

Simplifying European Research Funding: Ideas for European Research and Innovation Programmes

This position paper complements the overarching [Helmholtz FP10 position](#) from 02/2024.

Framework Conditions

Long-term objectives: The challenges set by a common overarching agenda must be pursued in the long term and require the continuous commitment of all European stakeholders. The opportunity to lead in a scientific or technological field should not fall victim to interruptions and budget cuts. Research that contributes to the solutions of tomorrow depends on lasting support via funding, stable beneficial framework conditions and the reduction of detrimental subsidies in other sectors. Call descriptions of the current framework programme Horizon Europe require a wide variety of different actors to participate, leading to the formation of very large consortia and a lack of involvement by some key research participants. Being more precise and targeting medium size consortia could prevent frustration and increase success rates, enabling applicants with the right set of skills to apply. In addition, this would also result in consortia that are better manageable and more efficient in their cross-border collaboration.

Legal boundaries: The preparation of Horizon Europe projects was hampered by the late publication of the first full non-draft version of the Annotated Grant Agreement. As a result, beneficiaries could not align their procedures and the potential for errors increased. Therefore, the EU Regulation for the next European Research and Innovation Programme (MFF 2028-) should stipulate that the Annotated Grant Agreement shall be published within the first three months after the EU Regulation takes effect.

It has become a business model for consultancy firms to build large consortia, write competing proposals and to coordinate projects. Partners in such proposals are often pressured into paying a hefty fee to the coordinator. This development must be stopped. Clear-cut topics and call conditions, calls for small to medium sized consortia and incentives for research organizations to become coordinators could help to reverse this erroneous trend.

Interaction: The direct involvement of EU legal and financial experts in stakeholder events strongly decreased during the pandemic and was not reestablished afterwards. Moreover, the restriction of the "Whoiswho" EU Online Portal is causing an increasing lack of transparency regarding responsibilities and accessibility of potential contact persons in the European Commission. Furthermore, the Research Enquiry Service (RES) often replies to questions in a general manner and cannot substitute the Common Legal Support Service of DG RTD for all cases. In addition, only few RES FAQs get published on the F&T Portal. Feedback possibilities should not be reduced to public stakeholder consultations. Instead, there is a need to re-establish an active outreach and openness of the European Commission, not only to umbrella organizations and not only online, but to the full diversity of research stakeholder organizations and all formats.

Project Management

Lump sums: Mono-beneficiary grants in particular have potential for increased lump sum use if application procedures get simplified. To save time of applicants, all templates, tools and information related to lump sum proposals should be provided on a one common platform. The lump sum budget table should be integrated into part A of the proposal via a calculation sheet. It should be simplified in its structure and allow for the calculation of exact amounts to the second decimal. As time-sheets are not required for lump sum projects, please refrain from requesting reporting of person-months (PM) in this funding scheme.

Proposals: Searching for all the necessary tools and templates and manually inserting data of successful proposals into the F&T Portal creates a significant workload. For example, during Grant Agreement Preparation, most of the tables from the proposal template have to be manually copied into the corresponding tables in the SyGMA platform on the F&T Portal. Among them lists of deliverables, milestones and work package descriptions of several pages. An automatic transfer of the proposal data to the respective areas of the Portal would considerably reduce the workload of the coordinator and potential errors.

Furthermore, the current general information regarding the reserve lists for proposals is too vague. The requirements of funding for projects on a reserve list should be defined by a common strategy and communicated upfront and the duration of the time to decision should not exceed three months.

Portal: LEARs and Account Administrators should be given automatic access to all their organisation's proposals and grants on the Portal. Settings for information notification services should allow for individual filtering not only in terms of frequency but also in regard to content (e.g. projects). Moreover, request notifications should only be sent to the LEAR, Account Administrators and those individuals who have read access regarding the documents linked to them. A "my archive" section could be added to the grants folder of the Portal in order to shorten the list of items in the "my proposals" and "my grants" section according to the choice of the user. This will facilitate a better overview, efficient communication, a more relevant database and easier analysis.

Reporting: Train EU Financial Officers in regard to existing simplification measures to ensure 100% application e.g. of the 15% rule for other costs. Do not require additional justification if the declared interim reporting person-months (PM) deviate from a presumed average per month. The current assessment based on a theoretic average PM-rate per month is flawed by design, as in reality a beneficiary's workload can vary widely between Work Packages. Deviation below such an average rate is not underperformance and above is not over performance. In addition, personnel costs can vary between Work Packages due to different staff working on the action. Performance monitoring should be based on the technical reviews per reporting period. This will avoid a time consuming exercise on both sides and delays.

Personnel costs increase during the action duration due to developments in collective labour agreements and deviations above a reasonable fixed percentage could be briefly explained in the personnel cost financial reporting section. Regarding the calculation of personnel costs there should be no rounding of day-equivalents for the reporting of actual personnel costs as it is imprecise and causes additional complexity for the cost calculation, ceilings checks and reporting. It is a source of error for the beneficiary. In order to avoid a discrepancy between the personnel costs recorded in the accounts and the personnel costs in the financial statements, the exact amounts recorded should be used.

For the purchase of equipment necessary for the project a wider usage of the full cost option could facilitate the process. Moreover, a default rule for prototype costs is needed for all options of Art.6.2.C.2 Grant Agreement, making the full costs of components necessary for the prototypes development eligible based on national rules and usual accounting standards of the beneficiary irrespective of its record in the assets account ("capitalisation").

Audits: There should be one platform and one set of templates for audits. This will streamline the process, create a safe common platform and ensure that GDPR rules are observed. Auditors appointed by the EU should not be able to use other platforms with their own structures, tools or templates. Requests for audit samples should not only be limited regarding the minimum but also regarding the maximum, e.g. 10 to x samples instead of 10% (+?%) of the total. Checks of travel costs in audits should be based on the beneficiary's accounting principles and should not be subject to special investigations requiring more than proof of the costs invoiced and a short explanation why the travel was necessary.

Additional Simplification for the Future

Financial reporting: Accept personnel costs of persons working 100% for the action as they are recorded in the accounts. No calculation is required if no extraordinary absences occurred. For other staff a pro rata scheme instead of a complex calculation could apply. Part-time declarations signed once per reporting period listing the % per month or a work contract appendix, which foresees a certain percentage of work time dedicated to the EU action could deliver sufficient proof. Do not bar times of training or parental leave from eligibility of personnel costs in any EU programme. Try to streamline the reporting templates, guidelines (e.g. regarding travel costs) and rules of financial reporting across the different EU programmes. Make the tools available on one common platform and enable reporting for all programmes via the F&T Portal.

Amendments: During the implementation of a project, changes may become necessary due to changed circumstances or new knowledge. In the past, the amendment procedures were time consuming and hampered the project's further progress. Speed up these procedures, avoid friction caused by lengthy internal processes and increase trust in the assessment by a stronger focus on the achievement of project objectives and sense of proportion.

Internal monitoring: Once the PIC has been used for a proposal draft the respective LEAR and Account Administrators should get a short notification and automatic access to the proposal. This helps larger organisations to monitor and support their applicants. In addition, introduce an automatic change log for beneficiaries' staff involved in project reporting to easily check what was changed and by whom. This makes monitoring more effective, avoids superfluous messages and eases reporting.

Evaluation and communication: Proposals should be evaluated by experts in the respective scientific field to ensure proper quality assessment. High scoring but below the cut-off for funding encourages scientists to participate in multiple e.g. MSCA proposals per year and resubmit at a high rate in the following year. This leads to increased competition and frustration among scientists. The European Commission should convince Member States and regional governments to make use of synergies via financing those projects which received the Seal of Excellence but no EU funding. In addition, the MSCA expert database should be renewed and based only on experts who have own practical research experience and supervised PhDs in the past. Finally, to ensure effective communication during implementation, EU Project Officers should only be assigned to projects of their own expertise.

Templates: In order to facilitate the application of Grant Agreement obligations, please provide additional legal templates, e.g. a standard template for sub-grant agreements of cascade funding. Moreover, via an automatic transfer of EU-template data into the Portal also reporting can be simplified, e.g. the reporting of trans-national access activities which requires detailed data for each researcher granted access to a facility participating in the project. With hundreds of researchers to be reported for an 18-month period, entering this data into SyGMA manually creates a significant workload. SyGMA limits simultaneous data entry by multiple users, so the introduction of an Excel-compatible offline template that allows data to be completed, merged, and uploaded in a single online submission, would considerably simplify the reporting process.

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