How different multi-level and multi-actor arrangements impact policy implementation: Evidence from EU regional policy

Title Page

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Abstract. While the implementation through Multi-level Governance (MLG) has often been found to have achieved limited success, the literature agrees that further studies are required to investigate if and how different MLG systems impact policy implementation. By collecting data from the implementation of four EU regional development programs, characterized by distinct organizational and institutional arrangements, this article adopts a performance-oriented approach to EU implementation in order to support or challenge the conventional assumptions about the expected benefits of MLG. Our data suggests that effective MLG needs a central coordinating authority that has the power to: enforce decentralized actors' compliance, mobilize the implementation bodies, and, provide actors with adequate organizational structures and the resources that they lack.

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1. Introduction

Does Multi-level Governance (MLG) improve policy implementation? How do different MLG systems impact on policy implementation? Despite recent developments in the field, the political scientist literature agrees that only partial answers have been given to these interrelated research questions, to which this article intends to respond.

Implementation arrangements and structures are of long-standing concern in public policy and public administration research. Since the 1970s, in fact, political scientists have been interested in the impact of multi-level and multi-actor arrangements on policy implementation (Hanf & Scharpf, 1978; Matland, 1995; Pressman & Wildavsky, 1973; O'Toole 1986, 2000). This debate gained traction in the context of European integration, since the implementation of several European Union (EU) policies required the development of MLG systems (Benz & Eberlein, 1999; Casula 2022) in order to facilitate the fulfilment of EU policy targets and objectives (Committee of the Regions 2009, 2014). In this context, implementation through MLG often had limited success, since sub-national actors struggled to establish functional governance layers (Gollata & Newig, 2017) and became caught in a number of implementation traps (Domorenok, 2017; Milio, 2010).

The recent literature has confirmed that further empirical studies are required to learn if and how MLG improves policy implementation (Thomann & Sager, 2017a; Trein et al., 2019), thus advancing our understanding of implementation performance in the EU multi-level system (Thomann & Sager, 2017b). After testing their hypothesis that the interplay between Europeanization and domestication is a central explanatory feature of implementation performance, Thomann and Sager advocated addressing the practical effectiveness of EU policy through the use of a more evaluative perspective, and exploring the relevant properties of policies and institutions that bring about different implementation dynamics (Ibid., 1398). This article contributes to this academic debate on the relevance of MLG policy-settings to policy implementation from both a theoretical and an empirical standpoint. It does so by addressing if and how different MLG systems impact on policy implementation.

The theoretical contribution of this article consists in its assessment of the way in which components of MLG are integrated to produce policy. In doing so, the article investigates how four context conditions – namely, i) the level of decentralization in the management of policy, ii) the role of regional political factors, iii) the organizational features of policy performance; and, iv) the degree and type of stakeholder participation – affect the effectiveness of decentralized policy management by producing different implementation dynamics. For this purpose, the article posits a set of theoretical propositions to guide the empirical analysis in order to support or challenge conventional assumptions on the expected benefits of policy implementation through MLG.

Against this theoretical background, the article's empirical contribution is its examination of how different multi-level and multi-actor arrangements operate across different policy stages, and how they affect policy implementation. An evaluation perspective is adopted to analyze the different implementation dynamics related to the management of four Italian and Spanish regional development programs financed by EU regional policy (also known as the Cohesion Policy). The implementation of the Cohesion Policy is a paradigm case of MLG: since the 1990s, EU-funded regional development programs have been managed by means of multi-level and multi-actor governance arrangements (Hooghe, 1996), and implementation of the partnership principle (Bache & Jones, 2000). More specifically, EU regional policy is implemented through Operational Programs (OPs) — detailed plans in which the amount of money to be spent during a programming period is determined. The implementation of an OP, drawn up to achieve a country-wide or regional objective, requires constant interaction among EU, national, regional, local, and civil society representatives during all stages of preparation, financing, management, monitoring, and operations assessment. The way in which policy is designed can vary in each Member State (MS) and its regions, depending on domestic policy choices. Thus created are different implementation dynamics with different multi-level and multi-actor arrangements.

The article's findings suggest that, in order to avoid the implementation gaps that may arise between an intended policy and its results (Pressman and Wildavsky, 1984), effective policy

implementation through MLG must operate in a context of fully participating technical actors, politicians, and vertical and horizontal partners. But their participation must occur under the supervision of a higher level of government, one able to compensate for the potential shortcomings of MLG.

The article is structured as follows. Section 2 presents the theoretical background. Section 3 illustrates the distinct characteristics of the Italian and Spanish contexts for implementing EU Cohesion Policy. Section 4 details the research design and methodology. Section 5 presents the results of the empirical analysis. Section 6 discusses the findings. Section 7 concludes.

2. Theoretical Background: Policy Implementation through MLG

The concept of MLG made its first appearance in European integration studies as an alternative to the state-centered inter-governmental approach and as a result of the new structures put in place by the Treaty of Maastricht (Marks 1993). In this role, MLG reflects the importance of distributing the competences of actors at different levels for designing effective EU policies (Bache, 2008). The dispersion of policy-making tasks was seen as more efficient than central state monopoly and other modes of governance (Piattoni, 2010), given that the simultaneous activation of new center-periphery, domestic-foreign, and state-society dynamics — which is at the core of MLG theorizing — would first ensure wider and fuller participation in decision-making processes (input legitimacy) and then produce better policies (output legitimacy) (Piattoni 2009, 164).

The canonical distinction between Type I and Type II MLG provided by Hooghe and Marks (2003) suggested that the participation of lower levels of government in Type I MLG (because of their greater insight into the needs of beneficiary groups), and of private actors in Type II MLG (because of their different viewpoints), guarantees the incorporation of more diverse information in policy-making. Having established that more and more EU policies aim at the inclusion of both private actors and different levels of government, Piattoni defined MLG as «a class of policymaking arrangements characterized by the simultaneous activation of governmental and non-governmental

actors at different jurisdictional levels and such that the interrelationships thus created defy existing hierarchies and rather take the form of non-hierarchical networks» (Piattoni 2015, 326). In a seminal article, Piattoni (2009, 176) suggested that the concept of MLG should not be tailored as a mere descriptor of existing governance structures; rather, it should help empirically analyze the implications of these structures in different countries. Given that domestic actors enjoy a great deal of autonomy and discretion in designing their MLG mechanisms (Ongaro, Gong & Jing, 2019), the impact of different multi-level and multi-actor arrangements on policy implementation is an interesting subject for empirical investigation.

To investigate the matter, this article adopts a policy implementation perspective rooted in the public governance literature. As said, the study of implementation arrangements and structures has been of long-standing concern in the public policy and administration literature since the 1970s. In identifying the numerous barriers to effective implement policy programs (Linder and Peters 1987), the first studies on implementation research (see, among others: Bardach 1977; Pressman and Wildavsky 1973; Sabatier and Mazmanian 1979; Van Meter and Van Horn 1975) had the merit of conceptualizing implementation as a complex and dynamic process in which multiple actors with contrasting interests and different interpretations of authoritative decisions participate. These pioneering implementation studies were criticized for being overly top-down in their approach. Then, an alternative bottom-up approach in program implementation research began to develop in the 1980s (see, among others: Elmore 1980; Hjern 1982; Hjern and Porter 1981). These implementation scholars were interested in analyzing the role of local networks in affecting a given problem during the implementation process. According to Hull and Hjern (1987), for example, implementation structures and arrangements tend to be poorly hierarchical, and their establishment leads towards the creation of collaborative networks at the operational level that transcend standard organizational boundaries. This sterile top-down/bottom-up dispute has subsided since the 2000s because sufficient evidence has been accumulated to argue that «variables located at the top or center can be important, as can contextual or field variables» (O' Toole 2000, p. 268) – and therefore «to validate partially

top-down and bottom-up arguments» (Ibid.). Efforts at synthesis have been numerous (see, among others: Elmore 1985; Sabatier 1986; Goggin et al. 1990). They have adopted several theoretical and methodological approaches, often in combination with each other, and they have proved promising for implementation scholarship in the past three decades (see O'Toole 2000, pp. 273-282). Used in particular have been the following: rational-choice institutionalism; the governance approach; the network and network management; formal, rational-choice models; and, the policy design and instrument approach.

The study of network and public management is pertinent to the purpose of this article because it "draws from promising theoretical streams with questions of implementation—performance via governance in the delivery of policy results—as significant as ever" (O'Toole 2000, 281). In a pioneering article, O'Toole (1997) argued that «in many cases involving network implementation, empirical scholarship has demonstrated that substantial challenges await those seeking to manage the effort and that significant *implementation performance gaps can often be found*» (p. 116, *emphasis added*). This multi-actor implementation perspective (O'Toole 1986) has consolidated in recent decades (O'Toole 2012), and several attempts have been made to link it with the policy design approach (Busetti and Dente 2018; May 2012). Ansell et al. (2017), for example, argued that the implementation of well-crafted policy designs cannot be ensured by traditional top-down implementation based on command and control, but instead by an ongoing collaborative design process able to adapt the initial policy design so that it better reflects emerging problems and challenges. This literature has therefore conceived implementation as a problem of cooperation among multiple actors, with «the degree of coordination required in a given instance [that] is largely determined by the structure of interdependence among those involved» (O'Toole 1997, 120).

This article recognizes that these problems of cooperation increase in the context of EU integration, since the implementation of EU programs requires the design and consolidation of implementation structures that involve multiple actors at different levels of government. According to this article, the successful establishment of these multi-level and multi-actor implementation

arrangements requires an ongoing collaborative design process in which high degrees of coordination are needed to avoid the various disputes that may occur among politicians, bureaucrats and social and private actors (Ansell et al. 2017) if they see a policy program as directly relevant to their personal interests (Matland, 1995).

Due to the "complexity of joint action" (Pressman and Wildavsky 1984) required by a EU program's implementation (Bauer 2006), in the view of this article the achievement of these high degrees of coordination for a better policy performance is expected to happen under the supervision of a higher level of government able to guarantee continuous cooperation among the plurality of actors involved. Hence, this article follows the argument put forward by Homsy et al. (2019, 572-573) that to be effective, MLG requires the presence of a central coordinating authority with the power to enforce solutions on decentralized actors and to provide them with adequate organizational structures.

To discuss this general hypothesis, the article analyses the role that four different context factors – namely, i) the level of decentralization in the management of policy, ii) the role of regional political factors, iii) the organizational features of policy performance; and, iv) the degree and type of stakeholder participation – have on the effectiveness of decentralized policy management. By doing so, the article follows Winter's (2012) recommendation that implementation research can continue to improve only by «developing and testing partial theories and hypotheses rather than trying to reach for utopia in constructing a general implementation theory» (p. 265). Hence, the role played by these context factors in different stages of the implementation process is individually analyzed through the use of specific theoretical propositions. Finally, how they are integrated to produce policy in multi-level settings is discussed. Overall, in line with Piattoni's definition of MLG (2015), the analysis of these four selected dimensions evidences how the main actors within an MLG system (technical actors, politicians, and partners) hierarchically and horizontally interact to produce policy.

The analysis of these four specific components of MLG therefore helps to discuss the general hypothesis. It does so by assessing the different multi-level and multi-actor implementation dynamics,

and by unpacking those specific elements of the implementation process that are linked to distortions in policy implementation (Lester and Goggin, 1998). In this regard, Pressman and Wildavsky (1984) argued that the "complexity of joint action" can result in an "implementation gap" between intended policy and results. Moreover, in research on Europeanization, the compliance concept has been used to capture the degree of "conformance implementation" (Thomann and Sager 2017a, 1254), understood as the extent to which a policy is implemented from top to bottom (Barrett and Fudge 1981).

By focusing on policy outputs, this article conceives an implementation gap as (the extent of) non-compliance with intended policy (Thomann 2015, 178) brought about by non-conformance with EU regulations (Thomann and Sager, 2017a). Six theoretical propositions related to the four above-mentioned dimensions are used for the purpose of the article. These propositions interpret the emergence of a possible implementation gap (dependent variable) as a result of a particular context factor (independent variable). Formulated by combining the literature on policy implementation, which discusses the impact of multi-level and multi-actor arrangements on policy delivery, and on MLG in the context of EU studies, these propositions are presented below. In Section 3 they are connected with specific sub-dimensions of the OP implementation process to afford better understanding of how their analysis enables the exploration of the relevant properties of multi-level policies that generate different implementation dynamics (Thomann & Sager 2017b, 1398).

Decentralization

The implications of how public goods and services are allocated between the central and the local level have been discussed in depth in the policy implementation literature since the 1970s. In their pioneering study, Pressman and Wildavsky (1973, xvi) viewed the multiple levels of government in the U.S. as a cause of implementation delays. They postulated that implementation is more problematic in the presence of many decision-making points. This interpretation of multi-level structures as obstacles to implementation was shared by Bardach (1977), who advocated greater

control to remedy unpredictability. This also seemed to hold for EU policy-making, since both regional participation in the EU arena and the devolution of tasks and responsibilities at sub-national levels increased the complexity of policy-making due to high transaction costs required for the coordination of multiple jurisdictions (Hooghe & Marks, 2003; Scharpf, 1988). According to Maggetti and Trein (2019, 359), the problems may have also been a consequence of opportunist behavior, and the possible conflicts on competences between the regional authorities and the central state.

To avoid these coordination costs, some scholars suggested that, in multi-level systems, decentralization should be backed up by central control (e.g., Benz & Eberlein, 1999; Matland, 1995). Hanf and Scharpf (1978), for example, emphasized the necessity «to provide central government with the capacity for formulating and putting into effect comprehension and integrated policies, *implemented through instruments of central control* and designed to ensure that *lower units will be more effectively guided by the policy objectives of more inclusive levels of government*» (*emphasis added*, 2). Similarly, in the field of EU integration the debate centered on whether sub-national authorities are capable of improving EU policy-making without the supervision of central governments (Piattoni 2010, 18; Pollack 1995).

According to this article, those instruments of central control able to resolve possible problems of cooperation during program implementation, and which are therefore likely to be effective within a multi-level setting, refer to specific government measures giving a central authority formal responsibility for coordinating and supervising the overall program implementation, and the relative activities of the decentralized implementation bodies. On the basis of a coordination principle, these central instruments are then expected to help these bodies perform their tasks. The following theoretical proposition is therefore advanced:

Proposition 1. In the case of multi-level and multi-actor policies, we find fewer implementation gaps if there are instruments of central control than if there are none.

Organizational Features

The importance of organizational features in avoiding implementation gaps in program implementation has been frequently discussed in policy implementation studies since the 1970s. Pressman and Wildavsky (1973, xv) emphasized the significance of establishing adequate bureaucratic procedures and the presence of both sufficient resources and a clear system of responsibilities for effective policy implementation. The positive effects of these elements were also pointed out in the context of EU integration, with several scholars arguing that to avoid implementation gaps, EU policies must have adequate organizational structures and human resources, and enough available support functions in the right combination (see, among others: Bachtler et al., 2014; Dimitrakopoulos & Richardson, 2001; Milio, 2010). Moreover, according to Leonardi (2005), MLG requires all relevant actors to fully participate at different levels, and that effective institutions with adequate organizational features should carry out their due tasks. On this issue, some scholars (see, among others: Bachtler et al. 2014; Bondarouk et al., 2020) have added that the effective implementation of EU policy programs needs stable organizational structures throughout the programming period in order to prevent a reorganization of responsibilities among implementing bodies that may induce a loss of accumulated policy knowledge on EU regulations.

The following theoretical propositions are therefore advanced:

Proposition 2. In the case of multi-level and multi-actor policies, we find fewer implementation gaps if there is availability of suitably qualified staff than if there is not.

Proposition 3. In the case of multi-level and multi-actor policies, we find fewer implementation gaps if there is organizational stability than if there is not.

Political Factors

The literature identifies the interest of regional governments in promoting a policy as an influential political factor determining program implementation performance in multi-level systems. Indeed, Piattoni states that «the explanation of the differentiation in policy efficiency [...] lies in the different

capacity and willingness of the regional political class to promote adequate requirements for implementing the funds» (1998, 50). Similarly, for several scholars (see, among others: Bache and Jones 2000; Benz and Eberlein, 1999; Milio 2010; Pollack 1995; Smyrl 1997), the implementation of EU multi-level programs depends on the institutional capacity of the regional political class to build and sustain policies over the years. Hence, this article argues that leaving the management of a multi-level policy to regional political actors without central control creates implementation gaps related to different contextual political variables. It does so particularly in the presence of a regional government's different interest in promoting and sustaining the policy throughout the implementation period. The following theoretical proposition is therefore advanced:

Proposition 4. In the case of multi-level and multi-actor policies, we find fewer implementation gaps if regional government has a political interest in promoting and sustaining a policy over the years than when it does not.

Stakeholder Participation

From a normative standpoint, several different actors contributing information, consultation, and participation are expected to improve the quality of decision-making (Piattoni 2010, 2013, 2015; Trein et al. 2019). However, some empirical studies show that the lack of stakeholder participation is a disruptive factor at the implementation stage (e.g. West, 2005). Consequently, Ongaro et al. (2019) emphasize the necessity to create conditions for the empowerment of stakeholders, in order «to help these actors develop their capabilities and to provide room for their interactive involvement in governance» (p. 109). They agree with Piattoni that «although MLG arrangements challenge the ideal-typical notion of Westphalian state, *their ultimate impact is determined by the mobilization capacity of all actors involved*» (Ongaro et al. 2019, 109, *emphasis added*).

As a large body of research in network settings/collaborative implementation has shown, in fact, differences in stakeholders' mobilization capacity depend on several factors, including trust and the relative stakeholders' understanding of both the benefits and risks of participating (Ansell & Gash

2008); their interdependence with other stakeholders (Ansell & Gash 2008; Innes & Booher 2018); and, the presence/absence of formal and informal incentives and disincentives (Fisher 2012; Hui and Cain 2018). Hence, it has become increasingly evident that stakeholders' effective participation in program implementation is conditional upon their ability to present their views at the negotiating table, and upon their access to adequate technical resources and expertise (Culpepper, 2002; Maloney et al. 2004). Since these requisite resources and capacities are rarely distributed equally among stakeholders, this article maintains that it is first necessary to create conditions for their empowerment and to increase their mobilization capacity (Ongaro et al. 2019), and then to devise new opportunities structures to involve them more closely in the policy process (Ansell et al. 2020). Accordingly, in line with the general hypothesis advanced above, in multi-level settings these factors causing a possible lack of stakeholders' mobilization can be overcome in the presence of a high level of government able to stimulate a wider stakeholders' participation during the implementation phase by creating new opportunities structures.

The following theoretical propositions are therefore advanced:

Proposition 5. In the case of multi-level and multi-actor policies, we find fewer implementation gaps if there is mobilization capacity among all the actors involved than if there is none.

Proposition 6. In the case of multi-level and multi-actor policies, we find fewer implementation gaps if a higher level of government creates the conditions for mobilizing all the actors involved than if it does not.

Against this theoretical background, the next section will explain why the study of Cohesion Policy implementation in Italy and Spain is a testing ground for understanding how MLG works.

3. EU Cohesion Policy Implementation in Italy and Spain in Practice

The adoption of Community Regulation No 4253/1988 initiated a new era in EU regional policy because it completely reversed the logic adopted since the Treaty of Rome (Graziano, 2013; Leonardi, 2005). After the 1988 reform, five multiannual programming periods were launched by the EU, covering the following time spans: the first – 1989-1993; the second – 1994-1999; the third – 2000-2006; the fourth – 2007-2013; and the fifth – 2014-2020. During these decades, different structural funds worked together to support regional development in Europe, namely: the European Regional Development Fund (ERDF); the European Social Fund (ESF); the Cohesion Fund (CF); the European Agricultural Fund for Rural Development (EAFRD); and, the European Maritime and Fisheries Fund (EMFF).

While the regulatory context (and the role of the European Commission, EC) changed over the course of these five multiannual programming periods (Casula 2021a), the 2000-2006 programming period was characterized by a decentralization of responsibilities in implementation which was further stabilized in the following period (Piattoni and Polverari, 2016). From the 2000s, the responsibility for each OP was formally conferred to a domestic institution — the so-called Management Authority (MA) — that supervises its entire supply chain, i.e. from the definition and approval of the OP to its final evaluation.

Depending on the varying emphases to MLG given by the regulatory context and the EC, the role of partners changed after the 1988 reform. In particular, the "vertical" dimension of the partnership principle — that is, the interaction among European, national and sub-national levels during the formulation, implementation, and monitoring stages of the OPs — was placed side by side with a "horizontal" one through the involvement of private sector and socio-economic actors (Bauer 2002). The horizontal dimension was then expanded during the following two programming periods to include «any other appropriate body representing civil society, environmental partners, [and] non-governmental organizations»,[i] in order to strengthen the application of the partnership principle at all

OP implementation stages. This led to the establishment of a «cohesion policy system of multi-level governance based on decentralization of responsibilities and a stronger role for actors on the ground».[ii]

Keeping in mind the theoretical background presented in Section 2, even if EU regulations establish the "rules of the game", domestic actors have some maneuvering space to model their governance arrangements for OP implementation in accordance with their political-administrative structures and traditions (Casula 2021b). In particular, they can choose between more centralized and decentralized systems for policy management. Moreover, in line with Piattoni's definition of MLG (2015), and the choice to analyze the four dimensions under investigation in this article, OP implementation can be influenced not only by effective administrative structures but also by both regional political dynamics and the effective participation of vertical and horizontal partners.

Hence, the governance of Cohesion Policy implementation varied significantly among MSs (and sometimes within them), and in some cases it underwent changes over the course of the programming periods. Italy and Spain, for example, opted for different governance systems for implementing EU Cohesion Policy.

The implementation of Italian OPs was completely under the control of sub-national governments, with the MA placed under the supervision of regions. Thus, regional actors decided on development strategies and investment priorities, drew up the programming documents, and negotiated them with the EC; they decided on the content of public calls, as well as the features of regional institutions placed under their management and control; they established direct contacts with the final beneficiaries responsible for managing the projects; they were entrusted with creating a regional monitoring system and directly supporting the beneficiaries as they uploaded their data within an online system; they were made responsible for creating and consolidating evaluation units that were meant not only to produce frequent evaluation reports but also to actively support the overall programming. This system significantly differed from the one in Spain, which was centrally coordinated and where all activities were directly managed by a single MA located in Madrid, rather

than multiple MAs for each OP placed under the administrative control of the regions. Through a *documento de attribution de funcione*s (function attribution document), some of the MA's function could be delegated to the regions (which thus became Intermediate Bodies), while the MA still remained responsible for overall governance. In particular, regional actors had to manage the stage of project selection/approval on the basis of a common system of national rules, and in accordance with the MA's daily recommendations. Moreover, even if some of the monitoring structures were allocated to the regional level, a single national monitoring system with procedures consistent across regions was present. Only the evaluation was directly managed by regional governments.

In light of the foregoing description of the legal context, the next section will explain the empirical and analytical strategies used to assess the implementation performance of the Italian and Spanish OPs, and the factors influencing it.

4. Research Designs and Methodology

Driven by the logic of comparison in qualitative studies (Mahoney & Goertz, 2004; Casula et al. 2021), this article focuses on a small-N, case-oriented comparison. Case studies and small-N comparisons are praised for their detailed analyses of processes (Rueschemeyer, 2003) and can be useful for both theory-building and theory-testing (Blatter & Haverland, 2012). They can be used to explore the impact of a large number of relevant factors and to confront analytical propositions with many data points (Della Porta & Keating 2008, 211).

The four regional Italian and Spanish OPs, financed by the ERDF during the 2007-2013 programming period, are chosen here as units of analysis, and compared with each another. Against the above theoretical background, analysis of the regional ERDF OPs financed within the fourth programming period is a basis for understanding how different multi-level and multi-actor arrangements affect policy implementation, for three reasons: *i*) a decentralization of responsibilities

to sub-national actors; *ii*) the reinforcement of institutional capacities in domestic administrations, considered necessary to achieve greater economic efficiency; iii) the partnership principle going from simple consultation to close cooperation, planned to be strictly applied at all stages of OP implementation. Moreover, the decision to examine the implementation of two OPs for each of the MSs considered allows empirical investigation of the following: i) if central coordination produces similar effects among the regions; and ii) in the absence of central coordination, how regional contextual factors may lead to implementation gaps. As described in-depth in Section 3, in fact, Italy and Spain significantly differ in the extent of their multi-level and multi-actor policy-making. Indeed, «despite the highly decentralized political system in Spain, the central government plays a strong role […] in programming as well as in the OP implementation phase»,[iii] because established in this MS is a more general centralized system jointly with the attribution of responsibility to an overall 'national garrison' (Casula 2020) which has more instruments of central control with which to supervise the entire OP supply chain. In line with the theoretical background set out in Section 2, those instruments extend beyond an administrative basis. They allow, in fact, the presence in Spain of a central coordination authority able to supervise the program's implementation, and to support the activities of the decentralized implementation bodies.

When a comparison strategy for similar cases (della Porta & Keating 2008, 214) is adopted, the four regionally implemented OPs are similar from an economic standpoint. They were therefore selected against the same backdrop of EU regulations for OP implementation. To clarify, the four regions considered (Campania and Calabria for Italy, and Andalusia and Galicia for Spain) were part of the so-called Convergence Area, which included the most underdeveloped European regions, i.e. those with a GDP per-capita below 75% of the EU average. Given the theoretical propositions advanced, the following sub-sections describe the analytical and empirical strategies used to investigate possible implementation gaps. This methodological section concludes with the presentation of the data analysis procedure used.

4.1. Data

From an analytical standpoint, 13 dimensions were selected for each of the five implementation stages of a funded ERDF OP. These dimensions were adopted from previous analyses in the academic and non-academic literatures (see, for example, Bachtler et al. 2014; Leonardi, 2005; Milio, 2010), and modified in view of the policy's technical characteristics during the 2007-2013 programming period. Given the aim of this article, and the propositions advanced in Section 2, the use of these dimensions enabled us to see, very broadly, how organizational structures were modeled in different sub-national contexts, and – through the use of an evaluation perspective – to empirically assess whether implementation gaps were present during any of the OP implementation stages. Then, each dimension was used to measure a specific component of MLG, and its related proposition. Tables 1-2-3-4-5 summarize this analytical strategy by connecting each dimension (and the relative acronyms used in the body of the article, as indicated in the first column of the Tables) to a specific theoretical proposition (fourth column), on the basis of the main actors and/or structures involved, as required by EU regulations (third column). The Tables also describe how implementation should have happened ideally, i.e. without any implementation gaps (second column).

[Insert Tables 1-2-3-4-5 here]

4.2. Methods

With regard to the empirical strategy, a preliminary desk analysis was conducted. EC reports, national and regional program documents, and evaluation studies were consulted, as well as data related to commitment, expenditure, decommitment, and system effectiveness. Furthermore, a total of 80 semi-structured interviews were carried out from 2016 to 2020.[iv]

All the primary and secondary data collected were then triangulated to explain how the independent variables listed in the six theoretical propositions advanced in Section 2 affected the

implementation process. Used for this purpose was analysis of the presence/absence of implementation gaps for each of the 13 dimensions of analysis selected.

Following Thomann and Sager (2017b, p. 1398), an evaluative perspective was adopted to measure the implementation performance of each dimension: specifically, a bottom-up qualitative approach based on selected indicators that adapted the Institutional Development Framework (IDF) Method (USAID, 2000) was used. By following previous technical studies that had employed this method for evaluating regional policies,[v] it was possible to assess the complete program management cycle through the use of specific criteria to determine where, along a development continuum, each of the 13 dimensions was situated: the terms "consolidated/strong" (A), "significant" (B), "moderate" (C), and "absent/weak" (D) were used to categorize variations in the implementation performance. This assessment is summarized in Table 6, where this continuum is used to evaluate the extent to which the systems related to each component of the OP fulfil the EU's requirements. On the basis of this continuum, implementation gaps – quantified as a discrepancy between intended policy (as required by EU regulations and presented in the second column of Tables 1-2-3-4-5), and the actual results that each OP achieved – are classified as totally absent in the case of the "consolidated/strong" (A)' category and total present in the case of the "absent/weak" (D)' one.

[Insert Table 6 here]

As regards the empirical exploration of the independent variables, Table 7 summarizes which of the 13 dimensions were used to empirically examine the six theoretical propositions advanced, and it specifies the empirical strategy used to test them. More specifically, Table 7 reports: i) how the variables listed in the six propositions – instruments of central control, availability of qualified staff, organizational stability, regional governments' political interest in sustaining the policy, stakeholders' mobilization capacity, and higher level of the government's ability to create conditions for stakeholders mobilization – were defined for the purposes of the research (fourth column); and ii) how they were applied in practice (fifth column). As summarized in the sixth column of Table 7, the IDF Method was used for their assessment as well, with the elaboration of a development continuum

criterion to evaluate the degree of presence/absence of each variable, and the triangulation of all the primary and secondary data collected. For this purpose, the terms "consolidated/strong" (A), "significant" (B), "moderate" (C), and "absent/weak" (D) were used to categorize variations in the selected variables.

[Insert Table 7 here]

The sources used to empirically assess the variables listed in the six propositions, and to categorize each dimension for the four regional OPs analyzed, are presented in the Appendix.

4.3. Data Analysis Procedure

A four-step data analysis was conducted, with the procedure for each step based on a triangulation of different primary and secondary data.

The aim of the first step was to identify the main characteristics of the multi-level and multi-actor governance systems for the management of the four ERDF OPs in the Italian and Spanish contexts, and possible differences between the respective regions selected with regard to each dimension analyzed (see the fifth column of Tables 1-2-3-4-5).

The second step allowed reconstruction of the results of the implementation process, and in particular the presence of possible implementation gaps for each selected dimension. The implementation performance of the 13 dimensions selected was then categorized as "consolidated/strong" (A), "significant" (B), "moderate" (C), or "absent/weak" (D) for each of the four regions, and reported in the last columns of Tables 1-2-3-4-5.

The third step provided an extension of information concerning the factors influencing implementation for each dimension. It did so through a categorization of the degree of presence/absence of the related variable(s) listed in the propositions that the single dimension was intended to measure. The results of this third step of data analysis enabled the integration of the

information related to the main characteristics of the four sub-national contexts analyzed through the use of the development continuum criteria previously described. This information is reported in the fifth column of Tables 1-2-3-4-5.

Finally, the aim of the fourth step was to construct – for each of the five stages of implementation – a history of implementation performance for the four regional ERDF OPs based on the six theoretical expectations formulated. EU representatives, external evaluators, and observers specialized in this research field were consulted to validate the results once they had been completed. These policy narratives are presented in the following section, while Section 6 discusses how the four context conditions analyzed integrate with each other to produce policy in multi-level settings.

5. Findings

The manner in which different multi-level and multi-actor arrangements operated in the four regions, along with their implementation performances, is presented in what follows. By elaborating the five stages of OP implementation, differences between the Italian and Spanish OPs, and between the regions of the same countries, will be described, bearing in mind the theoretical propositions previously presented.

The presentation of the findings follows the structure of Tables 1-2-3-4-5, which steer the progress of this article. As described in the methodological section, these tables set out the results of the implementation process as regards the presence/absence of implementation gaps for each stage of an OP. These results of the implementation process are explained in terms of, first, the characteristics of the institutional context of the four regions analysed, and then of the specific component of MLG and the relative theoretical proposition that each of the 13 dimensions was intended to measure. These tables categorize variations in both the implementation performance of the 13 dimensions (dependent variables) and the implementation-influencing factors listed in the theoretical propositions

(independent variables), based on the assessment proposed in Table 6 and Table 7, which summarize how the IDF Method was used for the purposes of this article.

Programming

Implementation gaps were not found in the programming stage of the two Spanish ERDF OPs. The implementation process (Prog1) and the program documents (Prog2) – both dimensions classified as "consolidated/strong (A)"– were in fact clearly defined, and responsibility was attributed to a central coordinating authority ("Proposition 1"), which in Spain was identified with the MA.[vi] As reported in Table 1, the variable "instruments of central control" was then classified as "consolidated/strong (A)" in the two Spanish ERDF OPs, since "instruments of central control [were] present, well-defined and well-implemented". Moreover, by displaying a great capacity for mobilization ("Proposition 5"), stakeholders were able to contribute information that improved the general quality of programming. Due to the presence of stable organizational structures ("Proposition 3"), the negotiation of the OP (Prog3) was speedy and without technical problems.[vii]

Conversely, in both Italian regions, many implementation gaps were found for each of the three dimensions under scrutiny: Prog 1 was classified as "moderate (C)" in Calabria and "absent/weak (D)" in Campania, while Prog2 and Prog3 were respectively classified in both regions as "absent/weak (D)" and as "moderate (C)". To start with, partners were unable to present a coherent position at the negotiating table ("Proposition 5"). The "absence of stakeholders mobilization capacity (D)" was then classified and reported in Table 1. Moreover, in conditions of decentralization,[viii] the different political interests of regional governments in sustaining the policy over the years negatively affected this stage ("Proposition 4"), particularly with regard to programming organization (Prog1). For example, in Campania, implementation was re-programmed three different times from 2007, each time with a different programmatic line, and utilizing different implementation arrangements and tools.[ix] The absence of a coordinating authority also negatively influenced organizational features: their instability ("Proposition 3") caused implementation gaps during negotiation (Prog3).

559

560 *Project Selection/Approval*

561 In the Spanish regions, implementation gaps in the project generation stage (PSA1) concerned only
562 the competitive projects that were mainly financed through grants for Small and Medium-sized
563 Enterprises (SMEs). Given the insufficient presence of suitably qualified staff ("Proposition 2"), these
564 project applications were of low quality, as «half of them were not completely satisfactory in terms
565 of innovation».[x] In line with the theoretical and analytical background previously described,
566 instruments of central control ("Proposition 1") were used to improve the programming capacity of
567 the SMEs,[xi] particularly by organizing workshops, and providing enterprises with a permanent
568 technical consultant from the Regional Development Agencies.[xii] No implementation gaps were
569 found in the project selection/approval stage (PSA2) due to the stability of organizational structures
570 ("Proposition 3"). These procedures never exceeded 4-5 months.

571 In the Italian regions, on the other hand, several implementation gaps were found in most of
572 the "competitive" and "non-competitive" projects, the projects presented being of poor quality, and
573 not integrated into a single idea of development (D). The reason was the absence of qualified staff
574 able to generate high quality projects coherent with the overall programming ("Proposition 2"),
575 among both respective regional directors and the final beneficiaries involved – mainly the local
576 authorities in Campania and SMEs in Calabria. For example, in Campania, the main problem with
577 the local authorities concerned «their lack of knowledge regarding European rules, which often led
578 them to make mistakes when they decided to take part in a public call».[xiii] Calabria SMEs, on the
579 other hand, demonstrated a severe lack of planning capacity.[xiv]

580

581 *Project Management*

582 The strong coordinating center also had a positive impact during the management stage of the OPs in
583 both Galicia and Andalusia; neither region displayed implementation gaps, with ProjectMan1,
584 ProjectMan2, and ProjectMan3 classified as "consolidated/strong (A)". MLG was in fact effective at

585 this stage in Spain due to the presence of a central coordinating authority, with a constant supportive
586 role ("Proposition 1"). This authority was able to promptly separate control and management powers
587 (ProjectMan1). Moreover, it opted for a system in which responsibilities for annual control were
588 assigned to the CA and the MA (both located in Madrid). These bodies were allowed to temporarily
589 suspend payments in the case of irregularities. Organizational features, pertaining both to the
590 availability of suitably qualified staff ("Proposition 2") and the stability of organizational structures
591 ("Proposition 3"), positively affected the other two dimensions considered.[xv] Unique problems during
592 the management of these EU projects pertained to the SMEs, since their capacities to finance the
593 projects significantly declined due to the global financial crisis. Nevertheless, under strong
594 solicitation by the MA, the regional governments decided to improve the use of financial aids, and to
595 involve the banks in the certification of expenditure. Because of these corrective actions, there was
596 no decommitment (ProjectMan3). In Andalusia, moreover, the MA assigned direct responsibility for
597 supporting local beneficiaries to the Regional Development Authority. [xvi]

598 Conversely, implementation gaps were found throughout the entire management stage in
599 Campania and Calabria, with ProjectMan1, ProjectMan2, and ProjectMan3 classified as
600 "absent/weak (D)". Because this stage was completely decentralized in Italy at the sub-national level,
601 the regional administrations were reluctant to introduce the novelties required by EU regulations that
602 concerned the separation between management and control functions (ProiectMan1).[xvii] This resulted
603 in direct intervention by the EC, which suspended payment for around a year and a half. In fact,
604 systems were not clearly defined, with major processing problems and frequent delays (D). This
605 inevitably affected the stages of project payment (ProjectMan2) and project management
606 (ProjectMan3) due to the participation of both the regional offices and the final beneficiaries at this
607 stage. In the case of ProjectMan2, for example, while the PA offices were poorly organized, with
608 unstable structures and frequent internal reorganizations ("Proposition 3"), the staff of the final
609 beneficiaries showed a lack of European culture in managing the project dossiers and the relevant

610 expense documentation, with «nearly all of them lacking highly qualified staff to interact with a
611 regional monitoring system that is often very confusing»[xviii] ("Proposition 2").
612
613 *Monitoring*
614 Implementation gaps were absent in both the Spanish regions during the monitoring stage for each of
615 the three dimensions considered. As regards Monit1, the use of a monitoring system was perfectly in
616 accordance with European standards and classifiable as one of the most effective and well-structured
617 monitoring systems in Europe.[xix] In line with "Proposition 1", this was due to the presence of a single
618 monitoring system applied across the whole of Spain and developed by the MA in Madrid.
619 Monitoring data were available throughout the programming cycle (Monit2), due to the presence,
620 among the final beneficiaries, of qualified staff with a consolidated monitoring culture to ensure that
621 monitoring data were promptly and correctly uploaded to the online system ("Proposition 2").
622 However, monitoring for management purposes (Monit3) was increased within the Spanish regions
623 during the last years of implementation of the 2007-2013 ERDF OPs, due to increased political
624 support from the regional governments ("Proposition 4"). In 2015, for example, the Galician regional
625 government assembled a regional task force «to guarantee as much effect as possible of the
626 monitoring data on decision-making».[xx] This decision was accepted within the MC,[xxi] where
627 stakeholders were strongly encouraged to actively participate in these strategic choices ("Proposition
628 6").
629 Once again, implementation gaps were found in both Calabria and Campania. In accordance
630 with the analytical section, and in the absence of central coordination, implementation gaps at this
631 stage can emerge due to a lack of interest by the regional governments ("Proposition 4"), which
632 impeded the development of an adequate monitoring system in line with EU standards — Monit1
633 was classified as "absent/weak (D)" in both regions. For example, doubts were expressed by the EC
634 on several occasions about the Calabrian monitoring system, described at times as rudimentary.[xxii]
635 This had knock-on effects on the other two dimensions analyzed in Calabria and Campania. With

636 regard to Monit2 – classified as "moderate (C)" in both regions – widespread training activities were
637 not carried out by the managers of the operational objectives, and their high turn-over rate did not
638 allow for the consolidation of a coherent training system for the final beneficiaries ("Proposition 2").
639 Moreover, with regard to Monit3 – classified as "absent/weak (D)" in both Campania and Calabria
640 since a lack of use of monitoring for program management had been found – the MC was «a place
641 for decisions that were already made, without concrete strategic actions being proposed, and with
642 poor involvement from partners» ("Proposition 6").[xxiii] Such was the case of Campania, where the
643 regional government was «interested only in obtaining the financial data when necessary for external
644 publicizing»[xxiv], and not to improve the general programming ("Proposition 4").
645
646 *Evaluation*
647 With regard to the evaluation stage, fewer implementation gaps were found in Galicia and Campania.
648 On the other hand, evaluation was still far from completion in Andalusia and Calabria: a "low quality
649 of evaluation activities (C)", and a "lack of use of evaluation for program management (D)" was
650 found in both regions.
651 The absence of implementation gaps in both Galicia and Campania – where evaluation
652 activities (Eval1) were "established and well implemented (A)" and an "institutionalized use of
653 evaluation for program management (A)" (Eval2) was present – must be attributed to the close
654 attention paid by the regional government to the evaluation stage during those years ("Proposition
655 4"). In Campania, for example, although the regional government underwent some change, evaluation
656 was always acknowledged as «a practice of decision-making support» (Eval2).[xxv] This also ensured
657 a strong involvement of partners ("Proposition 6"), who found themselves able to use evaluation as
658 support for general programming. [xxvi] In both regions, the findings showed a "strong interest to
659 increase stakeholders' mobilization capacity [,with] actions clearly defined and implemented (A)".
660 In particular, while training courses in Campania were organized to create the conditions for

661 stakeholder mobilization, partners in Galicia were involved in the design of a regional evaluation
662 plan.

663 Regional governments were not similarly invested in either Calabria or Andalusia, where the
664 widespread of an evaluation culture was delayed. In Calabria, for example, the Evaluation Unit was
665 not able to start a process of institutionalization (Eval1),[xxvii] and a real will to consolidate an
666 evaluation culture and improve the performance of the OP was lacking (Eval2).[xxviii]

667

668

669 **6. Discussion**

670

671 The last column of Table 7 summarizes the main empirical points supporting each of the six
672 theoretical propositions formulated from the analysis of implementation performance for the four
673 OPs. The analysis and its findings contribute to knowledge about the dynamics of implementation
674 performance in EU multi-level systems, and they afford better understanding of how different
675 components of MLG integrate with each other to produce policy. They thus further clarify how these
676 data can contribute to supporting or challenging the conventional assumptions about the expected
677 benefits of MLG.

678 The presence of various types of instruments of central control – particularly coordination –
679 can help prevent implementation gaps in multi-level and multi-actor policies ("Proposition 1"). The
680 presence of control instruments, in fact, also directly and indirectly impacts on the other three factors
681 considered. Even if the presence of suitable qualified staff ("Proposition 2") and stable organizational
682 structures ("Proposition 3") positively correlates with better implementation performance, it is not
683 true that this is always achieved in the absence of central coordination. This issue is connected with
684 the role played by the third component of MLG considered in this article and related to regional
685 political factors. The presence of a central coordination authority is also able to overcome a lack of
686 interest by the regional governments in sustaining the policy ("Proposition 4"). Similarly, although

687 increased participation in decision-making of all vertical and horizontal partners is expected to
688 produce better policies (output legitimacy), partners do not necessarily possess the knowledge and
689 expertise to take part in EU policy implementation ("Proposition 5"), and their mobilization may
690 depend on whether it is stimulated by higher levels of government ("Proposition 6").

691 These findings contribute to the long-running debate among political scientists on policy
692 implementation in different multi-level settings. In particular, they shed light on those aspects of
693 implementation performance related to the crucial policy design/implementation dynamic (see also,
694 Winter 2012; Kaufmann et al. 2020). Whilst the fact that the design of public polices can play a
695 crucial role in program implementation was recognized by pioneering implementation scholars,
696 academic interest in this link has waned in recent decades. Nevertheless, according to Sætren and
697 Hupe (2018, pp. 571-572), its study can continue to represent an advancement towards a more general
698 theory in this field of research. This is particularly the case in the context of EU integration, where
699 different MLG policy-settings for policy implementation are needed, and different regional actors
700 and stakeholders are involved. As regards the aforementioned link, the findings presented allow us to
701 advance observable implications on the way in which the presence of a central coordination authority
702 can compensate for the potential pitfalls of MLG settings. More in detail, these findings substantiate
703 the thesis that multi-level and multi-actor structures obstruct implementation in the presence of
704 multiple decision-making points, and in the absence of central control to remedy unpredictability. In
705 other words, while generalization of results beyond these cases requires caution, MLG seems to
706 improve policy implementation in the presence of a coordination authority that, besides possessing
707 traditional command and control instruments, is able to ensure the real involvement of all the actors
708 during the implementation process, doing so in particular through the creation of new opportunities
709 structures that guarantee an equal distribution of those actors' involvement. As the findings suggested,
710 in fact, effective MLG can benefit an authority that mobilizes implementation bodies, not only by
711 providing actors with adequate organizational structures and the technical and professional resources
712 that they lack, but also by creating conditions for consolidating the participation of stakeholders when

they lack a similar mobilization capacity. The same central authority can guide an ongoing collaboration design/redesign process which may be needed over the years to reflect emerging management challenges better, and to ensure a high degree of cooperation when multi-actor and multi-level arrangements are established.

7. Conclusion

In recent decades, MLG has been increasingly used as an instrument of effective policy implementation. While the greater involvement of various actors at different levels of government is expected to produce better policies, the literature is in agreement that more empirical studies are needed to analyze if and how different MLG systems impact on policy implementation. Adopting a performance-oriented approach to EU implementation, this article has contributed to this academic debate by investigating how different context conditions affect the effectiveness of decentralized policy management. By combining traditional literature on policy implementation with the literature on EU studies, this article has developed a set of interrelated theoretical propositions to guide empirical research on the various stages of implementation of an EU development program in four different regions belonging to two MSs characterized by different organizational and institutional arrangements.

The findings support the hypothesis that the presence of a central coordination authority can compensate for the potential pitfalls of MLG settings, and that it is therefore helpful to guarantee a better implementation performance in the EU multi-level system. However, it should be borne in mind that the empirical research reported in this article adopted a logic of qualitative comparison focused on a small-N comparison. Hence, caution is necessary when proposing possible generalizations of these results not only to other EU policy sectors where MLG systems are used for policy implementation but also to other MSs where Cohesion Policy is implemented. As explained, policy implementation can be affected by different policy traditions, institutional architectures, and

739 other factors related to policy specificity. The decision to decentralize to sub-national governments
740 in Italy, for example, led to the consolidation of very different regional governance systems for the
741 management of EU structural funds. Those in Spain proved to be more homogeneous (apart from the
742 institutionalization of the Evaluation Units). The analysis of how these different multi-level and
743 multi-actor systems concretely operate and their effect on EU policy implementation has been the
744 empirical added value of this article for public administration scholars interested in Cohesion Policy.
745 It also assists theoretical reflection on the application of the "partnership" principle itself. If
746 comparative studies on how this principle operates across the different policy stages that compose an
747 OP and how it affects its policy performance continue to be limited because of the large amount of
748 field research work required, this article – which has likewise required a large amount of research
749 over the years – confirms the political (and not only technical) conception of the partnership principle.
750 It therefore substantiates the argument that the principle's correct application cannot ignore the
751 institutional and legal framework of each MS within which it is implemented.

752 To conclude, considering that the perspective adopted in this article seems to be a productive
753 way to provide a comprehensive outlook on research in the field of policy implementation and MLG,
754 the future challenge will likely be the conversion of the theoretical propositions presented into testable
755 hypotheses. This will make it possible to assess the level of intensity with which different factors
756 related to organizational features, sub-national political dynamics, and stakeholder participation are
757 able to influence policy performance, when such a central coordinating authority is present. The aim
758 could also be to perform comparative studies in different European policy sectors and countries, and
759 to investigate the effect of different contextual factors and governance models in order to evaluate
760 the usefulness of implementing through MLG. This means, as Piattoni puts it, that not only input
761 legitimacy, but also output legitimacy would be ensured.

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763

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[i] Cf. Official Journal of the European Union (2006), *Council Regulation (EC) No. 1083/2006 of 11 July 2006 Laying Down General Provisions on the European Regional Development Fund, the European Social Fund, and the Cohesion Fund and Repealing Regulation (EC) No. 1260/1999*, Brussels, p. 39.

[ii] Cf. CEC (2008), *Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the results of the negotiations concerning cohesion policy strategies and programmes for the programming period 2007-2013*, 0301 final, Brussels, p. 12.

[iii] Cf. European Parliament - Directorate-General for Internal Policies – Policy Department B: Structural and Cohesion Policies (2014), *An Assessment of Multilevel Governance in Cohesion Policy 2007-2013*, Brussels, European Union.

[iv] In accordance with EU regulations, reporting on the development programs financed within the fourth EU programming period ended in March 2017, while in the following years, the activities relevant for the assessment of OPs were completed, and all the monitoring data were disclosed. At the time of writing this article, it was not possible to assess the OPs financed during the fifth programming period, as these were currently being implemented. The analysis of the fourth programming cycle allowed for the empirical investigation of each stage of implementation for the 2007-2013 ERDF OPs by covering the preparation, financing, management, monitoring, and assessment of their operations.

[v] Cf. European Community (1999), *Evaluation Design and Management. MEANS Collection. Office of Official Publications of European Communities*, Luxembourg; Ernst & Young (2003) *Rapporto di Valutazione Intermedia POR Basilicata 2000/2006*, Regione Basilicata, Potenza; Oraz˘e, H. (2009), *The Assessment of Effectiveness, Continuity and Spillover Effects of Management and Implementation Systems in the EU10—Ex Post Evaluation of Cohesion Policy Programmes Co-financed by the ERDF 2000 – 06*, Final Report to the European Commission (DG Regio), European Policies Research Centre and Metis GmbH.

[vi] Cf. Applica, IsmeriEuropa (2016a), *Cambridge Economic Associates. WP1. Task 3 Country Report. Italy*.
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[ix] Cf. CEC (2013b), *Evaluation of the Main Achievements of Cohesion Policy Programmes and Projects Over the Longer Term in 15 Selected Regions (From 1989–1993 Programming Period to the Present), 2011.CE.16.B.AT.015. Case Study Campania*.
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[xii] Cf. Interview with representative from the MA, Madrid, 8 August 2019.
[xiii] Cf. Interview with official working on regional structure, Naples, 16 January 2017.
[xiv] Cf. Regione Calabria (2014), *I PISL. Un'esperienza di progettazione integrata in Calabria*, 30 giugno 2014, mimeo.
[xv] Cf. Interview with representative from the MA, Madrid, 6 August 2019.
[xvi] Cf. CEC (2013c), *Evaluation of the Main Achievements of Cohesion Policy Programmes and Projects over the Longer Term in 15 Selected Regions (From 1989–1993 Programming Period to the Present), 2011.CE.16.B.AT.015. Case Study Andalucia*.
[xvii] Cf. Applica, IsmeriEuropa (2016b), *Cambridge Economic Associates. WP1. Task 3 Country Report. Spain*.
[xviii] Cf. Interview with institutional stakeholder, Rome, 1 March 2016.
[xix] Cf. Interview with Commission officials in DG Regio, Brussels, 12 October 2016.
[xx] Cf. Interview with official working on regional structure, Santiago de Compostela, 10 July 2017.
[xxi] Cf. CEC (2013d), *Evaluation of the Main Achievements of Cohesion Policy Programmes and Projects Over the Longer Term in 15 Selected Regions (From 1989–1993 Programming Period to the Present), 2011.CE.16.B.AT.015. Case Study Galicia*.
[xxii] Cf. Interview with Commission official in DG Regio, Brussels, 2 May 2018.
[xxiii] Cf. Interview with socio-economic stakeholder, Catanzaro, 25 January 2017.
[xxiv] Cf. Interview with official working on regional structure, Naples, 16 January 2017.
[xxv] Cf. Regione Campania. 2013. *Programma Operativo Regionale FESR 2014-2020 "Campania"*, p. 71.
[xxvi] Cf. Interview with external evaluator, Rome, 2 November 2016.
[xxvii] Cf. Regione Calabria. (2007). *Piano Operativo Regionale FESR 2007–2013*.
[xxviii] Cf. Interview with national official, Rome, 7 August 2019.

Table 1. Explaining the results of the implementation process: the programming stage

<table>
<tr><th rowspan="2">Dimension (and relative acronymous)</th><th rowspan="2">Dimension Description</th><th rowspan="2">Main Actor(s) Involved</th><th rowspan="2">Specific Component(s) of MLG & Proposition(s) Measured</th><th colspan="2">Main characteristics of this stage</th><th colspan="4">Results of the implementation process</th></tr>
<tr><th>Italian Context</th><th>Spanish Context</th><th>Campania</th><th>Calabria</th><th>Andalusia</th><th>Galicia</th></tr>
<tr><td>Programming Organization (Prog1)</td><td>Clear definition of the OP implementation process</td><td rowspan="2">MA, following consultation with regional political actors - request of stakeholders' involvement</td><td>Decentralization:
○ Proposition 1

Political Factors:
○ Proposition 4

Stakeholder Participation:
○ Proposition 5</td><td rowspan="3">○ “Absence of instruments of central controls (D)”: stage decentralized at the level of an MA placed under regional administrative control

▪ In Campania & Calabria:
- “Unstable structures with frequent internal reorganization (D)”
- “Moderate political interest. Sporadic actions (C)”
- “Absence of stakeholder mobilization capacity (D)”</td><td rowspan="3">▪ “Instruments of central controls present, well-defined and well-implemented (A)”: stage centralized at the level of an MA in Madrid
- “Stable structures and responsibilities throughout the entire programming period (A)”
- “Strong stakeholder mobilization capacity (A)”</td><td>“Processes not clearly defined, and implemented inadequately (D)”</td><td>“Processes defined, but implemented inadequately (C)”</td><td colspan="2">“Processes clearly defined, and implemented well (A)”</td></tr>
<tr><td>Program Documents (Prog2)</td><td>Identification of a clear strategic development focus, with targets to be reached</td><td>Decentralization:
○ Proposition 1

Stakeholder Participation:
○ Proposition 5</td><td colspan="2">“Documents of poor quality, without a clear strategic focus (D)”</td><td colspan="2">“Well-structured documents, with a clear development strategy (A)”</td></tr>
<tr><td>Negotiation & Approval (Prog3)</td><td>Efficient and fast negotiation process concerning the OP</td><td>EC and MA</td><td>Organizational Features:
○ Proposition 3</td><td colspan="2">“Major problems with negotiations, but minor delays in approval (C)”</td><td colspan="2">“Efficient and speedy negotiation and timely approval (A)”</td></tr>
</table>

Table 2. Explaining the results of the implementation process: the project selection/approval stage

Dimension	Dimension Description	Main Actor(s) Involved	Specific Component(s) of MLG & Proposition(s) Measured	Main characteristics of this stage		Results of the implementation process			
				Italian Context	Spanish Context	Campania	Calabria	Andalusia	Galicia
Project Generation (PSA1)	High quality projects, and integrated within a single concept of development	○ MA, for non-competitive projects ○ Final beneficiaries, for competitive projects	Decentralization: ○ Proposition 1 Organizational Features: ○ Proposition 2	▪ "Absence of instruments of central controls (D)": stage decentralized at the level of an MA placed under regional administrative control ○ In Campania & Calabria: - As concern the non-competitive projects → "Staff available with serious lack of experience and qualifications. High turnover (D"): Lack of programming capacity of the MA - As concern the competitive projects → "Staff available with serious lack of experience and qualifications. High turnover (D)": Final beneficiaries unable to present high quality and coherent projects - "Unstable structures with frequent internal reorganization (D)"	▪ "Instruments of central controls present, well-defined and well-implemented (A)": stage centralized at the level of an MA in Madrid - As concerns the non-competitive projects → "Staff available with sufficient experience and qualifications. Low turnover (A)": strong technical expertise and qualification of the MA staff - As concerns the competitive projects → "Staff available with serious lack of experience and qualifications. High turnover (D)": in particular, lack of programming capacity of the socio-economic beneficiaries - "Stable structures and responsibilities throughout the entire programming period (A)"	As concerns both the non-competitive and the competitive projects → "Poor quality projects, and not integrated into a single idea of development (D)"		As concerns the non-competitive projects → "High-quality projects, and integrated within a single idea of development (A)" As concerns the competitive projects → "Poor quality projects, and less integrated within a single idea of development (C)"	
Project Appraisal & Selection (PSA2)	Definition of clear criteria, with short decision times	MA	Organizational Features: ○ Proposition 3			"Criteria not completely defined, lengthy procedures with a focus on formal criteria (C)"		"Well-defined criteria (including well-developed and applied criteria), with short decision times (A)"	

Table 3. Explaining the results of the implementation process: the project management stage

Dimension	Dimension Description	Main Actor(s) Involved	Specific Component(s) of MLG and relative Proposition(s) Measured	Main characteristics of this stage		Results of the implementation process			
				Italian Context	Spanish Context	Campania	Calabria	Andalusia	Galicia
Project Management/Financial Control (ProjectMan 1)	Creation of efficient financial control and management systems	MA, and CA - Formal separation of powers between management and control	Decentralization: ○ Proposition 1	○ "Absence of instruments of central controls (D)": stage decentralized at the regional level - In Campania & Calabria: - "Unstable structures with frequent internal reorganization (D)": poor organizational features of the PA - "Staff available with serious lack of experience and qualifications. High turnover (D)": Poor management capacity of beneficiaries to achieve the task	▪ "Instruments of central controls present, well-defined and well-implemented (A)": process supervised by the MA in Madrid, with its constant supportive role - "Stable structures and responsibilities throughout the entire programming period (A)": Adequate organizational features of the PA - "Staff available with some constraints in experience, qualifications or turnover (B)": significant management capacity of beneficiaries to achieve the task	"Systems not clearly defined, with major processing problems and frequent delays (D)"		"Systems clearly defined, with quick processing of payment claims, and efficient checks (A)"	
Project Payment (ProjectMan 2)	Establishment of a system of commitments and payments	PA	Organizational Features: ○ Proposition 3			"Ineffective systems (D)"		"Systems of commitments and payments highly efficient, within time constraints (A)"	
		Final beneficiaries, for the elaboration of a project dossier and relative expense documentation	Organizational Features: ○ Proposition 2						
Decommitment (ProjectMan 3)	Decommitment rule (n+2)	Final beneficiaries, with adequate management capacity	Organizational Features: ○ Proposition 2			"Significantly above-average decommitments (D)"		"No decommitments (A)"	

Table 4. Explaining the results of the implementation process: the monitoring stage

Dimension	Dimension Description	Main Actor(s) Involved	Specific Component(s) of MLG and relative Proposition(s) Measured	Main characteristics of this stage		Results of the implementation process			
				Italian Context	Spanish Context	Campania	Calabria	Andalusia	Galicia
Presence of an adequate system of indicators and monitoring procedures (Monit1)	Creation of a monitoring system in line with European standards	Monitoring structures Regional political support	Decentralization: ○ Proposition 1 *Political Factors:* ○ Proposition 4	▪ "Absence of instruments of central controls (D)": stage decentralized at the regional level ○ In Campania & Calabria: - "Staff available with serious lack of experience and qualifications. High turnover (D)": lack of the final beneficiaries' staff of a monitoring culture to ensure that monitoring data is promptly and correctly inserted within the online system - "Moderate political interest. Sporadic actions (C)": except for obtaining monitoring data for upcoming elections - "Absence of interest to increase stakeholders mobilization capacity (D)": within the MCs, low stakeholder involvement and decision-making role	▪ "Instruments of central controls present, well-defined and well-implemented (A)": presence of a single national monitoring system established by the MA in Madrid, with procedures consistent across regions - "Staff available with sufficient experience and qualifications. Low turnover (A)": final beneficiaries' staff with a consolidated monitoring culture to ensure that monitoring data is promptly and correctly inserted within the online system - "Strong interest to increase stakeholders' mobilization capacity. Actions clearly defined and implemented (A)": Strong involvement of the stakeholders within the MCs' activities - "Significant political interest. Actions partially defined and implemented (B)": in the last years of programming, strong investment of regional political class within the MCs to use monitoring for management purposes	"Incomplete monitoring system, with operational malfunctions (D)"		"Consistent monitoring system, with procedures perfectly operational. System perfectly in line with European standards (A)"	
Availability of physical, procedural, and financial data (Monit2)	Availability of monitoring data throughout the entire programming cycle	Final beneficiaries, able to correctly enter data into information systems	Organizational Features: ○ Proposition 2			"Only financial data available at all times (C)"		"All physical, procedural, and financial data available at all times (A)"	
Use of monitoring for management purposes (Monit3)	Monitoring as supportive of general programming	MC, with a decision-making role and plural composition (e.g. representatives from EU, MA, national and sub-national governments, stakeholders, etc.)	Political Factors: ○ Proposition 4 Stakeholder Participation: ○ Proposition 6			"Lack of use of monitoring for program management (D)"		"Frequent use of monitoring for program management (B)"	

Table 5. Explaining the results of the implementation process: the evaluation stage

Dimension	Dimension Description	Main Actor(s) Involved	Specific Component(s) of MLG and relative Proposition(s) Measured	Main characteristics of this stage		Results of the implementation process			
				Italian Context	Spanish Context	Campania	Calabria	Andalusia	Galicia
				Stage entirely delegated to regional actors					
Evaluation Activities (Eval1)	Institutionalization of an evaluation system	Evaluation Units	Political Factors: ○ Proposition 4	○ In Campania: - "Strong political interest. Actions clearly defined and implemented (A)" - "Strong interest to increase stakeholders' mobilization capacity. Actions clearly defined and implemented (A)" ○ In Calabria: - "Absence of political interest (D)"	○ In Andalusia: - "Absence of political interest (D)" ○ In Galicia: - "Strong political interest. Actions clearly defined and implemented (A)" - "Strong interest to increase stakeholders' mobilization capacity. Actions clearly defined and implemented (A)"	"Established and well implemented (A)"	"Low quality of evaluation activities (C)"	"Low quality of evaluation activities (C)"	"Established and adequately implemented (B)"
Use of evaluation for management purpose (Eval2)	Evaluation as support for general programming	Regional political support	Political Factors: ○ Proposition 4 Stakeholder Participation: ○ Proposition 6			"Institutionalized use of evaluation for program management (A)"	"Lack of use of evaluation for program management (D)"	"Lack of use of evaluation for program management (D)"	"Institutionalized use of evaluation for program management (A)"

Table 6. Assessment of the implementation process

Phase	Dimension	Assessment of the OP implementation performance			
		Total absence of implementation gap(s) ←			→ Total presence of implementation gap(s)
		Consolidated/Strong (A)	Significant (B)	Moderate (C)	Absent/Weak (D)
(1) Programming	Prog1	Processes clearly defined, and implemented well	Processes clearly defined, and implemented adequately	Processes defined, but implemented inadequately	Processes not clearly defined, and implemented inadequately
	Prog2	Well-structured documents, with a clear development strategy	Some deficiencies in program document structure and strategy	Several deficiencies in program document structure and strategy	Documents of poor quality, without a clear strategic focus
	Prog3	Efficient and speedy negotiation and timely approval	Efficient negotiation process, but with minor delays in negotiation/approval	Major problems with negotiations, but minor delays in approval	Major problems with the negotiation process, and major delays in approval
(2) Project selection/approval	PSA1	High-quality projects, and integrated within a single idea of development	Medium quality projects, and partially integrated within a single idea of development	Poor quality projects, and less integrated within a single idea of development	Poor quality projects, and not integrated into a single idea of development
	PSA2	Well-defined criteria (including well-developed and applied criteria), with short decision times	Well defined criteria, with partly long decision times	Criteria not completely defined, lengthy procedures with a focus on formal criteria	Lack of defined criteria, with long decision times
(3) Project management	ProjectMan 1	Systems clearly defined, with quick processing of payment claims, and efficient checks	Systems partially defined, with quick processing of payment claims and some checks	Systems partially defined, with major processing problems	Systems not clearly defined, with major processing problems and frequent delays
	ProjectMan 2	Systems of commitments and payments highly efficient, within time constraints	Systems of commitments and payments partially efficient, within time constraints	Systems of commitments and payments partially functioning, with some delays	Ineffective systems
	ProjectMan 3	No decommitments	Above-average commitment of funds, below-average decommitments	Above-average decommitments, below-average commitment of funds	Significantly above-average decommitments
(4) Monitoring	Monit1	Consistent monitoring system, with procedures perfectly operational. System perfectly in line with European standards	Consistent monitoring system, with procedures partially operational. System partially in line with European standards	Not totally complete monitoring system, with some operational malfunctions	Incomplete monitoring system, with operational malfunctions
	Monit2	All physical, procedural, and financial data available at all times	Physical, procedural, and financial data partially available at all times	Only financial data available at all times	No data available
	Monit3	Institutionalized use of monitoring for program management	Frequent use of monitoring for program management	Partial use of monitoring for program management	Lack of use of monitoring for program management
(5) Evaluation	Eval1	Established and well implemented	Established and adequately implemented	Low quality of evaluation activities	Absence of evaluation activities
	Eval2	Institutionalized use of evaluation for program management	Frequent use of evaluation for program management	Partial use of evaluation for program management	Lack of use of evaluation for program management

Table 7 Components of MLG, theoretical arguments, dimensions of analysis and main empirical evidence

Factor(s)	Theoretical Proposition(s)	Dimensions of analysis	Definition to the purpose of the research	Empirical Application		Assessment of the variables listed in the propositions				Main Empirical Evidence
						Consolidated/strong (A)	Significant (B)	Moderate (C)	Absent/weak (D)	
(I) Decentralization	P1. In the case of multi-level and multi-actor policies, we find fewer implementation gaps if there are instruments of central control than if there are none.	Prog1	Formal attribution of responsibility to a central authority to coordinate, and supervise the activities of the decentralized implementation bodies, and to help them to achieve their task	Presence of a central authority that:	Coordinates all the activities related to the programming organization	Instruments of central controls present, well-defined and well-implemented	Instruments of central control present, but partially defined and partially implemented	Instrument of central controls partially present and defined. Poorly used	Absence of instruments of central controls	- Dimension "Programming Organization" in Andalusia and Galicia - Dimension "Project Management/Financial Control" in Andalusia and Galicia - Dimension "Presence of an adequate system of indicators and monitoring procedures" in Andalusia and Galicia
		Prog2			Coordinates all the activities related to the elaboration of the program documents					
		PSA1			Has the power and the willingness to improve programming capacity of the implementation bodies through the elaboration of ad-hoc instruments to help them to develop their capabilities to generate high-quality projects coherent with the overall programming					
		ProjectMan1			Uses instruments to promptly separate management and control functions, and to assign clear responsibilities of annual controls between all the implementation bodies involved					
		Monit1			Coordinates the establishment and the development of the monitoring structures and systems					
(II) Organizational Features	P2: In the case of multi-level and multi-actor policies, we find fewer implementation gaps if there is availability of suitably qualified staff than if there is not.	PSA1	Availability of staff within the organization(s) with sufficient experience and qualifications to achieve the task due. Low turnover	No turnover, and presence of staff with adequate technical expertise and knowledge regarding European rules within the structure(s) related to:	The MA and the final beneficiaries, in order to generate high-quality projects coherent with the overall programming	Staff available with sufficient experience and qualifications. Low turnover	Staff available with some constraints in experience, qualifications or turnover	Staff available with major constraints in experience, qualifications or turnover	Staff available with serious lack of experience and qualifications. High turnover	- Dimension "Project Payment" in Campania - Dimension "Availability of physical, procedural, and financial data" in Andalusia and Galicia
		ProjectMan2			The final beneficiaries, in order to manage the project dossier and the relevant expense documentation					
		ProjectMan3			The final beneficiaries, in order to manage the single projects within time constraints					
		Monit2			The final beneficiaries, in order to ensure that monitoring data is promptly and correctly inserted in the online monitoring system					
	P3: In the case of multi-level and multi-actor policies, we find fewer implementation gaps if there is organizational stability than if there is not.	Prog3	Stability of the organizational structures of the implementing bodies throughout the entire implementation period. No internal reorganization of responsibilities.	No internal reorganization of responsibilities, and stability of the organizational structures related to:	The MA, to follow the activities related to the negotiation and the approval of the OP	Stable structures and responsibilities throughout the entire programming period	Largely stable structures, with minor internal reorganization	Some instability, with episodic internal reorganization	Unstable structures with frequent internal reorganization	- Dimension "Project Payment "in Andalusia and Galicia - Dimension "Negotiation & Approval" in Andalusia and Galicia
		PSA2			The MA, to follow the activities related to the definition of clear criteria for project selection/approval, and their related approval procedures					
		ProjectMan2			The PA, to follow the activities related to the project payment					
(III) Political Factors	P4: In the case of multi-level and multi-actor policies, we find fewer implementation gaps if regional government has a political interest in promoting and sustaining a policy over the years than when it does not.	Prog1	Willingness and capacity of the regional government to promote adequate requirements for policy implementation	Willingness and capacity of the regional government:	To build and sustain the programming organization throughout the entire implementation period	Strong political interest. Actions clearly defined and implemented	Significant political interest. Actions partially defined and implemented	Moderate political interest. Sporadic actions	Absence of political interest	- Dimension "Programming Organization" in Campania - Dimension "Evaluation Activities" in Galicia - Dimension "Use of evaluation for management purpose" in Campania
		Monit1			To establish and consolidate a monitoring system in line with the EU standards					
		Monit3			To use monitoring as supportive of the general programming throughout the entire implementation period					
		Eval1			To establish an Evaluation Unit, and to consolidate its evaluation activities					
		Eval2			To institutionalize the use of evaluation for management purposes throughout the entire implementation period					
(IV) Stakeholder Participation	P5: In the case of multi-level and multi-actor policies, we find fewer implementation gaps if there is mobilization capacity among all the actors involved than if there is none.	Prog1	Stakeholders with adequate technical resources and expertise to present their view at the negotiation table	Stakeholders' capacity to actively contribute to the discussion about:	The programming phase, by presenting ideas and concrete proposals to improve the general quality of programming organization	Strong stakeholder mobilization capacity	Significant stakeholder mobilization capacity	Moderate stakeholder mobilization capacity	Absence of stakeholder mobilization capacity	- Dimension "Programming Organization" in Andalusia and Galicia - Dimension "Program Documents" in Andalusia and Galicia
		Prog2			The programming phase, by presenting ideas and concrete proposals to improve the general quality of program documents					
	P6: In the case of multi-level and multi-actor policies, we find fewer implementation gaps if a higher level of government creates the conditions for mobilizing all the actors involved than if it does not.	Monit3	Willingness and capacity of a higher level of government to provide room for stakeholders' interactive involvement in governance and to help them to develop their capabilities	Elaboration of specific conditions for stakeholders' involvement:	Within the MCs' activities to guarantee its proper functioning (including the use of ad-hoc instruments to help them to develop their capabilities)	Strong interest to increase stakeholders' mobilization capacity. Actions clearly defined and implemented	Significant interest to increase stakeholders' mobilization capacity. Actions partially defined and implemented	Moderate interest to increase stakeholders' mobilization capacity. Sporadic actions	Absence of interest to increase stakeholders' mobilization capacity.	- Dimension "Use of monitoring for management purpose" in Galicia - Dimension "Use of evaluation for management purpose" in Campania and Galicia
		Eval2			In the evaluation activities and in discussing the evaluation results (including the organization of training courses to develop their capabilities on evaluation issues)					

Appendix

Table 1.A. and Table 2.A. respectively summarizes the sources used to empirically assess the variables listed in the six theoretical propositions and to categorize each dimension for the four regional OPs analyzed. These sources include the target interviewees and the questions posed.

For methodological correctness, it should be noted that all the in-depth interviews were conducted by the same researcher/evaluator, and that during the field analysis the same dimension had been investigated with at least three of the different public and private actors previously indicated (in accordance with their expert knowledge about the different stages of the OP implementation). In line with Natow (2020), in this way it was possible to obtain a fuller picture of the situation being investigated, and to make the triangulation as accurate as possible.

To select interviewees, an "expert interview" methodology (Littig, 2011) was used. For the purposes of this research, "experts" were considered individuals with thorough knowledge of how the four ERDF OPs were implemented in their different stages, and in accordance with the selected dimensions. Different types of public and private actors were included. Namely, interviewees were selected as follows for each OP analyzed: two Commission officials in DG Regio; three national officials; five representatives in total from the MA, Certifying Authority (CA), and PA; four officials working on regional structure; two external evaluators; six representatives of the main stakeholders involved in the OP (two institutional, two socio-economic, two from the tertiary sector). Interviews lasted approximately 60 minutes each. Following the recommendations of della Porta and Keating (2008), a low profile was kept, anonymity was guaranteed, and within 24 hours, interviews were manually transcribed and analyzed. Overall impressions regarding the interview and the interviewee were also noted.

Table 1.A: Source(s) used to assess the variables listed in the theoretical propositions

Factor(s)	Proposition(s)	Dimensions	Sources used to assess the variables listed in the theoretical propositions											
			EC reports	National and regional program documents	Evaluation studies	Interviews with:								
						Commission officials in DG Regio	Officials working on national structures	Representatives from:			Officials working on regional structures	External evaluators	Representatives of key stakeholders	Exemplary Question(s) Posed during the Interviews
								MA	CA	PA				
(I) Decentralization	Proposition 1	Prog1	X	X		X	X	X			X			*Which structures/actors participate in the activities related to the programming organization? Were these activities coordinate by a single authority? If so, by whom and how were the activities related to the programming organization arranged among the structures/actors involved?*
		Prog2	X	X		X	X	X			X			*Which structures/actors participate in the activities related to the elaboration of the program documents? Were these activities coordinate by a single authority? If so, by whom and how were the activities related to the elaboration of the program documents organized among the structures/actors involved?*
		PSA1		X	X	X		X			X	X	X	*[Related to the most representative axis of each ERDF OP] Has anything been done to help the final beneficiaries of the projects to improve their programming capacity for project generation? If yes, by whom and which specific actions had been elaborated? Were these actions promptly implemented?*
		Project Man1	X	X		X	X	X	X					*How was the process related to the separation of management and control functions? Which structures/actors participate in this process? Were these activities coordinated by a single authority? If so, by whom and how were the responsibilities of annual controls assigned among the implementation bodies?*
		Monit 1		X	X	X	X				X	X		*How was the process related to the establishment and the development of the monitoring structures and systems managed? Which structures/actors participate in this process? Were these activities coordinated by a single authority? If so, by whom? Were common procedures across all the implementation bodies developed?*
(II) Organizational Features	Proposition 2	PSA1			X		X	X			X	X	X	*[Related to the most representative axis of each ERDF OP] Did the final beneficiaries/the MA have staff with adequate technical expertise to generate high-quality projects coherent with the overall programming? Was there a staff turnover during this phase?*
		Project Man2		X	X			X		X			X	*Did the final beneficiaries have staff with adequate technical expertise, and monitoring culture, to manage the project dossier and the relevant expense documentation? Was there staff turnover during this phase?*
		Project Man3	X	X	X	X		X	X	X			X	*Did the final beneficiaries/the MA have staff with adequate technical expertise, and management capacity, to manage the projects financed within the OP within time constraints? Was there staff turnover during this phase?*
		Monit 2			X					X	X		X	*Did the final beneficiaries/the MA have staff with adequate technical expertise, and monitoring culture, to promptly and correctly insert the monitoring data within the online monitoring system? Was there a staff turnover during this phase?*
	Proposition 3	Prog3		X		X	X	X			X			*During the stage of negotiation and the approval of the OP, was there any change in the organizational structures related to the MA? And in the internal reorganization of responsibilities?*
		PSA2		X	X		X	X			X		X	*[Related to the most representative axis of each ERDF OP] During the stage of project selection/approval, was there any change in the organizational structures related to the MA? And in the internal reorganization of responsibilities?*
		Project Man2		X			X			X			X	*During the stage of project payment, was there any change in the organizational structures related to the PA? And in the internal reorganization of responsibilities?*
(III) Political Factors	Proposition 4	Prog1		X	X	X		X			X	X	X	*Which actions had the regional government taken to establish the processes related to the programming organization? Was there a political interest in programming issue throughout the entire programming period?*
		Monit 1		X		X	X	X						*Which actions had the regional government taken to establish and consolidate the monitoring system? Was there a political interest in the monitoring issue throughout the entire programming period?*
		Monit 3		X	X		X	X			X		X	*Which actions had the regional government taken to use monitoring as supportive of the general programming? Was there a political interest in this issue throughout the entire programming period?*
		Eval1		X	X		X				X	X		*Which actions had the regional govenrment taken to establish the Evaluation Unit and to consolidate its evaluation activities? Was there a political interest in the evaluation issue throughout the entire programming period?*
		Eval2		X	X		X				X	X	X	*Which actions had the regional government taken to use evaluation for management purposes? Was there a political interest in this issue throughout the entire programming period?*
(IV) Stakeholder Participation	Proposition 5	Prog1		X				X			X		X	*Were the stakeholders able to actively contribute to the discussion about the programming organization? Did they come up with any concrete proposals?*
		Prog2		X				X			X		X	*Were the stakeholders able to actively contribute to the discussion about the elaboration of the program documents? Did they come up with any concrete proposals?*
	Proposition 6	Monit 3		X		X		X			X		X	*Were the stakeholders actively involved within the MC's activities? Has anything been done to help them actively participate in MC's activities and decisions?*
		Eval2		X	X		X	X			X	X	X	*Were the stakeholders actively involved in the evaluation activities? And in the discussion of the evaluation results? Has anything been done to help them to increase their evaluation skills?*

Table 2.A: Source(s) used to assess the implementation process

Phase	Dimension	Sources used to evaluate the OP implementation performance												
		EC reports	National and regional program documents	Evaluation studies	Data related to (de)commitment, expenditure, and system effectiveness	Interviews with:								
						Commission officials in DG Regio	Officials working on national structures	Representatives from:			Officials working on regional structures	External evaluators	Representatives of key stakeholders	Exemplary questions posed during the interviews:
								MA	CA	PA				
Programming	Prog1		X	X		X	X	X			X	X		*Were the processes related to the programming organization clearly defined? Was there any re-programming? If yes, how is the original programming organization changed?*
	Prog2		X	X		X	X	X			X	X		*Did the program documents clearly identify the targets to be reached? Were they integrated within a clear strategic development strategy?*
	Prog3	X	X			X	X	X						*Were there any problems encountered during the negotiation and approval phase of the OP? If yes, what kind of problems? Was the process completed on schedule?*
Project selection/approval	PSA1		X	X		X		X				X	X	*[Related to the most representative axis of each ERDF OP] How was the quality of the competitive/non-competitive projects presented? Were they integrated within a single idea of development?*
	PSA2		X		X	X		X			X	X	X	*[Related to the most representative axis of each ERDF OP] Which were the criteria used for project appraisal and selection? Please, explain their main technical characteristics. Were these criteria clearly defined? How long did these procedures last?*
Project management	ProjectMan1	X	X		X	X	X	X	X		X			*Please, reconstruct the events relating to the formal separation of power between management and control, as required by the EU regulations. After this formal separation of power occured, were the processes related to the financial control and management systems clearly defined and operational? Were there any processing problems?*
	ProjectMan2		X		X	X	X			X	X		X	*Were the systems of commitments and payments operational, and within time constraints? Was there any problem at this stage?*
	ProjectMan3	X	X		X	X		X		X	X		X	*Was there any commitment of funds? If yes, please quantify it.*
Monitoring	Monit1	X	X			X	X				X	X		*Was the system of indicators of monitoring procedures complete and adequate? Was this monitoring system in line with the European standards? Were its procedures operational throughout the entire programming period?*
	Monit2			X	X			X			X		X	*Were all physical, procedural, and financial monitoring data available at all times? If no, please specify which monitoring data were always available and which were not.*
	Monit3		X	X		X		X				X	X	*Were the monitoring activities used as supportive of the general programming during the OP implementation process? If yes, when and how monitoring was used for management purposes?*
Evaluation	Eval1	X	X	X		X	X				X	X		*Please, indicate all the evaluation activities carried out in relation to the ERDF OP 2007-2013. By whom were these assessments made? How was the quality of the evaluation produced?*
	Eval2		X	X		X		X			X	X	X	*Were the evaluation activities used as supportive of general programming during the OP implementation process? If yes, when and how were evaluation results used for management purposes?*