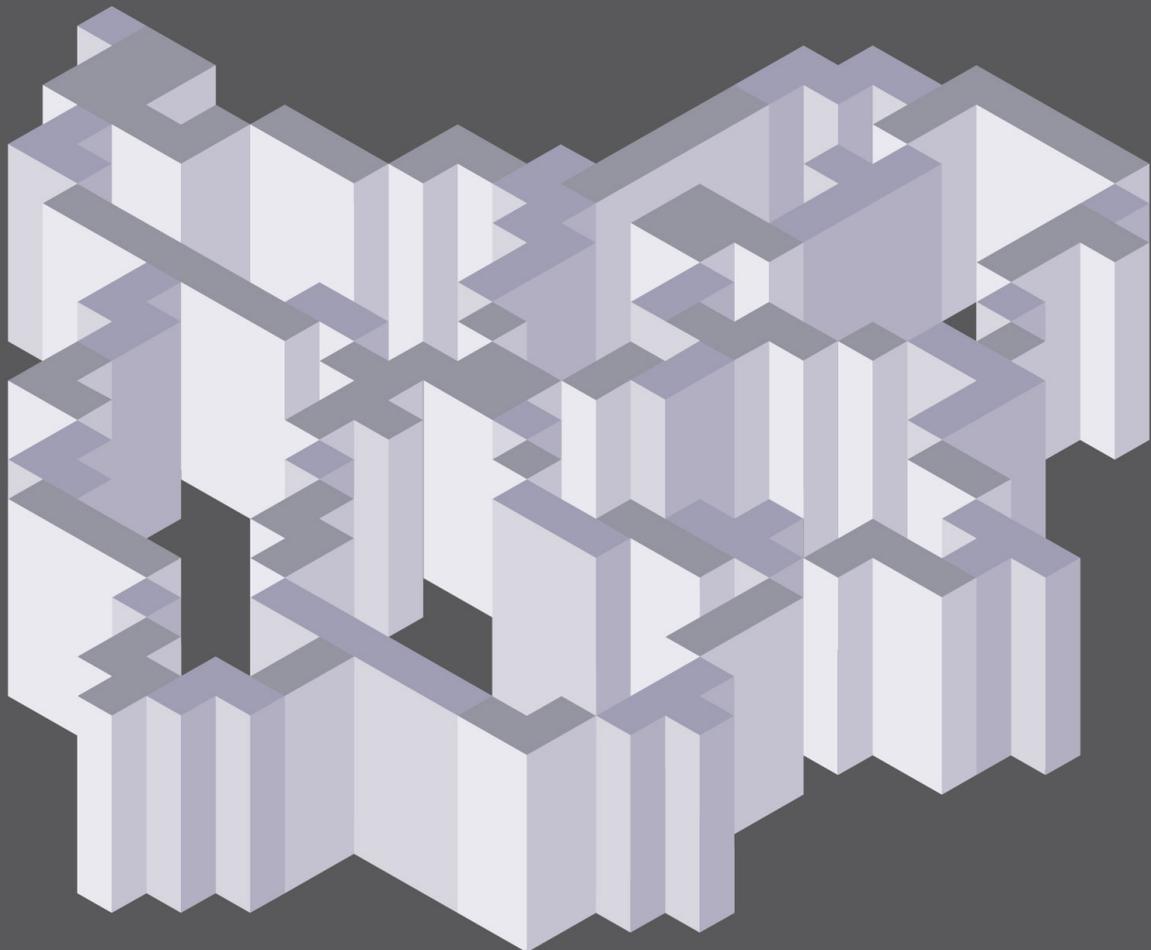


Programme for Development
of the Regions 2021 – 2027

OPERATIONAL DOCUMENTS
FOR REGIONAL DEVELOPMENT
COUNCILS



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This report has been prepared under a Reimbursable Advisory Services Agreement (RAS) on *Enhancing the Regional Development Process in Bulgaria and supporting Ministry of Regional Development and Public Works in the programming process for the period 2021-2027*, signed between the Ministry of Regional Development and Public Works (MRDPW) of the Republic of Bulgaria and the International Bank for Reconstruction and Development / the World Bank on April 8, 2019.

This report constitutes *Output 3.2 – A report with draft operational documents describing the specific operational dimensions of Regional Development Councils (RDC) related with their potential involvement in the implementation of the upcoming programme for 2021-2027 with respect to the current Regional Development Act (RDA)*. The report was delivered to MRDPW following a World Bank internal peer review process.

The Government of Bulgaria's programming process is evolving, and this report captures the status as of August 2020 to the extent possible.

Budget line:

BG16RFOP001-8.002-0005 of Sector „Strategic planning and programming” Unit, GD “SPPRD”

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ACKNOWLEDGEMENTS

This report was prepared under the supervision of Christophe Push (Practice Manager, Urban, Land, and Disaster Risk Management, Europe and Central Asia), David N. Sislen (Former Practice Manager, Urban and Disaster Risk Management, Europe and Central Asia) and Fabrizio Zarcone (Country Manager, Bulgaria, the Czech Republic, and Slovakia), with technical guidance from Paul Kriss (Lead Urban Specialist, Europe and Central Asia).

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Important peer review comments were received from Eolina Milova (Senior Environment Specialist), Ivelina Taushanova (Senior Communication Specialist), Desislava Nikolova (Senior Economist), Toma Yanakiev (Senior Transport Specialist), Ivelina Peneva (Audit Consultant), and Jordan Dimitrov (Human Resources Consultant) to finalize this document.

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ABBREVIATIONS AND ACRONYMS

CBC	Cross Border Cooperation
CCTA	Coordination Council for the Territorial Approach
CoM	Council of Ministers
CoMD	Council of Ministers Decree
CSA	Civil Servants Act
DIC	District Information Center
ESF	European Social Fund
ESIF	European Structural and Investment Funds
ERDF	European Regional Development Fund
GFA	Grant Financial Aid
ITI	Integrated Territorial Investment
LC	Labor Code
MA	Managing Authority
MF	Ministry of Finance
MFESIFA	Management of the Funds from European Structural and Investment Funds Act
MRDPW	Ministry of Regional Development and Public Works
NAFA	National Archives Fund Act
NGO	Non-governmental Organization
PDR	Program for Development of Regions
RDA	Regional Development Act
RDC	Regional Development Council
RIRDA	Rules for the Implementation of the RDA
UMIS	EU Project Management Information System in Bulgaria

GLOSSARY

Cohesion Policy	The European Commission's cohesion policy is aimed at EU Member States whose Gross National Income per inhabitant is less than 90 percent of the EU average. It aims to reduce economic and social disparities and to promote sustainable development.
Common Provisions Regulation	The Common Provisions Regulation is a regulation (No 1303/2013) of the European Parliament and of the Council laying down common provisions for the European Structural and Investment Funds. A new common provision regulation has been drafted in May 2018 to apply to the next implementing period for these funds, which covers 2021-2027 but not yet adopted by the Parliament.
European Regional Development Fund	The European Regional Development Fund is one of the main financial instruments of EU's cohesion policy. Its purpose is to contribute to reducing disparities between the levels of development of European regions.
European Structural and Investment Funds	The European Structural and Investment Funds are five main funds that work together to support economic development across all EU countries in line with the objectives of the Europe 2020 Strategy. These are the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development, and the European Maritime and Fisheries Fund.
European Social Fund	The European Social Fund invests in people, with a focus on improving employment and education opportunities across the European Union. It also aims to improve the situation of the most vulnerable people at risk of poverty. The fund covers all EU regions.
Integrated Territorial Approach	The Integrated territorial approach means the overall Government of Bulgaria framework to promote Integrated Territorial Investments. More specifically, the integrated territorial approach assumes the 2021-27 ESIF resources devoted to regional development will primarily finance integrated projects, meaning bundles of interventions with a common development goal covering functional areas and generating positive regional impact.
Integrated Territorial Investments	Integrated Territorial Investments allows EU Member States to bundle funding from several priority axes of one or more Operational Programs to ensure the implementation of an integrated strategy for a specific territory. These are defined in Article 99 of the proposed Common Provisions regulation.

Managing Authority	Under the auspices of the EU's cohesion policy, a managing authority is responsible for the efficient management and implementation of an operational program. A managing authority may be a national ministry, a regional authority, a local council, or another public or private body that has been nominated and approved by an EU Member State.
Nomenclature of territorial units for statistics (NUTS)	The NUTS is a geographical nomenclature subdividing the economic territory of the EU Member States into territorial units at three different levels (NUTS 1, 2, and 3), moving from larger to smaller units. NUTS is based on Regional (EC) No 1059/2003 of the European Parliament and of the Council of 26 May 2003.
Operational Programs	Operational programs are detailed plans in which the EU Member States set out how money from the European Structural and Investment Funds will be spent during the programming period. They can be drawn up for a specific region or a country-wide thematic goal (e.g. Environment). For the European Territorial Cooperation goal, cross-border or interregional operational programs are drawn up.
Regional Development Act	The Regional Development Act is a legal act in Bulgaria (in force since August 31, 2008) that regulates the planning, programming, management, resource provision, supervision, control and assessment of the implementation of the strategies, plans and programs for conducting state regional development policy; spatial development planning of the territory on a national and regional level. The act was most recently amended on March 13, 2020.
Regional Strategies	Territorial strategies (under Article 23 of the draft Common Provisions regulation) should contain the: (a) the geographical area covered by the strategy; (b) an analysis of the development needs and the potential of the area; (c) a description of an integrated approach to address the identified development needs and the potential; (d) a description of the involvement of partners in the preparation and in the implementation of the strategy. They may also contain a list of operations to be supported. Territorial strategies should be drawn up under the responsibility of the relevant urban, local or other territorial authorities or bodies.
Implementation Rules	These lay down the detailed rules for implementing the Regional Development Act. The implementation rules were updated in line with the recent amendment to the RDA and were promulgated in State Gazette, issue 70/August 7, 2020.

INTRODUCTION

The government of the Republic of Bulgaria seeks to reduce regional disparities. Some of these efforts relate to the introduction of an integrated approach for investing funds from European Structural and Investment Funds (ESIF) at the regional level. This will be realized by means of expanding the role of the Regional Development Councils (RDC) in defining future integrated territorial investments (ITI).

Integrated Territorial Investment Approach

During the programming period 2021-2027, investment in the amount of 76 percent of the financial allocation of the Program for the Development of the Regions (PDR) and 10 percent from the budget of contributing programs funded by the European Social Fund (ESF), the European Regional Development Fund (ERDF), and the Cohesion Fund for the next programming period will be implemented through ITIs to support the integrated territorial development of the Bulgarian regions.¹ The resources will be allocated among the six NUTS 2 regions as indicative regional financial envelopes.

The integrated approach envisions partnerships of eligible local beneficiaries (municipalities, NGO, business operators, service providers etc.) for the development and implementation of ITI concepts. The concept should address common problems or promote potential for development of targeted territories. Each ITI concept will integrate project ideas which are interrelated and coordinated but will be implemented independently by the members of the partnership, with funding obtained under individual contributing Programs. There is no restriction – apart from the size of the regional financial envelope - on the number of ITI concepts that can be prepared and implemented on the territory of one NUTS 2 region.

It is envisioned that RDCs participate in the process of selection of ITI concepts. To this end, the Regional Development Act (RDA) and the Rules for the Implementation of the RDA (RIRDA) were amended to reflect the modified membership structure of the RDCs to be consistent with their expanded functions. The changes, although a step forward, have not led so far to the establishment of fully institutionalized regional structures with their own administration (staff) and budget. It is envisioned that in its operations RDCs will use the territorial units of the MA of the PDR and experts from the District Information Centers, as well as sectoral experts seconded from contributing MAs based on a ‘networking principle’.

¹. Transport Connectivity Program and the Program for Food and/or Basic Material Assistance are excluded.

Membership and Structure of RDC

The Regional Development Council consists of a Chair, Deputy Chair and members and is assisted by Expert Teams.

The membership of the RDC includes **members with a casting vote when taking all decisions, and observers with advisory votes**. When taking decisions related to the selection of ITI concepts (Art. 19, par. 1, item 3 of the RDA) some of the observers (Art. 18, par. 13, item 6 of the RDA) have a casting vote. **When observers have a casting vote, the membership of the RDC is called an ‘extended team’.**

BOX 1: Members and Observers of the RDC

The members of the RDC are:

- District governors of the NUTS 2 region; and
- Municipal mayors and/or Chairs of municipal councils of the NUTS 2 region.

The ‘extended team’ of the RDC, engaged solely when taking decisions under Art. 19, par. 1, item 3 of the RDA, in addition to representatives of districts and municipalities in the NUTS 2 region, will also encompass the following observers with voting right:

- Representative of the National Association of the Municipalities in the Republic of Bulgaria;
- Representative of national employers’ organizations with members at the respective NUTS 2 region;
- Representative of national organizations of employees;
- Representative of universities from the respective NUTS 2 region;
- Representative of business from the respective NUTS 2 region;
- Representative of public benefit non-governmental organizations from the respective NUTS 2 region.

The representatives of municipalities and members of the ‘extended team’ in the RDC shall be appointed as per a procedure set out in the RIRDA.

The remaining observers with advisory vote at the RDC sessions shall be the representatives of the:

- Central Coordination Unit of the Council of Ministers;
- Executive Agency “Audit of European Union Funds”;
- Each ministry;
- National Statistical Institute;
- Bulgarian Academy of Science.

In its operation, the RDC is supported by Expert Teams. The RDC Expert Teams have no voting right and consist of three separate units with specific functions: *Mediation Unit*, *Public Consultations Unit*, and *Preselection Unit*.

The Mediation Unit consists of two representatives of all DICs in the NUTS 2 region.

The Public Consultations Unit consists of two representatives of DICs in the NUTS 2 region who are different from the DIC representatives in the Mediation Unit.

The Preselection Unit consists of four representatives of the territorial unit of the MRDPW in the respective NUTS 2 region who are members of staff of the MA of PDR as well as two representatives seconded from each of the other MAs of programs co-funded from European funds participating in the implementation of the integrated territorial approach through funding projects under ITI concepts.

When RDCs implement functions related to cross-border cooperation programs, the Expert Teams of the Preselection Unit consist only of representatives of the MRDPW who are members of staff of the MA, the national authority and other structures of the cross-border cooperation (CBC) programs.

Structure of the Report

Under art. 28, par. 3 of the RIRDA, all matters that are not regulated in the Implementation Rules should be in the scope of the rules for the operation of RDCs. **The present report consolidates the rules for the operation of RDCs that are not regulated in the RIRDA or are only partially codified.** A total of six functions/tasks of RDCs are identified which are not regulated in the. Each single function/task has a dedicated chapter. **The first three chapters cover procedures related with the functions of RDCs while the latter three chapters are on the administrative tasks of RDCs.**

Chapter 1 consolidates the procedures for the organization of the RDC information strategy, for mediation tasks, and for public consultations. **Chapter 2** contains a more detailed description of procedural steps compared to Appendix 4 under art. 39, par. 4 of the RIRDA relating to the assessment of ITI concepts by the Expert Teams and RDC, along with guidance on the submission of letters of support for Bulgarian partners involved in projects funded under CBC programs. **Chapter 3** contains the procedures for monitoring the implementation of the ITI concepts and the evaluation of their implementation. The procedure for the preparation of an indicative annual budget is described in **Chapter 4**, and **Chapter 5** focuses on the management of human resources. The last chapter (**Chapter 6**) is dedicated to documentation management, archiving, and maintaining an adequate audit trail.

The procedures are prepared **on the basis of the provisions of the RDA and the RIRDA, including Appendix 4** on setting out procedures for the selection of ITI concepts by the RDC. Some procedures reflect the provisions of other relevant legislation, which is indicated at the beginning of each chapter.

Detailing the implementation of the integrated territorial approach in Bulgaria is a process which is based on active communication between the MRDPW and other stakeholders (participating MAs, , prospective beneficiaries etc.). Therefore, **at the time of the preparation of these procedures, modifications to their initially agreed contents under the RAS Agreement were necessary and this was communicated in writing between the**

RAS Agreement parties. The modifications involve the reformulation of procedures to ensure maximum practical benefit for the Client and consistency with the applicable legislation.

The Bank team regards these procedures as an initial proposal to be further developed upon receiving comments from the MRDPW. In view of the fact that the approach is novel for all stakeholders and evolving, the operational documents should be open for adjustment as the new approach is refined and to reflect the experience that will be acquired during the implementation of the integrated approach especially in the first months after it is launched.

A substantial factor restricting the development of these procedures was the fact **that the preparation of the national legislation containing the detailed rules for the coordination of the implementation of the overall integrated approach, project assessment, grant award, and implementation of ITIs is still pending.** For this reason, some procedural steps are not yet elaborated. Those include the procedures for raising of objections or appealing the evaluation of ITI concepts conducted by the RDC, and the reconsideration of an ITI concept in case the relevant MAs reject fully developed project proposal(s).

Another limitation for the Bank team in developing the document was **lack of information on the restructuring of the PDR MA that took place in summer 2020.** Therefore, during the elaboration of the procedures, the restructuring proposed by the Bank in spring 2020, which was in principle accepted by the MRDPW, was taken into account or used as the basis. According to this earlier RAS deliverable, titled '*A Proposed Mechanism to Involve Regional Development Councils,*' the Bank team made a proposal for the restructuring of the territorial units of the PDR MA in order to establish the following departments and functions: (1) Secretariat and Monitoring; and (2) Mediation and Public Consultations Units; (3) providing each territorial unit with two additional remote workplaces of Strategic Planning and Contracting Department to be in charge of the organization of the operation of the Preselection Unit.

PART 1

RDC INFORMATION STRATEGY, MEDIATION AND PUBLIC CONSULTATIONS

Scope and subject of the procedure

The scope of the procedure covers the framework that needs to be followed by the Mediation Unit and the Public Consultations Unit in exercising their functions related to the implementation of the integrated territorial investments (ITI) in Bulgaria in the programming period 2021-2027.

To ensure a uniform approach and ensure efficiency in the implementation of the integrated territorial approach in the next programming period, the operations of the Mediation Unit and the Public Consultations Unit should be **coordinated and guided, in terms of methodology, by staff members from the territorial unit of MRDPW in the relevant NUTS 2 region.**

The functions of the Mediation and Public Consultations Units are regulated in Art. 43 of the RIRDA (see the text box below).

TEXT BOX 2: Rules for the Implementation of the Regional Development Act (RIRDA)

Art. 43. (1) **The Mediation Unit** has the following functions:

1. **Coordinates and supports the formation of a partnership between stakeholders** at the regional level in the process of preparing integrated project proposals or concepts for integrated projects under the integrated territorial approach;
2. **Facilitates communication between potential partners** by means of awareness campaigns and information activities;
3. **Has responsibility for the information strategy of the RDC** when publicizing the integrated territorial approach and providing information on the terms and conditions for obtaining letters of support within the meaning of Art. 19, par. 1, item 3 of the RDA;

4. **Every two months prepares a report on the established partnerships and prepared concepts** for integrated territorial investments for the relevant period; the report is submitted for information and reviewed at the next session of the RDC through its Chair within five days from the end of the relevant 2-month period;
5. **Assists potential applicants under CBC programs** through awareness campaigns and information activities.

The Public Consultations Unit has the following functions:

1. Has responsibility for conducting public events and for the preparation of the schedule and program for those;
2. **Organizes** and carries out conventional and innovative forms of **public consultations** and presentations **related with the review and discussion of submitted ITI concepts**;
3. In case of received proposals for modifying the scope and content of concepts the unit informs the partnership thereof and sets deadlines within which the partners have the right to redo their concepts;
4. **Prepares a report on the outcomes of public consultations held and evaluates the degree of public support for submitted ITI concepts** in accordance with criteria published upon the launching of the relevant call for selection of concepts; the report is submitted to the RDC Secretary;
5. Organizes and carries out public consultations and presentations related to the review and discussion of submitted concepts of potential Bulgarian applicants under the CBC program in accordance with the requirements in the announcement for submission of letters; prepares a report on the outcome of public consultations held and submits it to the Preselection Unit.

The three processes - of the implementation of **the RDC information strategy**,² **mediation and public consultation** - have a common denominator, namely **the implementation of the integrated approach in Bulgaria** in the coming programming period. This is the reason they are consolidated in a single chapter in the current document. At the same time from an organizational and procedural point of view they are clearly distinct. Each of the three processes is explored in a separate subchapter.

The rules for the measures for information and communication measures, mediation and public consultation are developed in accordance with **good practices** and recognized standards for conducting consultations with stakeholders in the **EU³ and Bulgaria**.⁴ Also used

² For conciseness and in view of the practical focus of the document, hereinafter 'implementation of RDC information strategy' will be referred to as 'information and communication'.

³ Better Regulation Guidelines – Consultations with Stakeholders, the European Commission (https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox_en)

⁴ Standards for conducting public consultations, adopted by the Council for Administrative Reform on September 16, 2019 (<http://www.strategy.bg/Publications/View.aspx?lang=bg-BG&categoryId=&Id=296&y=&m=&d=>)

as source of good practice are the principles of the World Bank⁵ for stakeholder engagement and public consultation in the development and implementation of projects.

In the document the term '**mediation**' is understood broadly. It does not refer to the traditional meaning in terms of mediation as part of conflict resolution processes. Rather it refers to the process of providing the conditions necessary for the establishment of viable partnerships capable of the development and implementation of integrated projects constituting elements of an ITI concept. From this perspective the approach used for mediation in each region will reflect local specificities. The success of mediation is more contingent on the skills of the relevant experts involved rather than on the implementation of standardized steps or approaches. Nevertheless the process of mediation has to be consistent with the general horizontal rules which provide for the required quality of the process and equality of all participants but also allow flexibility and diversity of details, which are in consistence with the specific scope of the ITI concept and expectations and needs of prospective beneficiaries.

In this case, '**public consultations**' should be understood as the combination of measures to inform the public about planned integrated investments and for obtaining feedback regarding the public support (or lack thereof) for the envisioned investments and the method of their implementation. From this standpoint, public consultations are more susceptible to a standardized approach compared to the process of mediation. Given the fact that public consultations are part of the process of assessing ITI concepts this further requires some level of standardized approach to guarantee credibility and transparency of the process.

This document has been developed **considering the dynamic nature** of the spread of **COVID-19 and the possible restrictions for face-to-face public events** required when launching mediation and public consultation processes. To mitigate potential risks, the proposed rules include additional information and proposals relating to electronic and virtual communication among stakeholders.

Principles

As mentioned earlier, the processes related to information and communication, mediation and public consultation although clearly distinct in procedural terms, share a common starting point - the implementation of the integrated approach in Bulgaria. Therefore, the main principles which are to govern the operation of the Mediation Unit and the Public Consultations Unit which are engaged in the processes, are as follows:

Openness - measures for information and communication, mediation and public

⁵ For more information visit:

<https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>

<http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf#page=111&zoom=80>

<http://documents1.worldbank.org/curated/en/476161530217390609/ESF-Guidance-Note-10-Stakeholder-Engagement-and-Information-Disclosure-English.pdf>

consultation must be accessible to all parties interested in the relevant topic. This requires maximum openness and transparency of the processes as well as additional efforts such as timely provision of information for stakeholders, the selection of appropriate methods and languages for communication, time and venue for the measures considering the abilities and preferences of stakeholders, etc.

In other words, for maximum outreach to people and institutions that may be interested in the proposed topic of intervention for reasons relating to social aspects, professional aspects, health, age, religion, etc., the processes themselves must promote genuine participation and sharing of opinions, which can be accomplished with sincere openness and an appropriately flexible approach.

Equality - introducing rules and procedures that create a level playing field and free access to information promoting inclusiveness as well as encouraging the involvement of all stakeholders. The procedures must guarantee equality of participants. They should incorporate elements that guarantee: 1) recognition of mutual dependence among stakeholders; 2) interaction among all stakeholders; 3) maximum openness to alternative points of view and trust; 4) nurturing shared perceptions of problems - although full consensus is not required, everyone should be helped to understand and recognize the way in which others perceive the problem; and 5) joint decision-making based on reciprocity and commitment, etc.

Equality and dialogue should be regarded as mutually reinforcing. Broad and open communication with different stakeholders, including timely provision of feedback, builds credibility and promotes trust among stakeholders. Trust is a capital which will be required throughout the process of designing, and the subsequent implementation of, ITI concepts.

Productivity/results - measures for information and communication, mediation and public consultation must be meaningful for all parties. In order to ensure satisfactory levels of interest and engagement it is important that stakeholders regard participation as an opportunity to fulfill some of their interests and demands through such an engagement. In the implementation of the measures for information and communication, mediation and public consultation the process of information sharing, and participation must reflect the concerns and interests of a broad range of stakeholders. These processes should be structured and managed in a way which ensures participants can develop a good understanding of the topic on the part of participants and subsequently engage in constructive discussions and efficient finalization.

Putting these principles at the core of the planning and organizing of measures for information and communication, mediation and the public consultation will promote trust, engagement, and consequently – credibility and efficiency of the three processes.

Timeframe

Although connected, the processes related to information and communication, mediation and public consultations will be implemented in sequence. Provisionally they are divided in three phases, because of their specifics and different duration.

Phase 1 covers measures for information and communication in connection with making local and regional stakeholders as well as local communities familiar with the integrated territorial approach, and with terms and conditions for obtaining letters of support in connection with CBC programs.⁶

This stage covers efforts to promote the integrated approach and integrated investments (ITI concepts) as a tool for addressing development challenges and supporting development potential of targeted territories and will be for the duration of the entire programming period. The information measures will support in communication terms the processes of mediation and public consultations.

Phase 2 envisions measures for mediation among prospective beneficiaries for the establishment of partnerships responsible for the development and implementation of ITI concepts.

This stage starts prior to the publishing of the calls for proposals (including guidelines) for ITI concepts and ends with the submission of the latter

Phase 3 is about organizing public consultations on developed ITI concepts. The stage is directly connected with the process for the assessment of ITI concepts at the level of RDCs, starting with their official submission via UMIS and ending with the preparation of a report on the outcomes of public consultations.

Phase 1 is a preparatory one with respect to the mediation and public consultation carried out in Phases 2 and 3, essentially conditioning their success. At the same time the outcomes of the process of mediation are also of key importance because they will help more accurately identify stakeholders that would require special attention and the opinion of which may positively or negatively impact public support for envisioned investments (Phase 3). In this respect **during the planning and implementation of individual stages it should be noted that the separation between them is relatively provisional, because they intertwine and are interdependent.**

Nevertheless, **to ensure a stable framework for implementation and also considering that different units are responsible for the implementation of the different activities (or phases) envisioned in the RIRDA, every stage must be planned separately.** The preparation of a plan and its observance will allow managing the process in accordance with the principles described above. The plan for each stage must be part of the planning and management of the

⁶ During the programming period 2021-2027 it is envisioned that the Bulgarian partners under projects funded from CBC programs will have to obtain letters of support from RDC to pursue their projects.

RDCs involvement in the implementation of the integrated approach. This would mean that typical project management instruments such as timeframes, Gantt Charts, and logical framework approaches can be used to support coordination of the phases. Enough time must be provided for each of the steps and key stakeholders should be accommodated. Stakeholders should be familiar, or be provided with information to become familiar, with the discussed topics to be able to constructively contribute to the discussion. Correct definitions and explanation of the objectives, sub-objectives, measurable results and their indicators with target values - all of those in the right moment and with matching requirement for resources - considerably reduce the risk of failure of the process of engagement. These plans must also provide for monitoring and adjustments, to ensure flexibility in case of unforeseen eventualities.

Information and communication (Information Strategy)

Having in mind the functions of the Mediation Unit (responsible for the RDC information strategy and in making local communities familiar with the integrated territorial approach and the terms and conditions for obtaining letters of support for CBC programs), this section provides **guidelines for the preparation and implementation of the RDC information strategy**. Such a strategy must **be prepared by each Mediation Unit** considering the specifics of the relevant NUTS 2 region.

The major elements of an information strategy are: (a) objectives of the strategy, (b) target audience, (c) communication activities and budget, (d) measures for monitoring the implementation of the strategy and indicators to quantify the outcomes of implementation.

Objective of the strategy

The major focus of the RDC information strategy is **to generate knowledge, understanding and support with respect to the integrated approach** (CBC programs included). The completion of this objective will create the foundations for a favorable communication environment for mediation and public consultation process. In the long-term it will also be conducive to building a positive public image of the RDC.

In this regard, special efforts are needed to ensure **maximum outreach to stakeholders** (eligible beneficiaries included) **and the general public**.

Before the preparation of the information strategy it is recommended that a survey be conducted among key stakeholder groups to identify their basic knowledge, areas where there is insufficient awareness, and the level of understanding and support for the integrated approach. This basic information will inform the design of a general message consistent with the target groups and allow the fine-tuning of the scope of information to be provided and the communication activities required. The survey and the analysis of survey results can be

carried out by the experts from the Mediation Unit or can be outsourced to an external contractor.

Target audience

Information and communication measures should be designed for maximum outreach to stakeholders and the general public.

When designing the information strategy, **stakeholders can be divided into three major groups** depending on their key roles and interests vis-à-vis the process of planning and implementation of regional policy through integrated investments. These groups are:

- **Group 1:** public institutions of the central and local government - decision-makers and/or authorities responsible for the implementation of regional policy within the relevant NUTS 2 region. The majority of entities in this group already have information on the integrated approach. This group includes ministries, governmental agencies and their regional structures, regional and local government authorities, etc.
- **Group 2:** the private sector, local business, educational and trade union institutions - this group of stakeholders encompasses the major non-institutional beneficiaries or parties affected by the implementation of the integrated approach. The constituent members in this group either do not have information or have little information about the approach. This group includes enterprises and companies of different sizes, operating across all economic sectors, industrial organizations, agricultural producers and agricultural associations, universities, schools, other education establishments, etc.
- **Group 3:** civil society, NGOs and members of the public as end-users concerned in the process of designing and implementing regional policies including integrated investments. Currently this group has not received much information and it can be assumed that the members of the group either do not have information or only have limited awareness of the integrated approach. This group is the most diverse and this will be a challenge for designing specifically targeted messages during the communication process. An important condition here is that the documents and the information used will need to be easily understandable.

Each one of those groups represents a separate target audience for the information strategy. The tools and channels for communication must accommodate the specifics of each of the groups and its interests.

Each RDC Mediation Unit should prepare a detailed list with stakeholders from groups 1 and 2 for their NUTS 2 region. For Group 3 it is essential to identify who are the opinion leaders and other key NGOs and associations important for the local communities. The list should be extended and regularly updated depending on the information and outcomes from envisioned information and communication measures.

The broad groupings of stakeholders above can be further elaborated as the information and communication activities are rolled out depending on the content of the information to be shared and communicated. **The groupings can be further broken down into subgroups with even more granular and specialized profiling of stakeholders.** It is also possible that some of the measures require the merging and simultaneous targeting of several groups, the focus being on features other than the ones identified during their initial classification.

The list of stakeholders (target groups) must be specified at each stage of the information and communication activities as well as for every specific information or communication measure.

Communication activities, budget, indicators and monitoring

The choice of communication approach should be consistent with the principles of *openness* - equal access to information for everyone, and *equality* - inclusion of everyone and provision of feedback.

These principles require **systemic and systematic efforts ensuring maximum openness of the process, including the timely informing of the public and stakeholders** of the selection of relevant communication channels and instruments, which take into account the abilities and preferences of the target audience.

In order for information and communication activities to be efficient, they will need to **be as specific, covering topics the stakeholders are interested in, and take into account the level of awareness and competence of stakeholders on topic being communicated.**

The different stakeholder groups, the objectives for communications with each group, and the possible types of instruments for communication that may be suitable were developed based on an analysis of available documents including the RDA and RIRDA. This information is summarized in Table 1 below.

TABLE 1: Summary of Key Stakeholder Groups and Communication Objectives and Instruments

Stakeholder group/target group	Objectives	Instruments
Institutions, central and local government authorities	<ol style="list-style-type: none"> Strengthening of: <ul style="list-style-type: none"> awareness, understanding and support for the integrated approach, ITI concepts and CBC; Promoting positive, collaborative and engaged cooperation within the framework of ITI concepts. 	<ol style="list-style-type: none"> Passive: <ul style="list-style-type: none"> Publishing of information in media, institutional websites, social media, directly targeted communication, surveys; Proactive: <ul style="list-style-type: none"> Public events (including virtual events), conferences, seminars, working meetings, etc.
Private sector, local business, educational and trade union institutions	<ol style="list-style-type: none"> Creating and maintaining: <ul style="list-style-type: none"> awareness, understanding and support for the integrated approach, ITI concepts and CBC; Promoting positive, collaborative and engaged cooperation within the framework of ITI concepts. 	<ol style="list-style-type: none"> Passive: <ul style="list-style-type: none"> Publishing of information in media, institutional websites, social media, directly targeted communication, surveys; Proactive: <ul style="list-style-type: none"> Public events (incl. virtual events), conferences, seminars, working meetings, etc.
Civil society, NGO, members of the public	<ol style="list-style-type: none"> Creating and maintaining: <ul style="list-style-type: none"> awareness, understanding and support for the integrated approach, ITI concepts and CBC; 	<ol style="list-style-type: none"> Passive: <ul style="list-style-type: none"> Publishing of information in media, institutional websites; Proactive: <ul style="list-style-type: none"> Public events (incl. virtual events); Contests and competitions;

Publications are one of the main means of communication, which can be envisioned as part of the information strategy. It is preferable to design separate sets of information for each target group presenting different aspects of the integrated approach and ITI concepts and CBC. The developed materials must consider the role and interests of the targeted stakeholders with respect to the process of designing and implementing regional policies. **The form and language must be consistent with the audience, and it is recommended to prepare short pieces of information in an understandable language.** The channels for disseminating information should be selected based on the target audience. **It is recommended, when applicable for the relevant audience, to use digital rather than printed publications.** Digital materials come with greater possibilities to relay information

and provide feedback. Digital communication, in addition to publications in electronic media, institutional websites and social media, can also make use of videos, streaming, webinars etc.

To avoid possible non-focused information and release of inconsistent or contradicting messages, it will be important that all pieces of information in the communication process be aligned with **a single consistent and comprehensive key messaging**. It will be also important to have messages designed for each NUTS 2 region in accordance with the main topics and priorities of the relevant Integrated Territorial Strategy for the Development of NUTS-2 Regions (ITSD).

To ensure understanding and support among **stakeholders it is recommended to complement the communication measures with public events and information meetings in different formats**. The format of events should correspond with the subject of the communication measures, the specific goals and characteristics of the stakeholders involved in the dialogue.

To promote feedback and to measure the impact of publicity measures, online surveys can be designed along with feedback forms for individual events and meetings.

When planning public events and discussions the situation with **COVID-19** must also be considered as this may require certain restrictions and preventive measures for face-to-face meetings or having those meetings online instead.

There will need to be a cost estimation for the envisioned communication activities, and the budget for their implementation should be detailed both in terms of planned expenditures for each individual measure and in terms of timeline for spending.

Having a clearly identified objective to be accomplished makes it easier to allocate and manage the resources as well as to monitor progress and take corrective measures when needed. To this end **the information strategy must accommodate measures for monitoring implementation and indicators to measure outcomes, with target values**. The indicators can reflect the number of individual communication activities, the number of specific identified stakeholders addressed, and/or the feedback received (number of events, proposals, etc.). The monitoring can be done through monthly review and analysis of the implementation of the strategy by the Mediation Units. Should nonfulfillment of indicators be reported, the analysis must also provide recommendations for corrective measures including change in approach for targeting stakeholders, the information activities, the communication channels employed, etc.

Organization of the operation of the Mediation Unit

Under the RIRDA, the Mediation Unit as part of the Expert Team of the RDC are the structures in charge of the implementation of information and communication measures for their relevant NUTS 2 region.

The first step in implementing information and communications measures is to design

the Information Strategy of the Mediation Unit within the RDC for the relevant NUTS 2 region. The strategy should be elaborated considering the ITSD of the relevant region. The strategy should be accompanied by a detailed list of stakeholders for the NUTS 2 region. This should be the basis for the formulation of the key objectives, channels and instruments or means of communication in accordance with the target stakeholders. The strategy should contain a timeline, organizational allocation of tasks among communication experts with the Mediation Unit, costing of envisioned activities, performance indicators and monitoring arrangements. It should be taken into account that as part of the Expert Team of the RDC the Mediation Unit should plan their activities (RIRDA, Art. 28, item 7) as well as their expenditures (RIRDA, Art. 41, par. 1) on an annual basis.

The second in implementing information and communication measures is the implementation of the information strategy on the territory of the NUTS 2 region. According to the approach adopted by the Mediation Unit when allocating tasks, the communication measures can be organized and implemented both at NUTS 2 region level as well as district and/or municipality levels. Regardless of the method selected, the members of staff of MRDPW's territorial unit in the relevant NUTS 2 region who are responsible for coordinating the work of the Mediation Unit will have an important role in ensuring efficient communication processes in the NUTS 2 region. Their obligations will include coordination both at the stage of designing the information strategy and during the implementation, monitoring and analysis of the outcomes.

The third step in implementing the information and communication activities will be their regular review and updating when needed. Considering the provisions of the RIRDA, this must be done at least once a year. Having in mind the expected large intensity of work and regular feedback that will be required, it is recommended that a review and analysis of implementation be done every month during the first year of the implementation of the information strategy.

Mediation

The process of facilitating the establishment of partnership/s for the preparation of ITI concept/s will be carried out by the Mediation Unit of the Expert Team of the RDC (Art. 43, par. 1, item 1 of the RIRDA). In terms of both methodology and coordination arrangements the work of the Mediation Unit will be overseen by an expert in MRDPW's territorial unit in the relevant NUTS 2 region.

Objectives of mediation

In the long run the objective of the mediation process is to create robust partnership relations to serve as the basis for the design and implementation of regional policy. **In the short term, the objective of the mediation process is to facilitate the establishment of partnerships between stakeholders** at the regional level for the preparation of ITI concepts with which to apply for financing in the programming period 2021-2027.

Organization of the operation of the Mediation Unit

The operation of the Mediation Unit is instrumental for the success of the new integrated territorial approach. **Its task is further complicated by the fact that there is still insufficient understanding of the approach and little experience in the preparation of integrated projects.** Therefore, the Mediation Unit will have to be proactive in identifying prospective stakeholders, capturing their attention, and in providing the conditions for the formation of partnerships.

Despite that, the survey conducted among members of staff of District Information Centers indicated a high level of self-awareness with respect to their new functions⁷, **in-depth assessment of the integrated approach highlighted some concerns in terms of potential conflict of interest within the Mediation Unit.** There must be clear distinctions between the functions of the units for facilitation of partnerships and those units **for consultation on the thematic scope of ITI concepts.** The second process is **exclusively within the competence of potential beneficiaries**, and the experts of the Mediation Unit shall not carry out such consultations, otherwise the entire integrated approach could be compromised due to the high likelihood of non-observance of the principle of equality and likelihood of situations related with conflict of interest arising. The steps proposed below are confined only to facilitation of the establishment of ITI partnerships and the provision of strictly procedural guidelines for the application process.

(For information only: At an earlier stage, the World Bank team proposed as an option (for MRDPW to consider), which could help overcoming the problem of both the potential conflict of interest and insufficient capacity and experience of potential beneficiaries with integrated projects. The proposal involved the establishment of an Advisory Hub to provide prospective beneficiaries with expertise with regard to the development and implementation of ITI concepts⁸. MRDPW may further consider this proposal as the arrangements for the integrated approach are further developed.)

The first step is to operationalize the regional objective, or in other words *what needs to be accomplished and how we measure the progress* of implementation. Once it is clear what needs to be accomplished it will be easier to allocate and administer the resources over time. Regular monitoring of progress by the Mediation Unit will allow swift corrective actions to be taken to guarantee the accomplishment of preset objectives to the maximum possible degree.

The results that should be achieved in each of the NUTS 2 region are derived from the development priorities specified in the ITSD and in accordance with the regional budget determined within Priority Axis 2 of the PDR.

⁷ Annex 2, A Proposed Mechanism to Involve Regional Development Councils, RAS for Regional Development.

⁸ Gaps and Solutions Note, risk 1.3. A detailed proposal for an Advisory Hub was presented to MRDPW in November 2020.

Each Mediation Unit should be familiar with the strategic priorities and objectives and the specific activities under the relevant ITSD. The Mediation Unit must be aware at what stage the activities proposed under the ITSD are at: conceptual design, preliminary planning or fully prepared project and the potential stakeholders involved etc. This study can be done in the first instance on the basis of available documents, publications in the media, and other publicly available information. The members of the Mediation Unit, by virtue of being members of staff of DIC, will have access to respective information with successful/unsuccessful prior initiatives and applications for financing. **Systematic study is part of the preparatory work which will allow the Mediation Units to properly allocate limited resources for the accomplishment of objectives.**

After completing the study, it will be **clearer which of the regional priorities are matched with sufficiently specific activities (an initial investment), and which are not.** Priorities with no matching activities would require additional efforts on the part of the Mediation Unit to identify potential beneficiaries. The Mediation Unit should also be aware of the availability of funding under PDR and other contributing Programs to have a sense of the chances that the developed ITI concepts can securing funding for the planned investments.

There is no one single universally valid answer to the question of how many partnerships/ITI concepts are required for a given region.⁹ Every region is different and has its geographic, economic, demographic and historical specificities. It is important that there is confidence that all or a maximum number of priorities identified in the ITSD are covered and the value of potential ITI concepts equals or exceeds the allocated regional financial envelopes.

Step two would be to identify stakeholders for the preparation of ITI concepts, who are subsequently to be subject to the dissemination of information on the integrated territorial approach. **The objective is to create a database with potential stakeholders who are interested in participating in the integrated territorial approach.** The identification will take place in parallel with the first step but it should not finish just with the establishment of a database of organizations, contact persons and their details. **The Mediation Unit should carry out a preliminary assessment as to the degree of possible interest on the part of identified partners to take part in the creation of ITI concepts.** Some prospective partners will be more obvious. These are the public institutions in the NUTS 2 region. Others will be less so, such as representatives of business or the NGO sector.

The Mediation should identify as many representatives of the above two categories of stakeholders as possible. The information about them should be structured based on the scope of the business or operations and level of interest determined on the basis of expert assessment. For example, from an interview in the local media with an executive director of a given business in which he/she announces an intention to invest in new production lines, the Mediation Unit can derive information about the potential need for staff, trainings etc. Subsequently information about the possibilities for financing under the integrated approach could be sent to this company.

⁹ According to the latest draft PDR available at the time the report was drafted, the MA is targeting at least 24 integrated projects under Priority Axis 2, which is roughly 6 on average for each NUTS2 region.

The database with potential stakeholders should be continuously updated and complemented with new information. It should allow filter searches, grouping and analysis of information to identify target addressees for distributing targeted information regarding the potential of the integrated approach.

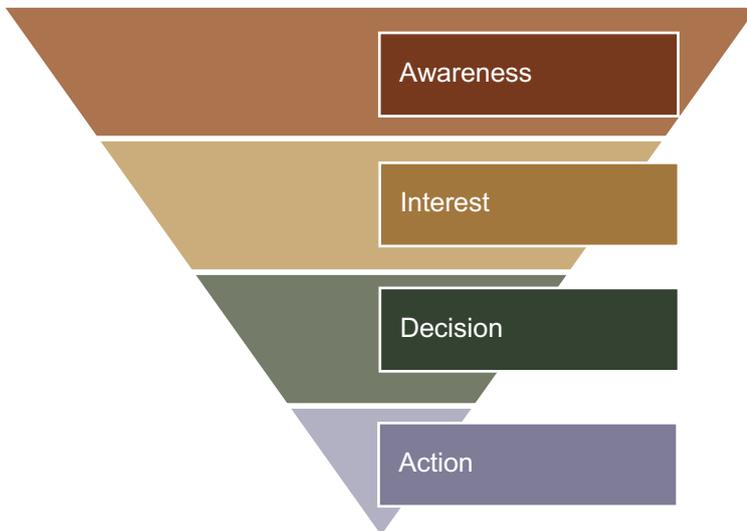
In future, and subject to the consent of the relevant public and private entities, the Mediation Unit, and/or the RDC respectively, could possibly make those registers public to allow easy search of potential partners for the implementation of different projects and initiatives.

The third step is the actual establishment of partnerships for the development and implementation of ITI concepts. **It is important to understand that the task of the Mediation Unit is to provide the conditions for the establishment of ITI partnerships. The Mediation Unit however cannot engage with the development of, and consultation on, the content of ITI concepts.** This would be within the prerogatives of potential stakeholders in case they identify clear interest in participating in the design and implementation of ITI concepts. Still the experts at the Mediation Unit must note that the ultimate objective is the positive assessment of ITI concepts by the RDC and the subsequent implementation of these concepts. Therefore, the work of the Mediation Unit is part of the facilitation of this process by providing the conditions for the establishment of partnerships and guidelines on the application process.

'Conditions for the establishment of partnership' would mean providing the environment (online and/or off-line alike) required for this and making available the necessary information and guidance to potential audiences.

Based on the outcomes of steps one and two, the Mediation Unit prepares a timeline containing the target groups, the methods employed, and the form of communications. This plan will serve to govern the operation of the Mediation Unit.

Although the **Mediation Unit** will build upon the prior accomplishments of the information campaign to promote the integrated territorial approach and ITI concepts as the main means for its implementation, the Unit will need to **organize its work** according to the principles of the so-called *'marketing funnel'*, i.e. **moving from a broad range of stakeholders to targeting more specific potential beneficiaries.**

FIGURE 2: Marketing Funnel

The task that needs to be fulfilled by the Mediation Unit soonest is to start reaching out to the maximum number of stakeholders identified at Step 2. This can be achieved by sending communications with information followed by requests for feedback on their areas of interest; and organizing individual or sectoral meetings to disseminate more specialized information.

At this stage it is important that the experts at the Mediation Unit actively seek feedback from potential partners to capture as much as possible any changes in their interest. Subsequent auxiliary activities should focus on those potential partners with a higher degree of interest. In view of the fact that the experts of the Mediation Unit are members of the staff of DIC, it would be feasible to use the facilities of the latter to host information-sharing meetings. In this way the Unit would effectively act as convener, taking on the role of host of the formats that allow for the meeting of potential partners.

The methods of communication that could be employed are:

1. Passive:

- publishing of documents;
- sending information via email;
- interviews/surveys for feedback from prospective stakeholders.

2. Active:

- public meetings including online meetings and discussions

An important form of support on the part of the Mediation Unit is to provide answers to questions regarding eligibility of partners and measures, as well as to provide upon request the sample partnership agreement, with additional clarifications. For the fulfillment of these duties and to guarantee a uniform approach as much as possible, the experts of the Mediation Unit will have to be trained accordingly. Their training should

precede the release of the Guidance for the beneficiaries under PA2 of PDR 2021-2027 (ITI concepts). The procedure for requesting clarifications on the part of potential beneficiaries should be part of the calls for proposals (including guidelines). The procedure should be in line with the principle of equality - the questions and answers are to be available to all potential beneficiaries.

It is not possible to determine the number of one-to-one or group meetings, required to mobilize potential stakeholders to establish partnerships and prepare ITI concepts. The work of the Mediation Unit starts with its very establishment, prior to the release of the calls for proposals (including guidelines) of ITI Concepts and ends with submission of ITI concepts via UMIS for the assessment at the level of the RDC.

Monitoring of progress

Under Art. 43, par. 1, item 3 of the RIRDA, the Mediation Units is required every two months to prepare a report to the Chair of the RDC on the established ITI partnerships and prepared ITI concepts. The objective of the preparation of this progress monitoring reports is to assess the implementation of the specific objectives set out in Step 1.

The reporting of progress should be measurable in quantitative terms such as number of established ITI partnerships, number of submitted ITI concepts, value of planned investments under ITI concepts (and their envisaged funding source) relative to the objectives. It is important that the progress monitoring report also contains analysis of these indicators in order to determine general trends in the implementation of the integrated territorial approach. It is essential that the RDC be aware of any strategic priority of the ITSD that has received no interest or, conversely, - a priority that may be receiving high interest (exceeding available funding opportunities under PDR and contributing Programs). The report should also contain information about major difficulties the experts of the Mediation Unit encounter as well as problems requiring action in the upcoming period.

Depending on the progress towards the implementation of objectives, the Mediation Unit will plan subsequent actions and will, if necessary, revise the previously prepared timeline.

Public Consultations

Under Appendix 4 to the RIRDA, **public consultations are part of the process of assessing submitted ITI concepts** and are carried out by experts from the Public Consultations Unit within the RDC.

The level of public support for submitted ITI concepts is assessed during the process of conducting the consultations according to three predefined criteria and the underlying measures for quantification:

1. *Degree of approval of the overall ITI concept.* (The percentage of respondents

- positively evaluating the ITI concept as a whole shall be multiplied by a specific weight to obtain the relevant number of points);
2. *Degree of approval for individual projects under an ITI concept.* (The arithmetic mean of percentages of support for each individual project shall be multiplied by a given weight);
 3. *Percentage of the population in the region that took part in the public consultations on the specific ITI concept.* (The percentage shall be multiplied by a weight to obtain the relevant number of points).

The process of public consultations starts with the submission of ITI concepts for assessment via UMIS and ends with the preparation of the report to the Chair of the RDC on the outcomes of consultations.

The preparation of public consultations starts simultaneously with the process of mediation. The experts from the Public Consultations Unit are regularly informed, via the Mediation Unit, of the number of ITI concepts expected to be submitted in the NUTS 2 region. This information is used for planning and conducting public consultations, within the short deadlines under the RIRDA, as well as for utilizing available resources in the most efficient way possible and, if necessary, for mobilizing additional assistance. External experts and/or facilitators of meetings can be included in the consultations, the requirement being that the financing of such activities be budgeted in advance.

In view of the specifics of the CBC program, the amount of work and the implementation timeline cannot be easily predicted and will need to be monitored.

When preparing the public consultations, a detailed implementation plan is required, which should include at least the following four elements: (1) objectives of the consultation, (2) scope of consultation and identification of stakeholders, (3) activities and budget for the public consultations, and (4) timeline for public consultation.

Objectives of public consultations

In preparing the public consultations plan for the submitted ITI and CBC concepts, the following objectives should be summarized:

- To inform the general public about the developed ITI and CBC concepts and the results anticipated from their implementation;
- To obtain feedback from the largest possible share of stakeholders on submitted the ITI and CBC concepts and individual projects they envisage;
- To generate ideas of desired measures to enhance the scope and content of ITI and CBC concepts, which are to be additionally incorporated in the discussed concepts in order to compensate for specific activities which are not acceptable for the general public.

Public consultations will be planned and conducted in a phased way according to the submitted concepts for each NUTS 2 region.

Scope of public consultations and stakeholder identification

The public consultations should have the largest possible stakeholder outreach. Efforts will be required to ensure the participation of regional and local authorities as well as of other administrative entities directly responsible for the implementation of regional policies, local business and unions, representatives of universities and research institutions, as well as NGOs and members of the public directly or indirectly concerned with the elaborated ITI and CBC concepts in the NUTS 2 region. Special attention should be paid to stakeholders who, according to submitted ITI or CBC concepts, are expected to be end-beneficiaries or parties impacted by the envisioned activities. During the public consultations, stakeholders from the following groups should be identified for each NUTS 2 region:

1. Regional structures of governmental institutions (ministries and state and/or executive agencies);
2. Regional government;
3. Municipal authorities;
4. Local business;
5. NGO;
6. Research and educational institutions;
7. Members of the public.

The list of stakeholders for every NUTS 2 region must be detailed before the launching of public consultations using the accumulated information and data on stakeholders collected during the activities for information and communication and for mediation. The list of stakeholders along with the measures for public consultations can be elaborated at the level of NUTS 2 region, district, and/or municipality. The list should be flexible and should be updated on a regular basis depending on the information and outcomes of the implementation of measures. The list of stakeholders taking part in the consultations must be specified at each stage of process.

Public consultations activities

The measures/procedures for public consultations can be classified into two main groups:

1. Passive procedures which can include:

- publishing of documents (including on the government portal for public consultations www.strategy.bg) allowing feedback from all groups of stakeholders and the general public;
- surveys conducted online or circulated at events; and
- public opinion polls.

2. Proactive procedures that can include:

- public meetings including online meetings and discussions;
- information days; and
- conferences.

Blending measures/procedures will allow better coverage of identified groups and differentiation of questions to be addressed to them. The choice of consultation activities is crucial for the efficiency and success of the process. The time limits for public consultations (14 days) must be taken into account when planning the specific measures. However, it will also be necessary to consider the workload of the Unit and how these consultations can be managed in cases where there are a large number of ITI concepts submitted at one time. In such cases it may be necessary for the MA or regional unit of the MA to recommend a minimum scope of consultation activities to ensure that all ITI concepts – regardless of their number – receive the same treatment.

BOX 3: Make Good Use of the Internet

1. A well-designed website (or a dedicated webpage of an institutional website) is a good means of communication with a broader range of stakeholders. It allows the possibility of both provide information and receive feedback. However, it is also important that the links to these sites are well publicized and shared – see below.
2. It is important to use the media and other communication channels to inform the public about the website and encourage engagement/visits. It can also help to prepare short information spots for radio/TV broadcast and publishing in print and electronic media. Use of local media is important. A good approach is to employ appropriate speakers enjoying public trust.
3. Actively use social media. These can be a good communication channel too if well used.
4. To maintain strong interest and engagement regularly update information on the website and social media. The information should be concise and engaging making the people come back to it and share it.
5. Online meetings and discussions should take place according to rules for participation announced in advance. Virtual events should not exceed 2-3 hours. If such time slots are not enough, two or more successive events can be organized on different days. Longer virtual events are usually not the best option.

There should be cost estimates for the envisioned public consultation activities, with detailed budget for implementation, by activity and timewise. It should be taken into account that as part of the Expert Team of the RDC the Mediation Unit should plan their activities (RIRDA, Art. 28, item 7) as well as their expenditures (RIRDA, Art. 41, par. 1) on an annual basis.

Organization of the operation of the Public Consultations Unit¹⁰

Public consultations of ITI concepts

The first step in the work of the Public Consultations Unit of the RDC is the preparation of the schedule and program for the consultations. The schedule and the program shall be prepared in accordance with the deadlines and the requirements of the RIRDA, including Appendix 4 thereof.

The Public Consultations Unit studies the ITI concepts submitted during the call and prepares a schedule and program for the different conventional and innovative public consultations for the purpose of reviewing, discussing and informing the public about the submitted ITI concepts. The choice of forms of consultation depends on the scope of the ITI concept/s. However, since the public consultation is to constitute an element of the evaluation and selection process it will be critical that some level of standardized procedure is devised and followed to avoid too much discretionary

In parallel, experts of the Public Consultations Unit should start **the preparations for public consultations**: preparation of materials, surveys, online events etc.

The schedule and program for the public consultations should be accompanied by a detailed list of stakeholders. On this basis the key objective and activities to be implemented in the process of public consultations should be based on the target stakeholders, the requirements of the RIRDA, and the specific criteria for assessment of ITI concepts. The schedule and program must include the allocation of tasks among communication experts of the Public Consultations Unit and the costing of envisioned activities.

The second step in the work of the Public Consultations Unit within the RDC is the implementation of the schedule and the program for the public consultations. According to the approach adopted by the Public Consultations Unit when allocating tasks, the public consultations can be organized and conducted both at NUTS 2 region level as well as district and/or municipality level. The main criterion when selecting the approach for public consultations should be the requirements for selection of ITI concepts and more specifically determining the percentage of t both at NUTS 2 region level as well as the level of district and/or municipality the population in the region that took part in the public consultations. Regardless of the approach selected, staff of MRDPW's territorial unit responsible for coordinating the work of the Public Consultations Unit will have an important role in ensuring an efficient public consultation process. Their obligations will include coordination both at the stage of designing the schedule and program for public consultations, during the implementation of the consultation, and monitoring and analyzing the outcomes

¹⁰ The organization of the work of Public Consultations Unit provided herein concerns the substance of consultations. The next chapter contains detailed description of the procedural steps they must fulfill.

The third step in the work of the Public Consultations Unit of the RDC is the processing and aggregation of completed survey results (both those completed online and in hard copy), after the public consultations are finished. This task will be organized by staff of the MRDPW territorial unit responsible for coordinating the Public Consultations Unit's work.

The operations of the Public Consultations Unit ends with the preparation of a report and an assessment according to predefined criteria, which would include: (i) the degree of approval for each submitted ITI concept as a whole, (ii) the degree of approval for individual constituent projects in the concept, and (iii) the percentage of population in the region who took part in consultations on a specific ITI concept. The report compiles the comments and questions received during the public consultations as well as the extent to which those are reflected by the applicants in the ITI concept. This is subject to review and discussion by the RDC during the final approval of the ITI concept. The report is sent to the Secretary of the RDC within two months from the expiry of the deadline for submission of ITI concepts in **accordance with Appendix 4 of the RIRDA.**

Public consultations of CBC concepts

The public consultations for review and discussion of submitted concepts of potential Bulgarian candidates under CBC programs will be organized in a similar way; here the requirements of the announcement for obtaining letters under the relevant program must be accommodated. The public consultations for CBC do not require the step for collecting and aggregating proposals to modify CBC concepts which are to be passed on to the potential Bulgarian applicants.

PART 2

ASSESSMENT OF ITI CONCEPTS AND GRANTING OF LETTERS OF SUPPORT TO BULGARIAN PARTNERS UNDER CBC PROJECTS

Scope and subject of the procedure

The scope of the current rules covers the operational organization of the RDC and the expert staff thereof, in connection with the assessment of ITI concepts and the granting of letters of support to Bulgarian partners under CBC projects. The rules only mention some processes which still are not clear. Such procedures are those relating to reporting of 'signals' (complaints or signs of corruption or improper behavior) and/or appealing ranking by the RDC, and reconsideration of the ITI concept in case of rejection of a project/s by the relevant MA.

Concerning the assessment of ITI concepts, the main statutory document governing the preparation of the present rules is Appendix 4 to Art. 39, par. 4 of the RIRDA, describing the steps and the entities in charge of the procedure for the selection of ITI concepts. In connection with the obligations of the RDC to provide letters of support to Bulgarian partners under CBC projects this procedure is to be applied by analogy under the Art. 43, par. 5 of the RIRDA too, unless different specific rules are explicitly established.

The rules are in line with the ESIF Management Act and CoM Decree 162/2016, the proposal for CPR for the programming period 2021-2027, and the practical use of UMIS.

The subject of the procedure is the allocation of responsibilities between the Expert Team of the RDC on the one hand and within the RDC and between the RDC and the Expert Team on the other.

ITI concept assessment

Stage 1: Assessment of ITI concepts by the Expert Team of the RDC

Assessment of the degree of public support

During the assessment of ITI concepts by the Expert Team of the RDC two units are engaged: the Public Consultations Unit and the Preselection Unit. The work of the Public Consultations Unit is coordinated by an expert within MRDPW's territorial unit.

The work of the Public Consultations Unit's experts starts from the day after the deadline for submission of ITI concepts (via UMIS) for assessment by the RDC. Before that the relevant experts should have UMIS user accounts in order to have access to the submitted ITI concepts. This would require amendments to the Ordinance on the terms, conditions and procedure for the functioning of UMIS¹¹ and in the procedure for user account management for the same system approved by the head of the CCU.

The coordinator of the experts of the Public Consultations Unit, within one working day allocates submitted ITI concepts among the members of the unit so that they get familiar with their scope and prepare a schedule for the public consultations.

A schedule for public consultations for each ITI concept is prepared separately, according to an adopted sample form. The schedules must be prepared within four working days and sent back to the coordinator for consolidation and aggregation. The consolidation and aggregation should be according to the principles of efficiency and efficacy for optimal use of available time and human resources.

The coordinator aggregates all schedules and, if necessary, coordinates with the members of the Public Consultations Unit any changes necessary within two working days. The aggregated schedule should be realistic and doable within a 14-working day period, the starting dates of which is to be set out in the schedule. The Public Consultations Unit coordinator submits the schedule for approval to the RDC Secretary. The approved schedule is sent to the experts of the Public Consultations Unit and to the lead partner of every ITI concept so that the events in the schedule be accommodated in their diaries. The schedule is archived according to relevant requirements.

Information on the submitted ITI concepts is published by the experts responsible for the ITI concept within one working day following the approval of the schedule for the public consultations by the RDC Secretary. The publishing is done on a dedicated platform designed for the purposes of public consultations; if this platform is not operational as at the

¹¹https://www.eufunds.bg/sites/default/files/uploads/eip/docs/2018-12/NAREDBA_za_funkcionirane_na_ISUN.pdf

relevant moment, alternatively the official portal eufunds.bg is to be used. **The events in the schedule for public consultations should be organized and conducted within 13 working days.**

Minutes shall be taken for all events to reflect the comments and proposals made in connection with the ITI concepts that have been publicly discussed. The compiling and processing of those minutes will be done regularly by the experts responsible for the relevant ITI concepts with the Public Consultations Unit.

Surveys will be used as a key instrument to obtain feedback on ITI concepts. They will be paper-based and will be handed out during the face-to-face events or they can be online on the Internet platform for ITI consultations or at eufunds.bg. All questionnaires completed on paper or electronically must be accordingly entered into a dedicated software for processing statistical data. Using free software for this purpose is also acceptable however they have limited features.

The questions in the surveys must be formulated to allow subsequent quantification of the level of support for the overall ITI concept and for the individual projects, as provided for by the criteria proposed for ITI concepts selection.

Each expert aggregates the comments received on the ITI concepts for which he or she is responsible and drafts a letter to the lead ITI partners thereby allowing them to redo their concepts. The letter is prepared and is approved by the coordinator of the Public Consultations Unit within five working days from the end of the consultations. The communication with the lead partners should take place in UMIS. The deadline for reworking of concepts should not exceed 10 working days.

Within five working days after the submission of the concepts reworked by the ITI partnerships, the unit must prepare a summary report on the public consultations held, comments received and the way in which they were reflected as well as an assessment of the level of public support according to predefined criteria. **The report is sent to the RDC Secretary.**

We would like to note the fact that public consultations will be organized, and the degree of public support for ITI concepts will be measured, for ITI concepts which were not checked for administrative compliance and/or eligibility. This chronology is logically inconsistent unless the process of public consultations aims at exactly this - to quantify public support and to have adjustments to the submitted projects, including with respect to administrative compliance and eligibility. It is recommended that the report of the Public Consultations Unit be available also to experts of the Preselection Unit. This would prevent inconsistent comments of the Public Consultations and Pre-selection Units to the partnerships with respect to the ITI concepts submitted for assessment and will also satisfy the requirement of item 8 of Appendix 4 under Art. 39, par. 4 of the RIRDA that the Preselection Unit start its operation after the preparation of the report covering the outcomes of public consultations.

Assessment of the eligibility and quality of ITI concepts

Before the Preselection Unit starts its operations, it will be necessary **to establish an Assessment Committee from among the members of the unit consisting of a Chair, Secretary and members**. The Assessment Committee must be established after the expiry of the deadline for adjustments of ITI concepts resulting from the public consultations. Pursuant to the currently effective MFESIFA and CoMD 162 from July 5, 2016, **the order for the establishment of the Assessment Committee is issued by the Head of the relevant MA. In this particular case this should be the head of the PDR** given their lead role in the implementation of the integrated territorial approach. The order should contain the names of the Chair, Secretary and members, including those from other MAs, as well as the criteria for assessment.

The Preselection Unit selects submitted ITI concepts in UMIS. The Chair of the Assessment Committee should create an ‘assessment session’ in UMIS in which to enter the information from the order for the establishment of the Assessment Committee. For traceability purposes it is necessary to explicitly display who did the assessment and according to what criteria. The features of the assessment module of UMIS allows for this.

The work related to the assessment of ITI concepts is done in two stages, in accordance with item 8 of Appendix 4 under Art. 39, par. 4 of the RIRDA, according to predefined evaluation criteria. The first stage is about assessing **the administrative compliance and eligibility of concepts**. The criteria to be applied are: 'yes'/'no'/'not applicable', and the assessment is done within five working days. Upon reporting any discrepancies, the Assessment Committee can demand clarifications from the ITI partnerships, but this cannot lead to the improvement of the quality of submitted ITI concepts.

The first stage finishes with the preparation of a list of all ITI concepts which obtained 'yes' or 'not applicable' on all criteria and are cleared to proceed to the next stage of the assessment of the quality of the ITI concept. The list is prepared by the Secretary of the Assessment Committee. The partnerships whose concepts are not cleared to proceed to the next stage shall be informed in writing accordingly, with the justification for their rejection. Cumulatively the deadline for conducting the assessment for administrative compliance should not exceed 20 working days, including the time necessary to receive additional clarifications.

The ITI concepts that passed the first stage will be assessed in terms of quality in accordance with criteria approved by the PDR Monitoring Committee and stipulated in the Calls for Applications. The deadline for this is 15 working days.

Within five working days from the completion of the work of **the Assessment Committee a report is prepared for the RDC Secretary with a list of ITI concepts which obtained scoring exceeding the stipulated threshold. With this, the work of the Expert Team on the assessment of ITI concepts ends.**

We hereby note that the WB team proposed in an earlier deliverable titled *‘A Proposed*

Mechanism to Involve Regional Development Councils in the Implementation of the PDR 2021-2027 that the **voting members also have the right to check and verify the assessment reports submitted by the Public Consultations Unit and the Preselection Unit**, for compliance with the selection criteria and to endorse these reports or to send these reports for re-assessment in case of inconsistencies. The WB team is of the opinion that the verification and approval on the part of the RDC of the assessment reports prepared by the two units would be an appropriate instrument for reinforcing the ultimate responsibility of the RDC in the selection of ITI concepts and their ownership of the process. **As present this possibility is not provided for in the RIRDA but can be envisioned in the future Council of Ministers Decree (CoMD) covering the integrated territorial approach.**

Stage 2: assessment of ITI concepts by RDC

Following the receipt of the report on the work of the Assessment Committee for ITI concept selection, the RDC Secretary must convene a session of the extended team of the RDC to proceed with the assessment of ITI concepts.

The invitation for the session of the extended team of the RDC, in addition to the venue (or virtual meeting arrangements) and the date of the session, should also contain the two reports of the Expert Team - on the outcomes of the public consultations and on the expert assessment of ITI concepts, along with the concepts themselves, because each member is obliged to independently assess them in accordance with predetermined criteria. The date of the session should be consistent with the amount of information provided for the session and to allow time for the members of the extended RDC team to properly prepare for the session. It will be important that the assessment of ITI concepts is given high priority by the extended team of the RDC to avoid unnecessary delays in the whole process, which is already relatively lengthy.

Each member of the extended RDC team is required to send to the RDC Secretary his or her scores prior to the session. This will not only guarantee independent scoring on the part of members but will also allow the RDC Secretary to aggregate the points from the individual scoring accordingly.

As early as upon receiving the invitation for the session, the members of the RDC extended team who are participating with a project in one of the ITI concepts to be assessed should recuse themselves as they are not allowed to take part in the review and assessment of that ITI concept (Art. 39, par. 5 of the RIRDA).

At the session scheduled by the RDC Chair, the Secretary presents the latest ranking of the concepts. Following an open deliberation, the members vote ‘in favor’ or ‘against’ on each ITI concept separately, thus expressing their support or lack thereof for the ITI concept. The obtained votes are translated into percentages of all members of the extended RDC team who voted. On the basis of obtained percentages of support, each ITI concept gets extra points according to the scale stipulated in advance in the Application Guidelines.

Under item 12 of Appendix 4 under Art. 39, par. 4 of the RIRDA, if one concept gets no positive votes from the members of the extended team of the RDC it will be disqualified and the partnership will have the right to redo it and reapply, in a future call launched by the PDR MA. In case the ITI partnership does not agree with the evaluation results, it may raise objections or appeal the evaluation decision of the RDC to the PDR MA and/or to the relevant court.¹²

The result of the assessment of the ITI Concepts carried out by the RDC can be appealed. The partners of the ITI concept are able to appeal against the evaluation and ranking of the submitted ITI concepts by the RDC - both the rejection of the ITI concept due to administrative inconsistency or ineligibility, as well as against its substantive assessment and the proposed ITI concepts ranking. As the appeal of the RDC assessment and ranking of the submitted ITI concepts is important to ensure the accuracy and legitimacy of the integrated territorial approach in the crucial first stage of the ITI lifecycle, the RDP decisions can be appealed both administratively and on general grounds in court.¹³

The assessment by the extended team of the RDC should take place within one single session. To provide an adequate audit trail, after the preparation of the final list of prioritized, approved and ranked ITI concepts by MRDPW' territorial unit, this list must be submitted to the Chair of the Assessment Committee for uploading to the relevant assessment session in UMIS.¹⁴

The RDC Secretary should send to the PDR MA the final prioritized list not later than 10 working days from the session (which is the time stipulated in Art. 40, para. 2 of RIRDA for the preparation of the minutes of the session and sending of the minutes to the members of the RDC)¹⁵. Upon receiving the list of positively assessed ITI Concepts, **the PDR MA informs the heads of the other MAs** about the outcomes of the procedure for assessment of ITI concepts at the level of the RDCs.

¹² The procedure of raising objections against and appealing of the ITI evaluation decision of the RDC by ITI partnerships is expected to be explicitly regulated in the ESIF Management Act and/or the dedicated CoM Decree on ITI. As far as this would constitute a formally regulated legal procedure, it is not appropriate to incorporate it in the present rules, but the involved bodies and staff members are to refer directly to the normative act in which it is regulated. Note: In the draft ITI Manual for Beneficiaries (cf. p. 62 - 66 thereof) the WB team has proposed a specific administrative appeal procedure for appealing the evaluation decision of the RDC to be regulated in the ESIF Management Act and the dedicated CoM Decree on ITI, in addition to the court appeal procedure. Two options of structuring such administrative appeal procedure, have been proposed, depending on the legal nature of the evaluation decision of the RDC

¹³ Description of the appeal procedure of the RDC assessments and ranking of ITI Concepts is proposed by the WB team in the ITI User Manual. The appeal procedure is not finalized yet. Its finalization is dependent on some pending decisions on its modalities to be taken by MRDPW. Upon its finalization this paragraph should be review and if needed adjusted.

¹⁴ The World Bank team note that there is a technical error in the reference to Art. 49, par. 4 in item 14 of Appendix 4 under Art. 39, par. 4.

¹⁵ ^[1] There is a mismatch between the deadlines stipulated in Article 40, par. 2 and item 15 of Appendix 4 under Art. 39, par. 4 of the RIRDA.

Granting of letters of support to Bulgarian partners of projects funded under CBC programs

With respect to the procedure for issuing letters of support, it is envisioned that the Minister of Regional Development and Public Works approves the dedicated internal rules for the operation of the Preselection Unit, which under the RIRDA, shall consist only of representatives of the territorial unit of the PDR MA, the national authority and other structures of the programs for CBC (Art. 42, par. 5 of the RIRDA).

The process of issuing letters of support starts with the preparation of an announcement. The announcement is prepared by the Preselection Unit and is subject to approval by the Minister of RDPW.

In connection with the public consultations and the assessment of concepts there are no departures from the procedural steps described above for ITI concepts.

In contrast with the assessment of ITI concepts, **for issuing letters of support, the RDC carry this out only through a written procedure**, as seen in Art. 37, par. 4 of the RIRDA.

Note: The WB Team's recommendation is that multiple deadlines for submission of concepts are provided rather than a single one. This would allow a more even distribution of the tasks of the Public Consultations Unit and the Preselection Unit over time. In addition, a concept which received a letter requesting revisions will be able to be adjusted and resubmitted within one of the following deadlines.

It is important once again to note that the RDC will be able to carry out efficient monitoring of funded activities at the NUTS 2 level and the administrative burden for all stakeholders will be reduced if the concept of Bulgarian partners are submitted for assessment through the relevant management information systems under the programs or through another channel the Territorial Cooperation Management Directorate of the MRDPW deems fit, UMIS, etc.

For convenience we provide a diagram below displaying the steps, units in charge and deadlines related to assessment of ITI concepts.

DIAGRAM: Steps, Units in charge and Deadlines related to assessment of ITI concepts.



PART 3

MONITORING AND EVALUATION OF ITI CONCEPT IMPLEMENTATION

Scope and subject of the procedure

The scope of the procedure includes the organization of the process for the monitoring and evaluation of the implementation of ITI concepts. In every NUTS 2 region it is possible to have more than one ITI concepts approved. The exact number and thematic scope of the ITI concepts at this stage cannot be foreseen. Each ITI concept consists of multiple projects which will be implemented by partners from the ITI partnership, under grant agreements concluded with the relevant financing program participating in the integrated territorial approach.¹⁶ The implementation of individual projects will take place according to the rules of the respective financing institutions.

The monitoring and evaluation of the implementation of ITI concepts covers the period after the signing of all contracts for the implementation of individual projects under the ITI concept and ends with the final payment of them. The sustainability period of investment is unaffected.

The subject of the procedure is the distribution of the obligations of the RDC and the Expert Teams thereof as well as the reporting to the Coordination Council for the Territorial Approach (CCTA). The establishment of the CCTA was proposed by the WB team in a previous deliverable title '*A Proposed Mechanism to Involve Regional Development Councils in the Implementation of the PDR 2021-2027*'.

The RDA and the RIRDA, the various proposals of the World Bank team, as well as the package of documents for the preparation of ITI concepts developed by MRDPW were all considered when elaborating the present procedure.

According to the documents elaborated by MRDPW, partners must establish a Coordination Team which will be responsible for: coordinating the development of an

¹⁶ Implementation of an ITI concept is possible with own funds and/or financial instrument. Here only the option of grant financing is discussed.

ITI concept; coordinating the efficient implementation of the overall ITI concept; and the projects and measures envisaged under the ITI concept (Art. 4, item 8 of the Partnership Agreement). During the implementation stage of the ITI concept, the Coordination Team is responsible for the preparation of the quarterly reports on the implementation of the ITI concept to be submitted in UMIS (Art. 7, par. 2 of the General Framework Agreement for Implementation of ITI).

Monitoring of the implementation of an ITI concept

The quarterly reports submitted by the Coordination Teams are reviewed by the experts of the Secretariat and Monitoring Department within the respective territorial unit of the MA within five working days from receipt. The reports should be standardized and must contain uniform information, which will allow for their aggregation and consolidation at the level of NUTS 2 region.

On the basis of the application form, while the ITI concepts are to be made up of interconnected projects, it will be important that, for each ITI concept, **it is determined which projects can be implemented independently and which are dependent on other projects in terms of timing or other matters (E.g. purchasing of equipment needs to happen before training).**

For projects that are to be implemented independently, the report should contain information on the status of the procurement and/or contracting process - tender documentation prepared, procedure announced, stage of submission of proposals, assessment stage, stage of appeals, awarded contract, and also it should be specified if there are any departures from the schedule for implementation in order to calculate any delays or early completion. After the signing of the main commercial contract monitoring only for timely execution of activities should be done.

For projects that have a level of interdependency, in the first months the main focus must be on the key project and the status of its procurement and/or contracting process, by analogy with the projects proposed for independent implementation.

It is recommended that the experts from the Secretariat and Monitoring Department with the territorial unit of the MA, **use the schedule for implementation from the ITI concept application form** updated following the signing of individual and agreements and that they enter there on an ongoing basis the information from the quarterly reports on the implementation of ITI concepts. **When UMIS is upgraded, this should be done automatically, and the expert should be able to generate the relevant reports.**

The reporting of the indicators envisioned in the application form for each ITI concept would be carried out once a year, as it can be expected that there will be no substantial changes quarterly or bi-annually.

The format of reports should allow the Coordination Teams to indicate major problems with the implementation of the ITI concept so that the reporting can serve as an early-warning system to issues with implementation.

All reports must be aggregated at the level of the NUTS 2 region in the form of a report to submitted to the RDC and the Secretary, to provide information about the progress of the implementation of ITI concepts. In case of reported problems, the RDC should be made aware of those in order to undertake measures accordingly. Aggregation of reports and their submission to the session of the RDC shall be within ten working days.

Following a discussion on the progress of the implementation of ITI concepts at the RDC, these concepts **are presented by the RDC Chair to the CCTA**. In view of the fact that the CCTA is envisioned to convene once in three months, the deadlines for reporting of the Coordination Teams to the RDC must be timed accommodate this.

The main function of the CCTA should be to coordinate the activities of the MA on issues related to the implementation of the integrated territorial approach. The sessions of the CCTA and its working groups will provide an official format for discussing the implementation of ITI concepts. In view of the fact that the projects are interconnected or even interdependent in some cases, the beneficiaries will require hands-on support to overcome any obstacles to implementation. Therefore, the CCTA or its working groups should have the authority to take operational decisions on the implementation of ITI concepts and on solving any obstacles regarding their execution.

Assessment of the implementation of an ITI concept

It is recommended that an assessment of the implementation of ITI concepts is carried out annually, when the indicators set out in the application form for each ITI concept are reported. The one-year period for assessment of implementation is recommended but will be especially important in the initial stages of implementation.

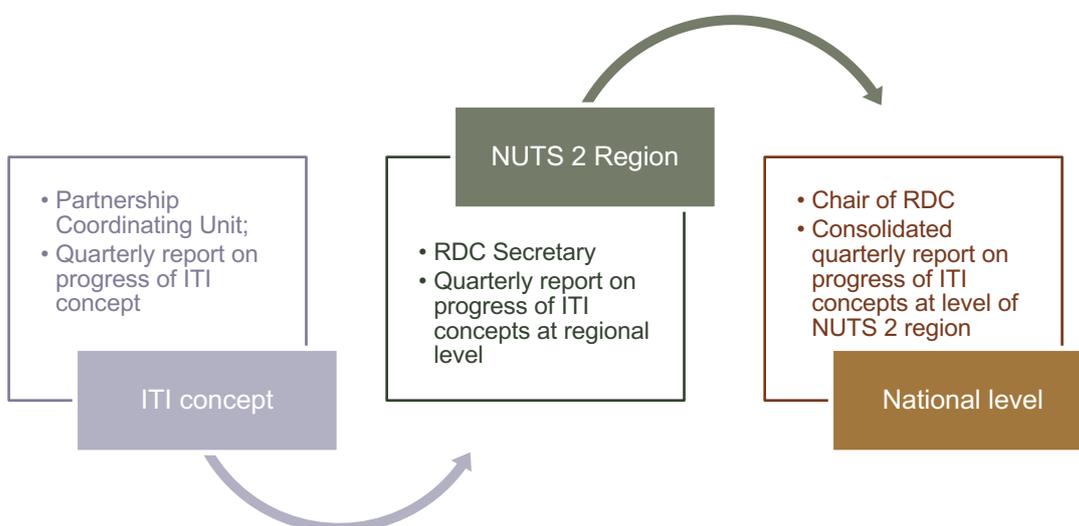
The assessment of implementation progress is conducted with the help of the mechanism described above for reporting progress on ITI concepts implementation - reported by the Coordination Team, reviewed and aggregated by the Secretariat and Monitoring Department of the territorial unit of the MA, reported by the RDC Secretary to the Council and discussed at a regular session of the RDC.

The RDA and the RIRDA envision that the RDC acts as the authority monitoring the implementation of the ITSD of the relevant NUTS 2 region (Art. 65, par. 1 of the RIRDA). The annual reports of the consolidated implementation of ITI concepts at NUTS 2 level can serve as inputs for the envisioned three-year reports Councils are required to prepare on the implementation of the region's ITSD (Art. 68, par. 1 of the RIRDA). **In view of the fact that ITI concepts are not the only instrument for the accomplishment of the objectives under**

the ITSD, for the preparation of the three-year report, it will be necessary for the RDC to collect and analyze information on the implementation of other investments under the strategy as well, including investments under CBC programs. Such information can be provided to the Secretariat and Monitoring Department of the territorial unit of the MA by the Territorial Cooperation Management Directorate of MRDPW, which is the MA/national authority for the CBC programs.

The decisions of the RDC resulting from the discussions of the annual reports shall be disseminated as part of the RDC information strategy.

For convenience a diagram displaying the different levels of reporting and the connection between them is provided below.



PART 4

INDICATIVE ANNUAL FUNDING PROGRAM

Scope and subject of the procedure

The scope of this procedure covers the preparation of the indicative annual program of the RDC. Under the RIRDA, the funds for the operation of the RDC shall be spent on carrying out of the RDC meeting sessions as well as for other activities directly related to the RDC functions.

The funds required for the operation of the RDC¹⁷ and for strengthening its administrative capacity shall come from programs co-funded from ESIF as well as from state budget. These funds are envisioned to be provided via an annual indicative program¹⁸, to be prepared by the Chair of the relevant RDC.

Every RDC shall prepare individually an indicative annual program for its operation.

The indicative program of the RDC is presented below with its major components: scope, procedure, format and sources of financing.

Indicative Program: scope

The scope of the program is contingent upon the activities of RDC and the Expert Team thereof and the relevant resources required for the operations of those teams.

Types of activities and expenditures

RDC sessions

The RDC holds at least four regular sessions a year, as well as ad-hoc sessions as provided for under the RIRDA. The expenditures for the sessions of RDC cover, where applicable, rent for conference space, audio equipment, printouts, translation/interpretation, soft drinks,

¹⁷ Under Art. 18 (16) of the RDA.

¹⁸ Under Art. 41 of the RIRDA. The 'Indicative Annual Program' is the budget framework that incorporates the funds provided under the programs funded from ESIF and from the state budget and required for the operation of RDC and for strengthening the administrative capacity thereof.

¹⁸ Under Art. 42 of the RIRDA.

catering, etc. These expenditures include travel, daily expenses and accommodation costs incurred by RDC members and observers with advisory vote as well as any persons invited to attend in connection with their work in the Council. These costs, pursuant to the RIRDA, are borne by the relevant agencies, administrations, institutions, organizations, legal entities and MA programs.

For their work in the Council, RDC members are not entitled to remuneration.

Other activities directly related with the RDC functions

The expenditures for other activities directly related to the operation of the RDC are in terms of the resources required for the operation of the RDC Secretary and the Expert Team of RDC without voting right¹⁹ – Mediation Unit, Public Consultation Unit and Preselection Unit (including external experts²⁰), their main functions and relevant matching groups of expenditures being provided below:

RDC Secretariat

(the head of the MRDPW territorial unit in the relevant NUTS 2 region is Secretary):

Functions	Expenditures for:
Organizing the RDC sessions Coordinating the work of the Expert Team of the RDC Storage of documents related to the operation of the RDC	<ul style="list-style-type: none"> Administrative and technical resources for the operation of the RDC (outside the direct costs for the RDC sessions which are included in the previous category)

Mediation Unit

(consisting of two representatives from all DICs in the districts in the relevant NUTS 2 region)

Functions	Expenditures for:
Mediation in connection with ITI concepts Information strategy of the RDC	<ul style="list-style-type: none"> Activities for the implementation of the RDC Information Strategy to provide information to the public about the integrated territorial approach. Awareness/information campaigns and information activities in connection with ITI and CBC programs. Organizing trainings, public discussions, etc.

¹⁹ Under Art. 42 of the RIRDA.

²⁰ External experts included under Art. 42 (8) of the RIRDA, when necessary, depending on the specifics of projects within ITI concepts.

	<ul style="list-style-type: none"> • Preparation and publishing of materials in mass media and social media. • Activities for coordination and facilitation for the establishment of partnerships. • Printing, and where necessary, circulation of two-month reports on established partnerships and prepared ITI concepts for the relevant period. • Participation in coordinated meetings with the RDC Secretary or other representatives of the Expert Teams of RDC.
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Public Consultations Unit

(consisting of two representatives of all DICs in the districts in the relevant NUTS 2 region)

Functions	Expenditures for:
Conducting public consultations	<ul style="list-style-type: none"> • Conducting conventional and innovative public consultations and presentations related to the discussion on the submitted ITI concepts. • Public events for the general public. • Communication with partners upon receipt of proposals for modifications in the scope and content of ITI concepts. • Printing and, where necessary, sending to the RDC Secretary, a report on the outcomes of public consultations with assessment of the level of public support for submitted ITI concepts. • Public consultations and presentations related with reviewing and discussing submitted concepts of potential Bulgarian applicants under CBC programs, in accordance with the announcement for obtaining letters of support; printing and, where necessary, sending to the Preselection Unit, a report on the outcomes of public consultations.

Preselection Unit
(representatives of MA of programs)

Functions	Expenditures for:
<p>Assessment of the administrative compliance and eligibility of ITI concepts</p> <p>Assessment of the quality of submitted ITI concepts and preparation of report</p> <p>Putting together the final list of ranked concepts</p>	<ul style="list-style-type: none"> • Obtaining additional external expertise when assessing ITI concepts²¹. <p>Inclusion of additional experts can be according to the established practice for the three applicable options for retaining external persons to assess proposals:</p> <ol style="list-style-type: none"> 1. Members of staff from the state administration who do not hold any positions in the MA or the Intermediate Unit; 2. Natural persons appointed following a competitive procedure held centrally; 3. Persons appointed under the Public Procurement Act. <p>The selection of a particular option to be applied will be done on a case by case basis, depending on the relevant needs for external expertise.</p>

Conducting the functions of the RDC Secretariat and the RDC Expert Team - Mediation Unit, Public Consultations Unit and preselection **requires offices** (including offices for meetings with potential beneficiaries) **and office furniture and equipment** (including laptops, scanners, printers, video conferencing (VC) equipment, etc.), **the relevant information and communication resources** (including resources for VC), **capabilities for regional mobility**, etc.

Strengthening the RDC administrative capacity

The strengthening of the administrative capacity of the RDC - members of the core and the extended team, as well as the Expert Team of the RDC - will be carried out by means of trainings according to an approved annual training plan for the RDC. The format of trainings can include training courses, seminars, exchange of experience with other institutions with relevant experience from Bulgaria and abroad, etc.

²¹ Under Art. 42, par. 8 of the RIRDA, in case additional expertise is needed, external experts can be appointed for the operation of the unit under par. 4, depending on the specifics of projects in the ITI concepts, via order of the head of the MA of the PDR, in accordance with the MFESIFA and the secondary legislation.

Indicative Program: preparation, approval and reporting procedure

Preparation

The Indicative Work Program is annual (with a forecast for the following two years for budgeting or project planning purposes) and will be prepared for the funds required for the operations of the RDC and for the strengthening of the RDC administrative capacity in the following year. **The forecast for the following two years shall be adjusted annually.**

The preparation of the program shall be standardized and **shall be coordinated by the RDC Secretary who launches relevant procedures and sets the deadlines within which the Expert Team of the RDC should submit its forecasts for expenditures required for execution of its functions.** The RDC Secretary is responsible for forecasting the expenditures for the RDC sessions and for compiling and discussing submitted proposals and preparing a consolidated version of **the Integrated Work Program for the RDC for submission to the RDC Chair.** The forecasts of the Expert Team of the RDC are done on the basis of an analysis of available information about the stages of development of ITI concepts, available budget (including delays or shortfalls of funds), problematic areas, etc.

Approval

The Indicative Work Program for the following year is submitted by the RDC Chair for discussion and adoption by the RDC.

The deadline for submission of the draft Indicative Work Program for adoption by the RDC is proposed in the present operational documents **as 30th of November each year.**

Reporting

The RDC Chair prepares annual reports on the expenditures incurred during the reporting year. The drafts of these reports are prepared by the RDC Secretary with the assistance of the relevant RDC team. The reports are approved by RDC members with ordinary majority of votes.

The deadline for submission of the annual expenditures report for adoption by the RDC proposed in the present operational documents **is 31st March each year.**

A format of the Indicative Annual Program for the operation of the RDC and for strengthening of the administrative capacity of RDC is proposed in Annex 1.

Sources of financing

The sources of financing for the operation of the RDC and for strengthening the RDC capacity come from programs co-funded by ESIF as well as from the state budget.

The financing of the operation of the RDC, in accordance with the approved Indicative Work Program, could be provided through a dedicated technical assistant project under the Technical Assistance Priority Axis of the PDR (the territorial units of the MRDPW). The modality for seeking greater flexibility and a longer implementation period (three years according to the approved sample of the financial plan of the MF²² and established practice) could be a budget line for direct awarding of grant financial aid, with the MA of the PDR as beneficiary and the six territorial units of MRDPW as assistance recipients. During the implementation of the projects, the PDR MA would be the contracting authority within the meaning of the Public Procurement Act. Providing grant financial aid through the budget line will be subject to the prior approval of the financial plan thereof, pursuant to the MFESIFA. If there is need to adjust, the required financial resources are identified on the basis of the evaluation of the implementation and of the updated forecast for the following years in the Indicative Work Program, the financial plan of the budget line will be updated pursuant to the MFESIFA.

To **avoid double financing**, it is necessary to have clear **demarkation** between the technical assistance financing the operation of the RDC under the PDR and the technical assistance **with respect to the financing of the operation of DICs**.

It would be feasible, where applicable, for the implementation of the financial plan to employ simplified costs options. Also, it is recommended that the management team of the TA project financing the operation of the RDC, includes representatives of all departments in the territorial unit of the PDR MA with functions in the context of the RDC, and those be responsible for the implementation of the project activities relating directly to their duties.

It is important to note here that it will be necessary to provide **clear demarcation vis-à-vis the program for Technical Assistance** having in mind the fact that under it the financing of DICs will continue. In addition to the remuneration of staff, the program will also cover expenditures for promoting ESIF (information campaigns, meetings, publications, etc.).

If the financing of the operations of the RDC or parts of it is funded from the state budget the procedure for the preparation of the Indicative Work Program should be consistent with the deadlines of the state budget procedure.

²² Order of Minister of Finance ZMF-53 from 21.01.2016.

PART 5

MANAGEMENT OF HUMAN RESOURCES OF RDC

Scope and subject of the procedure

The scope of this procedure covers the organization of activities related to the management of the RDC's human resources. When elaborating the procedure, in addition to the provisions of the RDA and RIRDA, the requirements of the Civil Servants Act (CSA), the Labor Code (LC) and the other applicable legislation governing aspects of human resources management are also considered.

The current rules are prepared in consistence with the structure and membership of the RDC described in the introduction of this document. Taking into account the specifics of the membership of the RDC - members, observers and Expert Team, nominees from other institutions and organizations for participation in the work of the Council, the present procedure is prepared to complement such documents regulating the human resources management and the administrations and institutions nominating representatives to the RDC.

The present rules cover the following procedures:

1. Appointing members of the RDC (names and number of members);
2. Reporting on the operation of the RDC and payment of remunerations;
3. Participation in RDC sessions, planning and use of leave;
4. Business trips;
5. Training and development of administrative capacity;
6. Procedures for the generation and circulation of relevant documents.

The main objective of this procedure is to guarantee compliance with the law, with the principles of openness and of coordination in the management of human resources for the accomplishment of the objectives and priorities of the RDC.

The RDC Secretary who is also head of MRDPW's territorial unit for the strategic and spatial planning and coordination of regional development for NUTS 2 regions is responsible of the implementation of the activities related to human resources management.

Procedures and rules for appointing individuals and setting the number of RDC members

Members and observers in the RDC

The procedures for appointment of the representatives of institutions and organizations to RDC are described in detail in the RDA and RIRDA.

Institutions and organizations delegating members and observers to the RDC inform the Secretary of the RDC in writing about their nominees.

Within five working days from receipt of the letters the RDC Secretary prepares and sends to the Minister of MRDPW for approval a proposed list with the names of the members and the observers with advisory vote in the RDC.

The list of named members of the RDC and of the observers with deliberative voice is subject to endorsement every four years by force of order of the Minister of RDPW.

The membership of a member of the RDC and of an observer with deliberative voice shall be terminated in the following events:

- When the capacity in which the persons is entitled to take part in the RDC is discontinued.
- Upon conviction of the person following his/her election, with an enforceable sentence of imprisonment for premeditated offence of general nature;
- When the legal capacity of the person is diminished;
- In case of physical inability to perform the obligations or in case of death;
- Upon expelling the member from the Council due to failure to attend two successive sessions.

Where members of the RDC who are representatives of municipalities, observers with voting right for the adoption of decisions or observers with deliberative voice fail to attend two consecutive sessions and fail to be represented by their designated alternates, those members shall be expelled from membership of the council. **The procedure for replacement of members and observers under this item is initiated by the RDC Secretary** who sends a written notice to this effect to the nominating organization.

Upon termination of the membership of an RDC member and the involvement of an observer with deliberative voice, another representative of the relevant institution shall be appointed as per the procedure for their election. The institution that replaces a member or observer in the RDC shall inform the RDC Secretary of the change in writing.

The RDC Secretary, within five working days from the receipt of the letter, prepares a proposal to the Minister of MRDPW for approval modifying the list of names of members and observers in the RDC.

The changed members of the RDC are approved with an order of the Minister of MRDPW.

RDC Expert Team

The representatives of DICs in the Mediation Unit and the Public Consultations Unit are appointed with an official letter from the head of the relevant administration to the RDC Secretary. Members of staff of DICs cannot simultaneously be represented in both units.

The representatives in the Preselection Unit of MRDPW's territorial unit as well as the representatives of the MA of programs funded from European funds shall be appointed with an order of the head of the MA of the relevant program. The orders are sent to the RDC Secretary.

In case additional expertise is required, external experts depending on the specifics of projects within the ITI concepts can join the work of the Preselection Unit, **by force of an order of the head of the PDR MA,** pursuant to the MFESIFA and secondary legislation.

Within five working days after the receipt of letters and the orders for nomination of representatives **the RDC Secretary prepares and sends to the Minister of MRDPW for approval a proposal covering the names and number of members of the units of the Expert Team of the RDC for approval.**

The Minister of MRDPW issues an order stipulating the names and the number of members of the units of the Expert Team of the RDC.

Should the appointed representatives of the units of the Expert Team of the RDC be changed, nominating institutions inform the RDC Secretary in writing.

The RDC Secretary, within five working days from receipt of the letter, prepares a proposal to the Minister of Regional Development and Public Works for the change of names and number of members of units of the Expert Team of the RDC.

The Minister of MRDPW issues an order to the effect of changing the names and number of members in the units of the Expert Team of the RDC.

Reporting the work of the RDC and payment of remuneration

Members and observers in the RDC

The RDC Chair prepares an annual indicative program for the operation of the Council. It contains estimates of the funds required for the operation of the RDC. The program is discussed and adopted by RDC members.

The RDC Chair prepares annual reports on the execution of the annual indicative program and of expenditures. The reports are approved by the RDC members.

For every session of the RDC minutes are prepared reflecting the decisions taken by the Council. All accompanying materials reviewed at the session are attached to the minutes.

The Chair of the RDC provides for publicity and transparency of the operation in connection with exercising the functions of the RDC.

For their work in the Council the members and observers of the RDC, including the Chair and Deputy Chair, are not entitled to remuneration.

RDC Expert Team

The members of staff of MRDPW's territorial unit responsible for the coordination of operation of the Mediation Unit and the Public Consultations Unit **prepare monthly reports to the Secretary of the RDC on the activity of the units and their members.** Reports are submitted to the RDC Secretary on the first working day of the month following the reporting month.

The RDC Secretary submits the received reports within five working days from receipt to the heads of institutions with nominees in the units of the Expert Team of the RDC for information.

Any work of the Preselection Unit connected with ITI concepts is documented in UMIS. The heads of MA of programs with nominees in the Preselection Unit, for submitted ITI concepts which include proposals within the scope of the relevant program, will be able to be informed of the work done by the members of their staff, via UMIS.

When the Preselection Unit reviews the concept of Bulgarian applicants for participation in CBC programs funded under ESIF and IPA for compliance with the priorities of the integrated territorial development strategies for NUTS 2 regions, the member of staff of MRDPW's territorial unit who coordinates the work of the unit prepares monthly reports on the performance of the unit. The reports are submitted to the RDC

Secretary on the first working day of the month following the reporting month.

Within five working days from receipt of the report, the RDC Secretary submits it to the heads of the relevant units of MRDPW with nominated representatives in the Preselection Unit of the Expert Team of the RDC.

When exercising functions in the Expert Team of the RDC (described in Art. 43 of the RIRDA) the members of staff of the Mediation Unit, Public Consultations Unit and Preselection Unit **are entitled to remuneration from the institution which nominated them for the Expert Team of the RDC.**

Reports on the activity complement the information in the institutions which nominated representatives of the Expert Team of the RDC serving as a basis for determining the basic and additional remuneration to be paid.

Participation in sessions of the RDC and planning and using leave

Members and observers in the RDC

Where a member of the RDC is prevented from participating in a session of the Council he or she can be replaced by a person that has voting right at the session in advance authorized in written or appointed as per the same procedure.

Where an observer with deliberative voice is prevented from participating in a session of the Council, he or she can be replaced by a person with voting right appointed in advance according to the same procedure.

RDC Expert Team

At the beginning of each calendar year the head of the institution with nominated representatives in the Expert Team of the RDC agrees with the RDC Secretary on the schedule for use of annual leave.

For using statutory leave under the CSA/LC, **the members of staff of the Expert Team of the RDC shall file an application to the head of the institution that nominated them to participate in the Expert Team of the RDC within seven days before the date requested as the first day of leave.** During the period of fulfillment of the duties in the Expert Team of the RDC, the member of staff who will be filling in for the person on leave shall be specified, including during exercising his or her duties in the relevant unit of the Expert Team of the RDC.

During the period of fulfillment of the duties in the Expert Team of the RDC, the member of staff gets an approval of the application for leave from the RDC Secretary.

During the period of fulfillment of the duties in the Expert Team of the RDC, a member of staff who is on temporary disability leave should immediately inform his or her line manager in the institution which nominated him or her as well as the RDC Secretary of the duration of the absence according to the issued medical certificate for sick leave.

The medical certificates for sick leave shall be submitted to the institution which nominated the member of staff for the Expert Team of the RDC.

Business trips

The business trips of members, observers and the units of the RDC Expert Team for the fulfillment of obligations related to the operation of the Council shall be pursuant to the Ordinance on Domestic Business Trips.

Members and observers in RDC

The business trips of members and observers of the RDC take place subject to written order of the institution which nominated representatives to participate in the RDC. The applicable daily, travel and accommodation allowances are specified in the order.

The daily, travel and accommodation expenditures incurred by RDC members and observers are borne by the relevant delegating agencies, administrations, institutions, organizations, legal entities and MA programs.

RDC Expert Team

The business trips of the units of the RDC Expert Team take place subject to the written order of the institution which nominated representatives to participate in the RDC. The applicable daily, travel and accommodation allowances are specified in the order.

The daily, travel and accommodation expenditures incurred by the staff of the units of the RDC Expert Team are borne by the relevant delegating agencies, administrations, institutions, organizations, legal entities and MA programs.

Training and development of administrative capacity

The RDC Secretary prepares an analysis of training needs and a draft annual training plan of RDC members, observers, and Expert Team at the end of every year.

The objective of the training needs analysis is to ensure efficiency of work and development of RDC members, observers, and Expert Team, as well as nurturing of good administrative culture and administrative capacity.

The information for the preparation of the training needs analysis is collected annually from the following sources:

- Survey of the administrative capacity and training needs of the RDC;
- Outcomes of prior trainings;
- Any amendments to the legislation governing the operation of the RDC;
- Submitted proposals for training from RDC members, observers, and Expert Team, including exchange of experience via regular meetings of members of staff with similar duties in the RDC Expert Team;
- Courses and training programs provided by the Institute for Public Administration and similar domestic and international training providers and institutions.

Based on the findings of the training needs assessment a proposal for an annual training plan for RDC members, observers, and Expert Team is prepared and submitted to the RDC Chair.

The plan consists of:

- topic and duration of training;
- training institution;
- number of RDC members, observers, and Expert Team to be trained;
- required financial resources for which a project for financing under PDR 2021-2027 must be prepared.

The RDC Chair incorporates the activities under the plan as well as their funding in the indicative program for the operation of the Council for the following year which he or she prepares. The program is submitted for discussion and adoption by the RDC.

Following the approval of the annual training plan, the RDC Secretary organizes the preparation of detailed schedules for the implementation thereof. The schedules contain the following:

- name of trainee;
- position of trainee at the RDC;
- nominating institution;

- topic of training;
- period and venue of training;
- training provider.

Following the approval of the training plan and the elaboration of detailed schedules for it, the RDC Secretary sends the information to the heads of the institutions, which delegated RDC members, observers, and Expert Team.

The RDC Secretary is responsible for the organization of the implementation of the training plan and the detailed schedules thereof.

At the end of each year the RDC Secretary prepares a report on the implementation of the training plan which is submitted to the RDC Chair and to the institutions which nominated RDC members. The report contains the following:

- total number of trainings that took place;
- total number of trainees;
- topics of trainings;
- detailed list of trainees and topics of attended trainings;
- expenditures reports;
- evaluation of outcomes of trainings;
- conclusions and recommendations.

The RDC Chair incorporates the report in the annual report of expenditures which is subject to approval by RDC members.

PART 6

DOCUMENTATION MANAGEMENT, ARCHIVES, AND AUDIT TRAIL OF THE RDC

Scope and subject of the procedure

The scope of this procedure covers the stipulation of the terms and conditions for documentation management and archiving to ensure appropriate audit trail in the operation of the RDC. The requirements of the National Archives Fund Act (NAFA), the proposed CPR for programming period 2021-2027, more specifically Art. 63, item 5 and Annex XI, as well as the RDA and the RIRDA, were reviewed in the elaboration of these rules.

The subject of the procedure is the storage of documents prepared in connection with the operation of the RDC and its expert team, the organization of their use as well as the observance of statutory deadlines. The storage of documents is for the purpose of providing a proper audit trail at all levels of the operation of the RDC and the expert team thereof.

The present procedure relates to the exercising of the functions of the RDC Secretary related with storage of documents in connection with the operation of the Council (Art. 29, par. 12, item 5 of the RIRDA).

Documentation management

The organization of documentation management in the operation of the RDC requires that every incoming, outgoing and some internal documents be registered in a documentation management system. In view of the fact that the territorial unit of the MA is part of the structure of MRDPW, the documentation management system of the ministry must be used. It should be upgraded, if necessary, to accommodate new processes and documents to be generated.

The upgrading of the document management system²³ must allow affixing of a dedicated signature/index to the documents related with the operation of the RDC. For practicality and convenience, it is proposed that this signature be composed of a sequential number of the document and:

- digits from the number of the relevant call for ITI concepts to allow quick identification;
- a code for the major categories of documents which will constitute the documentation flow of the RDC. It is recommended that the documentation management system cover all the duties of the territorial unit rather than just the ones related with the operation of the RDC in connection with the ITI approach. This will allow more efficient organization of the processes in the team and regular analysis of the workload and its allocations among experts based on quantitative evidence.

The following categories of incoming and outgoing documents are proposed:

1. General Correspondence
2. Strategies for Integrated Territorial Development
3. Integrated approach and ITI concepts
4. CBC Programs
5. Complaints and Signal

In connection with the ITI approach the number of documents for archiving will be limited as there will be primarily electronic communication in UMIS for the assessment stage. In future a detailed description of the types of documents that will be subject to archiving outside UMIS is important. **At present, based on the available information, the following documents should go through the documentation management system:**

- Reports of the Mediation Unit to the RDC Chair with information on the progress of establishment of partnerships for the preparation of ITI concepts (Art. 43, par. 1 , item 4);
- The reports of the Public Consultations Unit on the outcomes of public consultations to the RDC Secretary (item 6 of the RIRDA, Appendix 4 under Art. 39, par. 4);
- Documents related to the monitoring of progress of the implementation of ITI concepts in the relevant region, if such a feature is not developed on time as a module in UMIS.

²³ The documentation management system of the MRDPW is ACSTRE-Office.

Archives

The RDC Secretary must organize the creation and maintaining of two archives. One will be for paper-based documents and the other for electronic communication.

Paper archives

The paper archives are for storing of incoming documents and answers to them, if decisions for responding are taken. Periodically, depending on the internal rules of the MRDPW, documents will be archived and will be handed over to the person in charge of archives.

If the documentation management system of the ministry allows preparation, approval and forwarding of documents electronically, no paper records will be required at the RDC level.

Electronic archives

For efficiency and practicality in the operation of the RDC it is proposed that processes for which there are no explicit prescriptions in the RIRDA be managed electronically, using all modern technologies available to the RDC Secretary.

The records of **the organizing of the RDC sessions** can be kept entirely electronically, having in mind the fact that the correspondence between RDC Secretary and the extended team of the Council will be in electronic form. Moreover, the RIRDA allows for remote sessions (Art. 36, par. 4).

The archiving unit must be 'RDC sessions' (RDC meetings) on the relevant call for submission of ITI concepts or for granting of letters of support for Bulgarian partners on projects under CBC programs. Each unit must contain:

- invitation for participation in an RDC session, information of the date of dispatch and recipients;
- the related materials including draft agenda, and convention venue and time;
- minutes from the session including received comments and proposals during it;
- audio or stream recordings of the session, if available;
- RDC decisions;
- information on RDC decisions (Art. 39, par. 1 of the RIRDA).

The records of the operation of the Public Consultations Unit can also be entirely electronic, in view of the fact that the communication among the experts from the RDC Expert Team is electronic (Art. 43, par. 7 of the RIRDA).

The archiving unit must be public consultations on the relevant call for submission of

ITI concepts or for granting of letters of support for Bulgarian partners on projects under CBC programs. **Each unit must contain:**

- schedule for the public consultations approved by the RDC Secretary;
- organized events including attendance lists, pictures, collected surveys and other relevant documents;
- aggregation of received proposals for modification of ITI concepts;
- letters to the lead partners with aggregated information from the public consultations;
- report to the RDC.

It is recommended that a dedicated member of staff and alternate to be responsible for the organizing and maintaining the paper and electronic records and for providing documents upon requests from duly authorized entities.

Audit trail

The audit trail represents a set of information which must describe the activities and events taking place at the organization, the movement of resources and relevant control and approval procedures. The obtained information on the audit trail must allow to establish the order of events in the process. The audit trail is insured through the rules for:

- the documentation flow and the documentation management system of RDC;
- RDC archives
- UMIS.

The audit trail provides for traceability of every single document in the process of its preparation, operational use and storage.

Ensuring an audit trail is required for transparency and for reasonable guarantees for lawful, efficient and effective management; for traceability of the processes in the organization to the end-user and back (bottom-up and top-down approaches); and **for monitoring the allocation of duties within the RDC and the Expert Team.**

The audit trail shows existing procedures and relevant persons in charge; documents and databases created and the relevant persons in charge.

ANNEX 1: INDICATIVE ANNUAL PROGRAM FOR THE OPERATION OF THE RDC AND FOR STRENGTHENING THE RDC CAPACITY

Indicative Work Program of RDC Region¹

BGN thou.

#	Category of Expenditures ²	Unit in Charge:	Year n					Year n+1	Year n+2
			Q1	Q2	Q3	Q4	Total		
1	RDC Sessions								
1.1	Expenses for RDC sessions								
2.	Other activities directly related to the RDC functions	Secretariat							
2.1	Administrative and technical resources for the operation of RDC excl. of expenses for RDC sessions	Secretariat							
2.2	Mediation in connection with ITI	Mediation Unit							
2.3	RDC Information Strategy	Mediation Unit							
2.4	Public consultation	Public Consultations Unit							
2.5	Facilities (by unit in the RDC Expert Teams)	RDC Secretariat Expert Team							
3	Strengthening of the administrative capacity of RDC								
	Annual training plan for RDC - members (core and extended team) and Expert Teams								

¹ The Indicative Working Program should be in Excel.

² For each category of expenditures please insert as many rows as necessary