

Spanish Stakeholder Workshop on Horizon Europe Implementation (9 October 2019)

DECALOGUE OF SUGGESTIONS

1. Increased **interactions between project officers and NCPs /applicants**;
2. Improved **feedback to participants** through more detailed ESRs and better EC Helpdesk answers;
3. **Clearer and predictable evaluation criteria** (and sub-criteria) in particular for ex-aequo proposals and for the *"portfolio approach"*;
4. Increased acceptance of **usual accounting practices of participants**;
5. **Daily rates for personnel costs are not a straightforward simplification for many participants.** Thus, we would propose to keep it as an option along with hourly rates for those having the latter as their usual accounting practice and therefore, accept time-recording both in days and hours. In any case, alternative options for the calculation of productive days/hours should be maintained;
6. Unit costs for **internally invoiced goods and services** (including indirect costs) should have sufficient impact and thus, a more flexible interpretation is needed, including the use of historical data and allocation keys for goods or services connected to the action;
7. Welcome the **"full costs" option for pilots and prototypes** as long the guidance is clear and this option could be consistently applied;
8. Extending the use of the **Lump Sum model** must be preceded by a full cycle evaluation of current pilots and applied to projects where it better suits (no "one size fits all");
9. The benefits and reach of **ex-ante systems and process audits** need clear and transparent guidelines;
10. Further guidance and support for **exploitation and dissemination** is needed.

FULL SET OF SUGGESTIONS/RECOMMENDATIONS

Proposal Submission, Evaluation and Selection

- Increased interactions between applicants and Project Officers or through an improved contact between the EC and NCPs;
- Improve feedback to participants through more detailed ESRs (in particular for Stage 1 proposals);
- Clear evaluation criteria (and sub-criteria), in particular for ex-aequo proposals, reserve lists and for the *"portfolio approach"*;
- Two stages call for proposals and blind evaluations should not be a general rule;
- Maintain emphasis on the impact of projects;
- Add certainty to the Grant Agreement Preparation by increasing its predictability;
- Reduce the number of pages for proposals (around 50);
- Improve support to expert evaluators on "non-scientific" issues such as impact, market, etc;
- An evaluation process in two phases proposal: 1) only excellence is evaluated, 2) only the most excellent projects will then be evaluated on their impact/implementation.

MGA

- Increased acceptance of usual accounting practices:
- **Personnel costs:**
 - Further simplification of the average personnel costs methodology is needed;
 - Additional remuneration has not fulfilled its objectives and should, therefore, be replaced or removed;
 - Daily rates for personnel costs are not a straightforward simplification for many participants as they are not aligned with their usual accounting practices. Therefore, their calculation will entail an extra burden and consequently a higher error risk linked to both, the

understanding and the calculation of the “full-day equivalent” concept which in any case will require very clear guidance. In short, we propose to keep the daily rate as an option along with hourly rates, and therefore accept time-recording both in days and hours. In both cases, alternative options for the calculation of productive hours should be maintained;

- Remove the calculation of hourly rates for personnel working exclusively for the action and accept their full cost per period.
- **Internal Invoices (indirect costs)**
 - To be a real improvement, the proposal for Horizon Europe should have sufficient impact (avoid repeating the LRI model) and thus a more flexible interpretation is needed;
 - Allowing the use of actual historical data and direct technical costs measured by allocation keys (e.g. quantity, working hour or unit);
 - Allow for goods or services connected to the action as long as they are part of its usual cost accounting practices.
- **Equipment:** the “full costs” option for pilots and prototypes is welcome as long the guidance is clear and it can be consistently applied.
- **Third parties:**
 - Maintain the current linked third parties definition, including entities with a “legal link” and Joint Research Units;

LUMP SUMS

- Extending the use of the **Lump Sum model** must be preceded by a proper evaluation of current pilots and adapted to its suitability to different type of projects (no “one size fits all”);
- Seems appropriate for closer to market and CSA type of projects but not as a general rule;
- More support to Lump Sum type II as long as the identified shortcuts are tackled and discretionary reductions of budget during the evaluation or negotiation phases are avoided;
- Higher risk and payments uncertainty may lead to a fragmentation of projects and represent, de facto, a barrier for newcomers;

- Reduce the financial risk by establishing clear payment criteria for cases where one Partner breaches its obligations (partial WP payments);
- Lump-Sum have increased the costs of elaborating proposals for all participants and the management costs for coordinators;
- Lump-Sum will increase Grant Agreement management burden (e.g. amendments for any budget reallocation).

Control Strategy: Ex-ante & ex-post controls

- The benefits and reach of ex-ante systems and process audits need clear and transparent guidelines;
- Increase the quality of external auditors;
- Reduce the duration of audits and standardise the documentation required;
- More guidance on the contents of “technical audits” for Lump Sum Projects is needed;
- Certificate on the Financial Statements should be more prescriptive;
- Enhanced cross reliance on other audits would need clear guidance.

Project reporting, communication, dissemination and exploitation

- Reporting requirements need to be simplified;
- Further guidance on communication, exploitation and dissemination is needed;
- Further dissemination obligations for participants after the end of projects requires additional funding;
- Improved reach to the different “open access” channels;
- Common Exploitation Booster impact/results are not clear. Launching “project clusters” as a way to stimulate interactions between projects with similar objectives could be envisaged;

- A clearer differentiation between research results and research data is needed;
- Improve Project Officers training on dissemination, exploitation and communication issues;
- Analyse the possibility of changing the generic dissemination and communication part of the proposal by clear and specific obligations defined by the EC (web, publications, social networks, events, etc.)?

International Cooperation

- Clearer guidelines and predictability for third countries participation (in particular for those not receiving funding);
- Increased cooperation Projects with Latin American countries;

Others

- Alignment between different EU funding programs and their rules is welcome as long as they do not worsen the current H2020 conditions;
- Improve the "partner search" facility in the F&T Opportunities Portal;
- Automatic access for LEARs to all their running projects plus automatic messages when their MGA are modified/updated;
- Further reduction of the Time To Grant should be pursued;
- Improved Electronic Grant Management guidelines and a friendlier Annotated Model Grant Agreement for participants would be welcome.