ASSESSMENT OF APPLICABILITY OF COUNTERFACTUAL EVALUATION METHODS AND AVAILABILITY OF STATISTICAL DATA TO EVALUATE THE IMPACT OF EU STRUCTURAL SUPPORT

EXECUTIVE SUMMARY

Contractors:

PPMI
PUBLIC POLICY AND MANAGEMENT INSTITUTE

PPMI
GROUP

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The goal of this evaluation is to improve the quality of evaluation activities in Lithuania. The evaluation is aimed at assessing the feasibility of applying counterfactual impact evaluation (CIE) and the related methods for evaluating impacts of EU structural support measures. As part of the assignment, the evaluator assessed the quality and accessibility of data needed for CIE and proposed recommendations for the 2014-2020 programming period.

Counterfactual impact evaluation is a quantitative impact assessment method that enables estimation of the impact of a given policy. This is achieved by comparing the results or impacts of two very similar groups, one of which benefited from an intervention (i.e. treatment/target group), whilst the other did not, despite being eligible for the particular type of assistance (i.e. control group). CIE compares the situation change between the two groups at a given point in time. In this sense, the behaviour or the results achieved by the control group constitute what is called *the counterfactual* – i.e. a situation that shows what would have happened to the target group, had it not participated in the intervention. If the assumption of direct comparability between the two groups holds, CIE gives a robust estimate of the impact. As a result, counterfactual analysis methods allow for computation of impacts of public policies (e.g. support to SMEs) in specific areas of intervention (e.g. creation of jobs), at the same time controlling for intervening factors (e.g. macroeconomic trends) that might affect the observed results.

During the evaluation, the evaluation team analysed all measures (i.e. 194 at the time of analysis) of the 2007-2013 programming period. In addition, the evaluator reviewed a series of studies, evaluations, methodological guidelines, and various articles related to counterfactual impact evaluation of EU structural support, including Cohesion Policy. Further analysis entailed reviews of data availability, suitability and accessibility in Lithuania, following which the evaluator conducted a detailed analysis of the national laws that legislate personal and confidential data in Lithuania. A round table discussion was held to discuss issues related to data availability and accessibility. The discussion was attended by all major stakeholders. More than 40 interviews were held to accomplish various tasks of the evaluation. Finally, 3 case studies examined experiences of the European Commission and EU Member States (i.e. Italy and Poland) in the related areas. Based on this work, the evaluator drafted proposals for the use of CIE in the 2007-2013 and 2014-2020 programming periods and prepared detailed methodological guidelines for the Lithuanian authorities and the evaluation community.

Context of the evaluation

The economic realities of the recent past meant that EU policy has become increasingly evidence-based and driven by desire to maximise the benefits of EU structural support. This process raised the need to justify the investments made, which in turn, increased the demand for robust evaluation methods. In 2009, the Barca[1] report emphasised that the established practise of treating monitoring indicators as impacts was often not justified. Conventional impact assessments are not always able to adequately assess the intermediate factors that might influence the observed results. In 2010, the Fifth Cohesion Report[2]

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[1] Barca, F., "An Agenda for a Reformed Cohesion Policy", European Commission, 2009, p. 179-181

[2] „Fifth Report on Economic, Social and Teritorial Cohesion. Investing in Europe's future", COM(2010) 642/3
http://ec.europa.eu/regional_policy/sources/docoffic/official/reports/cohesion5/index_en.cfm

highlighted the need for increasing the effectiveness of the implemented policies and urged implementation of interventions whose impacts were backed by sufficient evidence. The Report states that for this purpose it is first necessary to improve the existing monitoring and evaluation systems that would allow use of rigorous evaluation methods, including CIE. As a result, the European Commission and EU Member States have started preparing for the application of CIE in the forthcoming programming period.

Although the first counterfactual impact evaluation was successfully delivered in Lithuania in 2011[3], CIE has not yet become systematically applied. Often insufficient, inadequate or inaccessible data prevent wider application of the methods. What is more, those data issues and general lack of knowledge about CIE have contributed to the application of second-best methodologies that in some cases produced controversial and questionable results. As a result, this evaluation is a timely contribution that will enhance the quality of future evaluations of EU structural assistance in Lithuania and will contribute to better reporting and accountability to the European Commission, the Lithuanian authorities and the wider public.

Main conclusions, suggestions and recommendations of the evaluation

Analysis of priorities and measures of the 2007-2013 programming period showed that the programmes with the best potential for applying CIE was in Human Resources Development Operational Programme (HRDOP), priority axis 1, and in Economic Growth Operational Programme (EGOP), priority axes 1 and 2. Table 1 outlines the list of priorities and measures where all key factors (e.g. intervention design, availability of data) are in favour of CIE.

Table 1. Measures of the 2007-2013 programming period where CIE methods can be readily applied.

Priority	Measure
HRDOP, priority axis 1: Attraction and Retention of People in the Labour Market	• "VP1-1.1-SADM-08-K. Promotion of Entrepreneurship" • "VP1-1.1-SADM-09-V. Reorientation of Workforce in Rural Areas from Agriculture to Other Activities" • "VP1-1.2-SADM-01-V. Integration of Jobseekers Into the Labour Market" • "VP1-1.2-SADM-02-V. Establishment and Implementation of Vocational Rehabilitation System for the Disabled" • "VP1-1.3-SADM-02-K. Integration of Persons at Social Risk and Socially Excluded Persons into the Labour Market"
EGOP, priority axis 1: Direct and Indirect Assistance to R&D and Innovations and Investment Promotion	• "VP2-1.3-ŪM-01-K. Idea LT" • "VP2-1.3-ŪM-02-K. Intellect LT" • "VP2-1.3-ŪM-05-K. InnoVoucher LT"
EGOP, priority axis 1: Increasing Business Productivity and Improving the Business Environment.	• "VP2-2.1-ŪM-01-K. Leader LT" • "VP2-2.1-ŪM-02-K. E-business LT" • "VP2-2.1-ŪM-04-K. New Opportunities" • "VP2-2.2-ŪM-03-V. Assistant-3" • "VP2-2.3-ŪM-01-K. Holding Funds" • "VP2-2.3-ŪM-02-V. Partial Financing of Loan Interest" • "VP2-2.3-ŪM-03-V. Guarantee Fund"

Based on these findings, it is recommended that CIE be applied in ex-post evaluations of the aforementioned measures of the 2007-2013 programming period.

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[3] Public Policy and Management Institute, "Evaluation of Social Integration Services for Socially Vulnerable and Socially Excluded Individuals for the Effective Use of the EU Structural Assistance for the Period of 2007-2013", the Ministry of Social Security and Labour, 2011

Table 2. Recommendation 1. Counterfactual impact evaluation should be applied in ex-post evaluations of HRDOP, priority axis 1, and EGOP, priority axes 1 & 2 measures.

Interventions where CIE should be applied in ex-post evaluations	Additional conditions and issues	Addressees	Timeline for implementation
Measures listed in Table 1.	The relevant technical specifications should focus on specific, narrow "what works?" questions (e.g., how many *additional* jobs did measure X create? How much EU structural support was spent per additional job created?). The specifications should avoid asking wide-sweeping, general questions that cannot be answered by CIE alone (e.g., what was the impact of measure X on the development of human resources in Lithuania?). Qualitative and quantitative methods should be triangulated in case the contracting authority decides to include additional "why and how" questions in the specifications. Obtaining the required data would inflict additional administrative burden on organisations that collect and store them. Therefore, the specifications should take into account the possible need to compensate for the burden caused (especially in cases where data providers charge fees for services provided).	The Ministry of Finance and intermediary bodies	2013–2016

It was also found that CIE could, in principle, be applied in a number of other interventions, including HRDOP priority axes 2 and 3, as well as two measures in Cohesion Promotion OP priority axis 1 aimed at renovation of multi-storey buildings and improvement of their energy efficiency. However, although these interventions satisfy all conditions necessary for CIE, actually carrying out such evaluations would be highly challenging due to the lack of systematically/centrally collected data on the key indicators for analysis. As a result, the contracting authorities should in future take into account these limitations when preparing the evaluation plans for the 2014-2020 programming period. During the drafting phase of the future evaluation plans, it should be carefully assessed whether the main obstacles for CIE will have been lifted before the initiation of the respective evaluations (for more details on the key obstacles, please see Annex 2 of the report).

Table 3. Recommendation 2. In preparation of the evaluation of the EU structural 2014-2020 period, evaluation plans should take into account the following possibilities to use CIE.

Intervention type	Additional conditions and issues	Addressees	Timeline for implementation
Interventions whose logic will be similar to measures from HRDOP, priority axis 1 (with a focus on the integration of jobseekers and the employed into the labour market).	No key obstacles or issues found.	The Ministry of Finance and intermediary bodies	2013–2020
Interventions whose logic will be similar to measures from HRDOP, priority axis 2 (with a focus on lifelong learning activities for particular target groups, including early school leavers)	During the planning phase of the evaluation, it should be checked whether centrally collected data became available on a person's occupation and/or education level.		
Interventions whose logic will be similar to measures from HRDOP, priority axis 3, especially ones that target employment or reintegration of researchers and highly skilled workers.			

Interventions whose logic will be similar to measures in EGOP priority axes 1 and 2.	No key obstacles or issues found.		
Interventions whose logic will be similar to measures in Cohesion Promotion OP, priority axis 1 (including two measures focusing on renovation of multi-storey buildings and improvement of their energy efficiency).	In preparation of the evaluations, the contracting authority should assess the likely cost of implementing CIE for measures "VP3-1.1-AM-01-V. Jessica Holding Fund" and "VP3-1.1-VRM-03-R. Renovation of Multi-storey Buildings Aimed at Improving their Energy Efficiency". A large part of the data needed for analysis is only available in text format. With respect to the data on the control group (including the data on renovation works completed in each building), the evaluators would have to contact administrators of each building included in the control group. At the same time, the contracting authority should also acknowledge the very high added value of CIE. In the on-going discussions on the housing renovation programme, CIE could provide robust evidence on its financial and economic returns to the public.		

The evaluation found that CIE is not applicable in evaluations of horizontal interventions (e.g., equal opportunities and similar). As the effects of such interventions are felt across the whole population, it becomes almost impossible to find a group of potential beneficiaries who would be in most ways comparable to the treatment group. Counterfactual methods are also not useful for assessing the impacts of very broad interventions, such as a whole programme (e.g. HRDOP). However, CIE may be used as a part of a broader assessment initiative. For example, an ex-post evaluation of the 2004-2006 programming period in Poland[4] used CIE for the evaluation of interventions that were aimed at employment services and integration of jobseekers into the labour market. Practice shows that thematic evaluations can provide robust evidence on the impacts of different interventions that target the same groups or for the same goal, as well as estimates of their cost-effectiveness. Such evidence brings significant added value to policymakers when planning future interventions and funding priorities. As a result, despite the potential risks of implementing thematic evaluations (see Table 4), the evaluators recommend using CIE in ex-post evaluations of both this and the future programming periods of EU structural support.

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[4] „PAG Uniconsult and the Ministry for Regional Development, "Evaluation of Values Achieved for Outcome Indicators of the Regional Component of the Human Capital Operational Programme", Poland, May 2012

Table 4. Recommendation 3. Ex-post evaluations of the 2007-2013 and/or 2014-2020 programming periods should include at least one thematic CIE that would cover several measures of the same OP.

Type of intervention	Additional conditions and issues	Addressees	Timeline for implementa-tion
The proposed thematic evaluations could include: • Thematic evaluation of ESF's response to the economic crisis, including the actions taken to mitigate the crisis and to fight unemployment. • Thematic evaluation of HRDOP priority axis 1, including measures where CIE can be readily applied • Thematic evaluation of EGOP priority axes 1 and 2, including measures where CIE can be readily applied	For example, the thematic evaluation of ESF's response to the economic crisis would analyse a set of measures aimed at integration of jobseekers into the labour market. The analysed impact indicators would be a person's employment status, wage rate, annual income and similar. Considering the wide diversity of the implemented interventions to date, the evaluation could be split into several smaller sub-evaluations (e.g., if one analysed intervention targeted highly skilled individuals that needed retraining, the control group would include persons with the same level of qualification that registered in the Lithuanian Labour Exchange; if the target group in another intervention consisted of low-skilled persons who participated in the public works programme, the control group would be formed out of persons who had similar qualifications and had not been employed for a similar period of time, etc.). Analysing several interventions at a time would help determine which measures achieved the largest effect and were the most cost-effective. Such evaluation would provide very valuable evidence and would allow comparing alternative policies in a direct manner. For example, how much of EU structural support was spent to create one additional job in retraining activities for the highly-skilled? Similarly, how much of the support was spent per one additionally created job in the public works programme? As a result, thematic CIE can provide reliable evidence on the effects of several different interventions for the same target group and the intended purpose, as well as their cost-effectiveness. Such evidence becomes particularly useful for planning future interventions. However, it is also important to take into account the possible risks of such evaluations. A large-scale and thematic CIE would be much more complicated to implement as compared to an evaluation of a single measure. First of all, thematic CIE would entail detailed analyses of several measures' intervention logics, following which a set of common indicators would have to be determined. Another methodological difficulty would be to find directly comparable treatment and control groups, especially if the treated or non-treated also participated in other similar activities. Another key challenge would be to collect good quality data for several interventions at once even though the data might be stored in several different databases serving different purposes. As thematic CIE would analyse several interventions at a time, it is likely that the data providers will have to extract information on tens of thousands of data entries. The contracting authorities should thus take into consideration the additional administrative burden that would be caused by thematic evaluations. Likewise, the contracting authority should be prepared to	The Ministry of Finance and intermediary bodies	2013–2016

| | | mediate between the evaluator and the data providers during thematic CIE evaluations. | | |
| | | Thematic CIE would require considerably large time and financial resources, hence the evaluations should be linked to a programme-level evaluation to ensure that adequate resources are dedicated for timely and of high quality execution of thematic CIE. | | |

CIE indicators

The evaluation found that the majority of CIE-oriented output and result indicators of the monitoring system (i.e. indicators that implicitly or explicitly measure behavioural change) were present in HRDOP priority axis 1 and EGOP priority axes 1 and 2. On the other hand, measures in HRDOP priority aces 2 and 3 had a general lack of behavioural-change-oriented output and result indicators, even though in some cases the evaluators found that such indicators could be determined. As a result, the evaluators recommend setting more of these indicators and including them in the national monitoring system of EU structural support. The identification of the indicators would help to prepare in advance (i.e. right from the planning phase) for the development of the measures' intervention logics and the measures' likely impact on the end users.

It must be emphasised that the monitoring system should not compute estimates of the impact indicators in an automatic way. Carrying out monitoring of the impact indicators (i.e. in real time, as it is done on the website esparama.lt) would be extremely difficult and expensive, since it would require systematic and regular collection of data on the control group. In addition, the monitoring authorities would have to pick in advance a CIE method that would provide correct estimates of impacts. As it is extremely difficult to foresee the exact type of selection bias that will occur in an intervention before it is implemented, the automatic estimation of the impacts would risk producing misleading evidence. Our proposal is thus to include a set of behavioural-change-oriented indicators that would be assessed 2-3 times during an intervention. This could be achieved via on-going/mid-term evaluations that would implement CIE and other evaluation methods. The results of these evaluations would be entered into the monitoring system of EU structural support[5].

Table 5 outlines the proposed indicators that could be used for the calculation of the impacts. According to a draft guidance paper issued by the Commission on the monitoring and evaluation of Cohesion Policy[6], the result indicators of the 2014-2020 programming period will also have to take into account the influence of other (intervening) variables. The proposed indicators would thus be included into the monitoring system as result-level indicators. The responsible authorities should take into consideration the likely increase in administrative burden as a result of this proposal. The impacts of interventions (i.e. comparison of results between the target and the control groups) will be carried out by an independent evaluator, using CIE or another suitable approach. During 2014-2020, this could be implemented in the evaluations of the achievement of intermediate goals (i.e. milestones) in 2016, 2018, 2020 and in the succeeding years. Using

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[5] Indicators of the monitoring system of EU structural support can be of two types, including the "estimated" ones which rely on data provided in project beneficiaries, as well as the "entered" ones, which can rely on external sources of information such as evaluations

[6] European Commission, „Monitoring and Evaluation of European Cohesion Policy – European Regional Development Fund and Cohesion Fund – Concepts and Recommendations", Draft Guidance Document, November 2011.

this approach, CIE would become an external source of information to the monitoring system of EU structural support.

Table 5. Recommendation 4. During the planning and implementation of the 2014-2020 period interventions, more behavioural-change-oriented indicators should be included in the monitoring system of EU structural support. The indicators' values would be estimated 2-3 times during an intervention.

Examples of indicators	Additional conditions and issues	Addressees	Timeline for implementation
Interventions aimed at integrating jobseekers and the employed into the labour market: • Additional number of jobs created. • The average change in wage/earnings (in comparison to the control group). • Average number of days worked (in comparison to the control group). • Average number of workplaces changed (in comparison to the control group). *Interventions aimed at lifelong learning activities:* • Students returning to school (in comparison to the control group). • Persons who have completed secondary/tertiary education and/or training (in comparison to the control group). • Increase of average grade in the target group (in comparison to the control group). *Interventions aimed at formal or informal education:* • Persons who have completed secondary/tertiary education and/or training (in comparison to the control group). • Persons involved in stage II or III studies, (in comparison to the control group). • Persons who continue formal or non-formal education activities (in comparison to the control group). *Enterprise support interventions:* • R&D intensity/R&D as a proportion of turnover/innovation intensity (in comparison to the control group). • Patent activity (in comparison to the control group). • Productivity growth (in comparison to the control group). • Export growth (in comparison to the control group).	Once the impact indicators are estimated, it would be useful to conduct additional cost-effectiveness analyses that would determine the unit costs of each achieved impact (e. g. how much of EU structural support was spent on one additionally created job?) The impact indicators would be estimated two or more times during an intervention through use of centrally collected administrative data. It should be ensured that the analysed impact indicators are closely in line with the intervention logic of a given measure. Contracting authorities should further consider the likely costs of collecting data on the impact indicators if the data are not collected centrally (e.g. data on early school leavers; data on the renovated multi-storey buildings etc.). The authorities should thus take into account the level of administrative burden that would fall on the shoulders of data providers and the likely time and financial costs induced by evaluators. A detailed list of indicators is provided in Annex 2 to the report.	The Ministry of Finance and intermediary bodies	2013–2022

- Profit growth (in comparison to the control group).
- Investment activity (in comparison to the control group).
- Number of employees (in comparison to the control group).

Interventions aimed at improving energy efficiency of multi-storey buildings:
- Cost of heating of 1 square meter of living space (LTL) (in comparison to the control group).
- Price of 1 square meter of living place (LTL) (in comparison to the control group).

Table 6. Recommendation 5. On-going/mid-term should be implemented in order to estimate the values of the impact indicators. The estimated values would be entered into the monitoring system of EU structural support.

Examples of interventions	Additional conditions and issues	Addressees	Timeline for implementation
On-going/mid-term evaluations will be conducted for interventions where the impact indicators will be determined during the planning phase of the future programme.	During the preparation of technical specifications of evaluations, it should be checked whether sufficient time has elapsed for there to be enough time for the expected outcomes of interventions to occur. For example, if certain enterprise support measures will be implemented in 2015-2017, it will be unfeasible to kick-start an on-going evaluation in 2016, because the projects will not have been finalised by then. On the other hand, evaluating interventions aimed at integrating jobseekers into the labour market may be viable in 2016 if the training will have taken place in 2015. The added value of such evaluation would be particularly high if similar training activities were planned in 2017-2018. The analysed impact indicators should be closely in line with the intervention logic of a given measure. A detailed list of the impact indicators is provided in Recommendation No. 4 and in Appendix 2.	The Ministry of Finance and intermediary bodies	2013–2022

Existence of directly comparable target and control groups

The analysis of measures of the 2007-2013 programming period found some measures where it was not possible to construct directly comparable treatment and control groups. As a result, it was not possible to apply CIE for their evaluation. Such example was found in several measures Cohesion Promotion OP priority axis 2, including interventions aimed at improving healthcare infrastructure. The evaluator found that those measures targeted all persons who were eligible to receive that particular type of support. All in all, finding directly comparable control groups for the treated was identified as by far the most challenging part of CIE. The risk of not constructing a directly comparable control group increases in situations where the data on

the key characteristics, that determine the likelihood of getting enrolled in an intervention, are not available or are not collected.

The evaluation report and the methodological guidelines (see Section 4.2.2) indicate that the experimental approach is best suited for constructing directly comparable target and control groups. If the method is executed correctly, the target and control groups become identical in all properties except for the fact that some members of the intervention receive treatment, while others do not. As a result, the evaluator recommends planning and implementing experimental interventions in the 2014-2020 programming period, especially in the areas of employment, education, enterprise support for SMEs and healthcare.

Table 7. Recommendation 6. During the 2014-2020 programming period, a few small-scale interventions should be introduced in the areas of employment, education, enterprise support for SMEs and education. The interventions should be planned and implemented based on the logic of experimental design.

Examples of experimental intervention design	Additional conditions and issues	Addre-ssees	Timeline for implement ation
Example: an experimental approach in the area of healthcare. Currently a lot of resources are spent on healthcare, including on breast cancer prevention programmes. The aim of an experimental intervention would be to find out whether one of the widely practised means for the prevention – distribution of leaflets and information brochures on breast cancer - was effective. In order to verify the effectiveness of these measures, the evaluators randomly select 2000 mail addresses, 1000 of which receive the publications whilst the other 1000 do not. Subsequently, the evaluator monitors both groups via the national population register and the national health insurance database to see how many persons in both groups went to hospitals to have checks for breast cancer, how many came back for the same checks next year and so on. If the experiment is implemented properly, it can provide robust evidence on the impact of the analysed intervention aimed at breast cancer prevention. If there is enough evidence to support the benefits of the programme, it could be implemented nationally. *Example: an experimental approach in the area of enterprise support to SMEs.* A significant part of EU structural assistance to Lithuania was spent on enterprises. The accumulated evidence on the effects of similar interventions in other EU countries shows that particular intervention (e.g., non-repayable grants to business) are less effective than other interventions (e.g., loans, interest rate subsidies etc.). In addition, the impacts are often the largest for SMEs, whereas for large enterprises the support had no significant effect. Certain forms of experimental design can be adopted to provide evidence on the impacts of enterprise support in Lithuania. **Example 1.** Upon receiving applications from firms, the implementing authority assesses their eligibility for support. Projects that attracted funding are randomly selected into two groups, one of which starts its projects 1 year later than the other. In this case, the treatment group consists of projects launched in year N and the control group consists of projects launched in year N +1. When projects in the treatment target group are completed (e.g., in year N + x),	It is necessary to prepare in advance for the implementation of the experiment in planning and implementing the 2014-2020 EU Structural Funds interventions (particularly in employment, education and health).	The Ministry of Finance and intermediary bodies	2013–2016

projects in the control group projects will be still on-going. By comparing the two groups of firms in the subsequent years (e.g., in terms of number of jobs created), one can accurately estimate the number of additional jobs that were created as a result of the intervention. **Example 2.** Upon receiving applications from firms, the implementing authority assesses their eligibility for support. All successful projects are launched in the same year. However, for example, half of the beneficiaries receive an offer that, if their projects exceed the project plans by a certain amount (e.g. 25 percent), they would receive a 5-percent increase in their project's co-financing rate. The other half of the projects are implemented as before (i.e. they do not receive the offer). By comparing the two groups in the subsequent years, one can determine whether the assigned premiums to co-financing rate encourage companies to achieve better results in their projects. The proposed experiment can be further developed in order to find out the most effective rate of premium. An increase to the co-financing rate of 5 percent may be too small or generous to the beneficiaries. As a result, the treatment group could be divided into three subsets where each was offered a different increase to the co-financing rate (e.g. 1/3 of the group would receive a 5 percent increase, 1/3 would receive a 10 percent increase and the remaining 1/3 would receive a 15 percent increase). By comparing the results of the different subsets of the treatment group with those of the control group, one could find the rate that would yield the best return for the investor. If there is enough evidence to support the benefits of the programme, it could be implemented nationally.			

Ability to plan interventions and perform CIE

The evaluation found a number of pilot projects implemented in Lithuania whose logic resembled that of an experimental intervention. For example, in 2012, the Ministry of Social Security and Labour introduced a new employee motivation system in several territorial units of the Lithuanian Labour Exchange. In the pilot system, employees were awarded bonuses based on their performance. However, while this project satisfied virtually all features needed for an experimental intervention, the Lithuanian Labour Exchange did not perform random selection of employees that participated in the pilot project. Hence, despite the increasing need for reliable evidence on the effectiveness of interventions, experimental interventions have to this date been not fully implemented due to the lack of knowledge about the application and value added of experimental interventions.

Similar challenges exist in the area of quasi-experimental methods. In order to strengthen the CIE methodological framework, the European Commission issued guidelines for CIE[7] in 2012. A systematic review of the methodological approaches and the implemented CIE are presented in the Commission's interactive online resource EVALSED[8] and in DG REGIO's Impact Assessment Centre[9]. In addition, the Commission organises regular training courses and seminars for officials and evaluators from across the EU. The activities are seen as a key tool for ensuring the continuity and demand of CIE at a national level. As a

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[7] Morris, Stephen, Herta Tödtling-Schönhofer, Michael Wiseman, „The Design and Commissioning of Counterfactual Impact Evaluations A Practical Guidance for ESF Managing authorities. Draft", contracted by the European Commission, DG Employment, June, 2012.

[8] EVALSED can be found here: http://ec.europa.eu/regional_policy/sources/docgener/evaluation/evalsed/sourcebooks/method_techniques/index_en.htm

[9] DG Regio's Impact Evaluation Centre: http://ec.europa.eu/regional_policy/information/evaluations/guidance_en.cfm#2

result, the evaluators recommended carrying out regular training sessions and seminars in Lithuania that would involve officials from various public authorities responsible for the planning, implementation and evaluation of EU structural support. Recently, the first training activities and events of this king have been initiated in Lithuania. To maintain and strengthen the institutional demand for CIE, it is recommended to organize similar events in the future.

Table 8. Recommendation 7. Training of officials from public authorities should be initiated and continued with respect to CIE and its added value

The main training topics	Additional conditions and issues	Addressees	Timeline for implementation
Training title: "Counterfactual impact evaluation methods for assessing the impact of EU structural support." *The main training topics:* objectives, purpose, application and added value of CIE (including experimental intervention design).	Each year, at least one training event or seminar should be organised where issues related to CIE would be discussed. The events would introduce participants to the theory and practice of CIE. If feasible and required, the events could attract experts from abroad. The training activities should be run in areas where CIE (including the experimental interventions) are most applicable (i.e. in the areas of employment, education, enterprise support and healthcare).	The Ministry of Finance and intermediary bodies	2013–2022

Availability of adequate and appropriate data in Lithuania

The evaluation found that virtually all data needed for CIE were collected in a number of national registers and databases. Information about a person's qualifications and occupation are not centrally stored, however, which is the main reason why CIE was not feasible to implement in certain interventions (i.e. HRDOP priority axes 2 and 3). It was found that the data on qualifications – a key data sufficiency problem at the moment - will become centrally collected via the Ministry of Education's initiated project "Qualifications Map". Centrally and continuously collected data on a person's occupation will remain a key obstacle for the application of CIE, however attempts to collect these data nationally should be weighed against the costs of obtaining them.

Application of CIE in Lithuania is by and large restricted by the fact that the methods often need personal and/or confidential data whose use is strictly regulated by the national data protection laws. To this end, the evaluation analysed three ways for transferring the data to an evaluator (see Annex 3 of the report), including all personal and confidential data being sent directly to an evaluator (see model C); a model where all data are received, processed and anonymised by a public institution (i.e. usually the contracting authority), which then sends the anonymised data to an evaluator (see model B); as well as a decentralised data processing model where an evaluator receives anonymised data separately from each data provider (see model A).

The evaluation found that personal or confidential data *could not be provided* either directly to an evaluator, or to any *single* public institution, if an evaluation was carried out by an independent evaluator. In order to solve this restriction, one would need to amend the existing legal acts, including the Personal Data Protection Act. For this reason, the evaluator proposes to use model A which would not require data providers to send personal or confidential data to any third users. Under the proposed scheme (see model A in Annex 3), each data provider would gather the requested data, anonymise them and then send them

to the evaluator. To facilitate this process, it is necessary to ensure smooth cooperation between the different institutions providing the data, especially in cases where data need to be collected from a few different registers or databases.

All in all, even though the existing legislation permits to use anonymised data for the evaluation of EU structural support, there is a general lack of legal framework and established practises that define how data providers cooperate with each other and transfer data to evaluators. Practice shows that getting the data for CIE can become burdensome and riddled with lengthy discussions and negotiations between evaluators and data providers. As a result, the evaluation recommends establishing clear and explicit rules that would legislate the use and provision of data for evaluations, in accordance with the regulations set at an EU level obliging EU Member States to provide all necessary resources necessary for carrying out evaluations.

Table 9. Recommendation 8. In order to improve access to data, the authorities in Lithuania should adopt the required changes that would define and legislate the process of obtaining and using data for evaluations. The process of obtaining data for such purposes should be clearly defined.

Required legislative changes and amendments	Additional conditions and issues	Addressees	Timeline for implementation
In the Rules for Responsibilities and Functions of 2014-2020, the related parts should incorporate the following statement from EU regulations: • At present, Article 47 in the Commission's Proposal for a Regulation No. 1083/2011 outlines this as follows: Member States shall provide the resources necessary for carrying out evaluations, and shall ensure that procedures are in place to produce and collect the data necessary for evaluations, including data related to common and where appropriate programme-specific indicators. The Rules for Responsibilities and Functions (2014-2020) should clearly outline the right of external independent evaluators to carry out evaluations of EU structural support, as outlined in Article 47 in the Commission's Proposal for a Regulation No. 1083/2011. The Rules for Responsibilities and Functions (2014-2020) should define duties for data providers to cooperate when providing requested data for evaluations. The Rules for Responsibilities and Functions (2014-2020) should define duties for data providers to supply anonymised data for evaluations. The document should also clearly describe the process during which data providers would gather, anonymise and send requested data to evaluators. The responsible authorities should also assess the feasibility of signing contracts/agreements with data providers for obtaining data for evaluations. Such agreements should include legal basis for receiving requested data, objectives of using them, frequency and periodicity of data requests, payments for services and other provisions. In order to avoid potential fragmentation and inconsistency of contractual provisions, the Managing Authority should monitor the process.	Using data stored in national registers and other public databases for evaluation purposes is still a new and uncommon procedure in Lithuania. In particular, many legal and administrative difficulties arise when one needs to obtain and merge data from different databases. While this evaluation report and Annex 3 of the report provide a clear and realistic approach, overcoming actual obstacles and setting the practise for obtaining data for evaluations will take at least a few more implemented evaluations.	The Ministry of Finance and intermediary bodies	2012–2014