that young people will be divided into target groups according to their disadvantage. No detailed information on implementing personalised services (guidance, individual action planning, tailor-made support) is provided.
- Supportive measures – more information needed on particular sub-criteria.

72. On EAC 9.1:

The Commission agrees with the Czech self-assessment of this EAC as being fulfilled. However, more information is needed on particular sub-criteria, namely on measures for enabling access to mainstream services in the community (education and training, employment, housing, health, transport, leisure activities) and how they are ensured.

73. On EAC 9.3:

The self-assessment should provide more information referring to particular sub-criteria.

As regards the action plan:

- It is claimed that the EAC will be fulfilled through a document "National strategy of health protection and assistance and diseases prevention – Health 2020" and its implementation documents (action plans); however, then it is specified that the necessary strategic framework required in the EAC is in fact defined also by many other documents (which may be more relevant to ensure economic sustainability).
- From the action plans which are specified to a great detail in the Annex 5 (description of sub-criteria is welcomed but details such as names of people supervising different chapters are unnecessary) it is clear that those plans react to the Strategy and in some cases only very partially react on the need defined by the EAC. Example: the action plan for ensuring the access and organisation of care providers is claimed probably not to be elaborated while it seems very much relevant for the EAC. On the other hand, some action plans seem not to be much related to some criteria, even if they are claimed to be so; some themes of first action plan on health protection and assistance and diseases prevention (e.g. appropriate nutrition habits or sufficient physical activity of population) or the action plan linked to tobacco use and alcohol have very little to do with the access to the services which is the core of the EAC.
- Planning in the action plans in the Annex 5 is often not updated referring to actions to be done while they should have happened in the recent past.
- As regards a system for monitoring and assessment, it is claimed that it will be a part of all action plans and related areas; however, the EAC assumes a system for monitoring and assessment of the health sector as such and this is not described at all.

74. On EAC 11:

The Commission agrees with the Czech self-assessment as to non-fulfilment of this EAC. However, the self-assessment needs to provide more information referring to particular sub-criteria.

As regards the first criterion, the fact that crucial methodologies will be elaborated by the end of 2015 needs to be reflected in the column for the deadline; as regards the third criterion, a general reference to the implementation plan is not sufficient, deadline for the measures planned has to be added; as regards the fourth criterion, a general reference to the implementation plan is again not sufficient, deadline for the measures which are relevant (as some of the presented ones are not) needs to be added – end of 2015 should be added as a factual deadline. As regards the last criterion, the idea of the CZ authorities to create the monitoring and evaluation for the management of the administrative system is welcomed, but it has to be ensured that all objectives of the planned and ESF-supported reforms will be covered as well and evidence for the attainment of objectives will be collected.

Moreover, it is not clear why an action plan presented separately from the one which is in the OP itself (specific annex for EAC 9.3 and 11, pages 24-27) is developed only for the Civil Service Act (which is related only to some criteria of the whole EAC) and therefore is incomplete. The following criteria are not tackled: quality management systems, simplification and rationalisation of administrative procedures, procedures and tools for monitoring and evaluation. The action plan in the OP Employment (pages 157-159) is the only one to be used.

75. Many general ex-ante conditionalities make reference in some criteria to the Partnership Agreement that is not sufficient; summary information needs to be provided also in the OP. The latest self-assessments provided within the Partnership Agreement have to be used in the grids.
76. On GEAC 3 - the issue of accessibility is important for this OP. As regards the 3rd criterion, it is also necessary to keep in mind that information on the monitoring mechanism in scope of the ESIF is required, i.e. who will be responsible for monitoring (e.g. Ministry of Labour or Government Council for People with Disabilities) and under which framework (e.g. a part of the National Plan for Creating Equal Opportunities for People with Disabilities).
77. On GEAC 4 - regarding this general EAC and the necessary arrangements for the effective application of EU public procurement rules through appropriate mechanisms, the Commission considers that the following points and questions have to be covered by a detailed action plan as a minimum (but not exclusively):
 - The setup of a coordination mechanism including not only the meetings of a working group, which will be established, but also its powers/mandate (how it will decide and whether it will be able to enforce its decisions, for example upon the OPC), monitoring and follow up of issues linked to the effective application of EU public procurement rules. Moreover, the EAC assessment attached to the PA to which the OP refers to states that there is a planned analysis of the working group activities to be carried out by the end of 2016; this has to be a part of the action plan.
 - Information/plan on how the most common errors are going to be tackled, when an analysis is going to take place, what the follow up will be, when this is going to take place and by whom.
 - Regarding the internal database of most common errors, the assessment of this EAC in the PA to which the OP refers to notes that it will be modified; the action plan has to state when the database will be functional, whether it is intended to be public and when it is to be modified.
 - As regards any possible incompliance of the decisions of the Office for the Protection of Competition (hereinafter OPC) with EC, ECA, ECJ, the Commission acknowledges that OPC is an independent body. However a mechanism has to be in place to prevent,

monitor, follow up any possible discrepancies (e.g. an analysis has to take place at a certain point of time by a responsible body about the compliance, e.g. on a sample basis).

As for the arrangements to ensure administrative capacity for implementation and application of EU public procurement rules, it is still not clear whether the competent bodies have already ensured the necessary capacity (see also the previous point regarding the necessity of an HR analysis) and, if not, by when it will be ensured. The same comment is valid also for the OPC, where the administrative capacity to deal on time with public procurement cases linked to the EU funds in the past was not sufficient.

78. On GEAC 5 - according to the action plan for the ex-ante conditionality on the state aid included in the Partnership agreement, the individual operational programmes will describe in the state aid action plan OP-specific measures to fulfil this EAC. As the current OP does not mention any additional OP-specific measures compared to the PA, it has to be amended correspondingly for the first and third EAC criteria.
79. On GEAC 7 – latest self-assessment as in the Partnership Agreement has to be provided, including the assessment of the system to collect and store micro data (obligatory for ESF financed OP). Moreover, the fulfilment of the GEAC 7 needs to be reassessed in light of the above general observations on result indicators, namely on the baselines. In fact, missing baseline values put in question the target-setting methodology.
80. For all unfulfilled (elements of) EACs it should be noted that until further information is provided there is a potential risk that the significant prejudice clause would be triggered, according to Article 19, para 5 of the CPR.

SECTION 10 REDUCTION OF ADMINISTRATIVE BURDEN FOR BENEFICIARIES

(Reference: point (c) of Article 96(6) CPR)

81. This chapter presents an unnecessary too long description of government's acts creating the unified methodological environment. Information on the OP specific arrangements to decrease the administrative burdens needs to be included. More information on the use of simplified costs also has to be provided.

SECTION 12 SEPARATE ELEMENTS

82. Annex 2: As regards coordination with other EU funds, please refer to Internal Security Fund instead of Internal Safety Fund.