Case study

Topic 01: ESIF Architecture

Portugal

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List of abbreviations

AA	Audit Authority
CA	Certification Authority
CF	Cohesion Fund
EAFRD	European Agricultural Fund for Rural Development
EC	European Commission
EMFF	European Maritime and Fisheries Fund
ERDF	European Regional Development Fund
ESF	European Social Fund
EU	European Union
EUR	Euro
EY	Ernst & Young
GIF	General Inspectorate of Finance
IB	Intermediate Body
ICC	Interministerial Coordination Committee
IS	Information system
IT	Information Technology
MA	Managing Authority
NCA	National Coordination Authority
NGO	Non-Governmental Organization
NSRF	National Strategic Reference Framework
OLAF	European Anti-Fraud Office *(Office de Lutte Anti-Fraud)*
OP	Operational Programme
PA	Paying Authority
POCH	OP Human Capital
POCI	OP Competitiveness and Internationalization
POISE	OP Social Inclusion and Employment
POSEUR	OP Sustainability and Efficiency
R&D	Research and Innovation
ROP	Regional Operational Programme

Portugal
Implementation structure

Portugal's model is highly centralized. The technical and administrative coordination of programs is ensured by the state Agency for Cohesion and Development (NCA) under the Ministry of Planning and Infrastructure. The Agency was created specifically for the purposes of the ESIF by merging three public entities that have performed its function in the past. The line ministries have several roles in the implementation structure (approving the plan of calls, evaluating the selection criteria etc.), but they do not have the role of MA or IB.

The centralized structure brings knowledge concentration, more efficient use of resources, a more global approach, and avoids duplication of competences, but it cannot fully capture the diversity of different territories combined with the lower self-governing importance of the regions in Portugal.

Positive aspects

► Continuity and continuous improvement of the system
► Knowledge transfer across funds through a centralized structure
► Clear definition of competences of the institutions thanks to which competences do not overlap
► Developed and relatively functioning IT system
► Clearly processed issues related to ESIF in laws

Negative aspects

► Higher administrative burden associated with non-compliance with deadlines
► Complexity, rigidity and time-consuming coordination due to a centralized structure
► Insufficient reflection of the interests of relevant stakeholders and regional needs in program making

Key aspects of the implementation structure

1 High degree of centralization

The actual coordination of the ESIF is ensured by one sole institution, which also performs tasks of the PA, CA, AA, evaluation and monitoring activities. Political coordination (representation, dialogue with the EC) is carried out by the Interministerial Coordination Committee.

2 Role of regions

In contrast to the Czech Republic, the mainland regions are more of a tool of the centralized government, rather than proper autonomous authorities. Although the management of the ESI funds is discussed with relevant stakeholders, discussions are often formal, and regional voices are not fully taken into account in final decision making.

3 Thematic coordination

The multifund character of the OPs and the combination of thematic OPs across regions poses a challenge for the Agency in terms of coordination. One of the solutions are the Networks of coordination – platforms for cooperation. Members regularly meet and discuss their issues, the Agency coordinates the meetings and invites experts in the field.

4 IT system

Each MA has its own IS from the previous programming period, and the Agency manages a central IS that collects information from the MA's IS and from state administration systems, and has a single entry point for beneficiaries. There is also an IS for audit reports and conclusions.

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1. Basic characteristics of the ESIF system

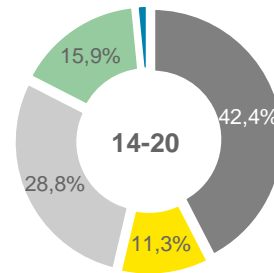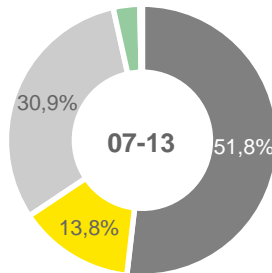| Number of operational programmes (OP/ROP)	Number of territorial units (NUTS1/NUTS2/NUTS3)
16 (6/10)	3/7/25

Total planned allocation (according to programming period and fund)

Total allocation (mil. EUR)

14-20: 25 398
▲
07-13: 21 073

- ■ ERDF
- ■ CF
- ■ ESF
- ■ EAFRD
- ■ EMFF

07-13: 51,8% ERDF, 13,8% CF, 30,9% ESF

14-20: 42,4% ERDF, 11,3% CF, 28,8% ESF, 15,9% EAFRD

Overview of the operational programmes[1]

	Allocation (mil. €)	Absorption	Managing Authority
National Competitiveness and Internationalisation - ERDF/ESF/CF	6 233 062 608	31 %	MA OP Compete 2020
Human Capital - ESF	3 642 155 414	44 %	MA OP Human Capital
Maritime and Fisheries - Portugal	507 807 536	10 %	MA OP Mar
Social Inclusion and Employment - ESF/YEI	2 564 601 118	20 %	MA OP Social Inclusion and Employment
Sustainability and Resource Use Efficiency - CF	2 650 284 901	13 %	MA OP Sustainability and Efficiency in the Use of Resources
Technical Assistance - ERDF	167 862 249	22 %	Agency for Cohesion and Development
Regional Alentejo - ERDF/ESF	1 312 087 209	13 %	Alentejo Coordination and Regional Development Committee
Algarve - ERDF/ESF	447 573 300	15 %	Algarve Coordination and Regional Development Committee
Azores - ERDF/ESF	1 392 165 800	41 %	Autonomous Region of Azores
Azores - Rural Development	340 396 956	44 %	Autonomous Region of Azores
Centro - ERDF/ESF	2 642 875 695	18 %	Coord. and Regional Development Committee of the Central Region
Continental Portugal - Rural Development	4 178 885 097	43 %	PDR2020
Lisboa - ERDF/ESF	1 821 373 196	11 %	Lisbon Coordination and Regional Development Committee
Madeira - ERDF/ESF	472 030 679	75 %	Autonomous Region of Madeira, Institute for Reg. Development of Madeira
Madeira - Rural Development	201 162 490	22 %	Autonomous Region of Madeira, unit MA of the OP PRODERAM
Norte - ERDF/ESF	4 165 589 709	19 %	Coordination and Regional Development Committee of the Region Norte

[1] Data gathered on 18.10.2018 from https://cohesiondata.ec.europa.eu/. Allocation is in EUR. Absorption means actual expenditure declared by the projects to the programmes.

2. Simplified scheme of the implementation structure

Scheme 1: Simplified scheme of the implementation structure in Portugal
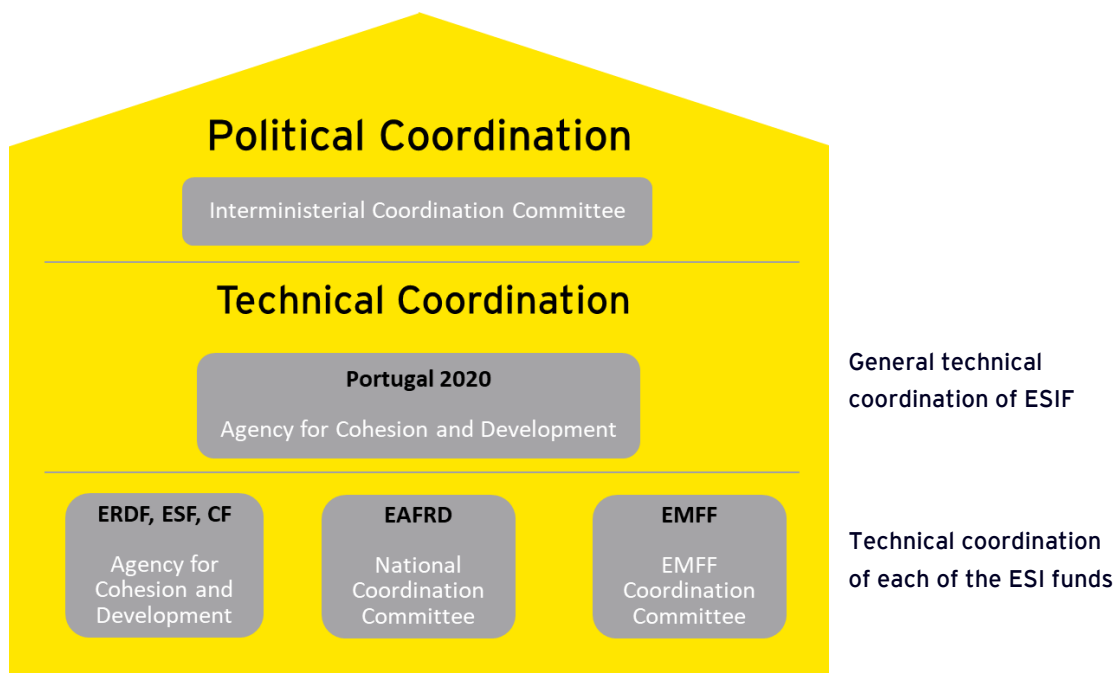
Applicable for OPs / ROPs

3. Answers to evaluation questions

3.1. Description of the implementation system

3.1.1. Key players and their position in the system

ESI funds in Portugal are **politically coordinated** by the *Interministerial Coordination Committee for the Partnership Agreement (ICC Portugal 2020),* which is responsible for political guidance and communication with the EC. The *Interministerial Coordination Committee* consists of one Government member from each ministry and it is coordinated by the Minister for Regional Development.

Scheme 2: Scheme of coordination of the ESIF in Portugal.

However, the **general technical coordination** of Portugal 2020 (all ESIF programmes in Portugal in the programming period of 2014-2020) is ensured by the *Agency for Cohesion and Development* (further also mentioned as *Agency*).

The **technical coordination of each of the ESI funds** is guaranteed by the Agency for ERDF, ESF and CF; the *National Coordination Committee* (NCC) for the EAFRD and the *EMFF Coordination Committee* (CCF) for the EMFF.

ⓘ   Agency for Cohesion and Development

The Agency for Cohesion and Development (*Agência para o Desenvolvimento e Coesão,* hereafter referred to as "**the Agency**") is a public institution of a special regime with legal capacity to intervene in the whole national territory of Portugal. The Agency is a part of the Ministry of Planning and Infrastructure and it acts under the Ministry's supervision. The Agency was created by the decree-law no. 140/2013 by the Presidency of the Council of Ministers as a merger of three institutions *(see Chapter 3.3.1).*

The Agency was created with the aim of promoting the coordination of structural and regional development policies co-financed by the EU funds and enhancing the economic rationality and financial sustainability of co-financed investments. Another reason why the Agency was established was the elimination of inefficiencies caused by duplicities/overlap of functions. Currently, most of the

There are 16 **Managing Authorities** in Portugal - one for every OP. Managing Authorities of the regional OPs correspond to the Administrations of the Autonomous Regions of the Azores and Madeira in case of these two autonomous regions, and the Regional Coordination and Development Commissions (CCDRs) in case of the regional OPs of the mainland (e.g. *CCDR Norte, CCDR Centro, CCDR Lisboa*). The CCDRs were created specifically for managing the OPs. The MAs of the thematic OPs (*MA OP Sustainability and Efficiency (POSEUR), OP Social Inclusion and Employment (POISE), POCI (OP Competitiveness and Internationalization), OP Human Capital (POCH)*) were also created specifically for managing OPs. The management of the OP Technical Assistance is in the scope of the Agency for Cohesion and Development.

MAs of the OPs supported by the ERDF, ESF and CF may contractually delegate the exercise of their powers to the **Intermediate Bodies**. Some Intermediate Bodies are public agencies, reflecting the sectorial approach. For instance, the agency for SMEs is the intermediate body for all the MAs regarding the SMEs. In some specific cases, the agencies are not intermediate bodies according to the Regulation, but they carry out some of their tasks, such as selection process for specific conditions (*see subchapter 3.2.2 Involvement of the line ministries as policy-makers*).

The role of the **Audit Authority** was assigned to the *General Inspection of Finance* (GIF, *Inspecção Geral das Finanças*), which is responsible for ensuring the preparation of the audit strategy, annual and final monitoring reports, submission of closure declarations for the OPs. Furthermore, the General Inspectorate of Finance conducts the **audits of systems, audits of designation and audits of accounts**, while it delegates the **audits of operations** to the **Agency** (based on the decree-law no. 137/2014). However, the GIF and the Agency have a segregated structure. The exercise of the functions defined for the audit authority, including audits of operations, is not further delegable (if not otherwise stated in the above-mentioned law).

The **Monitoring Committees** play a role in monitoring, analysing all issues likely to affect the performance of the OPs, tracking the implementation and progress made in achieving its objectives and proposing measures to reduce the administrative burden for the beneficiaries. A Monitoring Committee is established for each OP and the members meet at least twice a year. Its composition is defined by subject matter and region, it might include representatives of the regional governments of the Azores and Madeira, the National Association of Portuguese Municipalities, representatives of the social partners and the social economy, higher education institutions, NGOs and entities from the environmental sector.

The **Advisory Board of the Agency for Cohesion and Development** is an independent body responsible for strategic monitoring, support and participation in the definition of the general guidelines for the implementation of the ESIF. It annually issues an opinion on the results of the implementation of the ESIF in terms of promotion of the development and cohesion.

Another authority of the implementation structure is the **Beneficiary's Curator** (*Curador do Beneficiário*), who receives and resolves complaints presented by the beneficiaries of programs co-financed by any of the ESIF. The curator will either solve the problem or redirect the complainant to a corresponding institution/body. However, comments concerning transparency of its resolutions have appeared.

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i	Beneficiary´s Curator

This institution was created on the basis of decree no. 137/2014. Curator has the following duties:
- ► Receive and assess complaints filed by beneficiaries of ESIF directly related to acts or omissions of managing or other authorities and provide beneficiaries withe recommendations;
- ► Introduce adjustments to increase quality of services provided by the implemenation structure;
- ► Prepare an annual report describing its activities and publish it in ESIF IT system (Balcão Portugal 2020),

The Curator must always request justificiation from the involved subject before providing a recommendation to the beneficiary. The recommendation is communicated both to the beneficiary and representative of the implementation structure.

The Curator is independent from other state administrations but they are supposed to cooperate with together upon Curator´s request, especially in formo f providing all relevant information and documentation without harrassing their duty of confidentiality. CUrator´s operation is funded from the technical assistance.

The role of the Curator was introduced during 2015 but its operation was early terminated in the beginning of 2016 due to discussions about its effectiveness, personnel capacities etc.

„In the current programming period of 2014-2020, the institution of the Beneficiary's Curator of the ESIF was set up to "receive and assess complaints from beneficiaries of the ESIF and issue recommendations to them, as well as proposing the adoption of measures that contribute to the improvement of the management of Portugal 2020". However, although the Curator has a website, where basic information on Portugal 2020 is obtained, it is not supplemented by the dissemination of information on the issues and complaints presented to it, or on its possible resolutions."

Representative	
National Association of Portuguese Municipalities	

3.2. Division of competences

The responsibilities of individual stakeholders are based on the decree-law no. 137/2014 establishing the Governance Model of the ESIF for the period 2014 -2020 issued by the Presidency of the Council of Ministers[2]. The decree-law is legally binding for all OPs within ESIF.

i	Division of fundamental competences

Competences of the **Interministerial Coordination Committee (ICC)** include:
- ► Ensuring consistency of the application of the ESI funds with national and European strategies,
- ► Coordinates the global strategy of Portugal 2020,
- ► Establishing strategic guidelines for the strategic, operational and financial monitoring of Portugal 2020 and assesses and approves the annual monitoring reports,
- ► Informing the Council of Ministers on the pursuit of the strategic priorities of Portugal 2020,

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[2] The *Presidency of the Council of Ministers* provides support to the *Council of Ministers* and promotes the coordination of the various government departments. Members of the Presidency of the Council of Ministers are (when they exist) vice-ministers, ministers and ministers responsible for specific matters, but who do not have a ministry.

► Approving the list of Intermediate Bodies and the powers delegated to them on the proposal of the MAs,
► Approving the overall evaluation and communication plans proposed by the Agency,
► Approving the operations which total eligible cost is more than EUR 25 million,
► Preparing and approval of respective internal regulations.

Competences of the **Agency for Cohesion and Development** include:

► Ensuring, in liaison with the CCN and the CCF, the technical dialogue with the EC at the level of Portugal 2020,
► Ensuring overall coordination, including monitoring of the programming, reprogramming and monitoring of the funds, in liaison with the managing authorities of the OPs and ROPs,
► Coordination and development of the evaluation system of Portugal 2020,
► Performing the AA and CPA for ERDF, ESF and CF - making payments to the beneficiaries - and, in liaison with the Audit Authority, carrying out the audits of operations,
► Coordination of the design and overall monitoring of the performance framework of the results and objectives proposed in the Partnership Agreement,
► Approving the technical guidelines applicable across OPs and ROPs and monitors their implementation,
► Preparation and submission to the approval of ICC the annual strategic, operational and financial monitoring reports for Portugal 2020,
► Maintenance of the information portal for the ESIF (Balcão 2020),
► Managing a pool of external experts for the ESIF.

Competences of the **Managing Authorities** include:

► Ensuring the management and monitoring of the OPs and ROPs;
► Performing the financial management and control of the OPs and ROPs;
► Definition of the selection criteria;
► Approval of the applications that meet the selection criteria;
► Ensuring the collection and processing of financial and statistical indicators;
► Ensuring the efficiency of the use of public financial resources, assessing the financial reasonableness of applications in the light of market benchmarks;
► Ensuring that the beneficiaries use a stand-alone accounting system for all related transactions with transaction codification or tax accounting;
► Adopting effective and proportionate anti-fraud measures;
► Preparation of statements of account and annual summaries.

Some of the competences of the MAs may be delegated to **Intermediate Bodies** by means of a written agreement.

3.2.1. Involvement of the line ministries as policy-makers

The **line ministries** have several roles in the implementation structure, however, they **do not play roles of MAs or IBs**. First, the minister is a member of the Interministerial Coordination Committee. Second, the line ministries are currently (as of November 2018) involved in the approval of the final version of the calls (plan for the next years and the final proposal of all the calls). However, only the line ministries for which the topic is relevant are involved.

Some agencies within line ministries can also perform tasks of Intermediate Bodies (although they are not officially Intermediate Bodies according to the Regulation) - they are involved in the selection process for specific conditions. E.g. in the case of provision of support to social infrastructure – the agency within the Ministry for Social Security is responsible for the assessment of conditions of social infrastructure.

The role of line ministries within the implementation structure has changed over programming periods. At first, there were OPs by each budget chapter and complete line approach to those OPs. Therefore, there were OPs for culture, health, etc., and the MA within the ministry managed those OPs. Then the vertical approach was changed to the thematic approach, so instead of OP on health there was an OP on social issues; instead of an OP for economy and science, there was an OP for competitiveness, etc. Therefore, the responsibility went from a responsible line ministry to a political committee. There are discussions about changing (increasing/decreasing) the roles/influence of the line ministries, but they are more of political debates.

> „*The movement from the National Strategic Reference Framework in 2007 was not easy. It required a strong involvement of the Prime Minister and a strong persuasion that we needed a more integrated approach in Portugal. After three cycles of a line approach, there was the idea that we need to put a strong emphasis on competitiveness. Nowadays, we are quite comfortable with this approach.*"

Representative	
Agency for Cohesion and Development	

3.3. Modifications in comparison to the previous programming period

3.3.1. Centralization

In comparison to the previous programming period of 2007-2013, the implementation structure has been centralized, and all respondents agreed that the change was for better.

The governance of the ESI funds in the previous programming period was based on the following organizational structure:

► **Political management** was ensured by the **Ministerial Coordination Committee** of the National Strategic Reference Framework (NSRF);
► **Technical body** responsible for the **strategic coordination and monitoring** was ensured by the **Technical Coordination Committee** of the NSRF;
► **Coordination and financial monitoring** of the ERDF, CF and ESF was ensured by the **Financial Institute for Regional Development** and the **European Social Fund Management Institute** (*see more details below*), which also exercised control and audit responsibilities together with the General Inspectorate of Finance.

The Agency for Cohesion and Development was established as a central coordinating body for the programming period of 2014-2020. Agency was created by merging three public bodies: the Financial Institute for Regional Development (*Instituto Financeiro para o Desenvolvimento Regional,* IFDR), the European Social Fund Management Institute (*Instituto de Gestão do Fundo Social Europeu,* IGFSE) and the **Structure of the Observatory Mission of the National Strategic Reference Framework** (*A estrutura de missão do Observatório do Quadro de Referência Estratégico Nacional, QREN*).

The **Structure of the Observatory Mission of the National Strategic Reference Framework** was a structure designed to ensure the exercise of the strategic coordination and strategic monitoring activities of the National Strategic Reference Framework. The NSRF was a framework for the implementation of the ESIF in Portugal in the programming period of 2007-2013. The NSRF Observatory was responsible for technical coordination and monitoring of how strategic priorities are being pursued.

The **Financial Institute for Regional Development** was responsible for ensuring the national management of the ERDF and CF. IFDR ensured the coordination, management and financial monitoring the ERDF and the CF, and to carries out the functions of payment and control authority for these funds. A similar role for the ESF conducted the **Institute of Management of the European Social Fund.**

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> *„The Agency has a strong position towards the MAs to put their guidelines into practice. We did it and we are successful in that way, but I'm not saying that we're more successful than those 3 entities in the previous programming period. But it depends on the framework; the current framework is challenging especially as we are trying to move from the financial approach towards the quality approach."*

Representative	
Agency for Cohesion and Development	

One of the main objectives was to have a **stronger coordination entity** for the funds with a strong capacity on regional issues. The cost efficiency was not the main reason for the merger, however, it was one of the reasons.

The merger into a single institution contributes to rationalization, specialization and increase in the efficiency of services. The creation of the Agency also makes it possible to support sustainable regional development policies more broadly, in particular through the design and promotion of territorially based instruments aimed at enhancing the territory while at the same time developing and stabilizing a centre of expertise of State aid.

> *„The centralization of issues has made everything more efficient – the monitoring, evaluation, controls, etc. Before, with the three institutions, some issues have overlapped.*
>
> *However, the selection process has become more complicated for the MAs - there are more documents in total, and they are more specific, technical and complex. The institutions within the implementation structure were not ready for such a big change."*

Representative	
Managing Authority	

3.3.2. Number of OPs and thematic focus

In the **current programming period**, there are **16 OPs**: 4 thematic OPs corresponding to 4 thematic areas (see below), 7 regional OPs (5 mainland regions + 2 autonomous regions), 3 rural development programs (EAFRD), one marine PO (EMFF) and one technical assistance OP. In the previous programming period of 2007-2013, there were **only 14 OPs**: 3 thematic OPs corresponding to 3 thematic areas, 9 regional OPs (5 continent regions + 2 OPs for each of the autonomous regions), and 2 technical assistance OPs (ESF and ERDF). In both programing periods each of the priorities is achieved through a centrally managed thematic operational program and components of the regional operational programs; a rather centralized model is therefore created.

The investment priorities are currently structured in **four thematic areas**: Competitiveness and Internationalization, Social Inclusion and Employment, Human Capital and Sustainability and Efficiency in the Use of Resources. In the previous programming period, there were only **three thematic areas**: Operational Agenda for Human Potential; Operational Agenda for Competitiveness Factors; Operational Agenda for the Valorisation of the Territory. The new thematic areas were chosen such as to correspond to the investment priorities at the EU level and to improve the structural weaknesses of Portugal.

The programming of actions to be supported by Portugal 2020 has been the subject of negotiations with the EC, which has substantially reduced support for territorial infrastructures. The purpose was to reinforce support for **productive investment and increase productivity**, making the economy more competitive and more internationalized, as well as addressing issues related to climate change and carbon reduction in a more focused way.

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3.3.3. Modifications planned for the upcoming programming period

The debates on the modification have so far started at the political level. The political debate is currently focused on strategy (*Strategy for 2030*), which is the anchor for the application and use of ESIF. The strategy should be presented in the first quarter of 2019, and it should be approved by the qualified majority of the Parliament.

The Agency is currently involved in the negotiation of regulations with the political guidance of the Minister for Planning and Infrastructures and the Minister for Foreign Affairs concerning the multi-fund framework. However, no details on possible changes within the Agency are known; discussions on the governance level are not intense yet.

3.4. Legislative framework

The [Decree-Law No 140/2013](#)[3], [Decree-Law No 137/2014](#) and the [Decree-Law No 159/2014](#) are the most important legislative acts relevant to ESIF in Portugal.

i	Legislative framework

Decree-Law No 140/2013 of October 18

The decree-law issued by the Presidency of the Council of Ministers creates the Agency for Cohesion and Development and extinguishes the three institutions that performed the coordination of the ESIF in the previous programming period (*see chapter 3.3.1*). The law specifies the mission of the Agency, its role, tasks, Agency's bodies, internal organization, staff selection criteria, powers, revenues and expenses.

Decree-Law No 137/2014 of September 12

The decree-law on ESIF was issued by the Presidency of the Council of Ministers, and establishes the governance model for ESI funds for the programming period of 2014-2020.

The decree-law establishes the organizational structure of the ESI funds in Portugal and describes competences of the various bodies within the implementation structure. Namely, it specifies competences in the categories of political coordination, technical coordination, managing OPs, certification, payments, audits and controls, monitoring and evaluations. It is divided into the following sections:

- ► The object, scope and definitions;
- ► General provisions applicable to the ESIF (i.e. general principles and provisions);
- ► Operational programs;
- ► Management model;
- ► Integrated territorial instruments;
- ► Funding and financial instruments;
- ► IT systems;
- ► Communication and advertising strategies;
- ► Regulation and decision-making in the field of state aid.

The Decree-Law is binding on all the operational programmes within the ESI funds in Portugal, and also applies to the *European Territorial Cooperation* (ETC) OPs and the *Fund for European Aid to the Most Deprived* (FEAD).

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[3] Laws in Portugal can be issued by the Assembly of Republic ("laws"), Government ("decree-laws"), or by the legislative assemblies of the autonomous regions ("regional legislative decrees"). Therefore, decree-laws are ordinary laws issued by the Government.

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Decree-Law No 159/2014 of October 27

Legal Decree No 159/2014 sets out general rules for the implementation of the ESIF for the 2014-2020 programming period, specifying forms of support, eligibility criteria, beneficiaries' obligations, information on payments, communication with beneficiaries etc. It is mainly oriented on the beneficiary and applicants for grants.

Furthermore, there are special orders (*despacho*s) and decrees (*portarias*), which are published in the Electronic Official Journal, and which are binding in the same way as other national legislation. Documents are issued by the Agency for Cohesion and Development, government offices and ministry offices (Ministry of Agriculture, Forestry and Rural Development, Ministry of Science, Technology and Higher Education, Ministry of Planning and Infrastructure) and usually regulate specific areas targeted to specific OPs.

In addition to the national legislation concerning ESIF, the Interministerial Coordination Committee issues resolutions (such as delegating management powers and structures, setting out methodologies, or modifying existing documents), which usually concern specific OPs. The Agency and other entities also issue technical guidelines for the OPs.

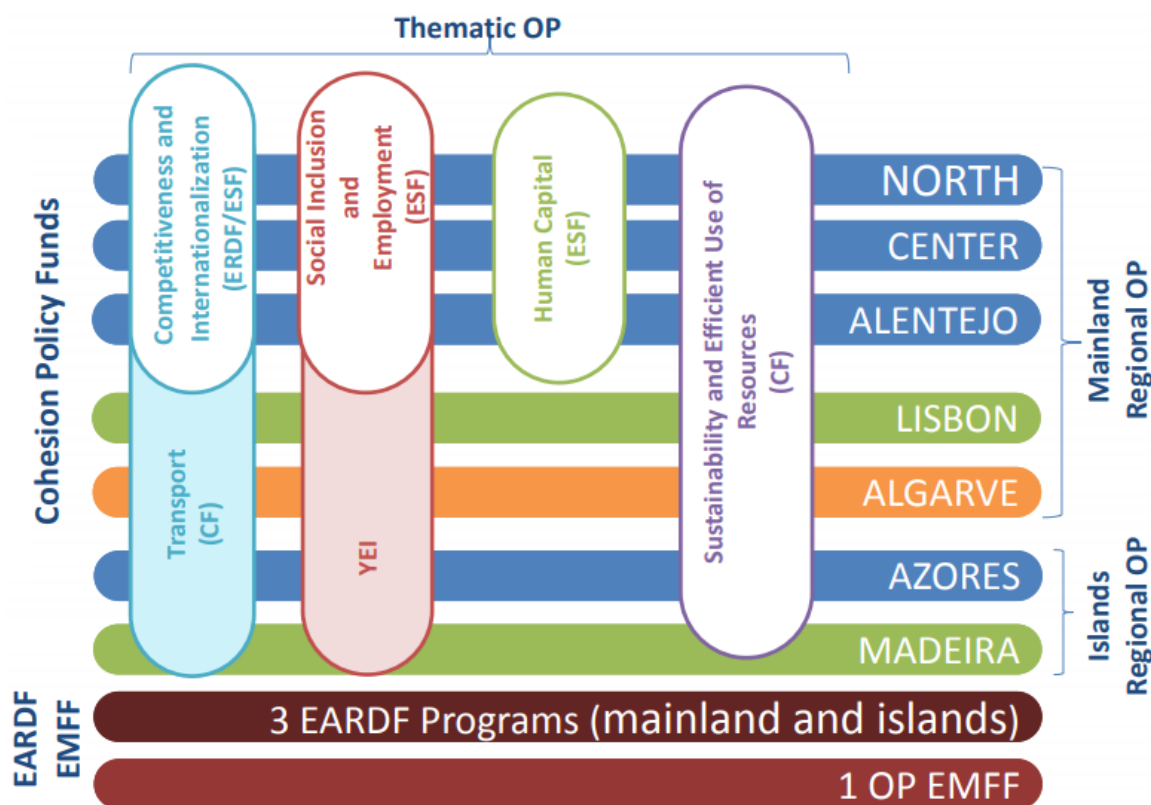### 3.5. Coordination between individual funds and OPs, thematic coordination

3.5.1. Coordination between funds and operational programmes

Administratively, Portugal is a decentralized state. But in practice, the system and decision-making are highly centralized, which is also mirrored in the management of the ESI funds in Portugal. However, as mentioned earlier, there are also 7 regional OPs apart from the 4 thematic OPs, which turns the coordination into a complex and challenging issue.

Portugal is divided into five regions in mainland (*Norte, Centro, Alentejo, Algarve, Lisbon*), which are formally administered by the Commissions for Coordination and Regional Development (*Comissões de Cooperação e Desenvolvimento Regional, CCDR*), but the CCDRs are more of a tool of the centralized government. Furthermore, there are two autonomous regions that are their own NUTS II regions - *Madeira* and *Azores,* which are considered politically autonomous, they have their own organic laws, regional governments and administration, unlike the mainland regions. Each of the 7 regions has its own regional OP, for which Managing Authorities are the CCDRs for the mainland regions and the autonomous governments in case of Madeira and Azores.

The following scheme depicts the operational structure of the ESI funds in Portugal in the current programming period. Each of the ovals represent an OP (or 3, in case of the EARDF). The thematic OPs include Competitiveness and internationalization, Social Inclusion and Employment, Human Capital and Sustainability and Efficient Use of Resources. All of them, except for the Human Capital OP, operate in both mainland and the autonomous regions. The only multifund OP under the ESIF is the Competitiveness and Internalization, which combines the ERDF and ESF. The OP Social Inclusion and Employment combines finance from the ESF and YEI (*Youth Employment Initiative*).

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Scheme 3: Scheme of the operational structure of Portugal 2020.[4]

The Agency ensures only coordination of the ESI funds, coordination with other funds is rather a task of the individual Managing Authorities.

3.5.2. Networks of cooperation

One of the ways to deal with the multifund character of the OPs and the combination of thematic OPs across regions are the Networks of cooperation. Coordination of the ESI funds in Portugal and its institutional capacity-building are ensured through the coordination networks, without prejudice to the responsibilities of the Managing Authorities.

i	Legislative framework of the networks of cooperation

Article 61 of the decree-law 137/2014 defines several networks of cooperation:

1. Monitoring and evaluation network;
2. Communication network;
3. Network for regional dynamics;

The networks of Monitoring and evaluation, Communication network and the Network for regional dynamics are coordinated by the Agency. Members of these include all the MAs, Network for regional dynamics are also joined by the Regional Commissions. The networks they take into account contribution from of the CCDRs and intermediate bodies in their respective areas.

4. Thematic networks (including Training and qualification network, the Green growth network, National rural network) – coordinated by the MAs of the thematic OPs and the regional OPs – cooperation between the thematic and regional OPs following the double approach (regional and thematic).

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[4] Presentation "Portugal 2020 – Programming principles and structure" provided by the Agency for Cohesion and Development

The networks are more of a **platform for cooperation,** they don't have any formal responsibilities - the responsibilities are allocated within the participating entities. For example, the Agency has the responsibility to present the Global evaluation plan to the Interministerial committee.

The main objective of the networks is collecting best practice, debating ideas, solutions etc. The Agency is responsible for the provision of guidance on the issues. **But instead of providing formal guidance, they rather debate.** At the end of the day, the draft versions of the MAs' outputs are the foundations for the guidance. Another aim of the networks is improving the capacity building of the MAs etc. There is a room for sharing ideas, and the Agency also invites experts/speakers to provoke the debates in different fields.

Therefore, the cooperation is a two-way process – the Agency receives information from the MAs and regions, and the Agency provides them with guidance and benchmarks on the best practice.

The level of responsiveness is not equal within the MAs, it depends on the area – the Agency has more contribution from some MAs and less from others. Even though if in some areas the MAs are not as responsible as the Agency would like, at the end of the day, the overall understanding should improve.

3.5.3. Monitoring and evaluation network

The evaluation and the monitoring network try to benchmark the best practices of DG REGIO and DG EMPLOYMENT networks. The Agency is responsible to represent Portugal in the EU networks, and it also collects information from the network meetings and it passes the information to its partners in Portugal.

Members of the network include all the MAs (including the EMFF and EAFRD). In general, they meet 3 times per year and discuss all the relevant subjects related to evaluation and monitoring, coordinate the annual reports, benchmark best practice from previous years (ideas collected by the MAs), and they also collect lessons learned from the previous reports.

Another of the competences of the network is to improve the **National indicator system** for ERDF, ESF and CF. At the beginning of the programming period, the network developed methodologies and set the indicators. After having set the basic framework, the network continually improves the indicator system. The evaluation network transmits the best practices related to the new methodologies and develops guidance for methodologies, which serve as a basis for all the evaluation plans of the MAs. The network also discusses ongoing evaluations.

3.5.4. Network for Regional Dynamics

The Network for Regional Dynamics creates an observatory for each region. The observatory is a unit of 2 - 5 people, linking the Operational programs to the regional authorities of coordination. Usually, the meetings happen 2 times a year. Dynamic process in the field includes the smart specialization strategy, trying to catch the dynamics of the region and to follow the processes. The Agency calls the network together with the MAs of the thematic OPs to discuss the areas in which they can learn from them, to understand what they do and what they are planning to do in the future. Usually, the Agency brings over experts (including international) from the field.

The main objectives of the network are the following:

- ► Territorial monitoring – coordination of the monitoring and analysis of economic, social and territorial developments, as well as monitoring of the regional impact of public policies financed from ESIF;
- ► Training and knowledge – organization of the joint initiatives that produce and disseminate knowledge;
- ► Multilevel articulation – deepening of the articulation and integration of the entities responsible for the implementation and financing of sectoral public policy instruments.

3.5.5. Key aspects of the success of the networks

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The key aspects that make the networks efficient are **the topics and legacy**. There has to be an added value of the meetings, the exchange of ideas etc. According to the Agency, the MAs always want to discuss topics that are interesting, urgent and relevant for them.

> „If they understand that your legacy is to exchange ideas, they are more able to share. But it depends on topics, on people, on coordination. For instance, one of the topics discussed at the monitoring and evaluation meetings was the guidance on performance at work. And of course, we had a room full of people. This is a very hot topic for everyone, they need help."

Representative

Agency for Cohesion and Development

The networks of the monitoring and evaluation, the communication and one of the thematic networks existed already in the previous programming period, and it proved to be a good practice. Therefore, the networks were extended for the current programming period and formalized in the decree-law no. 137/2014.

3.5.6. Thematic coordination

There are many situations in which the centralized structure cannot capture the diversity of the different territories, along with the small role that is given to territorial agents. The representatives of regions and regional MAs stress that the local territorial development strategies are very little valued, despite the level of knowledge added by the proximity. Indeed, the experience of programming and management of the ESIF in the island regions of the Azores and Madeira is an interesting example of the advantages of the model of lower dependency on the centralized state.

Moreover, in this centralized model, the pressure of major economic and other interests is felt more consistently, in favour of sector strategies that do not always converge with the objectives of support or territorial development strategies.

Some respondents mentioned that the thematic concentration does not exactly match the current needs of Portugal.

> „According to the Enterprise Confederation of Portugal, there is a tendency in Portugal to finance just government/public projects - scholarships, universities, etc., but not the economy. If it goes to the economy, the money goes to the large and medium-sized companies, but the small actors are ignored. The funds go to the biggest actors. However, there is over 1 million of microenterprises in Portugal. They are very important for the economy, but they are completely ignored."

Academic

3.5.7. Modifications Linked with Reallocation

The total allocation of ESIF allocated to Portugal was reduced by 19% in the current programming period compared to the previous programming period (*see Table 1*), and there has been some redistribution of the allocation within single funds as well.

Table 1: Distribution of resources allocated among ESI funds in Portugal.[5]

Fund	2007-2013	2014-2020	Change in allocation
ERDF	13 750	10 174	**-26%**
ESF	8 195	7 204	**-12%**
CF	3 659	3 102	**-15%**
EAFRD	4 274	3 739	**-13%**
EMFF	294	361	**23%**
TOTAL	**30 172**	**24 580**	**-19%**

Comparing 07/13 with 14/20, the ERDF lost weight from the total sum allocated to Portugal having passed from 46% to 41%; the ESF gained weight, going from 27% to 29%. The ratios of allocations for the CF, EAFRD and the EMFF have not changed significantly.

Portugal 2020 faces a break from the previous three periods, favouring productive investment, skills and employment, to the detriment of territorial infrastructures (for more details see *chapter 3.3.2*). However, the reduction of allocation itself was not a reason for a change of the implementation structure.

It is important to stress that the most substantial changes do not refer to the weight of each fund in the ESIF as a whole, but rather to the direction of spending. Clear examples include:

- ► The establishment of "negative priorities" (investments in school infrastructure, roads, heritage, social facilities, etc.);
- ► The imposition of mappings and other enabling instruments;
- ► The weight of each thematic OPs in the Partnership Agreement.

„The drastic reductions in grants for the state and municipalities pursuing fundamental policies for balanced and sustained development and for social and territorial cohesion are neither reasonable nor necessary. Reinforcing support for the economy could be achieved with more resources, based on the Financial Instruments, if the strategy to leverage other financing had been strengthened."

Representative
Association of Municipalities

3.6. Pros and Cons

Continuity of the system and continuous improvement are perceived as one of the key factors of a successful and efficient ESIF implementation by representatives of institutions from both the inside and outside of the implementation structure. The weaknesses that were mentioned the most by the respondents are the excessive administrative burden and associated lack of respect for deadlines.

Strong centralization and IT system were mentioned as both the strengths and weaknesses of the current implementation structure, depending on the point of view of the respondents.

3.6.1. Continuity of the system and continuous improvement

Continuity of the system is perceived as one of the factors of successful and efficient implementation of ESIF in Portugal. The implementation system has changed compared to the previous programming period, however, the prevailing modifications over time were usually linked with the concentration of

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[5] Amounts are in millions EUR in 2014 prices.Source: Luís Madureira Pires: 30 anos de Fundos Estruturais, p. 35.

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competences (*see chapter 3.1.1*), and they followed the strategies of the EU and Portugal and always reflected the lessons learned from previous programming periods.

The continuity has been ensured also in terms of employees' experience. In the case of the last centralization of the implementation structure, the employees from the three entities in the previous programming period were taken to the Agency in order to ensure continuity. Furthermore, in case of changes in the implementation structure, there is usually a transition decree-law saying that the employees from the old MAs should be moved to the new MAs in order to bring over the knowledge.

> „*The Agency (as a successor of previous structures) has accumulated lots of experience over the years. Every time they make a change, they are doing better and better. In terms of structure, the Agency does a good job, they do it according to the book, according to the legal requirements, even according to the EC.*"

Academic

3.6.2. High level of centralization – more complex and rigid coordination

Some of the most emphasized advantages of the centralized structure in Portugal are **learning across the funds** and a **more global approach**. There are also advantages in speeding up the programming process, the coordination, and harmonization of public policies which belong to the national strategy negotiated with the EC as transposed to the approved Partnership Agreement – there is a lower number of written comments, levels of approval etc.

Overall, the coordination of all the funds is **easier** for the main actors of the implementation structure now when it is done within one institution, both at the national level and at the level of the coordination with the MAs and the AA.

> „*In the beginning, it was difficult to merge the three coordination entities, because there were different cultures. But nowadays, there are more advantages than disadvantages in the centralized structure.*"

Certification Unit
Agency for Cohesion and Development

The strengths are, at the same time, also the most relevant challenges for the Agency, as the strong centralization increases the **complexity and rigidity of the coordination**. Furthermore, it **takes time to coordinate the approaches of different funds** because of their specifics.

3.6.3. Role of the regions in ESIF

Several academic respondents and municipality stakeholders mentioned that although the strategic direction of the ESI funds in Portugal is discussed with relevant stakeholders, they feel that such discussions are more of a pro-forma, and regional voices are not fully taken into account. Furthermore, the regions do not have a strong player who would be able to influence the decision making.

However, this is mostly caused by the fact, that the mainland regions in Portugal are, unlike in the Czech Republic, more of a tool of the centralized government instead of proper autonomous regions (*see chapter 3.2.1*).

3.6.4. IT system

The ESI funds in Portugal are fully computerized (apart from the EMFF, *see below*), and the implementation structure actors emphasize the user-friendliness of the systems. The IT system is described in detail in *chapter 3.4*.

The MAs have their own IT systems from the previous programming periods, which are interoperable with the Agency's front and back office systems. The representatives of the MAs appreciate that they did not have to get used to new IT systems when their own systems worked well.

The single entry allows unification in the collection of information from public administration institutions. Therefore, information on applicants and beneficiaries can be collected automatically from public administration sources.

However, there have been problems with IT systems of EMFF and ESF: the EMFF is not computerized and some beneficiaries of the OPs funded from ESF were not reimbursed yet (as of December 2018, *see chapter 3.3.2*). Furthermore, there has been a delay in the operationalization of some of the modules, for which reason they did not work properly.

3.6.5. Administrative burden and lack of timeliness

On one hand, respondents mentioned that the administrative demands for the beneficiaries decreased in some areas compared to the programming period of 2007-2013 because roles of different subjects within the implementation structure are now more clearly defined, when there is only one central coordination body and all competences are clearly specified by law. Respondents agreed that most duplicities in the implementation structure disappeared thanks to the centralized structure.

„It is still too early to assess the achievement of the objectives of centralization, although consideration can be given to the excessive bureaucratic burden associated with new territorially based instruments. In some cases duplicating mechanisms and provisions already enshrined in the legal order in particular in those of municipal incidence and territorial management."

Representative

Association of Portuguese Municipalities

On the other hand, most of the respondents agreed that the whole administration process has become more complex for the actors of the implementation structure. Especially the MAs mentioned that the selection process has become more complicated, and that the guidelines became more specific, technical and complex. Another often mentioned weakness associated with the excessive administrative burden is the long implementation time and the lack of respect for deadlines.

„A bad practice is the lack of respect for the deadlines. There must be planning of the applications for the companies to plan their investments. If in the calls it is indicated that the approval will be settled in a month, then that date should be respected."

Representative

Advisory company

3.7. Monitoring and IT

3.7.1. Monitoring and Evaluations

Monitoring and evaluation of the ESI funds in Portugal is ensured through a global approach that combines the evaluations of OPs, the thematic domain and the territorialisation of the interventions. Based on the decree-law no. 137/2014, **monitoring and evaluation are the responsibility of the Agency for Cohesion and Development**, specifically by the Monitoring and Evaluation Units within the Agency.

Furthermore, there are **Monitoring Committees** established according to the General Regulation. A monitoring committee is established for each thematic and regional OP. The committees are composed of representatives of the respective MAs (who shall preside), IBs, the regional governments, National Association of Portuguese Municipalities, the economic and social partners and relevant organizations from the social economy and higher education institutions; the most relevant public entities for the OP in question and representatives from the civil society, including the environmental sector. Members of the Committees meet at least once a year, and representatives of the national entities that make up the Monitoring Committees shall meet informally twice a year. Responsibilities of the monitoring committees are described in the decree-law 137/2014.

The Agency coordinates and develops, in conjunction with the National Coordination Committee (EAFRD) and the Coordination Committee of the EMFF, the **overall evaluation plan** for Portugal 2020 and its programs. All evaluations are made public and presented to the Monitoring Committees of the OPs, which should prepare recommendations for the OPs. The MAs shall ensure that evaluations, including evaluations to assess effectiveness, efficiency and impact, are carried out for each programme on the basis of the evaluation plan.
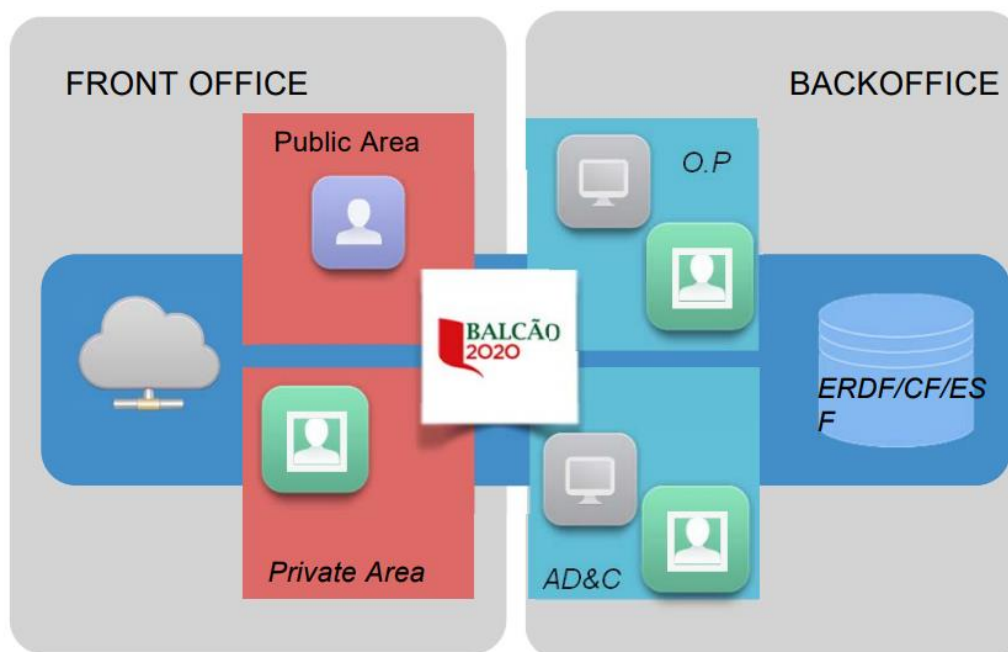
3.7.2. IT system

The IT system **mirrors the model of governance of ESIF in Portugal** with some minor exceptions. In the previous programming period, every MA had its own IT system with specific entry points, a system for administration of decisions by the MAs and a common back-office system for the specific entities within the implementation structure. Therefore, the IT architecture was fragmented.

The IT system *Balcão 2020* was created for the current programming period of 2014-2014, and it is managed by the Agency. There is a front-office system including the public (open) and private (accessible after login) areas. Applicants and beneficiaries can submit their applications through a single entry point, they can view their current projects, access online forms, request payments, see contracts and ask for support. Autonomous regions of Azores and Madeira have a separate access.

The back-office system is available for the MAs and the Agency. The single-entry point receives information from different systems of different MAs, which are connected via Hypertext Transfer Protocol for secure communication (HTTPS). The system connects for certification, payment, monitoring and audit purposes; information is collected from the MAs in a single back-office system.

To sum up, there is a distributed system with a single entry point and a single ending point. In the middle, information from MAs is disseminated and collected in different systems.

Scheme 4: Scheme of the IT system in Portugal 2020.[6]

Interoperability

The interoperability allows for the permanent updating of the back office from the *Balcão 2020*, from which information is extracted in the scope of the Monitoring System. According to the respondents, the main advantage of the single entry point is that there is a single basis for all the promoters which allows unification in the collection of information from public administration institutions. Therefore, information on applicants and beneficiaries can be collected from several public administration databases. E.g., the Agency does not have to ask the applicants to give evidence of no outstanding payments to the tax system. Instead, they get this information directly from the IT system of the tax agency. Subsequently, the system does not approve applications from entities that have a debt to the tax system. All the information provided by the applicants and the public administration databases is transferred to the MAs, who evaluate the applications.

In the analysis of the eligibility of projects and applicants, several criteria defined in the General regulation are confirmed, namely the size of the company and economic and financial situation. These conditions are verified based on the information from public databases, or, if this information is not available, through a specific declaration of the beneficiary on compliance with those criteria.

All the processes related to control actions carried out by the control entities, be the Audit Authority, Certification Authority, Managing Authority, etc., are recorded in the **SI AUDIT 2020 information system**. The system includes reports from the on-the-spot checks carried out by the MAs, as well as the results of those audits and controls, information on the deficiencies and / or detected irregularities and their monitoring.

3.7.3. One IS for the MAs

There have been debates on the unification of the information systems for the MAs, and also about the Agency being responsible for the single entry point and the back office. However, there are no known planned changes for the next programming period.

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[6] Presentation "Portugal 2020 – Programming principles and structure" provided by the Agency for Cohesion and Development

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> *„My opinion is that we should mirror the governance of the IS with the governance of the funds.*
>
> *It is difficult to have a single IS with many functionalities, trying to cover all the specifics. We went for the golden mean, leaving the MAs with their information systems and building an IS 'around them' for our and beneficiaries' purposes."*

Representative Agency for Cohesion and Development	

3.7.4. Public tender of the IT system

The provider of both systems is an external entity selected through a public tender. According to the respondents, the main issue with the tender was the specification of requirements of the functionalities of the system.

> *„The issue was not the tender. The issue was to say from the very beginning to the external provider of the IT system what we wanted from the system, what should be its functionalities. Of course, there were lots of complaints on the IS - that it does not let us do what we want, that is not flexible enough, that everything takes too long, etc."*

Representative Agency for Cohesion and Development	

In the case of a modular information system, there has been a delay in the operationalization of some of the modules, namely those related to monitoring the execution and closure of operations, which sometimes causes blockages in the system. Furthermore, problems have appeared regarding payments to beneficiaries - there are still companies under the ESF that did not receive funding under Portugal 2020[7].

3.8. Partnership Agreement

The Partnership Agreement is not considered a crucial document in relation to ESIF in Portugal. It is more of a **formal document** that was prepared before the beginning of the current programming period, and since then has been changed only due to external changes that had to be reflected. The content of the Partnership Agreement is mainly **strategic**.

The Partnership Agreement was so far changed only once as the original Partnership Agreement was not in line with the new energy efficiency commitments of Portugal. Another change of the Partnership Agreement is expected to happen in January 2019. Both modifications in the Partnership Agreement are driven by changes in the Operational Programmes or changes coming from the EC; national strategies on which the document is built do not change.

As for the strategies, respondents expressed the opinion that stakeholders in Portugal are not able to influence the strategic direction of the Partnership Agreement. The strategic direction is discussed with stakeholders; however, it is merely a pro forma. Furthermore, the regions do not have a strong player who would be able to influence the decision making. Therefore, public policy in Portugal is conducted in a top-down centralized fashion, in which policymakers maintain their paternalist attitude towards regions. In the end, the centralized way of policymaking may not reflect the needs of the regions and population.

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[7] *https://observador.pt/2018/11/02/falhas-informaticas-atrasam-fundos-comunitarios/*

3.9. Audit and Controls

3.9.1. Division of competences

The Audit Authority in Portugal is the **General Inspectorate of Finance (GIF)**, which operates directly under the Ministry of Finance. GIF performs the **audits of systems, designation and audits of accounts**. Based on the decree-law no. 137/2014, the Audit Authority delegates **audits of operations** to the Agency for Cohesion and Development, and it supervises Agency's audit work, which is the only connection they have. The cooperation of these institutions is described in the decree-law no. 137.

In the Agency, there is a unit responsible for auditing the ERDF and CF and a separate unit for auditing the ESF. The EAFRD and EMFF have their own audit authorities. The sampling is statistical, and it always has to be approved by the AA. After the approval, the Agency sends the plan to the MAs and informs them about planned checks of beneficiaries. Then the MAs send the plans to the Intermediate Bodies.

The Agency indirectly audits the MAs and Intermediate Bodies; whether they perform their duties. All their conclusions have an associated recommendation.

> *„The MAs are very cooperative, and they even go with us to the beneficiaries. If there's an issue that appears many times, we informally meet and discuss why it's happening. We ask them questions and we try to understand what happens, but these meetings are not systematic."*

Audit Unit

Agency for Cohesion and Development

3.9.2. OP Technical Assistance

In case of the OP Technical Assistance, whose MA is the Agency, the audit unit of the Agency contracts external auditors, because they can't perform the audits themselves due to the potential conflict of interests. The contracted auditors use Agency's checklists, but the Agency makes checks to ensure that the audits meet Agency's standards. There were no objections by the EC against these procedures. In the past, these audits were performed by the GIF, as there is no independence issue in this case.

3.9.3. Character of findings

The conclusions made by the Audit Unit of the Agency for Cohesion and Development are **only recommendatory, not binding**. The final reports including findings are sent to the MAs, who work with the beneficiaries on the remedy. For more information on irregularities, see *chapter 3.6.4*. However, the MAs usually accept Agency's proposals. However, the MAs usually accept Agency's proposals. In case the MA did not accept them and they wouldn't be able to reach and agreement with the Agency, the issue would probably go to court.

> *„The MA usually does what the Agency suggests, but they don't have to, in theory. But I don't remember any case when this did not happen. They basically agree with us even if they don't want to. In case the MA did not agree with the proposal made by us, the MA would pay it from their budget. But we don't have this very clear as this does not happen."*

Audit department

Agency for Cohesion and Development

The MAs are subject to control actions carried out by different external control entities. The audits carried out by the European and national Courts of Auditors give rise to decisions, previously contradictory to the MA, which are translated into recommendations which, when addressed to the MA, have to be implemented by the MA. In general, the MA follows the conclusions proposed by these entities, since they are always duly substantiated. However, in case of divergence, the Authority that carried out the control action may issue a reserve note in the sphere of the performance of its competencies, i.e. at the

level of the Certification of Expenditure, or the Evaluation of the Management and Control Systems of the MA, in the case of the CA or AA, respectively.

3.9.4. Certification Authority

The task of the CA is to draw up statements of expenditure and payment applications and ensure that they are derived from reliable accounting systems. The CA also checks the MAs and the Intermediate Bodies on the spot to see whether they perform their duties and to ensure that they respect the laws and the designation procedures. The CA also performs administrative checks to see whether the ineligible expenditures are withdrawn from the accounts.

The controls of the MAs and Intermediate Bodies done by the CA are similar to the audits of systems, and they are complementary to those of the AA. The AA passes on some responsibilities to the CA because of lack of personal capacities.

3.9.5. Sharing audit plans and conclusions

Sharing of plans of controls takes place between all three institutions which conduct auditing and controls, i.e. the Agency for Cohesion and Development, the General Inspectorate of Finance and the Court of Auditors. Meetings of the Agency for Cohesion and Development and the GIF take place on a monthly basis and auditing plans are shared once a year (cooperation is more on a vertical level). The GIF and the Court of Auditors share audit and control plans to avoid duplicities (controls of the same institutions) - cooperation is rather on a horizontal level. Sharing audit plans with the MAs and Intermediate bodies was described above.

The Court of Auditors publishes its conclusions on its webpage, the Agency for Cohesion and Development shares its conclusions with the General Inspectorate of Finance, and the General Inspectorate of Finance shares its conclusions with the Agency for Cohesion and Development and the Court of Auditors.

3.9.6. Irregularities

Managing Authorities are responsible for establishing an internal control system to prevent and detect irregularities. Information on the ineligibility of expenses is transmitted by the Audit Unit of the Agency to the Certifying Unit (CA), which then forwards the results to the MA. Finally, the MA recovers ineligible expenses from the beneficiaries.

The Agency is responsible for the coordination of the process of informing about irregularities within ESIF. It centralizes data on detected irregularities, draws up guidelines for the uniform treatment of irregularities with other institutions, ensures cooperation between national authorities and OLAF in cases of suspicion of irregularity and ensures implementation of the recommendations. The Agency also communicates the irregularities to OLAF. The Agency has a system called Information System Audit, where all irregularities are filled in. The irregularities can be identified by any of the bodies (AA, MA, CA, etc.). The Agency also informs the EC about the irregularities, and it sends the information to the AA, who is responsible for filling the amounts in the IS of the EC.

There are some formal mistakes that can be corrected, but if there is a financial correction, it is always considered irregularity. Smaller mistakes can be an anomaly. For Agency's purpose, all mistakes are considered as irregularities, except for amounts below 25 EUR. The recovery from the beneficiaries is made by the MA to the Agency.

4. Project activity review

Total number of institutions approached

- ► 29

Total number of persons approached

- ► 37

The total number of interviews conducted (by institution):

- ► Implementation structure institutions (NCA/MA/AA/CA/PA/IB1/IB2): 10
- ► Academics: 2
- ► Consulting companies: 1
- ► Representatives of the beneficiaries: 0
- ► Local EY office: 1
- ► Other: 1

List of studies, analyses, evaluations, and other relevant documents used

- ► Partnership Agreement.
- ► Operational Programme documents.
- ► Luís Madureira Pires: 30 anos de Fundos Estruturais (1986-2015). Relações Internacionais, March 2017, pp. 019-038. Available at <https://doi.org/10.23906/ri2017.53a03>.
- ► Observador (2.11.2018): Falhas informáticas atrasam fundos comunitários. Available at <https://observador.pt/2018/11/02/falhas-informaticas-atrasam-fundos-comunitarios/>.
- ► José Magone (2014): Politics in Contemporary Portugal: Democracy Evolving. Lynne Rienner Publishers.