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 On the occasion of the preparation of the mid-term evaluation by the European Commission –

In the current funding period (2014–2020), the Erasmus+ programme for education, training, youth and sports is funded with 14.7 billion euros, corresponding to an increase of 40 per cent compared to the previous funding period. Of the total budget, 10 per cent are dedicated to the sub-programme Erasmus+ YOUTH IN ACTION, another 3.9 per cent to the sub-programme Erasmus+ GRUNDTVIG. The abovementioned organisations expressly appreciate the willingness of the European Union to invest in the youth and education sectors. A lot of experience has already been gained from various proposals and projects in the first application round for YOUTH IN ACTION and GRUNDTVIG — the sub-programmes dedicated to the non-formal education sector. In order to ensure a comprehensive European approach to education that is not guided solely by employability and takes into consideration small and big institutions and organisations, we point out the following problems and request changes in the further development of the programme.

1. Total budget: YOUTH IN ACTION and GRUNDTVIG programmes need a significant increase in funding directly reaching the projects

The total budget for Erasmus+ has been significantly raised in the current funding period, a fact presented as a great success by the European Commission and the European Parliament. The individual projects have yet to profit from this measure, though. An increase of the annual budget that could lead to a rise of the funding quota is not planned until 2017. According to the current funding practice, this will only have an effect on the number of projects funded, and not result in a better endowment of the individual projects. The introduction of lump-sum subsidies under the YOUTH IN ACTION programme has even entailed a decrease in the total funding of individual projects, as certain expenses – like fees for outdoor, artistic and cultural education – cannot be funded additionally anymore. Central application for admin grants with the EACEA should be possible again for European and international umbrella organisations for adult education. The lower budget of the national agencies in the smaller participating countries only allows for a very limited number of projects to be funded with the maximum subsidies. This applies especially for projects under key action 2 and penalises coordinating institutions in smaller participating countries.

2. Improving the visibility of non-formal education

Erasmus+ is perceived as a students programme by the media and the general public. Brands and logos such as YOUTH IN ACTION and GRUNDTVIG need to be used more actively to ensure a better recognition. This applies especially to the representation on the websites of the European Commission, the national agencies and other political stakeholders. The branding should also be used for brochures and other publications of the European Commission.

3. Higher rejection quota in spite of budget increase – noticeable increase in funding required for 2016

Among the applicants, the budget increase raised expectations for improved funding quotas and augmented project grants. As mentioned above, the budget is increasing exponentially during the current seven-year funding period; an increase in the annual Erasmus+ budget is thus not planned until 2017. The European Commission and the national agencies should have communicated these budget dynamics more clearly in the run-up.

According to the national agency Youth for Europe (Jugend für Europa), the funding quotas for the subprogramme YOUTH IN ACTION in Germany in 2014 divided by the three key actions amounted to: key action 1 (mobilities): 73 per cent (compared to 83 per cent in 2013), key action 2 (strategic partnerships and transnational youth initiatives): 17 per cent; key action 3 (political reforms): 47 per cent. For the GRUNDTVIG sub-programme, the national agency at the Federal Institute for Vocational Education (Bundesinstitut für Berufsbildung, NABIBB) published the following funding quota for approved applications in 2014: key action 1 (mobilities): 46 per cent; key action 2 (strategic partnerships in adult education and cross-sectorial partnerships): 19 per cent. The funding quotas in other European Union countries were found to be even lower. With key action 2 open for the participation of companies and commercial providers, the funding for independent associations will again be reduced. The relatively elevated rejection quotas result in associations and institutions refraining from applying, especially if they lack experience with projects and programmes at European level, and in rejected applicants possibly dispensing with European project work in general.

4. Ensuring adequate significance for the non-formal education sector within Erasmus+

The impact of the Europe 2020 strategy on the entire Erasmus+ programme results in little scope for traditional forms of international youth (association) work and sets the focus on employability. But Erasmus+ is also a non-formal education programme. Employment promotion, for example, is actually covered by the European Social Fund. Non-formal education, in youth work as well as in adult education, serves to promote European exchange, intercultural learning, European citizenship and

voluntary work, to reduce prejudice and to build democracy and values. Non-formal and informal education each need to maintain their own significance.

Maintaining working concepts: reintroducing the (national) youth initiatives, the participatory democracy projects, the GRUNDTVIG workshops, the comprehensive project database as well as the preparatory visits in adult education

The previous funding period for YOUTH IN ACTION (2007–2013) saw the development of youth specific project concepts like the "national youth initiative" or the "participatory democracy projects". Unfortunately, these have not been included in the Erasmus+ programme, which thus lacks easily accessible, open concepts for informal groups as well as a special concept for democratic empowerment. These should be reintroduced. The comprehensive COMENIUS-GRUNTDVIG-database and the GRUNDTVIG workshops should be re-implemented in the GRUNDTVIG sub-programme. The previous funding period offered the possibility to apply for the funding of preparatory visits dedicated to the development and proposal of GRUNDTVIG projects. This opportunity should be reintroduced with regard to the more complex structure of the new programme. To limit the administrative work to a minimum, we suggest that a cost category "preparatory visits" be included in the application form. The transnational youth initiatives were assigned to key action 2 (strategic partnerships) where they fit neither the main topic nor the project requirements. Maintaining this project concept is very important for the youth sector, seen that neither the national youth initiatives were taken over from the predecessor programme. Reassigning them to key action 1 seems as crucial as considerably simplifying the application.

6. Providing identical information throughout the national agencies in Europe

The national agencies act differently when it comes to providing information. This is as true for the registration of new project partners in the URF (Unique Registration Facility) and the ECAS (European Commission Authentication Services) databases as for the approval of projects or the counselling of applicants, e.g. on project drafts. These differences in approach can be observed as much with the four national agencies in Germany as with other European national agencies. Approximately the same concepts and information should be available on all relevant websites throughout Europe.

The following details need to be urgently and consistently added to the national agencies' websites throughout the European Union:

- Key action 1: Consistent information on preparatory meetings under YOUTH FOR ACTION
- Key action 2: Consistent information on the difference between cross-sectorial strategic partnerships and partnerships in a single education sector, information on central and local applications for fundable projects respectively (strategic partnerships, alliances and capacity building)
- Key action 3: Consistent information on activities and project funding under the Structured Dialogue
- Consistent information on special requirements with regard to physically or mentally disabled people
- Consistent information on extraordinary expenses
- Consistent information on the definition of intellectual outputs

7. Making the programme guide user-friendly; simplifying applications and expenditure reports

The 300-page-programme guide published by the European Commission is not user-friendly and constitutes a big obstacle, especially for first time applicants. The information is poorly edited and presented in a confusing way. The explanations do not clarify which costs exactly are eligible through the lump-sum subsidies or rather, which of them will be granted at the checks and audits after the end of the project. In general, the national agencies' priorities should be in line with those of the European Commission and reflect in the application forms. Single registration in the newly introduced mobility tool requires too much time and effort. As of now, in the youth sector only the responsible person is able to enter all account relevant data. Moreover, the mobility tool has been

introduced belatedly in 2015; under all key actions, it presents the participant organisations with particular organisational challenges and technical difficulties.

8. Simplifying the participation of non-EU countries

Strategic partnerships include at least three partner organisations from at least three EU programme countries. Including another – non-European – country is possible only if an added value for the strategic partnership is established. But then, neither the programme guide nor the national agencies provide useful information on the definition of added value and the actual way to make the funding of a non-EU country possible. The EU commission needs to provide clarifying information, then to be spread by the national agencies.

9. Allowing project project participation from non-applicant organizations

Limiting the participation in international projects to the collaborators of the applying institution is to be criticized. Many projects in the past were open to all education professionals. Umbrella organisations were able to set up international projects for collaborators of small institutions and organisations in the fields of youth work and adult education. The opportunity to create such projects without setting up complicated consortium agreements needs to be reintroduced.

10. Adjusting lump-sum grants to the actual expenses

The introduction of lump-sum grants is welcomed. Unfortunately, it did not contribute to reducing bureaucracy. It remains widely uncertain how lump-sum grants may be used and what for. No certified information is available on what kind of co-financing is apt and does not affect the funding. With regard to the strategic partnerships, it is unclear how staffing expenditures and fees may be financed apart from the intellectual outputs. The administration lump sum under key action 2 is too low, amongst others for the field of dissemination, which was accorded great importance in the new programme. All dissemination activities have to be covered by the admin grant. 250 euros/500 euros for the partner organisations and the coordinating organisation respectively do not pay for the editing of the interim and final reports and the establishment and maintenance of a website. The lump sums should be graded according to income groups (country groups), like the staffing expenditures for intellectual outcomes. The lump sums for material expenses and the refundable amounts for sub-contracts have proven insufficient, too. Translations, for example, are very expensive. Also, it is not understandable why in certain cases travel expenses may only be refunded if the travelled distance exceeds 99 km. YOUTH IN ACTION provides the lowest refunds, with a lump sum of 80 euros per participant for distances between 100 km and 499 km, while at the same time COMENIUS or GRUNDTVIG provide a refund of 180 euros for the same distances. The lump sum for travel expenses disadvantages participants from remote areas and cities who will always travel at a higher cost, even if planning thoroughly.

11. Different application periods must not lead to budget shifts

Simplifying the application was one of the goals of the new programme. The different application periods for the sectors of higher education, vocational education, youth and adult education do not come across as a simplification. Under YOUTH IN ACTION, projects may be proposed under each of the three key actions within three different application periods. This must not result in other education sectors having access to the youth budget, e.g. through cross-sectorial partnerships. An additional application period should be introduced for adult education.

12. Simplifying the application forms

Two major problems occur: the current application forms are not provided in time, and they are not translated in the respective national languages. Also, application forms are provided in different versions.

This creates major time and technical problems for the organisations just four weeks before the application deadline.

With regard to mobility projects in adult education, there is the option to apply as a consortium. This is made difficult by many forms not being adapted to consortium applications. Error reports should be noticed where they appear in the document.

13. Abolishing the exclusive evaluation of proposals by independent experts

The introduction of independent experts for the evaluation of proposals worth more than 60,000 euros under the sub-programme YOUTH IN ACTION has not yet proven its value. Counselling and evaluation become disconnected. The reasons stated in the evaluation results are met with incomprehension on the applicants' side and induce a lot of enquiries. Previously rejected applications, revised and improved after additional counselling, in some cases earned even fewer points during the second evaluation by independent experts. A consistent and co-ordinated assessment by a single authority – supported by independent experts – is required under YOUTH IN ACTION and GRUNDTVIG. Leaving the assessment and decision-making exclusively to independent experts is inadequate.

14. Extending the support for disabled people and disadvantaged youths

Projects with disadvantaged people require more social work resources during the preparation, the implementation and the follow-up. This must reflect in extended funding. Currently, the exact amount of the additional funding has to be indicated in the application form, though it is difficult to predict, especially when it comes to psychosocial or mental disabilities. In order to ensure a comprehensive inclusion, an ex post adjustment of the required additional funding needs to be made possible. Special funding for disabled people must not be included in the maximum grant. Facilities, institutions and organisations working with disadvantaged or disabled young people should be enabled to bill the expenses for professional full-time staff. This is the only way to guarantee the continuity in attendance especially important to these young people. As it is, additional staff may only be recruited and the expenses billed under the cost unit for fees reimbursement. Under the existing rules, especially the projects under the Structured Dialogue will offer almost no chances for participation.

15. Enabling participation for smaller organisations

The strategic partnerships put a strong focus on developing products/intellectual outputs, as proven by the elevated quota of subsidies over 150,000 euros granted in 2014 and 2015. Network and exchange projects have a considerably smaller chance of being accepted, as they compete with product development projects. Especially smaller organisations prefer smaller co-operation projects. To create better chances for co-operation projects, categories with fixed budgets should be introduced for both kinds of projects. Also, project coordinators have to comply with a lot of requirements due to the introduction of the lead-partner-principle and the high expectations towards the quality of the product under development. Smaller organisations often do not have these financial and organising capacities and thus refrain from submitting a proposal.

16. Strengthening the European Voluntary Service (EVS)

Within the European Voluntary Service (EVS), problems with insurance codes, the adjustment of insurances and belated approvals make it impossible to guarantee a thorough preparation of the volunteers. The number of proposals dropped accordingly. The funding for the assistance of volunteers needs to be included in the share dedicated to the sending organisation. Cancelling the regular sending grant without any substitution entailed a noticeable difference in quality between the respective predeparture trainings. The former procedure stipulated that the contract be signed by the volunteers, the sending organisation and the host organisation. This procedure should be reintroduced into the standard EU contracts. The EVS database is not up-to-date and poorly organised. Smaller organisations increasingly find themselves competing with institutions disposing of bundled EVS grants. In general, the pedagogic assistance for volunteers was observed to drop in quality. In order to include

disadvantaged young people in the EVS, the "organisation principle" according to the German model needs to be introduced. The central procedure between the national agencies and the respective local hosts prohibits an adequate assistance for disadvantaged young people.

17. Create more spaces for the unique concept of the Structured Dialogue

Only under YOUTH IN ACTION, proposals may be submitted locally under key action 3. This special regulation empowers the youth sector and strengthens the connection between European funding instruments and the European Youth Strategy. On the other hand, the lump sums are aimed at few big events, as opposed to the German idea on the Structured Dialogue, which favours sustainable, intensive dialogue processes. The limitation to 15 events for one- to two-year projects should be removed from the application form in favour of more events with less participants meeting on a regular basis. Moreover, a complex project like the implementation of the Structured Dialogue requires additional cost units for fees and public relations. Expenses for excursions to Brussels and Strasbourg to study the EU and its institutions, including dialogues with the political stakeholders, should be eligible costs, too. The option to apply for two-year projects is well viewed, but needs to entail an adjustment of the maximum amount granted. It is currently still limited to 50,000 euros for biennial proposals.

As of September 2015