

Evaluation of the administrative capacity of OPTA MA/IB including evaluation of the system of training

Summary of outputs



April 2012

1 BASIC INFORMATION

1.1 Identification of contracting authority and contractor

Contracting authority:

Czech Republic, Ministry for Regional Development (MRD)

Staroměstské náměstí 6

110 15 Praha 1

www.mmr.cz

Contractor:

Association „EUFC CZ, DHV CR“

EUFC CZ s.r.o.

Popelova 75

620 00 Brno

IČ: 269 42 364

www.eufc.cz

DHV CR, spol. s r.o.

Sokolovská 100/94

186 00 Praha 8

IČ: 45797170

www.dhv.cz

1.2 Aim and purpose of project

Aim of the project "Evaluation of the administrative capacity of OPTA MA/IB including evaluation of the system of training" was to verify the effectiveness and adequacy of current staff capacity of the bodies involved in the implementation of OPTA together with an assessment of the impact of financial and non-financial motivation on the stability of staff within the implementation structure of the OPTA.

Evaluator assessed during the realization of the project how the administrative capacity of OPTA MA/IB is set, including the relation to personnel changes in the MRD, and whether the system of training of the OPTA implementation structure is sufficiently functional and efficient. The output of the evaluator's work is the evaluation report, a comprehensive summary of the findings and evaluation, including identification of deficiencies and recommendations for specific proposals for possible changes and measures leading to more effective program management.

Evaluation project „Evaluation of the administrative capacity of OPTA MA/IB including evaluation of the system of training“ constitutes a part of project „Ensuring of management activities OPTA MA“, which is funded from Structural funds of the European Union – Operational Programme Technical Assistance (OPTA 2007-2013). Project registration number is CZ.1.08/1.1.00/11.00118.

1.3 Methodical approach

Methodical approach was based on collection of relevant data and information and their analysis, at the same time a collection of both qualitative and quantitative data had been carried out. Based on the mentioned data an analysis focused on answering relevant evaluation questions was carried out.

The main methods and techniques used in the project were mainly: the use of secondary data sources, survey, individual (controlled) interviews, desk research, SWOT analysis, the comparative method and the method of synthesis.

Used methodological approaches differed in individual phases of the project according to current needs and assessed principles. From general perspective these were activities related to the launching of evaluation process – collection of primary and secondary data sources. Further on these were followed by field enquiry in form of questionnaires among implementation structure bodies in OPTA

complemented by individual interviews with managers in view of clarification/completion of information acquired through questionnaires. Acquired data and information had been analysed, the results of these analyses were evaluated in the final phase via method of synthesis of knowledge and findings and recommendations were formulated subsequently.

1.4 Timetable for implementation and evaluation process

Project for evaluation of the administrative capacity of OPTA MA/IB including evaluation of the system of training has been processed in three main phases and in line with terms of reference of relevant public contract.

Within the first phase of project, the realization team concentrated mainly on collection and further sorting of accessible data sources (publicly accessible documentation, non-public data sources submitted by the contracting authority and individual consultations). Simultaneously, an analysis of stakeholders was carried out.

Second phase of the evaluation focused on collection of primary data, work with secondary data sources and analytical part of work. This phase was further divided into three parts which reflected logical succession and sequence of individual steps in the evaluation process:

1) Collection of primary data and utilization of secondary data sources

The first sub-step was focused on the analysis and evaluation of all relevant documents relating to the assignment and objectives of the contract - OPTA documents, manuals, outcomes of evaluations, studies, analyzes and other documents. Based on the previous incremental step a research was carried out. The investigation took the form of: a) a questionnaire survey among bodies involved in the OPTA implementation, b) individual interviews with managers of the OPTA implementation bodies and representatives of other selected stakeholders in order to clarify and supplement information.

2) Analysis and assessment of acquired data

Another part of the second phase of the project focused on analysis and comprehensive evaluation of the data. The main part was to perform detailed analyzes based on the selected methodologies so that it can comprehensively answer questions arising from the assignment and contracting authority requirements.

3) Proposal of partial results

The output of the second stage of the evaluation was formulation of partial conclusions, findings and recommendations of the thematic areas of evaluation.

Third phase of contract execution concentrated on complex evaluation of achieved results of analyses and research. On grounds of discussions within realization team the evaluator realised a relevant summary and formulated well-founded complex results into a proposal of final report. At the same time recommendations for efficiency of OPTA administrative capacity setup and system of training have been proposed.

Output of the third phase of contract execution is a final version of the Final report in Czech language that summarises results and conclusions of previous phases and contains partial conclusions, complex conclusions and recommendations.

2 SUMMARY AND RECOMMENDATION

It is possible to recommend the following main measures for the current programming period 2007-2013 aimed at strengthening **administrative capacity** and efficiency of implementation of the OPTA:

- To perform an internal realignment of some agendas within OPTA MA. To strengthen the administrative capacity of OPTA MA in the area of public procurement controls.
- To consider in cooperation with the Department of Personal Issues of the MRD extending the existing recruitment system of OPTA MA of opportunity to test aspirants knowledge, for example through a test aimed at the EU funds issues.
- To stabilize personal capacity in particular of OPTA MA, while further strengthening erudition of the MA staff through non-financial instruments, as well as financial incentives, and a suitably chosen "mix" of ideas contained in the report.
- To supply the existing system of reporting concerning the OPTA administrative capacity at least of data on numbers of employees according to their length of practical experience.
- To consider separation of the department 253 from the Department of OPTA MA, e.g. in the form of a separate department within the Division of NCA.
- To review the Department of OPTA MA inclusion in the organizational structure of MRD and select the same manner as in the case of the Department of management of operational programs (Department 26), which performs the function of the IOP MA. That is, the Department of OPTA MA set aside from the Section NCA under 1st Deputy Minister.
- To consider processing methodology for the management of the project in the OPTA on the beneficiaries (with a focus on government departments), based on further communication and clarification of IB requirement.
- To strengthen the financial allocation of the area of intervention 3.1 OPTA; there is a possibility to move part of the "saved" resources form the area of intervention 3.2.

For the next programming period 2014 - 2020 it is possible to recommend the following:

- Further stabilize personal capacity in particular OPTA MA while strengthening MA staff erudition by non-financial instruments, as well as financial incentives.
- To simplify the management structure of the operational program by deleting the Intermediate body and the relevant agenda delimit directly under the MA incl. relevant increase in the number of posts on OPTA MA.
- Clearly separate/set aside unit performing the tasks of the MA from units in the role of beneficiaries (if that will be units within the same department/ministry).

Within the OPTA implementation, there exists a **system of training** covering all the employees of the implementation structure of this OP. From the practical point of view, this system is based on the realization of three complementary projects financed from the OPTA.

For the current programming period (2007-2013) it is possible to recommend in this area the following:

- To ensure the existence of the written documentation concerning the regular evaluation of the individual training plans of the employees of the Ministry for Regional Development of the Czech Republic (this recommendation can be realized e.g. by adding a new row to the current individual training plans where the responsible representative of the ministry would evaluate the fulfillment of the plans),
- To review regularly the usage of the financial resources of those OPTA projects which are focused on training and to consider a re-allocation of these resources in case of the projects where it is not probable that these resources will be fully used within these projects. (this

recommendation seems relevant especially in the context of the identified delays in realization of some of these projects).

- To consider a possibility of preparation and realization of a supplementary project ensuring further education for the employees of the OPTA IB enabling them an access to other, very specific training activities organized both in the Czech Republic and abroad (based on an assumption that the participation on the study visits abroad organized for the employees of the OPTA IB would be approved by the OPTA MA).
- To prepare and ensure the realization of more types of the individual training activities requiring a different level of knowledge of the respective area from the participants.
- To define for each training activity a minimum level of knowledge which is a prerequisite for the successful completion of the training from the point of view of each participant. This measure would eliminate the current situation when employees with different level of practical experience and knowledge of the area participate at the same training activity, which creates problems during the realization of the training activity as such.
- To broaden the offer of the training activities focused on the representatives of the OPTA implementation structure, especially in the area of thematic workshops or platforms for the exchange of experience with other bodies involved in the implementation of the similar types of projects both in the Czech Republic and abroad.
- To consider the introduction of steps leading to higher efficiency of the current training activities, especially in the area of language training (the organization of the training after the working hours, the introduction of the financial contribution of each participant in case that they do not pass the final exams, the organization of the language training according to themes and not according the ordinary language textbooks etc.). The realization of these measures depends especially on the Department of Personal Issues of the Ministry for Regional Development of the Czech Republic as the language training is not paid from the OPTA projects.
- To consider the modification of the decision of the deputy minister of the Ministry for Regional Development of the Czech Republic binding all the employees of this ministry in the managerial positions to participate in the activities of the OP HRE project realized by the Department of Personal Issues of the Ministry for Regional Development of the Czech Republic. Considering the identified duplicities in the focus of the offered training activities and the training activities organized within the system of training of the OPTA it seems recommendable not to make the participation of the employees involved in the implementation of the OPTA obligatory in such training activities.

For the next programming period (2014+) it is possible to recommend the following:

- To use the experience gained within the system of training in the current programming period, especially it is recommended to prepare similar projects focused on the area of training also for the next programming period;
- To use for the preparation of the next programming period also the negative experience with the implementation of the system of training – especially to ensure an early preparation and realization of the system of training for the next programming period in order to avoid similar mistakes concerning timing of such activities in the future;
- To ensure also for the next programming period that the training activities will be organized separately for participants with different levels of knowledge and practical experience;
- To consider the introduction of the similar measures ensuring the higher efficiency of the language training (see also the recommendations for the current programming period).

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2.1 Answers to evaluation questions and recommendations

Evaluation question	Findings, answer to evaluation question	Recommendation
1. Administrative capacity of the OPTA		
<p>Is the personnel capacity of the OPTA implementation entities in accordance to the volume of activities carried out?</p>	<p>Given the relatively small absolute number of employees involved in the implementation of the OPTA, this operational program faced with the problem of how to cover all type positions, which ideally should have secured the implementation structure. The situation is temporarily resolved through partial distribution of the agenda. The result is that just above the MA employees who are forced to take agenda resulting from the type positions in the implementation structure, which is not enough capacity covered by OPTA, the real amount of work done in connection with OPTA significantly exceeds the amount of their working time. This finding represents a significant risk factor for the administrative capacity of the OPTA; it increases the likelihood of further staff turnover in the future.</p> <p>As for the expectations in relation to the volume of activities carried out by the OPTA MA, a further increase in work associated with implementation of the OPTA, in particular MA can be expected. The reason is the gradual "step up" during the implementation of OPTA, which brings with it a further increase in the related agenda, especially in the projects. At the same time steadily increasing number of procurement procedures and this trend can be expected in the near future; new projects will be submitted including "The extension of" existing projects; the MA is a new role in the recipient, which adds the MA agenda related to the management of the project itself; a number of projects are long-term and their implementation will continue until the end of the programming period; new beneficiaries were added in OPTA, they submit new projects and have sufficient knowledge of the rules OPTA - these need to pay attention; with increasing number of projects grows error in their implementation, which in turn requires the guidance of recipients ; increasing emphasis will put on evaluating the results of the operational program; further agenda will be added associated with the closing of OPTA and the entire programming period 2007 - 2013 at the end of the programming period.</p> <p>It is expected approximately the same volume as the activities carried out at present in the case of IB and FU with the fact that in some way change their structure depending on the cycle of the OP (the shift from the administration of applications to the administration of payments).</p>	<p>To perform an internal realignment of some agendas within OPTA MA.</p> <p>To strengthen the administrative capacity of MA in the field of public procurements controls.</p> <p>Following the inclusion of new beneficiaries to OPTA and the recommendations of the evaluator in increasing employee motivation in the IS of OPTA, it will probably be necessary to strengthen the financial allocation of the area of intervention 3.1 OPTA; there is a possibility to move part of the "saved" resources from the area of intervention 3.2</p>

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Evaluation question	Findings, answer to evaluation question	Recommendation
<p>Is the current state of the administrative capacity of OPTA implementation bodies sufficient?</p>	<p>The current state of the administrative capacity of MA OPTA is rated as satisfactory, but with some minor remarks:</p> <ul style="list-style-type: none"> • by reducing the number of positions in the Department of OPTA MA there is a vacant position of project manager for the priority axis 3; emergency but logical solution with regard to the same recipient was the allocation of work associated with project management in area of intervention 3.2 to the agenda of PM for PA 1; the administrative capacity of the department 251 is currently not sufficient to ensure the project management agenda in the area of intervention 3.1 (provides temporary manager of dept.) and activity type position "Education coordinator" as well (temporarily solves the head of department and the administrative staff). • There is insufficiently covered risk management agenda in the OPTA, which falls within the dept. 251, but due to lack of staff capacity in makeshift mode ensures head of department. • There is a large increase in workload on the agenda of the public procurements controls and originally delimited number of working time is already inadequate; staff utilization in the area of public procurements controls is very high. <p>The current state of IB and FU administrative capacity is sufficient. However, there was identified lack of IB in connection with projects concerning OPTA employee specializing in the area of government departments funding.</p>	<p>To perform an internal realignment of some agendas within OPTA MA.</p> <p>To strengthen the administrative capacity for public procurements controls, for example by the employment agreement. Further monitor and evaluate the situation in this agenda and, if problems persist consider further assistance, ideally a person with a legal background.</p>
<p>Is the set method of selecting of employees within the OPTA effective? What are the recommendations for efficiency procedures for selecting employees?</p>	<p>The selection of employees within the OPTA is governed by the internal rules of recruitment as well as methodological guideline for the procedures for selecting new employees implementing the NSRF. The existing system can be considered effective.</p>	<p>To consider in cooperation with the Department of Personal Issues of the MRD an extension of the existing recruitment system of OPTA MA of opportunity to test aspirants knowledge, for example through a test aimed at the EU funds issues.</p>
<p>What is staff turnover at the subjects of the OPTA? What are the most frequent causes of their eventual departure?</p>	<p>Given the low absolute number of working times, each employee's departure reflected in the implementation structure of the OPTA stronger than in other operational programs with greater personal capacity. OPTA MA staff turnover since the beginning of implementation of this operational program is seen as one of the major risk factors for implementation.</p> <p>The most commonly reported reason for staff turnover is dissatisfaction with job performance by the supervisor or, conversely, dissatisfaction with the supervisor.</p> <p>Only partial changes in personnel composition occurred during the programming period 2007 to 2013 at FU; the causes were always different.</p> <p>There is a partial turnover within IB, especially at the level of ordinary employees of the CRD (the reasons are different, dominated by private retirement or another position in public administration, or superiors dissatisfaction with working results), but the situation is not extraordinary / exceptional.</p>	<p>To stabilize personal capacity in particular of OPTA MA, while further strengthening erudition MA staff through non-financial instruments, as well as financial incentives (see other recommendations).</p>

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Evaluation question	Findings, answer to evaluation question	Recommendation
<p>Are the incentives used to stabilize and motivate the staff sufficient? What other incentives may be introduced to increase their motivation?</p>	<p>Salaries of MA and FU employees correspond to governmental recommendation No. 818/2007. The financial motivation rewards are applied (depending on available resources), compared Methodology for financial evaluation (1332/2009) is applied in a system of personal allowances, since in OPTA that managed to run out of time allocation of 2008, OPTA MA develops maximum effort for the payment of fees after the full use of the given allocation. Identified problem is that the current system of financial evaluation does not significantly differentiate employees according to wage rate of work.</p> <p>The way to ensure financial motivation of IB is designed according to internal rules of the CRD.</p> <p>The most commonly used tools of non-financial incentives include extra vacation, flexible working hours, meal vouchers, training opportunities, international internships and trainings etc.</p>	<p>To increase employee motivation could use some additional incentives beyond those currently used, but the evaluator is aware that the true extent of their implementation depends on available resources and the management decisions at the department. The recommendations may include incentives such as: the possibility of further professional training, upgrading of IT equipment, FSCR, longer "sick leave" time, work from home for executives, time off in lieu of overtime, payment in lieu of leave, contributions to pension or life insurance (at least selectively in the case of employees, where the interest in their continuance in the implementation structure NSRF), bonuses, team-building event, "corporate" school for employees' children of preschool age.</p> <p>To simplify and speed up administrative procedures for dealing with the deadline requirements for the acquisition of literature, mobile phones, laptops and office equipment.</p> <p>To allow OPTA IB employees within their own project paid by OPTA a participation in educational activities organized abroad and related to work activity performed (see below).</p>
<p>Is ensured interchangeability of the OPTA employees in their absence?</p>	<p>Yes, it is ensured interchangeability of the OPTA employees in their absence, with the exception of some type positions.</p>	<p>-</p>
<p>Is there a system to monitor the number of the OPTA implementation structure employees and the length of their experience in EU funds set optimally and adequately? Alternatively, what changes are necessary for the need for improved monitoring of the administrative capacity of the OPTA?</p>	<p>The monitoring system of the OPTA administrative capacity is based on quantitative data; there is no comprehensive information tracking qualitative aspects of OPTA implementation structure as well.</p> <p>The problem was identified relating to monitoring the indicator of the OPTA 48.31.01 "The number of permanently employed employed staff of the implementation structure". Setting this indicator is not in accordance with the methodological procedures applied in the System motivation and retention of the NSRF, moreover, this indicator is not binding on the beneficiaries in OPTA, which</p>	<p>To supply the existing system of reporting concerning the OPTA administrative capacity at least of data on numbers of employees according to their length of their practical experience: i) the OPTA implementation structure and ii) in the implementation of EU funds total, if necessary in a specific area of work resulting from the inclusion in the OPTA (e.g. public procurement, audit, accounting, etc.).</p> <p>To supplement existing data on staff turnover by monitoring fluctuations in the typical positions.</p> <p>To obtain necessary data for the indicator 48.31.01 either:</p> <ul style="list-style-type: none"> • on a ad-hoc-depth survey of recipients in this area of OPTA, or • in conjunction with the Department of Education NSRF to expand appropriately the form through which this unit

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	in turn affects and complicates its evaluation in relation to the relevant OPTA strategic objective.	collects data from all of the MA in its Report on the administrative capacity of the NSRF.
<p>What are the evaluator's recommendations on possible improvements and strengthening administrative capacity within the OPTA?</p>	<p>Beyond the analysis and evaluation aimed at answering the evaluation questions of the assignment, the evaluator identified during project implementation some other aspects affecting the administrative capacity and hence the OPTA implementation system. These are mainly the following findings:</p> <p>It seems to be somewhat problematic the current internal organizational structure of the Department of OPTA MA. The integration of dept. 253 into the Department of OPTA MA lacks factual foundation and goes against the principles of a clear separation of MA and the recipient; there is also a "double-tracking" in the management of this department, where responsibility for its operation is the Director of the Department of OPTA MA, but its work is factually managed from the Managing Director of the NCA. The position of dept. 253 does not seem to be too strong as well, in this respect it should ensure coordination of education and administrative capacity within the NSRF.</p> <p>Neither incorporation of the Department of OPTA MA into the Section NCA cannot be considered as optimal, namely for similar reasons, i.e. not entirely clear separation of unit executing the function of MA from units in the role of (significant / major) OPTA beneficiaries.</p> <p>The communication with the IB is currently perceived as a somewhat lengthy from the perspective of the MA, because of the flow of information through several management levels.</p> <p>In IB opinion, implementation of the OPTA could be more efficient by higher "readiness" of beneficiaries when submitting Request for payment, especially with regard to verifying the correctness and completeness of the accompanying documents. Administration of the requests would be accelerated.</p>	<p>To consider to separate the department 253 from the Department of OPTA MA, e.g. in the form of a separate department within the Division of NCA.</p> <p>To review the Department of OPTA MA inclusion in the organizational structure of MRD and select the same manner as in the case of the Department of management of operational programs (Department 26), which performs the function of the IOP MA. That is, the Department of OPTA MA set aside from the Section NCA under 1st Deputy Minister.</p> <p>To consider processing methodology for the management of the project in the OPTA on the beneficiaries (with a focus on government departments), based on further communication and clarification of IB requirement.</p>
<p>2. System of training of the OPTA</p>		
<p>Are the employees informed about the possible ways of their personal development in the framework of the financial/non-financial motivation and stabilization of the employees?</p>	<p>Yes, the system of financial and non-financial motivation and stabilization of the employees in well established at all the levels of the OPTA implementation structure and the employees of this structure are well informed about them.</p>	<p>-</p>
<p>Are the requirements associated with individual working positions defined clearly and are they known by all the employees? Are the training activities for individual working positions planned appropriately according to the requirements of</p>	<p>The requirements related to individual working positions are defined in the description of working positions of individual employees and also in the Standard of training of the NSRF. The description of the working position is signed by all the employees, and therefore it is ensured that all the employees know the</p>	<p>To enlarge the offer of the training activities also with the more specialized training activities focused on different training needs of individual employees of the OPTA implementation structure (e.g. to introduce more levels of difficulty of different training activities related to the</p>

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<p>those positions and are they organized well as for their planning in time?</p>	<p>requirements related to their positions.</p> <p>As for the planning of the trainings with regards to the requirements related to the individual working positions, we can sum up that this planning is appropriate. Additionally, the employees in the managerial positions involved in the OPTA implementation see the personal development of individual employees which is ensured by the existence and realization of the system of training of the OPTA.</p> <p>From the point of view of planning in time, the training activities are planned well, although concerning the often overload of some employees of the OPTA implementation structure it is not possible to eliminate the possibility that certain employees will not be able to participate in all the relevant training activities.</p>	<p>performance of the individual working responsibilities connected to the OPTA implementation, e.g. the checks of public procurement etc.).</p>
<p>Are the employees of the OPTA implementation structure regularly trained and informed about the training opportunities organized both in the Czech Republic and abroad?</p>	<p>Yes, the employees of the OPTA implementation structure are regularly informed about the new offers of the training activities organized both in the Czech Republic and abroad. During the individual years of their involvement in the OPTA implementation, they are also regularly trained, especially in the relation to the training needs identified in the regularly prepared individual training plans.</p>	<p>To broaden the offer of the training activities also with specific training activities, e. g. in order to facilitate the exchange of experience of different aspects of the OPTA implementation in the Czech Republic and abroad, with training in the area of business correspondence, business negotiations etc.</p>
<p>How does the employee responsible for the co-ordination of the training fulfill this role and which services does he/she provide to other parts of the OPTA implementation structure?</p>	<p>At the level of the NSFR, resp. OPTA there exist two separate functions – the function of the employee responsible for co-ordination of the training ensured by an employee of the OPTA MA and the function of the department for training of the NSFR which ensures the offer of the training activities for individual departments or bodies involved in the implementation of the NSFR. The employees responsible for the co-ordination of the training co-ordinates the agenda of training at the level of the OPTA MA. This agenda is not covered sufficiently as this person only co-ordinates the training while in this area also other activities are necessary (the analysis of the training needs, the preparation of the individual training plans, the evaluation of the training activities etc.).</p>	<p>To perform an internal realignment of some agendas within OPTA MA.</p>
<p>Is the quality and practical usage of the training activities regularly evaluated?</p>	<p>Yes, the regular evaluation of the quality and practical usage of the respective training activities is ensured both at the level of individual training activities and at the level of the questionnaire survey of satisfaction organized each 6 months. The results of such evaluations are used in the preparation of the training offers for the next period of time.</p>	<p>For the employees of the OPTA implementation structure it could be interesting to see the results of the evaluation of quality and practical usage of individual training activities prepared by other employees who have already participated in those activities. E. g. on the websites of the system of training there could be established a new folder with such results of the evaluations.</p>
<p>Are the employees satisfied with the existing system of training?</p>	<p>Yes, the majority of the employees (82% of the questionnaires) is satisfied with the existing system of training. Those who are not satisfied work especially in the OPTA IB, which might have been caused by the problems identified in the access</p>	<p>To ensure higher co-ordination of the training activities organized within the OPTA and within the Ministry for Regional Development of the Czech Republic – especially to avoid the duplicities in those two separate systems of</p>

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	to further training activities for this target group.	training.
Is the existing system of training of the OPTA implementation structure satisfactory and efficient?	From the point of view of the employees involved in the OPTA implementation directly at the Ministry for Regional Development of the Czech Republic, it is possible to assess the existing system of training as sufficient and efficient. From the point of view of the employees implementing the OPTA at the level of the IB, there was identified a problem in the fact that a complementary project focused on the further education of the OPTA IB enabling the access of these employees to further training activities organized both in the Czech Republic and abroad is not prepared and realized.	To ensure also for the employees of the OPTA IB the access to training activities financed from the OPTA and focused on the further training activities realized both in the Czech Republic and abroad (based on the assumption that participation on the training activities organized abroad would be approved by the OPTA MA). Such a project should be prepared and managed directly by the OPTA IB.
Which recommendations were made in order to improve the system of training of the employees of the OPTA implementation structure?	Overall assessment of the system of training of the employees of the OPTA implementation structure is very good. On the other hand, it is possible to recommend several measures which would make the access to the further educations of all the employees implementing the OPTA more equal (see the recommendations).	See above.