



HRD OP AND ROMA INTEGRATION

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On 28 of November 2014, the European Commission approved the "Human Resources Development" Operational Programme (1), making it the first approved Operational Programme for Bulgaria for the period 2014 - 2020. It outlines how the European Social Fund can be used to achieve smart, sustainable and inclusive growth in several key areas: labor market (incl. youth employment, education and training, combating unemployment), social inclusion (incl. Roma integration, deinstitutionalization, development of modern social services and social economy) and modernization of public policies. HRDOP is one of the three programs, co-financed by the European Social Fund in Bulgaria for the period 2014-2020, together with "Science and education for smart growth" OP and "Good Governance" OP. Given the limited capacity of the state budget, the three programs are likely to be the largest investment framework for innovation in the labor market, social inclusion, education and training, as well as the modernization of public policies in the coming years. According to the approved financial plan in the 2014-2020 period, HRDOP will have a budget of \$ 2 billion and 136 million levs, including national co-financing. This amount includes 258 million levs of the Initiative for Youth Employment. Nearly 60% of the budget of the Program is provided under Priority 1 for combating unemployment among vulnerable groups in the labor market, with special emphasis on young people, permanently unemployed and older people. Priorities in the program are also the measures to increase the skills of workers, according to business needs. Over 31% of the financing of the HRDOP 2014-2020 will be used for the measures under Priority 2, which will contribute to reducing poverty and promoting social inclusion. They are aimed at socio-economic integration of the Roma, migrants and most marginalized groups and communities, active inclusion of people, who are furthest from the labor market, integration of people with disabilities and deinstitutionalization of

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children and adults. Most of the resources under this axis will be used for social and health services and to promote social entrepreneurship. The Program will also invest in the modernization of public policies in the field of labor market, social services and health care, for which measures under Priority Axis 3 are provided.

The fourth axis will support measures for cross-border cooperation.

Preparation of the operational program lasted more than two years: A Thematic Working Group was set for its preparation, which started work in August 2012 and the approved by the European Commission draft was the fourth in a row. The relevant line institutions, social partners (trade unions and employers' associations), and five groups of non-governmental organizations participated in the preparation of the Program. Roma organizations were presented in the Thematic Working Group of Deyan Kolev (CIDT "Amalipe") and Gancho Iliev (NGO "World Without Borders"). "Human Resources Development" Operational Program is, and will continue to be of key importance for the integration of Roma for at least three reasons. First, it covers four of the six priority areas, set by the National Strategy of the Republic of Bulgaria for Roma integration: employment, education (2), health and antidiscrimination (3).

Second, the national budget has never committed to fully fund the implementation of integration policy. Even in years of budget surpluses, activities for Roma integration were funded mostly by pre - accession funds, and since 2007 - by the European Social Fund. as the

contribution of national programs was modest. It is unlikely to expect that this will change in the coming years: especially taking into account the fact that after 2010 many system activities previously financed from the state budget were "transferred" to OPHRD: for example full day organization of the educational process in central schools and others. In this situation, the Program seems to be the main source of financial support for the implementation of the National Strategy for Roma integration. Although the presumption of European funding is that it should be complementary to national, regarding Roma integration, the European Commission has allowed exception and do not require evidence of systematic funding of the integration policy of national budgets. It is an exception (in the EU framework for national strategies for Roma integration is required "to provide sufficient resources from national budgets, which will be complemented, where appropriate, by international funding or EU funding"), and it is not clear how long the Commission will agree with it. But it can be declared with high probability that in the current programming period the exception will be granted as a rule, which is proved by the fact that the interpretation of the pre - convention 9.2. "A national strategic framework for Roma Inclusion policy is introduced", the Commission has not included the requirement for funding from the state budget. Recommendations of the European Council of December 9, 2013 required national funding, but not imperatively and without classifying it as a "leading" one(4). Third, during the 2007-2013 period OPHRD made the first steps to finance operations supporting targeted Roma integration: 7 operations for a total of over 57 million (See Annex 1) There is reason to expect developing and expanding of these initial steps - as by OPHRD and by the independent "Science and education for smart growth" OP (5)

This article analyzes the text of the OP "Human Resources Development", which are related to the issue of Roma integration. It examines the strengths and weaknesses of the approved program and proposes concrete actions to secure funding by the European Social Fund for

the implementation of integration policies.

The article states the following strengths of OPHRD:

1. The overall theme of inclusion of Roma integration in the Program: through a combination of targeted and common approach, defining Roma as a specific target group, inclusion of indicators and specific goals to achieve, related to Roma integration in all priority axes and the availability of indicative budget for targeted investment priority 2.1 .;

2. The inclusion of investment priority "2.1. Socio-economic integration of marginalized communities such as Roma";

3. The approach to support targeted projects for Roma integration: a decentralized approach to support multi-sectoral interventions, implementing municipal plans and regional strategies for Roma integration;

4. The created conditions for active involvement of civil society and the Roma community in the planning and implementation of the OP HRD.

At the same time, the article outlines certain challenges to the successful implementation of the OP HRD:

1. The capacity for implementation of integration policies at the local level in many municipalities is too low;

2. There is a lack of appropriate institutional and administrative framework at national level to assist municipalities in the preparation and implementation of multi-sectoral integration projects, to plan interventions and procedures, to monitor and evaluate;

3. The planned budget and indicators to investment priority 2.1. are relatively low;

4. There is no appropriate framework for integrated projects that bring together resources from OP HRD, OP "Science and education for smart growth" and OP "Regions in growth" / the Program for rural areas.

The article offers concrete solutions for overcoming the above weaknesses.

ROMA IN THE PLANNING OF HRD OP

Roma organizations were actively involved in the preparation of the HRDOP by participating in the Thematic Working Group and through several public forums. In June 2012 the Ministry of Labour and Social Policy organized the selection of representatives of five groups of NGOs, one of which was "Social organizations working for integration of minority ethnic groups and immigrants". Organizations chose as their representative in the TWG Deyan Kolev (CIDT "Amalipe"), and as his deputy - Gancho Iliev (NGO "World Without Borders"), who participated actively in the work of the group. In addition, the organizations held forums, where they presented their demands and discussed them with various stakeholders at local and regional level, incl. regional forums in Veliko Tarnovo, Burgas, Stara Zagora, Pazardzhik and Vratsa.

Participating in the development of OPHRD Roma organizations have changed the essential elements of the original appearance of the program on Roma. This fact is stated in the operational program itself, which states that "At the proposal of the NGO from Group 1 - Social organizations working for the integration of minority ethnic groups and immigrants, the civil sector was included as a partner in the implementation of public policies for social inclusion. The group's proposals also supported the formulation of the target groups within the Priority axis 2 and IP 1, and the inclusion of the implementation of regional and municipal strategies for Roma integration in the guiding principles for the selection of operations in the same investment priority". It could be stated that in the section on Roma, Roma organizations in the full sense of the word were co-authors of OPHRD.

ROMA IN HRDOP

The very first draft of the OP "Human Resources Development" contained texts related to Roma and Roma integration. This fact was not accidental: in the previous programming period 2007-2013, OPHRD was the program, which in the highest degree included the topic of social inclusion of Roma and the Managing Authority has accumulated positive experience in cooperation with Roma NGOs and in the management of procedures which strongly supported Roma integration. However, the initial versions of OPHRD contained significant weaknesses. For example, "Roma" indicators and interventions were provided only to the IP 2.1., which would severely restrict the possibility of the other investment priorities to support activities in the Roma community. On the other hand, the text of the IP 2.1. "Socio-economic integration of marginalized communities such as Roma" had important shortcomings: it did not include activities for community development and tackling anti-Roma stereotypes, as well as the requirement to carry out projects to implement municipal plans for Roma integration, in the target groups of IP 2.1. were included a wide range of vulnerable groups and Roma were missed, etc. All this would probably distract the impact of OPHRD and would prevent targeted support for the implementation of policies for Roma integration.

Gradually, those weaknesses were removed and the final version of the operational program includes texts that create the necessary prerequisites to support the implementation of the National Strategy of the Republic of Bulgaria for Roma Integration with funds from the European Social Fund. The Roma issue is included in Section 1 "Strategy for the contribution of the operational program to the implementation of the Union strategy for smart, sustainable and inclusive growth and the achievement of economic, social and territorial cohesion", which outlines the main approaches of impact. Concerning the Roma, the section states that "OPHRD will focus on improving access to employment, education, social and health services for Roma. In line with the approach in the National Strategy, OPHRD applies focused and integrated approach to vulnerable citizens of Roma origin, which does not preclude the provision of support for disadvantaged people from other ethnic groups." OPHRD strategy is based on three main pillars: (1) Higher and better employment; (2) Reducing poverty and promoting social inclusion; (3) Modernization of public policies. Roma integration as a specific area of impact is situated in the second pillar, but the need for intervention in the Roma community are indicated in the other two pillars as well.

In accordance with the described strategy, Section 2.A. "Description of priority axis" contains many texts outlining possible interventions in the Roma community. Priority Axis 1 "Improving access to employment and the quality of working places" includes many indicators / result indicators: in essence, the main indicators in the IP 1.1, 1.2 and 1.3 (measuring outcomes of interventions to secure employment for the unemployed and young people) will be measured in the Roma community as well. Thus, it is guaranteed that the implemented interventions will include enough unemployed Roma and Roma youth and will increase the capacity of institutions involved in the labor market to work in the Roma community. This is part of the use of the so called "mainstreaming" approach.

Weakness of the texts of Priority Axis 1 is the lack of examples of activities that would have guaranteed effect in the Roma community, i.e. lack of targeted activities: e.g. use of Roma labor mediators, different types of community centers and others. They are included in the justification of individual investment priorities, but not in the model supported activities. This weakness is not significant, since the indicative list of supported activities is not exhaustive and Monitoring Committee may add to it by the criteria for selecting the operations.

A significant weakness is the lack of indicators to measure the effect in the Roma community on investment priority "Self-employment, entrepreneurship and business". It is well known that many of the Roma deal with small business (often - in the informal economy), while to some of the specific Roma groups entrepreneurship is part of ethnic psychology. It is an error that this important part of the Roma remains unnoticed by OPHRD.

As expected, Priority 2 "Reducing poverty and promoting social inclusion" includes the issue of Roma integration in the most profound and multifaceted way. This axis includes the targeted investment priority "Socio-economic integration of marginalized communities such as Roma", in which Roma is one of the main target groups, as well as indicators and indicative budget. This IP, which is important merit of the program, is described in detail below.

Outcome indicator measuring achieved through

interventions Roma is included in 2.4 IP. "Promoting social entrepreneurship", which is a strong part of this priority, especially when compared to the IP "Self-employment, entrepreneurship and business" under Priority Axis 1.

The Roma issue is included in the smaller priority axis 3 "Modernization of institutions" and 4 "Transnational cooperation". Axis 3 is a prerequisite for increasing the capacity for monitoring and evaluation of the National Strategy for Integration of Roma, which is a requirement of preliminary conventions. A serious weakness of this axis is that it does not invest resources in joint activities of institutions and NGOs. Although this request was repeatedly placed on all groups of NGOs involved in the preparation of the OP HRD, it was diverted from the Managing Authority on the grounds for differentiation with OP "Good Governance". Thus OPHRD will not support targeted joint initiatives of institutions with non-governmental organization, unless the activities supported under Axis 1 and 2. This can be defined as a significant deficiency, since in some areas - e.g. Roma integration and social services - NGOs are key players with an accumulated capacity.

Regulation of the European Social Fund (art. 6, para. 3) provides opportunities for investments in capacity and joint action with NGOs, putting them on equal bases with the social partners: it is a pity that OPHRD do not use this opportunity.

Priority Axis 4 includes the ability to transfer best practices in IP "Socio-economic integration of marginalized communities such as Roma," an indication of result and financial resources. This will provide an opportunity to learn from the experience of other states with large Roma population - e.g. Romania. Table 24 "Applicable preconditions and evaluation of their implementation" also contains an important component associated with the Roma issue: pre-convention 9.2. "Roma Inclusion" and its definition as "partially implemented", as well as defining the criteria for the implementation of this convention as outstanding. As I had the opportunity to point out in another one of my analysis "Partnership Agreement and Roma integration in Bulgaria" the introduction of ex-ante conditionality EXAC is an important innovation for the current programming period, which will enable the European Commission not to approve or suspend payments to national management authorities. One of the ex - ante conditionalities set by the Partnership Agreement and by OPHRD is 9.2. "A national strategic

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- sets achievable national goals for Roma integration to bridge the gap with the rest of the population. These goals should address the four goals of the EU for integration of the Roma regarding access to education, employment, healthcare and housing;
- Identifies, where appropriate, disadvantaged micro-regions or segregated neighborhoods, where communities are most deprived, using already available socio-economic and territorial indicators (ie very low educational level, long-term unemployment, etc.);
- includes strong monitoring methods to assess the impact of actions for the integration of Roma and reviewing mechanism to adapt the strategy;

- is designed, implemented and monitored in close cooperation and continuous dialogue with Roma civil society, regional and local authorities'; Failure of the third sub-criterion related to the existence of an appropriate system for monitoring and evaluation of the integration policy is the cause of this entire criterion to be assessed as unfulfilled and pre-convention - as partly implemented. A curious fact is that in previous drafts of OPHRD Bulgarian government submitted EXAC 9.2. as fully implemented, but at the insistence of the European Commission it is referred to as "partially" completed.

Determination of EXAC 9.2. as partially implemented is definitely closer to reality. This rather negative assessment gave the chance and the incentive to work not only for the introduction of a comprehensive system for monitoring and evaluation, which is imperative and very serious lack. Operation for development and approbation of such a system will be the first procedure, financed by the new OPHRD. The assessment gives indirectly chance to work and to increase the capacity of NCP (ie the Secretariat of the National Council for Cooperation on Ethnic and Integration Issues), as well as for the overall improvement of the institutional framework for implementation of the integration policy. It is therefore important that the system for monitoring and evaluation should not be limited only to the so-called. administrative monitoring, but should also include forms of civil monitoring and community monitoring, as well as putting interaction between institutions, civil society organizations and local communities in a new way.

OPHRD AND ROMA INTEGRATION: STRENGTHS

The text of the OP "Human Resources Development" creates an appropriate basis for supporting policies for Roma integration - at national and local level - with funds from the European Social Fund. Among the strengths of the program can be distinguished:

1. The overall inclusion of Roma integration issue in OPHRD: the proposed combination of targeted and general approach (i.e. determining the specific investment priority to support integration initiatives and the inclusion of integration activities in other investment priorities), the definition of Roma as a specific target group, the inclusion of indicators and specific goals to be achieved related to Roma integration in all priority axes and availability of indicative budget for targeted investment priority 2.1. create preconditions for supporting policies for Roma integration. Without exaggeration, one can say that the approved version of OPHRD has no need for considerable improvements in the overall inclusion of the subject of Roma integration. The program creates the necessary preconditions, without guaranteeing that they will be used: the latter will depend on the activity of the Monitoring Committee and stakeholders involved in it.

According inclusion of Roma issue, OPHRD 2014-20 has continued improving and developing the program from the previous programming period. Then it was the only operational program, including explicitly Roma as a target group and supporting targeted procedures for the implementation of policies for Roma integration. The comparison between the way the issue of Roma integration is included in the new operational program clearly indicates the inclusion of a number of "lessons learned";

2. The inclusion of investment priority "2.1. Socio-economic integration of marginalized communities such as Roma "is important achievement of the program. It should be clarified that the regulation of the ESF for the current programming period offers a list of investment priorities of which national governments should choose which ones to include in their operational programs. I.e. the notion "marginalized communities such as Roma" was preset by the European Commission: Roma are the only ethnic

group mentioned in the regulation, which in itself is a clear indication of the importance of Roma integration. The inclusion of IP "Socio-economic integration of marginalized communities such as Roma" is important dignity of Bulgarian OPHRD.

The text of the priority is better scheduled and creates preconditions for the implementation of initiatives that will lead to real progress in the integration process at local level. As a specific purpose was defined "Increasing the number of persons from vulnerable ethnic communities involved in employment, education, training, health and social services with a focus on Roma, migrants, participants from other countries." The target groups of priority are defined in line with the goal: the Roma community; people from other countries; people at risk and / or the victims of discrimination; people living in areas with low population, rural and isolated areas, parts of towns, where there is a concentration of problems, creating a risk of poverty, social exclusion and marginalization (high unemployment, low income, limited access to public services, spatial segregation, spatial isolation, etc.).

The investment priority describes well the main problems and challenges facing Roma integration. It defines the types of activities that will be supported. They are grouped into four areas: improving access to employment, improving access to education, improving access to social and health services, community development and overcoming negative stereotypes. In each direction are set examples of activities that are in line with best practices and models verified in previous years. Particularly high can be appreciated the inclusion of direction "Development of local communities and overcoming negative stereotypes" and planned activities in it which would create the necessary supportive environment for the implementation of integration activities. The negative experience of Burgas and Varna, where unprepared community environment and the reaction of the ultra-nationalists impede the implementation of integrated interventions in the previous programming period clearly indicates that implementation of the activities of field 4 is a condition for the success of all other activities.

IP 2.1. sets and indicators, grouped in Table 4 and

Table 5. They are clearly measurable, although relatively modest, as indicated below.

3. The approach to support targeted projects for Roma integration can be defined as correct: OPHRD will use a decentralized approach to support multi-sectoral interventions, implementing municipal plans and regional strategies for Roma integration. Opportunities for implementation of a community development approach and standardization of certain interventions are also set.

IP 2.1. clearly indicates that the program will support integrated projects which bring together activities from different areas: employment, education, health and social services, development of local communities. Imperative will be the activities on the direction "Improving access to social and health services". It is also stated that this type of integrated projects should lead "to the objectives of key strategic documents: National Strategy of the Republic of Bulgaria for Roma Integration 2012-2020, the regional strategies and local plans for integration of Roma ...".

I.e. by IP 2.1. can be financed the so-called "soft measures" of municipal plans for Roma integration, which are defined as the main instrument for implementing the National Strategy for Roma integration. This possibility and decentralized approach (set from the National Strategy, but unsecured financially) certainly have to be welcomed. The lack of a national institution with management powers in the field of Roma integration and lack of capacity to work in the Roma community among the central institutions can be - if only partially - compensated by active

municipal policies. In the first quarter of 2013, 220 municipalities have adopted their Municipal plans for Roma integration 2013-14, and in 2014 began the development of similar plans for 2015-20 period. We expect the municipalities to receive EU funding (or funding from the state budget) for the implementation of these plans. Opportunity provided by the IP 2.1. is currently the only chance municipal plans to be implemented. Open questions remaining unanswered are related to the opportunities for multi projects - funded by OP HRD OP "Science and education for smart growth" and OP "Regions in growth." The need for such projects is unmistakable: Municipal plans for Roma integration include both "soft" and "hard" measures, "soft" measures can hardly be conceived without education, etc. At the same time, there is currently no answer how it will secure multi-Fund projects, which is one of the most important challenges described below.

4. There are prerequisites for active involvement of civil society and the Roma community: this is particularly important against the background of the very limited capacity of local and national institutions for activities in the Roma community. The inclusion of NGOs and local communities is necessary to increase the capacity and efficiency of integration initiatives. OPHRD creates the necessary preconditions for this: in planning (NGOs actively participated in the drafting of the program, as indicated above), in implementation (NGOs are possible beneficiaries on IP 2.1., as well as on other investment priorities; IP 2.1. includes also the partnership principle as a horizontal principle) in monitoring and evaluation.

HRD OP: challenges and weaknesses

Although described strengths, OP "Human Resources Development" contains certain weaknesses and will face important challenges in the implementation. Among them we can emphasize:

1. The capacity for implementation of integration policies at the local level in many municipalities is too low: some municipalities, especially the smaller municipalities in rural areas do not have sufficient human and financial resources nor the experience to implement large-scale multi-sectoral interventions in Roma community. In other municipalities. this is not a political priority.

There is a real threat, given the selected decentralized approach, for these municipalities to not take real actions for Roma integration or activities undertaken to lead to no real results.

This problem is systemic and is linked to inequality in the capacity of municipalities. During the previous programming period it has led to very serious imbalances in the absorption of European funds between different municipalities and even different regions, such as the lack of mechanisms to support smaller municipalities led to a further increase of disparities. It is very likely

to happen again in terms of the implementation of the IP 2.1. of this OPHRD. Measures are needed for that risk to be minimized;

2. Lack of appropriate institutional and administrative framework at the national level: to assist the municipalities in the preparation and implementation of multi-sectoral integration projects, to plan interventions and procedures, to monitor and evaluate. This problem is systemic and serious. Decentralized implementation of any policy requires a strong institution at national level to assist, coordinate and control participants from the local and regional levels. In essence, there is no such an institution in Bulgaria. Formally, these characteristics correspond to the National Council for Cooperation on Ethnic and Integration Issues, but it is a fact that it has no real power. The need of reform in the structure was declared for years, non-governmental organizations offer various options to strengthen its power, but at present it is not a fact. In 2012 was created an Interagency Working Group to resource Roma integration with EU funds, which had the chance to fill the descriptions deficit at least in terms of the use of European funds for the implementation of integration policies. It was chaired by the Minister for management of EU funds and it includes the respective deputy ministers responsible for the Managing Authorities of the key European programs, as well as representatives of Roma NGOs. Unfortunately, in 2013 it was stated more on administrative than on political level and it essentially stopped functioning.

OPHRD (as well as the Partnership Agreement) partially take into account the lack of appropriate institutional and administrative framework at the national level while acknowledging the preliminary convention 9.2. "A national strategic policy framework for Roma inclusion is set" as partially implemented and requires approbation of the national system for monitoring and evaluation. In any event, this is insufficient and will require compensatory mechanisms to replace this lack;

3. The planned budget and indicators to investment priority 2.1. are relatively low, although the IP 2.1. was included among the five so-called investment priorities of the so called "thematic concentration", the indicative budget set for it was about 130 million Ievs. about 6% of

the program budget. This is not enough taking into account the fact that 220 municipalities prepared their Municipal plans for Roma integration and OPHRD is currently the only option for their funding. Of course, municipalities and other beneficiaries will be eligible on the other investment priorities as well, but it will mean submission and management of several projects that will be a big bureaucratic obstacle.

The indicators to that IP, even after they increase in September 2014 remain relatively low and unambitious: e.g. 17,740 Roma who after leaving the operation began to look for work or have a job or are involved with education / training or have received training or are involved in social and health services. Thus only 5% of people who define themselves as Roma will be reached, which is unlikely to lead to a serious boost in the process of Roma integration.

These weaknesses can be compensated by the fact that at the insistence of the European Commission and Roma organizations in the final version of OPHRD were included indicators related to Roma and in parts of the other investment priorities. I.e. activities for Roma integration shall be supported in the procedures financed by them. Moreover, the budget IP 2.1. (and any other IP) is indicative and in the presence of great interest and quality projects it can be increased. But this remains dependent on the extent to which above mentioned shortcomings will be overcome; 4. Bureaucratic obstacles facing integrated projects: multi-sectoral interventions for the implementation of municipal plans for Roma integration require integrated projects with at least OP "Science and education for smart growth" (to cover the entire spectrum of "soft measures"), and - at least in some municipalities - with OP "Regions in growth" / Program for rural areas (to include priority "Housing"). Unfortunately, there is currently no adequate legal basis for integrated projects. This strongly reduces the potential effectiveness of projects to be financed within the priority 2.1. of OPHRD. Indeed, the Council of Ministers Decree 107 / 10.05.2014, provides the opportunity for integrated projects, which are funded by more than one program. Unfortunately, the decree creates many bureaucratic difficulties requiring beneficiaries to sign a contract and, respectively, to report to two or more Managing Authorities. In practice this will mean to manage

and report various projects, which will discourage many potential beneficiaries.

Furthermore, OPHRD do not clear the boundary between direction "Improving access to education" of the IP 2.1. of OPHRD and OP "Science and education for smart growth": although this question covers three pages of OPHRD. Surely this will lead to serious problems in the Managing Authority, the Certifying Authority and especially to potential beneficiaries who would want to include activities to improve access to education in their projects. Unfortunately, the possibility of integrated projects between the two programs remains also uncertain as well as in which cases the project could be funded by both programs. The text of the OP HRD in this regard is unclear and requires serious interpretation: "one and the same beneficiary (e.g. municipality) and its partners (e.g. NGOs) that have an idea for activities in diverse areas (labor market, education, social inclusion, etc.), do not have to apply to two contracting authority with two separate projects

to ensure sustainable integration of children and families from marginalized communities in an area, district or village. Through mechanisms for coordinated implementation of operations and where applicable - through "integrated operations" OP NOIR will complement initiatives in OPHRD, providing support to improve access to education for the target groups." The beneficiaries submitting project that want to finance the implementation of "soft" measures of municipal plans to integrate Roma will face the question: whether this can be done only through a project to OPHRD, through a mechanism for coordinated implementation of operations (such currently missing) or via a mechanism for integrated operations (which is also missing). There is a real danger for beneficiaries to be discouraged and to not apply. It is also a real danger if MAs OPHRD and OPSESG do not create extremely clear mechanisms for coordinated implementation of operations and integrated interventions, many costs to beneficiaries to become unverified.

POSSIBLE SOLUTIONS

Challenges described above are surmountable. The Monitoring Committee and the Managing Authority can take a large part of the solutions. The others are the responsibility of the Deputy Prime Minister on management of EU funds Tomislav Donchev and the Council of Ministers.

1. The lack of capacity to implement large-scale multi-sectoral interventions in the Roma community

In different EU countries there are numerous examples of targeted investments in the less developed regions where they do not compete with other municipalities and the Managing Authorities are working to improve their capacity to implement the necessary interventions. An example is the Hungarian program for the least developed microregions in the 2007-2013 period. Advantages of such an approach for equalizing territorial disparities are many. It was recommended by the EU framework for national strategies for Roma integration, which require Member States to "identify, where necessary, those micro-disadvantaged regions or segregated neighborhoods, where communities are the poorest, as using already available socio-economic and territorial indicators." Such a requirement was set in EXAC 9.2. "Roma Inclusion".

This option was not used in planning OPHRD 2014-20, due to many reasons. The main one is related to the lack of an appropriate institutional framework: the actual implementation of such a targeted approach - if only within the theme of Roma integration - would require the creation of units in MAs of OPHRD OPRG, possibly of OPSESG and regulatory changes in connection with the absorption of EU funds at national level. Apart from this, it will require a serious commitment of the Secretariat of NCCEII, which does not have the necessary human resource. Currently, there are several other possible solutions, namely:

1.1. Mandatory use of the partnership principle: funds in IP 2.1. must be spent by procedures for competitive selection of projects. It is announced the opening procedures to require mandatory partnership between the municipality and non-governmental organization that works with the local community. If the procedure is used for direct financing, direct beneficiaries must be certain municipalities with their NGO partners.

Partnerships can compensate the lack of sufficient capacity of potential beneficiaries. Especially important is the partnership to be real, i.e. each partner has a clearly defined role. For example,

every project on IP 2.1. should contain a component related to the activation of the local Roma community and this component should be delegated to organizations working on the field;

1.2. Support for the implementation of standardized integration interventions: in 2012-13 Interdepartmental group to resource Roma integration with EU funds began the process of defining "standardized integration interventions." The idea for them is that they are standardized models that have methodology, describing the basic elements of intervention and financial standard. Standardizing them aims to ensure correct and complete application: with all the essential elements / activities for the intervention. Interdepartmental group identified two interventions - community center and prevention dropout from school. Unfortunately, this process was not extended because the group's activities was practically terminated.

Definition of certain integration interventions (i.e. development of methodology and financial standard) and providing them with funds from OPHRD (through an appropriate mechanism, allowing beneficiaries to obtain resources for their implementation without unnecessary bureaucratic obstacles) will give a chance to these interventions to occur even in communities with low administrative capacity for the implementation of large-scale integration projects;

1.3. Providing opportunities for over-municipal projects involving more than one municipality: a known fact is that some of the municipalities in Bulgaria are too small in territory and population to be able to implement wider policies by themselves. They need over-municipal projects, a requirement which is enshrined in the Program for Rural Development, for example, in the development and implementation of strategies for local development.

With regard to Roma integration these findings are even with greater force. In addition, many municipalities do not have the necessary experience in the implementation of integration initiatives and the desirability of promoting their interaction with municipalities that have accumulated successful experience. It is therefore necessary OPHRD to promote the implementation and over-municipal projects for Roma integration. They can be on a regional basis or on the basis of partnership between certain municipalities having similar problems. Main beneficiary could be a non-governmental organization or one of the municipalities. The promotion of such projects will be essential to provide sufficient financial resources, i.e. to set a higher maximum limit per project. Particularly important will be this type of projects to be not a juxtaposition of activities in each

municipality, but also to have joint activities and exchange of best practices.

2. Lack of appropriate institutional and administrative framework at national level

Total reform of the administrative and institutional framework for the implementation of the National Strategy for Roma integration is an important task that currently lack political will, but that cannot be delayed too long. Recognized fact is that the National Council for Cooperation on Ethnic and Integration Issues is a structure which no longer perform the functions with which it has been created, and that it needs change. This reform is beyond the powers of OPHRD. What can and should be done within the program is:

2.1. Creating a sub-committee "Roma Integration", responsible for making the selection criteria for operations related to Roma integration. It should also approve the methodology for standardised integration interventions suggested above;

2.2. It is necessary Interdepartmental group to resource Roma integration with EU funds to be restored to the political level, chaired by the Deputy Prime Minister of the absorption of EU funds, with the participation of the respective deputy ministers responsible for OPHRD, OPSESG, OPRG and RDP as well as representatives of Roma organizations. A Sub-committee to the Monitoring Committee of the Partnership Agreement is an appropriate form. Among its key powers should be included the development of selection criteria for integrated operations, combining the resources of two or more programs;

3. Lack of an adequate legal framework for integrated / multi-fund projects: It is urgent opportunities for integrated projects between OPHRD, OPSESG and OPRG / RDP to be created to allow potential beneficiaries to implement projects, by applying and reporting in front of a Managing Authority. The following is necessary for this purpose:

3.1. Change in Decree 107 / 05.10.2014, minimum a change is needed in the art. 30 concerning integrated proposals;

3.2. Establishing mechanisms for coordinated implementation of operations and integrated projects for implementation of projects for Roma integration, supported by OPHRD, OPSESG RDOP / RDP

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