



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL FOR EDUCATION AND CULTURE

Vocational training and adult education; Erasmus+

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Ms. Gina Ebner  
Secretary General  
European Association for the  
Education of Adults (EAEA)  
Rue d'Arlon 40,  
B-1000 Brussels

**Subject: EAEA recommendations for the improvement of Erasmus+**

Dear Ms. Gina Ebner

The European Commission would like to thank the European Association for the Education of Adults (EAEA) for its members feedback on the new Erasmus+ programme. Below please find our replies to your concerns.

**1. GENERAL REMARKS**

**1.1. Participation of Third Countries**

ERASMUS+ is open to the participation of organisations from partner (third) countries. There are no restrictions to the level of the grant as it was in the case of LLP. They only need to bring their innovations and added value to the European partnership, since the programme is focused on boosting European cooperation. We consider that the programme already gives sufficient possibilities for including organisations from partner countries and enhance European cooperation.

**1.2. Coordination between NAs**

We share your concern for information and standards provided by National Agencies to be coherent throughout the Programme countries. The Commission therefore designs a full range of reference documents, rules, procedures and tools such as the Programme Guide, Guide for National Agencies, Guide for Experts on quality assessment, etc., for National Agencies to apply so as to ensure equal treatment of all applicants under the Programme. The implementation of these reference documents is closely monitored by the Commission.

**1.3. Create a 'European pot' at the EACEA**

The main aim of Strategic Partnerships is to support the development, transfer and/or implementation of innovative practices as well as the implementation of joint initiatives promoting cooperation, peer learning and exchanges of experience at European level.

Project proposals are assessed against a series of award criteria, among which is the relevance of the proposal to the objectives of European policies relevant to one or more fields of education, training and youth. Whereas it is true that the decentralised implementation of the strategic partnerships emphasises the national selection it is also true that the particular situation of Brussels based European organisations has been catered for by a specific budget allocation to the Belgian agencies allowing them to give funds to European organisations without disfavours national organisations and vice versa. The implementation of the programme will be assessed, including for this specific issue you raised, and adjustments put in place should it be deemed necessary.

#### **1.4. Larger-scale projects for adult education**

We consider that Strategic Partnerships still can cater for it and at the same time there will be a possibility for policy oriented projects under the KA3. Under KA3 two types of projects are envisaged: **Prospective Initiatives** giving support to **forward-looking cooperation projects** on policy developments led by high-level key stakeholders and **European policy experimentations** led by high level public authorities to stimulate innovative policies and prepare their implementation. You can find more information about this action and open calls on the Executive Agency's web-site: [http://eacea.ec.europa.eu/erasmus-plus/actions/support-for-policy-reforms\\_en](http://eacea.ec.europa.eu/erasmus-plus/actions/support-for-policy-reforms_en).

#### **1.5. Introduce an information campaign to potential applicants in countries with low participation**

We will take this into consideration and will work on it together with the National Agencies, National Coordinators for the European Agenda for Adult Learning and EPALE. EPALE will include information on funding available to Adult education stakeholders, including through Erasmus+. The additional support brought by EPALE National Support Service should help in reaching more stakeholders than has been done so far in those countries, which will hopefully increase interest / participation in Erasmus+. EPALE will also support adult education stakeholders in those countries to engage more learners, by providing them with resources to reach out to the hard-to-reach learners.

### **2. MOBILITIES**

#### **2.1. Enable umbrella organisations to apply for all their members**

The purpose of the KA1 and European Development Plan is to make sure that the mobilities are in line with the strategy of the organisation and also to build the capacity of the organisation. Umbrella organisations could apply on behalf of the national consortium, but the sending organisations should be identified since we have an obligation imposed by the Financial Regulation to trace all beneficiaries. We believe that the only way to build the capacity of the organisation that it takes part of the ownership of the project and that the activities are fitting to the strategy of the organisation. The mobility should have a clear purpose and be beneficial to the sending and receiving organisations.

#### **2.2. Lack of course overview**

Many organisations, including those funded through LLP or Erasmus+, will be able to post their courses on EPALE very soon. There will be no validation process of the courses as such, but a check will be made by the Central Support Service, to ensure that



the information provided on each course or event is sufficiently complete for potential participants to assess the event themselves, that events are of interest to the adult education community, and are submitted by recognised organisations.

### **2.3. At least a 2nd (if not 3rd) deadline is necessary**

On the basis of past experience, one deadline has been concluded to be sufficient.

### **2.4. Are conferences learning activities?**

Yes, the conferences are learning activities and as long as they fulfil the minimum requirement for the duration of the staff training activity, as long as it could be demonstrated that the teacher would learn and it fits into the European Development plan of the adult education institution.

## **3. STRATEGIC PARTNERSHIPS**

### **3.1. Simplify the form**

It would be helpful if you could provide concrete examples of what and how could be simplified.

### **3.2. What's an intellectual output?**

The explanations of an intellectual output in the 2015 Programme Guide will remain largely as they were in the 2014 Guide providing several examples in terms of broad categories. The purpose is to be as inclusive as possible and not to limit possible outputs to a narrow list.

Hence, the Programme Guide gives examples such as: *"curricula, pedagogical and youth work materials, open educational resources (OER), IT tools, analyses, studies, peer-learning methods, etc."*

### **3.3. Rethink the management fee urgently**

The Programme Guide 2014 and the forthcoming 2015 version both mention two figures for contributions to eligible costs under the heading project management and implementation: 500€ per month for the coordinating institution and 250€ for each of the participating organisations. The maximum per project is at 2750€ per month. These amounts are unit costs. It should be noted that unit costs for intellectual outputs include the provision of a dedicated manager. Contributions are granted as daily rates that vary depending on the country of the organisation whose staff is involved. The new Financial Regulation has clear rules regarding simplified grants, including that they must be based on an objective methodology. All the categories of unit costs have been prepared on thorough research based on real cost data from the previous programmes. As grants must include co-funding from the beneficiary, co-funding is built into the rates of the unit costs. The Financial Regulation obliges the Commission to regularly review the rates and a mid-term assessment will be made. In the meantime, it would be helpful if EAEA could submit evidence of any concrete problems, so that they can be considered in our monitoring of the functioning of simplified grants under Erasmus+.

### **3.4. Rethink dissemination / exploitation for financing**

The costs for activities related to dissemination and exploitation of results are covered by

the component of the budget "Project management and implementation". Dissemination and exploitation of results, especially for projects under KA2, is a key element of the new Programme. The fact that this element is conceived as part of a wider set of elements related to the management and implementation of the project does not diminish its value, but on the contrary, lists these types of activities as essential component among the core expenses of the project. Dissemination and Exploitation activities are treated here together with other activities which are essential parts of the project life-cycle, such as planning, finances, coordination and communication between partners, and possibly activities covering the organisation of virtual cooperation and local project activities or the organisation and mentoring of embedded learning/training activities.

### **3.5. Participants with less than 99 km**

The set-up of the programme considers that the travel costs are a contribution to the total expenses incurred when travelling to the activity, not necessarily covering the full costs. In the case of distances under 99 Km and based on the results of the analysis to create the funding rules, it was not deemed appropriate to include an additional distance band for under 99 KM for this action. The travel costs will also be subject to reviews and it would be helpful if EAEA could submit evidence of any concrete problems, so that they can be considered in our monitoring of the functioning of simplified grants under Erasmus+.

### **3.6. Lack of preparatory visits**

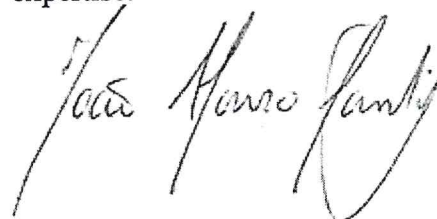
The preparatory visits were discontinued as they lacked impact and critical mass. However, the Transnational Cooperation Activities planned by NAs can be used for pre-project contacts in so far as these happen within the planned support and contact seminars for potential programme participants.

Indeed, NA may organise (and participate in).the following eligible activities:

- Transnational training, support and contact seminars of potential Programme participants;
- Transnational thematic activities linked to the objectives, priority target groups and themes of the Programme;
- Transnational evidence based analysis of Programme results

### **3.7. Definition of “extraordinary costs”**

The exact terminology used in the Erasmus+ Programme Guide is "exceptional costs", and it refers to relevant expenditure not covered under other categories of the funding rules. For strategic partnerships exceptional costs are related to subcontracting or purchase of goods and services or costs for providing a financial guarantee. The purpose of this category is to allow for innovative measures to be supported even though the implementing organisations do not have the necessary expertise.



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