

## Input note

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<b>Topic:</b>	First experiences with EU Funding Programmes from 2021 to 2027
<b>Date:</b>	21 April 2022
<b>To:</b>	EU institutions, relevant partners and stakeholders
<b>From:</b>	<a href="#">CESAER</a>

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The universities of Science and Technology (S&T) united within [CESAER](#) with this input present their first experiences with the EU funding programmes 2021-2027.

This follows our statement [Key messages on the next generation of EU funding instruments](#), our [statement on the EC proposal for the Multi-Annual Financial Framework](#), our [statement on the EC proposal for Horizon Europe](#), our [statement on the EC proposal for Erasmus](#), the [open letter with recommendations on effective funding for inter- and transdisciplinary research](#), and the joint statement [Caution needed on interim analysis of lump sum pilot](#).

With this input, we aim to contribute to the rapid improvement of these programmes by providing quick solutions to fix unintended issues. This input also serves as an early input to the interim evaluations. This note was prepared following consultations with our [Members](#) during summer and autumn 2021, and finalised by our [Task Force Sustainable Funding](#) during spring 2022. While positive aspects of the programmes will be introduced below for each of Horizon Europe and Erasmus+, we first highlight a few cross cutting comments.

## Cross cutting comments

### Navigating in uncharted waters due to a lack of guidance documents

For both Horizon Europe and Erasmus+, our Members have suffered and are still suffering from the late arrival of guidance documents (MGA, aMGA, guidance on the DNSH-principle, information on the impact of foreign interference on R&I-cooperation) and the initial uncertainties and confusions caused by this. This is on top of the uncertainties surrounding Covid-19 for researchers and support staff, which of course is a contributing factor to the delay in publishing key guidance documents which should have been of higher priority than ever given the uncertainty created by the pandemic. Confusion and problems were caused by the lack of guidance documents at the start of the programmes.

- We call upon all EU institutions to ensure that for the next funding programmes, all relevant documents and guidance must be made available from the start.

### Accessibility of data and institutional information

Our association takes an evidence-based and data-driven approach to inform our efforts and support our Members. An important aspect of this is gathering data on the engagement of our Members in EU funding programmes. Securing data related to the framework

programmes in research and innovation (Horizon 2020 and Horizon Europe) involves much needless manual labour. For example using the [CORDIS database](#) and the [Vinnova platform](#) visualisation tool. While these tools are excellent, they often require manual step-by-step approaches for data extraction for further processing and analysis. In general for EU funding programmes, a short-term solution would be provision of a simplified spreadsheet with all data which would allow us to efficiently select the most relevant information for analyses. In the longer-term, however, machine-readable and open access to institutional data related to EU funding programmes (especially Horizon Europe and Erasmus+) for all beneficiaries should be ensured.

In addition, we have identified that information within resources such as the H2020 database and similar resources have several dates in a given annual period where the data is updated. Therefore, it would be helpful to have notification of when these updates occur so that we can utilise the most up-to-date information and work these publications into our planning schedule.

- We call upon the European Commission to ensure that data for participation in EU programmes, notably including the EU framework programmes for research & innovation and Erasmus+, is available in machine readable formats in a timely manner following the [FAIR principles](#), and we offer to provide support and guidance for the European Commission in achieving this goal.

### **Align with usual accounting practices and cover real costs**

We reiterate our [previous call](#) that simplification efforts must be holistic and aim to improve the beneficiaries' experience in the programme, notably by ensuring effective implementation of the acceptance of usual cost accounting practices, and enabling cross-reliance on audits. This also includes ensuring [\(i\) caution on the interpretation of the interim analysis, and \(ii\) to await the final and thorough evaluation of the pilot](#). The aim must be to establish a culture of trust.

### **Reduce admin burden and ensure sustainability for European University Alliances**

Recalling our previous positions to [Advancing the European Strategy for Universities' Flagship Initiatives](#) and to [Enable universities to release transformative forces](#), we highlight that the current approach towards the European University Alliances being partly funded by different programmes at different levels (regional, national and European) through a short-term, project-based approach is causing increasingly growing administrative burdens and restricting what the European University initiative can achieve. It is vital that we move towards a sustainable approach, including moving from a project-level to programme-level approach.

## Synergies and complementarities

We welcome enhanced synergies and complementarities with [ESIF](#) and [RRE](#), and stand ready to provide support and expertise of our association and our Members to advance this important area.

## Horizon Europe

In the consultations, our Members indicated that they particularly like the following aspects of the programme:

- The introduction of the right to react mechanism;
- Open Science novelties;
- strengthened support from the NCPs for Widening, more specifically for the EU-13;
- The logic of the proposal template; and
- The webinars and the [Horizon Europe info days](#)

We would like to suggest these [immediate recommendations](#) for improvement:

- Webinars (e.g. the [Horizon Europe info days](#))
  - to definitively continue them;
  - to provide shorter webinars instead, with a maximum of 2 topics treated in depth;
  - to develop a webinar on Open Science content in templates.
- Widening
  - to add the list of Widening countries to the manual and/or the programme guide instead of only providing the list in the work programmes.
- Impact
  - to provide examples of the project's pathways to impact;
- Length of proposal templates
  - a page limit is welcome, but we would like to ask for: (i) more flexibility for large consortia (including exceptions to the page limit for supplementary information where needed); (ii) to help our EU support staff to get a clear view on the exceptions to the page limit
- Model Grant Agreement
  - to improve readability by making it more interactive;
  - allow users to apply filters.
- Qualitative inter-/trans- and multidisciplinary
  - inspired by the way of working for gender, start indicating in the Horizon Europe work programmes when it is **not** an obligation to consider collaborating with SSH researchers instead of using the 'SSH sentence';
  - increase the communication, interaction and cooperation with SSH communities, with – amongst others – the aim of reaching qualitative SSH integration from the drafting phase of orientation papers and work programmes onwards.
- Lump sum financing
  - [caution is needed on the interim analysis of the lump sum pilot](#);

- better guidance for lump sum projects, including guidance for the consortium agreement phase.
- Availability of guiding documents
  - publish the first version of the annotated Model Grant Agreement as soon as possible, since beneficiaries need the annotations to be able to start reporting
  - Show a maximum of flexibility towards reporting since the publication of the aMGA has been substantially delayed.
- Exclusions of entities from third countries
  - Communicate this information at the latest the same date as the publication of the work programmes.
- Provide clarity on European Innovation Council (EIC) inventorship concerns
  - On [page 124](#) of the Horizon Europe Model Grant Agreement it is stated that EIC inventors ‘are granted indefinite access rights for exploitation purposes at non-profit legal entities’. This provision is not aligned with internal policies at many universities, incompatible with national and regional law in some EU member states and therefore risks creating practical issues and extra ‘red tape’. This creates uncertainty which risks slowing down valorisation approaches.
- Use clear and fair criteria for a consistent strategic portfolio approach
  - Start to implement the decision implementing the Horizon Europe Specific Programme the correct way regarding the portfolio approach. The specific programme specifies that “programme managers oversee the implementation of [EIC] Pathfinder and Accelerator calls, and provide opinion to the expert evaluation committees, based on clear and fair criteria and in view of a consistent strategic portfolio of projects, expected to make essential contributions to the emergence of potential societal or economic market-creating innovations.”

## Erasmus+

- We welcome the programme structure and the new Actions, especially the clearer structure and cohesion between Actions. However, for some Actions a need to clearly indicate the target groups or possible crossovers between different sectors remains.
- As with Horizon Europe, we would like to highlight that the programme was launched on an unannounced date, and that the deadlines were very short, especially for the first calls. In spite of some information released earlier, there was too little time to prepare sufficiently and to plan institutional information sessions in a timely manner.
- Evidently there is margin for improvement in coordination between DG EAC, EACEA and the different NAs in spreading information and providing support.
- Digitalisation holds the promise of administrative simplification, but comes with considerable efforts to implement. Extra time throughout the project life cycle should be granted to adjust to the new digitised administrative systems, and support should be provided. This is true for both the mobility procedures, as well as for both platforms for project applications (Funding & Tender Platform, Erasmus+ and the European Solidarity Corps Platform). The latter severely impacts project preparation and implementation and technical issues are to be avoided at all costs. The related

procedures are to be designed with simplification for the users in mind and consistency between Programme Guide rules and the Platform is a must. In particular, we point to the fact that the standardised project management structures are not always suited for education activities.

- In general, for the HE sector the limited budget in the first year of the new programme reflected badly on the Commission, which had communicated positively on the overall Erasmus+ budget prior to launching the programme. There's some irony to the fact that COVID-19 reserves saved the day in some programme countries.
- We call for streamlining budgeting / funding mechanisms across Actions, but with the strong caveat that the effects of introducing the lump-sum funding model are closely monitored. Indeed, first feedback shows that the workload during the project preparation phase is certainly not reduced. Moreover, a lack of clarity remains over the impact of grant reduction mechanisms after the project implementation phase.
- Opening up KA131 to non-programme countries is welcomed. The 20% budget limit appears to be sufficient, provided that KA171 funding also becomes available. Allowing funding for incoming mobility should also be considered for specific global regions, perhaps drawing inspiration from the approach with '[widening countries](#)' under Horizon Europe or the rules already established under KA171's International Credit Mobility predecessor.
- The addition of blended short-term mobility and blended intensive programmes is welcomed, with a high potential being recognised, but there was very little preparatory time at the start of the programme.
- The new funding model for EMJMs is welcomed, providing a clear incentive for attracting additional students beyond EMJM grantholders, though the absence of a clear ceiling or reference point for consortium-level tuition fees may complicate negotiations among partners. The adapted rule on the geographical spread of EMJM scholarship holders (10% max. of the same country) may unnecessarily complicate recruitment of high quality students. The new Design Measures action is welcomed, but the application process is disproportionate for the level of funding. The weight of the criterion 'priority to states and institutions not involved in EM' would benefit from clarification.

For more information and enquiries, please contact our Senior Advisor for Learning & Teaching [Lloyd Anthony Huitson](#) or our Deputy Secretary General [Mattias Björnmalm](#).