



# **Study to develop simplified cost options (SCOs) for AMIF, BMVI and ISF for the 2021- 2027 programming period**

Final Report

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**PPMi**



**EUROPEAN COMMISSION**

Directorate-General for Migration and Home Affairs

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Directorate-General for Migration and Home Affairs

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## **Glossary of terms**

**Activity** is an action that can be costed under a single SCO.

**Area** (of activity) is a category of activities, as grouped by DG HOME. Ten areas have been identified (i.e. Area 6: Language Training).

**Beneficiary** is (a) a public or private body, an entity with or without legal personality, or a natural person, responsible for initiating or both initiating and implementing operations; (b) in the context of public-private partnerships ('PPPs'), the public body initiating a PPP operation or the private partner selected for its implementation; (c) in the context of State aid schemes, the undertaking which receives the aid; (d) in the context of de minimis aid provided in accordance with Commission Regulations (EU) No 1407/2013 ( 37) or (EU) No 717/2014 ( 38), the Member State may decide that the beneficiary for the purposes of this Regulation is the body granting the aid, where it is responsible for initiating or both initiating and implementing the operation; (e) in the context of financial instruments, the body that implements the holding fund or, where there is no holding fund structure, the body that implements the specific fund or, where the managing authority manages the financial instrument, the managing authority (Article 2(9) of Regulation (EU) 2021/1060).

**Costs (Direct)** are costs which can be attached exclusively to a single service or product (in the context of SCO, this service is usually an activity).

**Costs (Indirect)** are general administrative costs – overhead costs incurred in connection with the eligible direct costs for the action.

**Creaming** of participants, implies selecting participants, which are most likely to successfully enter and exit the activity and thus generate the intended outputs or results.

**Flat-rate financing** refers to specific categories of eligible costs, which are clearly identified in advance, are calculated by applying a percentage, fixed ex ante to one or several other categories of eligible costs.

**Gold plating** refers to instances where a national legal framework, eligibility rules or practices are more complex than what is required by the EU and that makes implementation more costly and burdensome for programme bodies and beneficiaries. In the context of this study, gold plating may prevent the use or the development of simplified cost options.

**Lump sums** are fixed, single payments based on achievement of agreed incurrence of costs.

**Managing Authority** is an institution in a Member State responsible for managing the programme with a view to delivering the objectives of the programme. In particular, it shall have the following functions: (a) select operations in accordance with Article 73, with the exception of operations referred to in point (d) of Article 33(3); (b) carry out programme management tasks in accordance with Article 74; (c) support the work of the monitoring committee in accordance with Article 75; (d) supervise intermediate bodies; (e) record and store electronically the data on each operation necessary for monitoring, evaluation, financial management, verifications and audits in accordance with Annex XVII, and ensure the security, integrity and confidentiality of data and the authentication of users (Article 72 of Regulation (EU) 2021/1060).

**NACE** is the acronym used to designate the various statistical classifications of economic activities developed since 1970 in the EU. NACE provides the framework for collecting and presenting a large range of statistical data according to economic activity in the fields of economic statistics.

**Observations:** total number of units in the dataset i.e. enterprises that provided data to CVTS5 or SES.

**Participant(s)** means a natural person benefiting directly from an operation without being responsible for initiating or both initiating and implementing the operation and who, in the context of the EMFAF, does not receive financial support (Article 2(40) of Regulation (EU) 2021/1060).

**Simplified Cost Options** (SCO) are a way of reimbursing grants and repayable assistance where instead of reimbursing 'real costs', SCO allow reimbursing expenditure according to predefined methods based on process, outputs or results. SCO can take the form of flat rate financing, unit costs, and lump sums.

**Slicing** of operations is a perverse incentive risking to result in reduced quality of the activity/operation.

**Target group** is the group of persons who are eligible to participate in the activity.

**Unit costs** are the costs per unit of input, output or result generated.

## List of abbreviations

Abbreviation	Definition
<b>AMIF</b>	Asylum and Migration Fund (2021-2027 programming period)
<b>AMIF</b>	Asylum, Migration and Integration Fund (2014-2020 programming period)
<b>BMVI</b>	Border Management and Visa Instrument
<b>CBRN</b>	Chemical Biological Radiological and Nuclear (preparedness exercises)
<b>CEPOL</b>	European Union Agency for Law Enforcement Training
<b>CPR</b>	Common Provisions Regulation
<b>CVTS</b>	Continuing Vocational Training Survey
<b>DG HOME</b>	Directorate-General for Migration and Home Affairs
<b>EBCGA</b>	European Border and Coast Guard Agency
<b>ESF</b>	European Social Fund
<b>ESI funds</b>	European Structural and Investment funds
<b>FR</b>	Financial Regulation
<b>IBMF</b>	Integrated Border Management Fund
<b>ISF</b>	Internal Security Fund
<b>ISF-B</b>	Internal Security Fund - Borders
<b>ISF-P</b>	Internal Security Fund - Police
<b>JIT</b>	Joint Investigation Team
<b>LCI</b>	Labour Cost Index
<b>MA</b>	Managing Authority
<b>MS</b>	Member State
<b>NP</b>	(National) Programme
<b>SCO</b>	Simplified Cost Option
<b>SES</b>	Structure of Earnings Survey
<b>SSUC</b>	Standard Scale of Unit Cost
<b>TCN</b>	Third-country national
<b>THB</b>	Trafficking in Human Beings



## **Abstract**

This study proposes simplified cost options for the Asylum and Migration Fund (AMIF), the Border Management and Visa Instrument (BMVI) and the Internal Security Fund (ISF) for the 2021-2027 programming period. Simplified cost options were developed in ten areas of activity namely: 1) legal assistance to asylum seekers, 2) training for asylum case workers 3) support to migrants immediately after their arrival 4) preparatory classes for minors 5) pre-departure measures in third countries 6) language training for third-country nationals 7) orientation training for third-country nationals 8) voluntary return 9) training of border guards and 10) training of consular staff.

The study is built on a comprehensive set of historical data collected from Member States and complemented with alternative sources from Eurostat.

Finally, the study explores additional areas where simplified cost options can be developed in the future for the migration and home affairs funds including Joint Investigation Teams operating in the EU and training of law enforcement officials.

## **Executive Summary**

The overall aim of this study is to support the European Commission, Directorate-General for Migration and Home Affairs (DG HOME), in establishing EU-level simplified cost options (SCO) for the programming period 2021-2027 for the Asylum and Migration Fund (AMIF), the Border Management and Visa Instrument (BMVI) and the Internal Security Fund (ISF).

The legal basis for setting EU-level SCOs is set out in the Financial Regulation (FR) (Regulation (EU, Euratom) 2018/1046)<sup>1</sup> and the Common Provisions Regulation (CPR) (Regulation (EU) 2021/1060) with a view to simplifying the funding rules and achieving results.

The present study supports these simplification efforts through collecting and analysing data and developing methodologies for the activities covered by the study, implemented in shared management<sup>2</sup>.

The study consists of four main parts:

- Methodological approach used to define and calculate SCOs;
- Presentation of simplified cost options for ten areas of activities;
- Feasibility studies exploring the possibility to develop SCO for: i) Joint Investigation Teams (JITs) operating in the EU, and ii) training of law enforcement officials implemented under Internal Security Fund – Police (ISF-Police); and
- Presentation of other areas of activities for which SCO could be developed for the three DG HOME funds mentioned above.

## **Methodological approach**

This study is largely based on historical data collected from Member States and analysis of statistical data extracted from Eurostat. The data collection was an iterative process with multiple steps, checks and follow-ups to collect and validate the most comprehensive sample of historical data possible. These data were complemented with information from alternative sources using publicly available datasets, as well as microdata requested from Eurostat specifically for this study. The study team used the latest available datasets from the Continuing Vocational Training Survey (CVTS) and the Structure of Earnings Survey (SES). For the CVTS, this was the 5<sup>th</sup> edition, from 2015, while for the SES, microdata was available for 2018.

In the data analysis phase the above sources were used to develop approaches and cost estimation methods for SCO development.

## **Key results of the study**

Simplified cost options were developed for ten areas of activity:

### **1) Legal assistance provided to asylum seekers**

This area covers legal assistance provided to asylum seekers who have applied for international protection and are either waiting for the decision on the application or have appealed a negative decision at first instance.

In this area three alternative SCOs were developed:

- Alternative A: Hourly cost of legal assistance per one asylum seeker;
- Alternative B: Cost of one asylum seeker provided with legal assistance; and
- Alternative C: Cost of one legal assistance session provided to one asylum seeker.

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<sup>1</sup> Article 125, Article 181.

<sup>2</sup> Suitability of SCOs for (in)direct management cannot be verified due to insufficient level of detail of data on direct and indirect management actions.

Alternative A is the most flexible of the three alternatives, as it is based on an hourly duration parameter. This option is best fit for an EU-level SCO. Because of its high flexibility, the hourly rate is applicable irrespective of how much time it takes to assist one asylum seeker. This aspect is especially important in the context of study's finding that actual duration of analysed activities can vary significantly from country to country.

## **2) Training for asylum case workers**

Activities in this area include the provision of training for asylum case workers through face-to-face meetings, classroom trainings, exchanges, workshops, and/or blended learning. The target group for these training activities can vary greatly based on the data received from Member States.

For this area two alternative SCOs were developed:

- Alternative A: Cost of a training course per one asylum case worker;
- Alternative B: Hourly cost of training per one asylum case worker.

Both alternatives are a good fit for an EU-level SCO in the area of training for asylum case workers. Each has some advantages and disadvantages that need to be weighed.

Alternative A (cost of a training course per one asylum case worker) has higher simplification potential and leads to lower administrative costs. The underlying documentation required for management verifications and audits only requires proof that units delivered by projects in the sense of quantified outputs covered by the unit cost (number of trained asylum case workers) are properly documented and thus verifiable and real.

Alternative B, on the other hand, is more flexible. Depending on the actual duration of a specific training attended by asylum case workers, both shorter and longer trainings can be reimbursed based on the proposed hourly rate. This is particularly relevant if training needs change over time.

## **3) Support to migrants immediately after their arrival**

The proposed SCO under this area consists of the cost of support for one day for one third-country national supported during the reception period after their arrival to the host country. The original hypothesis had foreseen that this option should cover the first 24 hours of reception period.

The development of viable and robust alternatives for an EU-level SCO in this area was hampered by the limited availability and poor quality of historical data. As a result, only one alternative – a lump sum for reimbursement of the daily costs of support provided per one asylum seeker – is proposed by the study. This alternative is primarily based on data collected by the European Migration Network in the context of their ad hoc query on average costs and average length of reception for asylum seekers. It is difficult to verify to what extent data reported by this source are comparable across Member States.

## **4) Preparatory classes for minors**

This area covers preparatory classes for minors (under 18 years of age) aimed at facilitating their access to participation and integration in the host country's education system. For this area three different SCO alternatives were developed:

- Alternative A: Cost of one 45-minute preparatory class per one minor;
- Alternative B: Cost of one 45-minute preparatory class per group of maximum 15 minors; and
- Alternative C: Cost of one minor provided with preparatory classes.

In the case of preparatory classes for minors, Alternative A, a process-based unit cost is recommended as the most suitable option for an EU-level SCO. Contrary to Alternatives B and C, Alternative A (cost of one 45-minutes preparatory class for one minor) is also

applicable to mixed classes, i.e. classes attended by both foreign-born minors and their native-born peers. It also does not impose any additional conditions concerning the group size or the required minimum number of classes each minor must attend. This allows for more flexibility and fits different implementation approaches.

### **5) Pre-departure measures in third countries**

This area covers pre-departure measures provided to third-country nationals before their departure to an EU Member State. They take place in the country where the third-country national is staying. Two SCOs were developed in this area:

- Alternative A: Cost of one third-country national supported prior to their departure to the Member State (including a 45-minute pre-departure workshop);
- Alternative B: Cost of one third-country national supported prior to their departure to the Member State (including a pre-departure workshop of 6.5 hours).

There is insufficient evidence to recommend any of the two alternatives developed for pre-departure measures in third countries. The lump sum amounts in both cases are based on data coming from a large variety of sources: historical data on staff costs, CVTS 5 microdata on travel, subsistence, rental and learning material costs, and data from alternative sources on health check costs<sup>3</sup>. As the historical data has been available only for one of these cost items, the study cannot verify if and to what extent the calculated lump sum amounts are comparable to the actual costs incurred when providing support to third-country nationals prior to their departure to one of the Member States.

### **6) Language course**

This area covers simplified cost options on language training for third-country nationals. In this area two output based SCOs were developed:

- Alternative A: Unit cost of one hour of language training for one third-country national;
- Alternative B: Unit cost of one language training course provided to one third-country national.

For language trainings of third-country nationals Alternative A Unit cost of on hour of training is recommended as a preferred option for EU-level SCO in this area. Both alternatives are a good fit for an EU-level SCO. The hourly unit cost allows for more flexibility and can be adjusted to different implementation methods while still ensuring the same standards for reporting are met. To ensure that funding is efficiently spent it is recommended that a maximum limit on contract hours that programme participants can receive. The most prominent added value of Alternative B compared to Alternative A is the relatively lower administrative burden when it comes to audit trail and reporting requirement. Participation is verified by participant enrolment and attendance records, but no hourly timesheets are required.

### **7) Orientation course**

This area covers simplified cost options on orientation training for third-country nationals to promoting access to employment and further education and training as well as enhancing civic, cultural and life-management skills of those third-country nationals who have a right to stay in the Member State. In this area three output-based SCO were developed:

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<sup>3</sup> As explained in the description of the calculation method and data used for the analysis, the data on health checks was taken from Area 3, where information from alternative sources has been available on their actual expenditure incurred while providing healthcare services to third-country nationals during their reception period.

- Alternative A: Unit cost of one hour of orientation course for one third-country national;
- Alternative B: Unit cost of provision of orientation course to one third-country national; and
- Alternative C: Lump sum of orientations services provided to a group of 15 third-country nationals.

For simplified cost options in the area of orientation courses Alternative A is perceived the best suited for EU-level SCO. It provides the most flexibility for Member States and can be easily tailored to different practices across countries. On the other hand, alternative C was also well received by stakeholders in the final workshop highlighting that this alternative can be useful for small-scale projects where this alternative can minimise administrative burden for beneficiaries.

### **8) Assistance to third-country nationals prior to departure from the Member State (return)**

This area presents simplified cost options for voluntary return of third-country nationals including the following activities:

- One information session or one-to-one counselling of returnees (45 minutes);
- Health assistance (medical screening and documentation);
- Transport assistance (in-land travel allowance, documents and formalities); and
- In-kind assistance (e.g. clothes, phone card).

Two alternatives were developed in this area:

- Alternative A: Unit cost of support provided to one third-country national prior voluntary return; and
- Lump sum of service provided to a group of ten third-country nationals prior voluntary return.

Alternative A is the preferred option for this area as it allows for more flexibility. It can be adjusted easily depending on the number of people returned. This alternative can hence be easily used to support already existing practices in Member States.

The limitations on the availability of historical data however challenge the robustness of the simplified cost options developed for both alternatives. Due to the small sample size the accuracy of extrapolated values may vary, and there is a rather significant margin of error.

### **9) Training for staff responsible for external border controls**

This concerns the provision of training to staff responsible for activities related to external border controls in accordance with the Integrated Border Management / Schengen *acquis* standards. In this area an output-based SCO, unit cost of one hour of training to one member of staff responsible for external border controls was developed.

Based on the historical data collected the practices across countries vary greatly both in terms of duration as well as content. In many cases covering different cost categories than those included in the current definition above. Due to these vast differences a one-size-fits-all approach might not suit all countries and the uptake of such EU-level SCO might be low.

### **10) Training for consular staff**

In this area one SCO was developed: unit cost of one hour of training to one member of staff responsible for external border controls.

Practices across countries vary greatly both in terms of duration as well as content and in many cases covering other cost categories than those included in the current definition developed in this study. Due to these vast differences a one-size-fits-all approach might not suit all countries and the uptake of such EU-level SCO might be low.

### **Feasibility studies**

In addition to developing SCOs for ten areas of activity feasibility studies were carried out to explore additional areas where SCOs could be developed. In relation to Joint Investigation Teams (JITs), the study identified potential for SCO development, specifically for logistical activities supporting police cooperation within the scope of a JIT. All other activity areas taking place within typical JITs are too diverse and differ across Member States. EU-level SCOs in this area are not recommended.

Similarly, in the area of training of law enforcement officials the team identified possibilities for SCO development, especially for common training activities such as classroom, practical and language training, study visits and exchanges of best practice conducted in groups. Analysis of cost data on training projects funded by ISF-P in 10 Member States shows that EU-level SCOs for one law enforcement official or one hour of training would be feasible to develop.

## 1 Introduction

The overall objective of this study is to develop EU-level simplified cost options (SCOs) for the 2021-2027 programming period for the different funds and instruments in the area of migration and home affairs: the Asylum and Migration Fund (AMIF), the Border Management and Visa Instrument (BMVI) and the Internal Security Fund (ISF). This was done by collecting and analysing data, and developing SCO methodologies for the different activities that the study covers, which are implemented through shared management<sup>4</sup>.

More specifically, this study aims to:

- develop SCOs for 10 areas of activity for each Member State;
- carry out two feasibility studies exploring the possibility of developing SCOs for (i) Joint Investigation Teams (JITs) operating in the EU, and (ii) training for law enforcement officials under ISF-Police; and
- indicate a minimum of five other types of activities for which SCOs could be developed for the three DG HOME funds mentioned above.

Table 1. Overview of the study scope

Elements of scope	In scope
<b>Areas of activity</b>	<p>The study aims at developing SCOs for the following 10 areas of activity: (1) legal assistance provided to asylum seekers; (2) training for asylum case workers; (3) support to migrants immediately after their arrival; (4) preparatory classes for minors; (5) pre-departure measures in third countries; (6) language courses; (7) orientation courses; (8) assistance to third-country nationals prior to departure from the Member State (return); (9) training for staff responsible for external border controls; and (10) training for consular staff.</p> <p>Feasibility studies on developing SCOs will be carried out in the following areas of activity: (1) Joint Investigation Teams (JITs) operating in the EU and (2) training for law enforcement officials.</p> <p>Other areas of activity are explored where SCOs can be developed in the future.</p>
<b>Funds</b>	<p>Asylum and Migration Fund (AMIF)</p> <p>Border Management and Visa Instrument (BMVI)</p> <p>Internal Security Fund (ISF)</p>
<b>Cost categories</b>	Cost categories eligible under the DG HOME funds.
<b>Management modes</b>	(In)direct and shared management. Suitability of SCOs for (in)direct management cannot be verified due to insufficient level of detail of data on direct and indirect management actions.

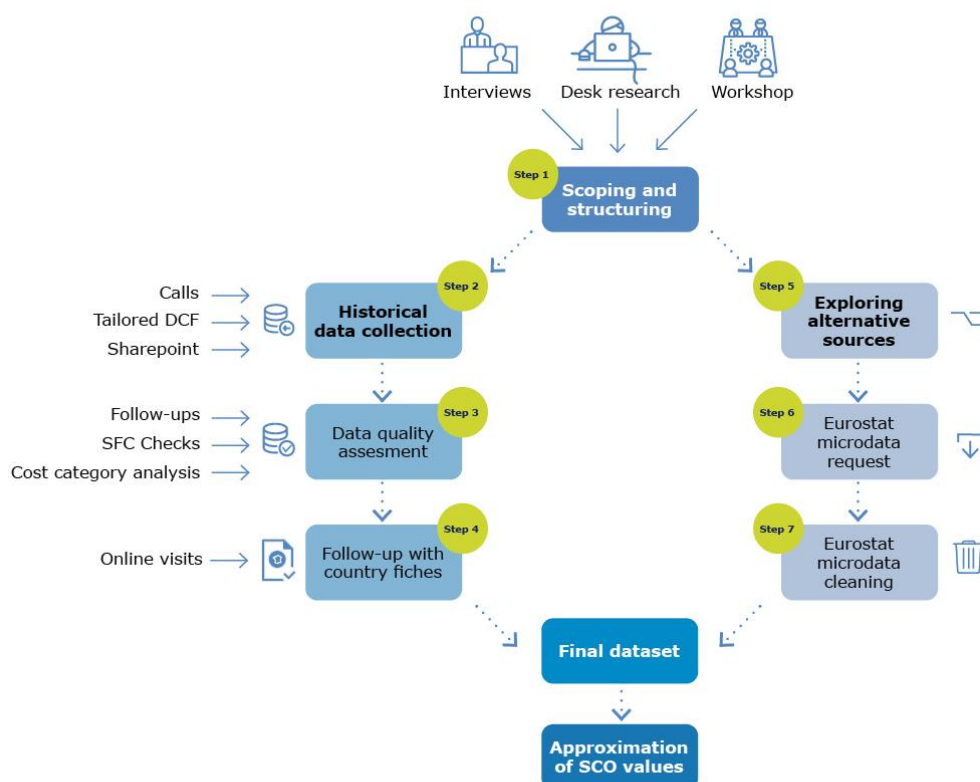
<sup>4</sup> Suitability of SCOs for (in)direct management cannot be verified due to insufficient level of detail of data on direct and indirect management actions.

<b>Geographical scope</b>	All 27 EU Member States participating in the DG HOME funds. For BMVI, also Schengen-associated countries.
<b>Timeframe</b>	Historic data was collected on previous programming periods – notably the 2014-2020 funding period and the 2007-2013 period, where relevant.  The SCOs presented in this report aim to feed into the 2021-2027 programming period and are adjusted to 2021 price levels.
<b>Relevant stakeholders</b>	Authorities responsible for shared management; other relevant competent national authorities in Member States receiving DG HOME funds; and the Commission (including DG HOME and DG BUDGET).

### 1.1 Methodological steps of the study

This section describes the approaches to SCO development and calculation methods.

Figure 1. Overview of the methodological approach to the study





The **data collection** phase of this study involved the following key steps:

- scoping, structuring and disseminating historical data-collection forms to representatives of Managing Authorities in EU Member States;
- cleaning data to eliminate any irrelevant or poor-quality data (e.g. missing values), as well as identifying and removing the most prominent outliers from the analysis;
- following up with Member States through tailored country fiches to further improve the historical data sample; and
- exploring relevant data from alternative sources, including requesting Eurostat microdata.

The **data analysis** phase consisted of the following:

- developing approaches and main unit-cost estimation methods for SCOs;
- conducting exploratory analysis to test the feasibility of different methods for establishing off-the-shelf solutions;
- calculating SCO amounts for each Member State;
- data analysis based on the historical data sample collected;
- data analysis based on Eurostat microdata;
- interpolating and extrapolating SCO amounts for Member States where data was either unavailable or not sufficiently reliable;
- adjusting SCO amounts to 2021 price levels based on inflation indices; and
- adjusting SCO amounts to include eligible indirect costs based: Article 54(a) of the CPR was applied with a fixed flat-rate of 7% towards the calculated SCO amounts.

A detailed description of the methodological steps taken to establish EU-level SCOs is provided in Annex 1: General methodology of the study.

### **Validation**

National stakeholders were regularly consulted through two online workshops, and a survey and online focus group discussion.

The first workshop aimed to present the preliminary list of alternatives for the ten areas of activity and explore which ones have the highest potential for simplification for national authorities. The second workshop took place in January 2022 at the final phase of the study. The aim of the workshop was to present the SCOs developed for the ten areas and validated the audit trail for each of these areas.

In addition, the online survey and online focus group discussion fed into the results of the feasibility studies.

## **2 SCOs for 10 activity areas**

The aim of Section 2 is to present an overview of the 10 activity areas for which the study examined the various possibilities for establishing simplified cost options. This section below is divided into 10 sub-sections, each covering one activity area.

Each sub-section starts with an overview of the data sources that were used to establish SCO values. It presents the different alternatives for establishing a simplified cost option in that area, and ultimately reaches a conclusion on which of these SCOs is the preferred option. This preference is expressed as a relative preference, comparing the various alternatives for the depth and quality of the data.

There are still, however, limitations that need to be borne in mind for all alternatives, including the preferred ones expressed below. The various sections seek to highlight the various limitations in terms of the availability of (reliable) data.

It should be noted that the wider methodology on which the approach to SCOs is based is not shown in this section, but rather in Annex 1. The specific calculation method for each alternative (the formulae) instead are presented in Annex 2. There are also several alternatives to the SCOs outlined below that were specifically excluded from the comparison for reasons of reliability, robustness and quality of data. These are shown in Annex 3.

### **2.1 Area 1. Legal assistance provided to asylum seekers**

This area covers legal assistance provided to asylum seekers who have applied for international protection and are either awaiting the decision on the application or appealing a negative decision at first instance. Legal assistance consists of the following:

- Provision of legal and procedural information tailored to specific circumstances of asylum seekers whose applications for international protection are still being processed.
- Provision of information clarifying the first-instance decision and the preparation of required procedural documents. In case of a negative decision about the status of international protection at first instance, representation at a court hearing on behalf of the applicant<sup>5</sup>.
- Translation services for relevant legal documents.
- Interpretation services for consultations and representation at court hearings.

We propose three SCO alternatives for this area:

- **Alternative A:** Hourly cost of legal assistance per one asylum seeker.
- **Alternative B:** Cost of one asylum seeker provided with legal assistance.
- **Alternative C:** Cost of one legal assistance session provided to one asylum seeker.

#### **2.1.1 Overview of data**

The following **data sources** were used to establish the SCO values for the alternatives presented:

- Historical data collected from the Member States on AMIF projects that supported legal assistance to asylum seekers. The following cost categories were found to

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<sup>5</sup> Please note that data for legal representation was collected from Member States based on provision of services and is therefore not compatible with the breakdown of cost categories. Furthermore, only two Member States could provide us with this data, so we could not include it in the data sample.

be the most common in the historical data and therefore, deemed relevant for the development of SCO in this area:

- staff costs for lawyers and legal assistants providing legal assistance to asylum seekers (direct staff);
  - translation costs (written translation of relevant legal documents);
  - interpretation costs (oral interpretation during consultations or court hearings).
- SES microdata obtained from Eurostat on earnings of legal professionals (including lawyers and legal assistants). This data was used to fill in some of the gaps in the historical data collected from Member States.

As shown in the table below, four Member States (Bulgaria, Ireland, Romania and Spain) provided the study with historical data for at least one of the preselected categories of costs. Three other Member States (Austria, Croatia and Latvia) could not provide data on costs at the level of detail required for the analysis. However, these countries were nevertheless, included in the sample because they supplied the study with the historical data on duration of legal assistance activities and number of participants. If data for certain cost categories were not provided but other historical data was available, the missing values had to be interpolated, i.e. statistically estimated from the historical data for that cost category provided by other Member States. Thus, the estimated cost of staff, translation and interpretation for Austria, Croatia and Latvia were interpolated, i.e. inferred from costs incurred by Bulgaria and Romania.

*Availability of historical data for relevant cost categories under Area 1*

Country	Staff costs	Translation costs	Interpretation costs
AT	I	I	I
BG	H	I	H
ES	H	I	I
HR	I	I	I
IE	H	I	I
LV	I	I	I
RO	I	H	H

*Note: the cost categories for which Member States provided historical data are marked with 'H'. 'I' denotes gaps in the data that had to be filled with an interpolated approximation of the analysed costs.*

This sample was complemented by SES data on earnings of 'legal professionals' (based on ISCO 08 classification<sup>6</sup>). More specifically, the study team used SES data to estimate the hourly cost of staff for 12 out of 20 Member States that did not provide historical data at the level of detail needed for the analysis (i.e. the data was missing one of the key data points, such as total direct costs, number of participants or duration). This increased the overall sample of Member States for which hourly staff cost estimates can be calculated to 19. The hourly cost of translation and interpretation for these 12 Member States were extrapolated from historical data collected in Bulgaria and

<sup>6</sup> see <https://www.ilo.org/public/english/bureau/stat/isco/>

Romania, and interpolated translation and interpretation costs in Austria, Croatia, Ireland, Latvia, Romania and Spain.

Table below indicates how many enterprises per Member State provided information for SES on earnings of the legal professionals they employ.

*Table 2. Number of observation (or enterprises) in the microdata in each Member State*

<b>Country</b>	<b>Number of observations in the SES microdata</b>
AT	-
BE	-
BG	-
CY	216
CZ	8,387
DE	-
DK	22,616
EE	1,034
EL	104
ES	-
FI	-
FR	1712
HR	-
HU	-
IE	-
IT	495
LT	267
LU	439
LV	1,579*
MT	167
NL	-
PL	5,538


PT	-
RO	-
SE	-
SI	-
SK	3,874

Note: SES data for Latvia was not used. The hourly cost of staff in this country was interpolated from historical data on staff costs in Bulgaria, Ireland and Spain.

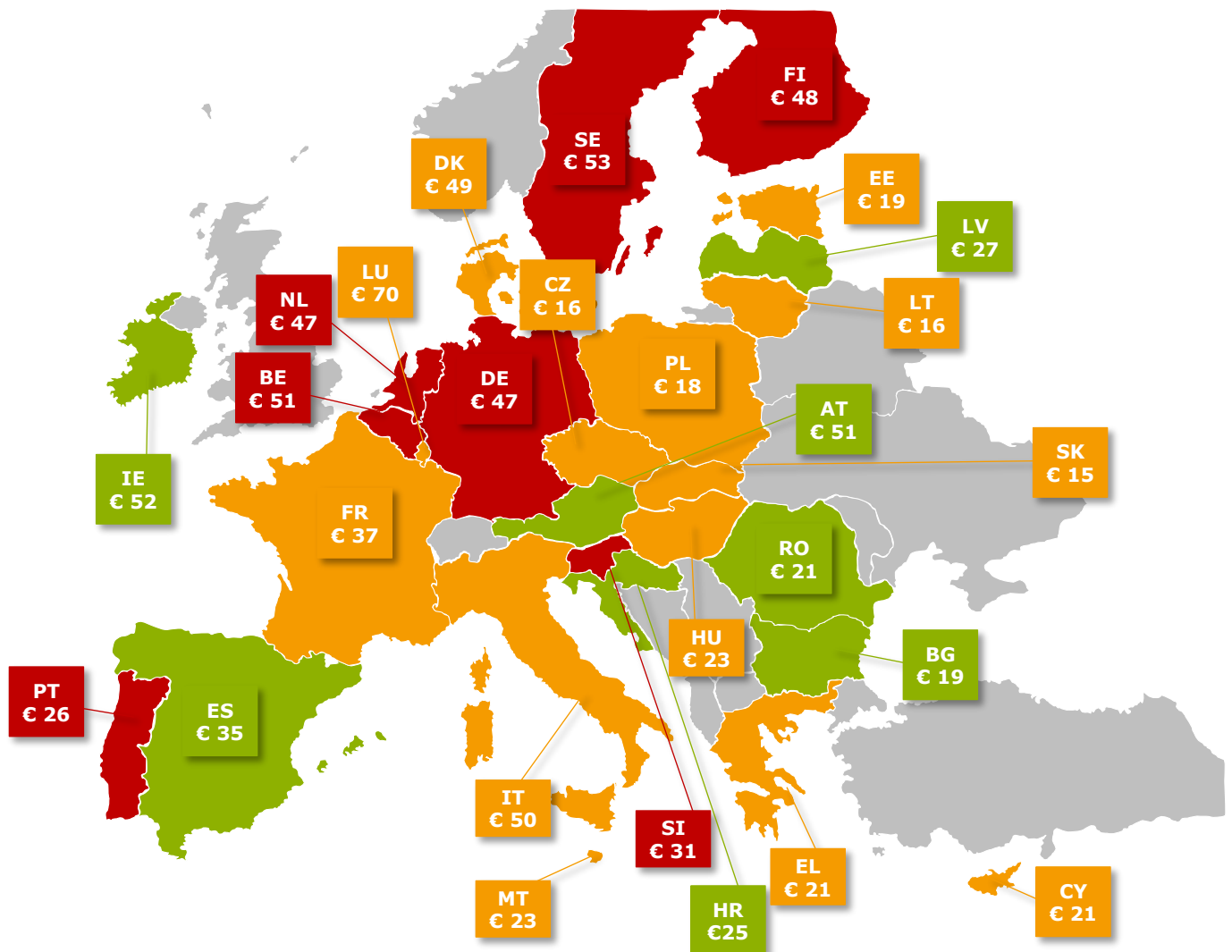
The unit costs for all remaining Member States (Belgium, Finland, Germany, Hungary, the Netherlands, Portugal, Slovenia and Sweden) had to be extrapolated, i.e. inferred from the unit costs calculated for other 19 Member States mentioned above. For more details on the precise calculation method of the Alternatives under this area, please see the Annex accompanying the report.

### Alternative A: Hourly cost of legal assistance per one asylum seeker

	<p><b>Description</b></p> <p>This SCO covers the cost of one hour of legal assistance provided to one asylum seeker. Legal assistance consists of the provision of procedural and legal information, preparing legal documents and representation at court hearings during first instance or appeal stage.</p>
	<p><b>Intended target groups</b></p> <p>Asylum seekers who have applied for international protection and are either waiting for the decision on the application or have appealed a negative decision at first instance.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of participant hours of legal assistance provided to asylum seekers.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs for lawyers and legal assistants. Translation costs. Interpretation costs.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of asylum seekers provided with legal assistance: any document that officially confirms the identity of the participant.</li> <li>• Proof of claimed legal assistance duration: timesheets or any other verifiable time management system records.</li> </ul>

	<ul style="list-style-type: none"> <li>• Programme for the provision of legal assistance including identification of asylum seeker, identification of legal professional, planned duration, and actual duration. The programme must be signed/e-signed by a competent officer supervising the action.</li> </ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly on the basis of the following indicator:</p> <ul style="list-style-type: none"> <li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: Professional, scientific and technical activities.</li> </ul>

The map below presents the SCO amounts (adjusted to 2021 price levels) established for the hourly cost of legal assistance per one asylum seeker.










Legend:

Countries in **green**: Green coloured values denote cost approximation based on historical data enriched by interpolations.

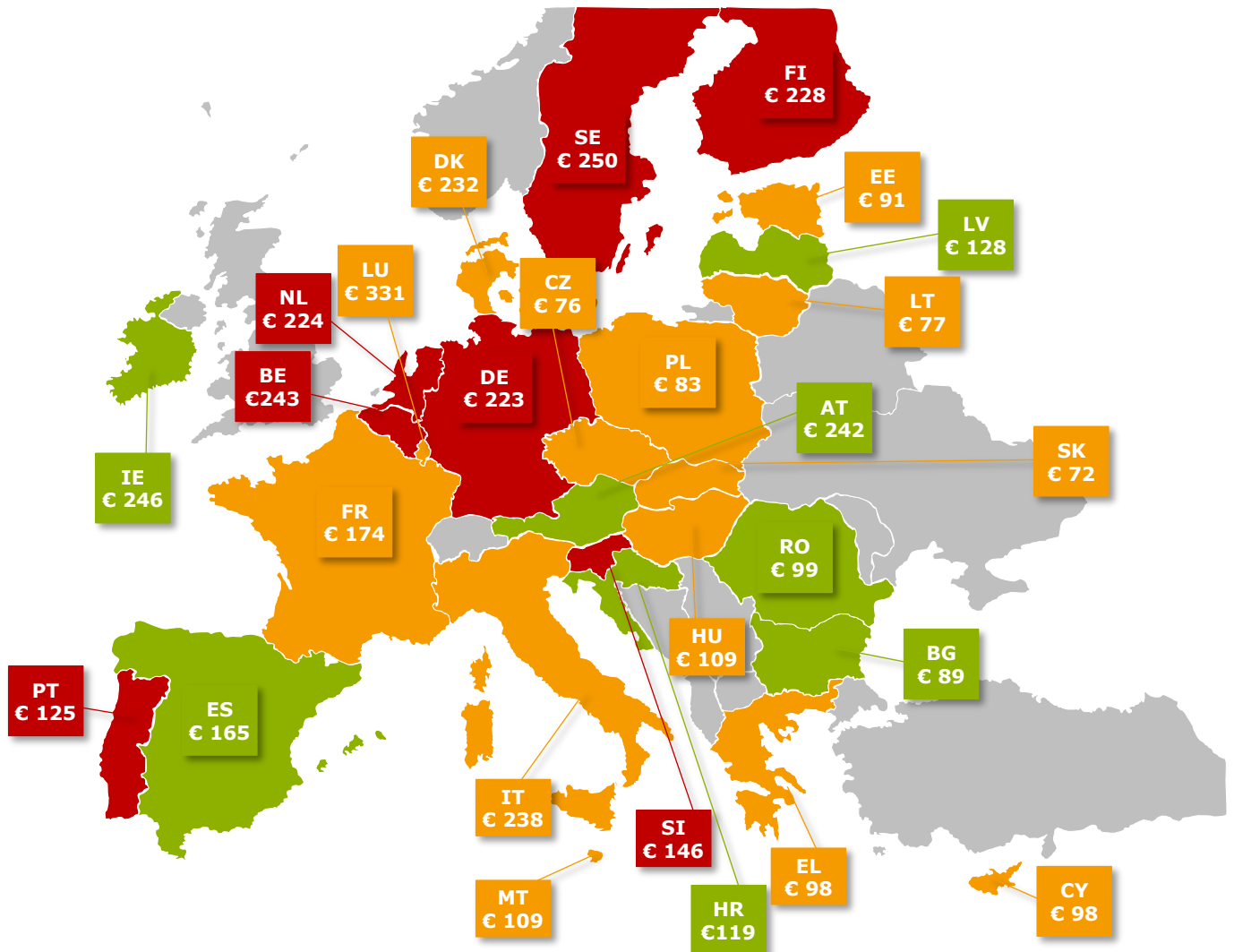
Countries in **yellow**: Yellow coloured values denote cost approximation based on SES microdata (used as proxy for staff costs) and extrapolations from the sample of countries where historical data was available (for translation and interpretation costs).

Countries in **red**: Red coloured values denote cost approximation based on extrapolations from the sample of countries with green coloured and yellow coloured values.

### Alternative B: Cost of one asylum seeker provided with legal assistance

	<p><b>Description</b></p> <p>This SCO covers the cost of one asylum seeker provided with legal assistance. Legal assistance consists of the provision of procedural and legal information, preparing legal documents and representation at court hearings during first instance or appeal stage. The duration of legal assistance provided per one asylum seeker should be within the range of 4 to 5 hours.</p>
	<p><b>Intended target groups</b></p> <p>Asylum seekers who have applied for international protection and are either waiting for the decision on the application or have appealed a negative decision at first instance.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of asylum seekers provided with legal assistance.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs for lawyers and legal assistants.          Translation costs.          Interpretation costs.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of asylum seekers provided with legal assistance: any document that officially confirms the identity of the participant</li> <li>• Reports or other relevant documentation providing evidence of the total number of asylum seekers assisted and detailing the subject matter of assistance</li> <li>• Documentation specifying requirements for the standard duration of legal assistance provided to asylum seekers: call for proposal, call for expression of interest, contractual arrangements, etc.</li> </ul>
	<p><b>Method for regular adjustment of the SCO amounts</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p> <ul style="list-style-type: none"> <li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: professional, scientific and technical activities.</li> </ul>

The map below presents the SCO amounts (adjusted to 2021 price levels) established for one asylum seeker provided with legal assistance.



**Legend:**

Countries in **green**: Green coloured values denote cost approximation based on historical data enriched by interpolations at the level of pre-selected categories of costs.







Countries in **yellow**: Yellow coloured values denote cost approximation based on historical data complemented by SES microdata

Countries in **red**: Red coloured values denote cost approximation based on extrapolations from the sample of historical data and microdata.

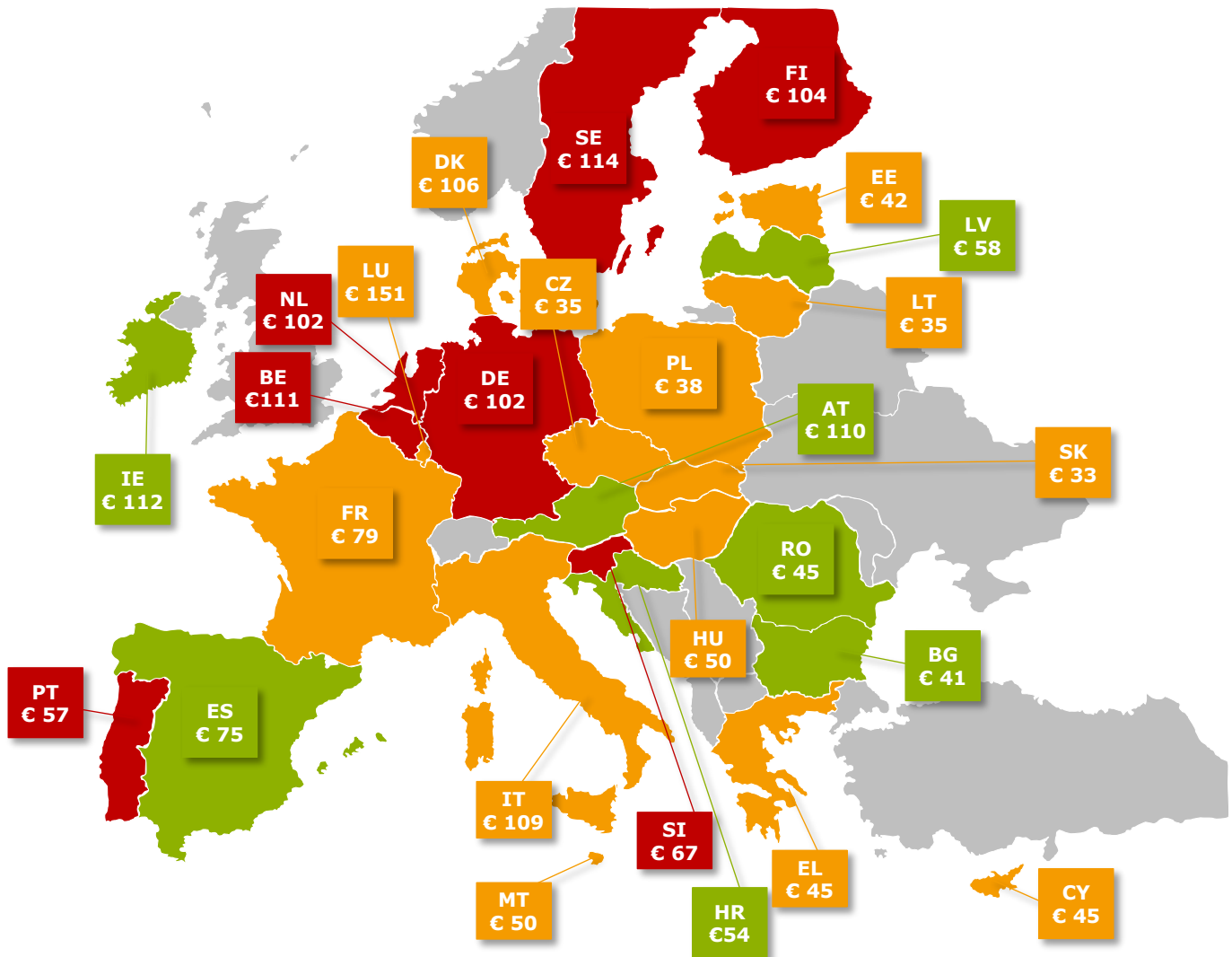
**Alternative C: Cost of one legal assistance session provided to one asylum seeker**

Description
<div style="display: flex; align-items: center;"> <p>This SCO covers the cost of one session of legal assistance provided to one asylum seeker. Legal assistance consists of the provision of procedural and legal information, preparing legal documents and representation at court hearings at first instance or appeal stage. The required duration of a legal assistance session is 2-3 hours per one asylum seeker.</p> </div>



	<p><b>Intended target groups</b></p> <p>Asylum seekers who have applied for international protection and are either awaiting the decision on the application or appealing a negative decision at first instance.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of sessions of legal assistance provided to asylum seekers.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs for lawyers and legal assistants.          Translation costs.          Interpretation costs.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of asylum seekers provided with legal assistance: any document that officially confirms the identity of the participant</li> <li>• Reports or other relevant documentation verifying the total number of legal assistance sessions and detailing the subject matter of assistance</li> <li>• Documentation specifying requirements for the standard duration of sessions of legal assistance provided to asylum seekers: call for proposal, call for expression of interest, contractual arrangements, etc.</li> </ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p> <ul style="list-style-type: none"> <li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: professional, scientific and technical activities.</li> </ul>

The map below presents the SCO amounts (adjusted to 2021 price levels) established for one legal assistance session provided to one asylum seeker.



**Legend:**

Countries in **green**: Green coloured values denote cost approximation based on historical data enriched by interpolations at the level of pre-selected categories of costs.

Countries in **yellow**: Yellow coloured values denote cost approximation based on historical data complemented by SES microdata

Countries in **red**: Red coloured values denote cost approximation based on extrapolations from the sample of historical data and microdata.

**2.1.2 Conclusions for Area 1**

Alternative A is the most flexible of the three alternatives, as it is based on an hourly duration parameter. Meanwhile the main advantage of Alternatives B and C is that they have easier requirements for documentary evidence (in the case of output based SCOs, only documented proof that activities took place and produced the quantified outputs covered by the unit cost is required). The key difference between Alternatives B and C is the output being measured: the number of participants or the number of sessions. Since Member States by default are obliged to report on the number of participants who received legal assistance<sup>7</sup>, Alternative B may be more preferable due to its potential for economies of scale.

<sup>7</sup> See Annex VIII of the Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021R1147>

Out of the three alternatives proposed in this area, **Alternative A (hourly cost of legal assistance per asylum seeker) is considered to be the best option for an EU-level SCO**. This is a good fit because of its high flexibility – the hourly rate is applicable irrespective of how much time it takes to assist one asylum seeker. This aspect is especially important. The actual duration of activities analysed seemed to vary significantly from country to country (based on a sample of historical data collected from Member States) and from case to case (based on the feedback received during workshops).

The main downside of Alternative B (cost of one asylum seeker provided with legal assistance) is that Member States using the proposed output-based unit cost must provide 4-5 hours of legal assistance per asylum seeker. This condition is based on the average duration of such activities observed in the sample. It must be set and applied in order to reduce the risk of overcompensating the actual cost of outputs (asylum seekers provided with legal assistance) reported by Member States. Otherwise, Alternative B is a better choice due to its higher simplification effect – timesheets or equivalent time-management system records are not required as proof for the controls and audits that apply to the output-based reimbursement of incurred costs.

The attractiveness and utility of Alternative C is similarly reduced by the requirement to standardise the duration of a legal assistance session per asylum seeker in all Member States that are inclined to use such an EU-level SCO. Despite the simplification of an output-based unit cost, the artificial limitation of legal assistance provided to asylum seekers could reduce the quality of those services (e.g. when the standard duration of 2-3 hours is insufficient to address a difficult case) or their efficiency (e.g. when the standard duration of 2-3 hours is more than is required to address a simple case). The former can be offset by multiple sessions for the same participant, whereas the latter is difficult to control and prevent.

The estimated rates for all three alternatives are based on the historical data provided by several Member States that was complemented by the SES microdata (used as a proxy for staff costs). Mostly due to large number of enterprises that provided data to SES on earnings of employed legal professionals, this sample is sufficient to accurately predict staff costs in all remaining Member States. They were extrapolated (i.e. inferred from values within an interval observed in the sample) on the basis of comparative price levels and labour cost indices from Eurostat. The reliability of estimated unit cost rates, however, is severely reduced by poor availability of historical data on translation and interpretation costs. In Romania, these cost items comprise around 16% of the estimated unit cost rate. If translation and interpretation costs in other Member States are significantly higher or lower, the extrapolated unit cost rates may overcompensate or undercompensate the actual cost of legal assistance activities.

## **2.2 Area 2. Training for asylum case workers**

Activities in this area include the provision of training for asylum case workers through face-to-face meetings, classroom trainings, exchanges, workshops and/or blended learning. The participants for these training activities can vary greatly based on the data received from Member States. The training was generally addressed to asylum case workers but also included other professionals working with asylum seekers, such as teachers, public administration experts, NGO workers or legal experts. For example, in the historical project data received from Austria, lawyers, judges, NGO workers, priests and civil servants were provided with group training that was listed under this area.

We propose two SCO alternatives for this area:

- **Alternative A:** Cost of a training course per one asylum case worker.
- **Alternative B:** Hourly cost of training per one asylum case worker.

Alternative A would result in a lower administrative burden for Member States, because the audits and controls for output based SCOs do not seek to verify training duration. It

may, however, require certain conditions for the minimum training duration to be set for Member States to avoid overcompensation. Alternative B is the more flexible of the two alternatives, as it uses an hourly duration parameter that enables Member States to provide training activities of varying durations.

### 2.2.1 Overview of data

After background desk research, an assessment of the historical data collected and further consultations with the European Commission, the following **cost categories** were deemed relevant for the development of alternatives in this area:

- staff costs for trainers providing classes for asylum case workers (professionals who provide training for people who are involved in the reception of people seeking international protection);
- training equipment costs (projectors, training materials and other items);
- rent and real estate costs (offices and other training venues).

Due to the small sample size for this area, the calculations based on historical data on incurred costs and extrapolations were excluded from this report. Please refer to Annex 3 for further details on alternatives, which were based on this calculation method.

Instead, microdata obtained from Eurostat for CVTS5 was used as the primary source for calculating SCO values. CVTS5 microdata was chosen as a proxy data source, as it includes data on training activities, which is the main focal point for this area. The cost categories under CVTS also closely resemble those for this area. The table below indicates how many enterprises per Member State provided information for CVTS on trainings similar to trainings attended by asylum case workers.

Table 3. Number of observations (enterprises that provided data to CVTS5 on trainings attended by their employees; only trainings that are similar to trainings attended by asylum case workers) in the microdata in each Member State

Country	Number of observations in the CVTS microdata
AT	-
BE	238
BG	29
CY	61
CZ	180
DE	30
DK	56
EE	129
EL	-
ES	878
FI	68
FR	165








HR	-
HU	168
IE	-
IT	447
LT	151
LU	64
LV	42
MT	39
NL	-
PL	201
PT	212
RO	306
SE	206
SI	36
SK	48

Microdata was available on training activities from 22 countries. To ensure that the costs derived from the microdata functioned as a good proxy for area-specific costs, the data was filtered by the following variables:

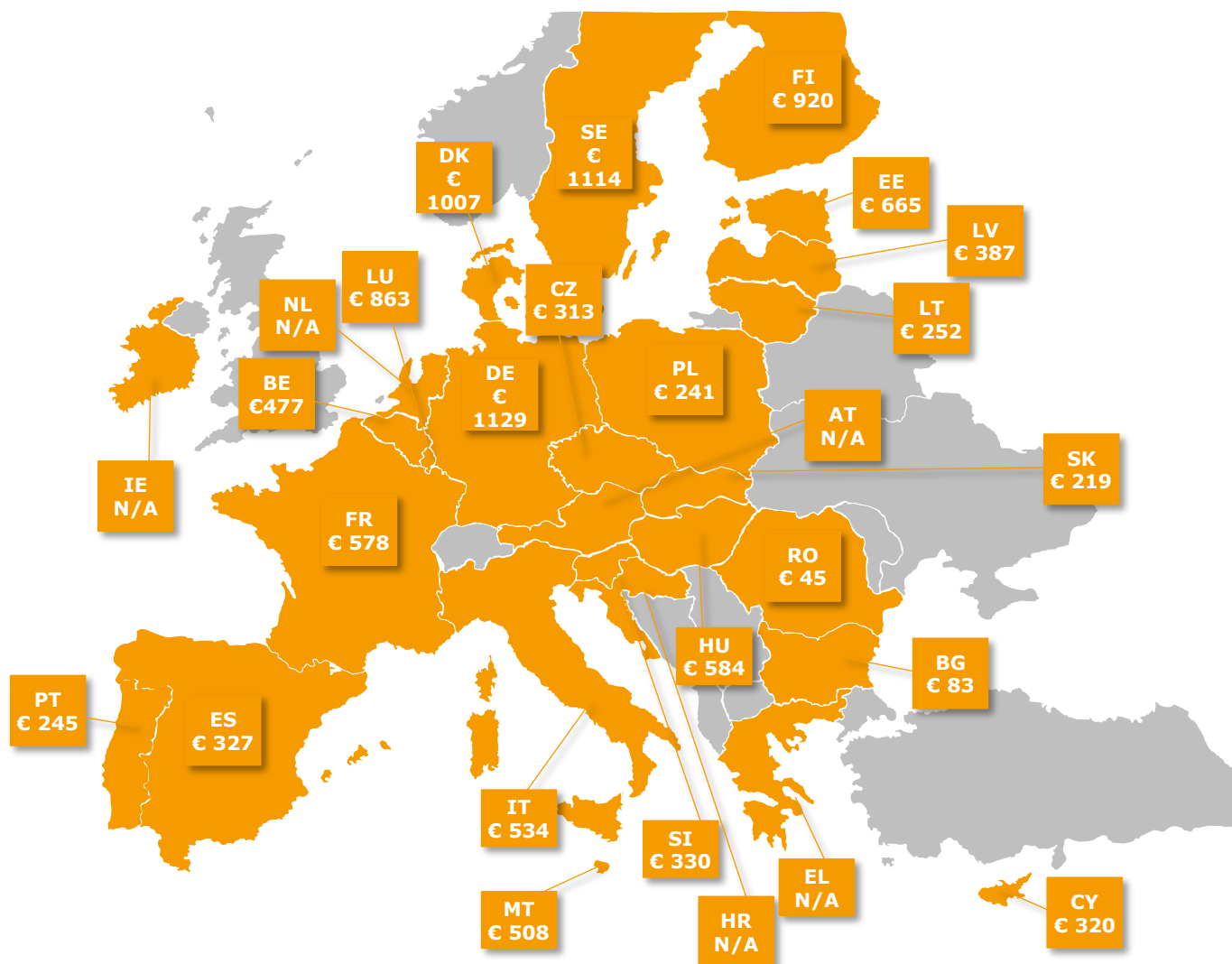
- NACE classification (to include only professional, scientific and technical activities);
- type of training (external guided on-the job training);
- training that does not include health and safety training (25% or less);
- skills and competences covered in the training (methodical and systematic skills, such as complex problem solving; judgement and decision making, etc.).

The unit costs for all remaining Member States (Austria, Croatia, Greece, Ireland, and the Netherlands) had to be extrapolated, i.e. inferred from the unit costs calculated for 22 Member States covered by the CVTS5 microdata. Notably, extrapolation was feasible only in the case of Alternative B – unit costs in Alternative A cannot be used to predict the unit cost rates in other Member States because training duration for this output-based unit cost has not been equalised. For more details on the precise calculation method of the Alternatives under this area, please see the Annex accompanying the report.

### Alternative A: Cost of a training course per one asylum case worker

	<p><b>Description</b></p> <p>This SCO covers the cost of one training course provided to an asylum case worker. Training may consist of face-to-face meetings, classroom training, exchanges, workshops or blended learning, etc.</p>
	<p><b>Intended target groups</b></p> <p>Asylum case workers and other specific groups involved in the reception of people seeking international protection.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of asylum case workers who attended a training course.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs for trainers.</p> <p>Training equipment costs.</p> <p>Rent and real estate costs.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of asylum case workers who attended training courses: any document that officially confirms the identity of the participant.</li> <li>• (Digitally) signed attendance lists or similar proof of participation in training.</li> <li>• Training programme, including information on the date, time and agenda of the training course.</li> <li>• Documentation specifying requirements for the standard duration of training courses for asylum case workers: call for proposal, call for expression of interest, contractual arrangements.</li> </ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p> <ul style="list-style-type: none"> <li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: professional, scientific and technical activities.</li> </ul> <p>In addition, separate cost category adjustments can be made by utilising the following indicators:</p> <p><u>Training equipment costs:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – education.</li> </ul> <p><u>Rent and real estate costs:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – housing.</li> </ul>




The map below presents the SCO amounts (adjusted to 2021 price levels) established for the cost of training course per one asylum case worker.







Legend:

Countries in **yellow**: Yellow coloured values denote cost approximation based on CVTS5 microdata. All countries not covered by CVTS5 microdata are marked 'N/A'.

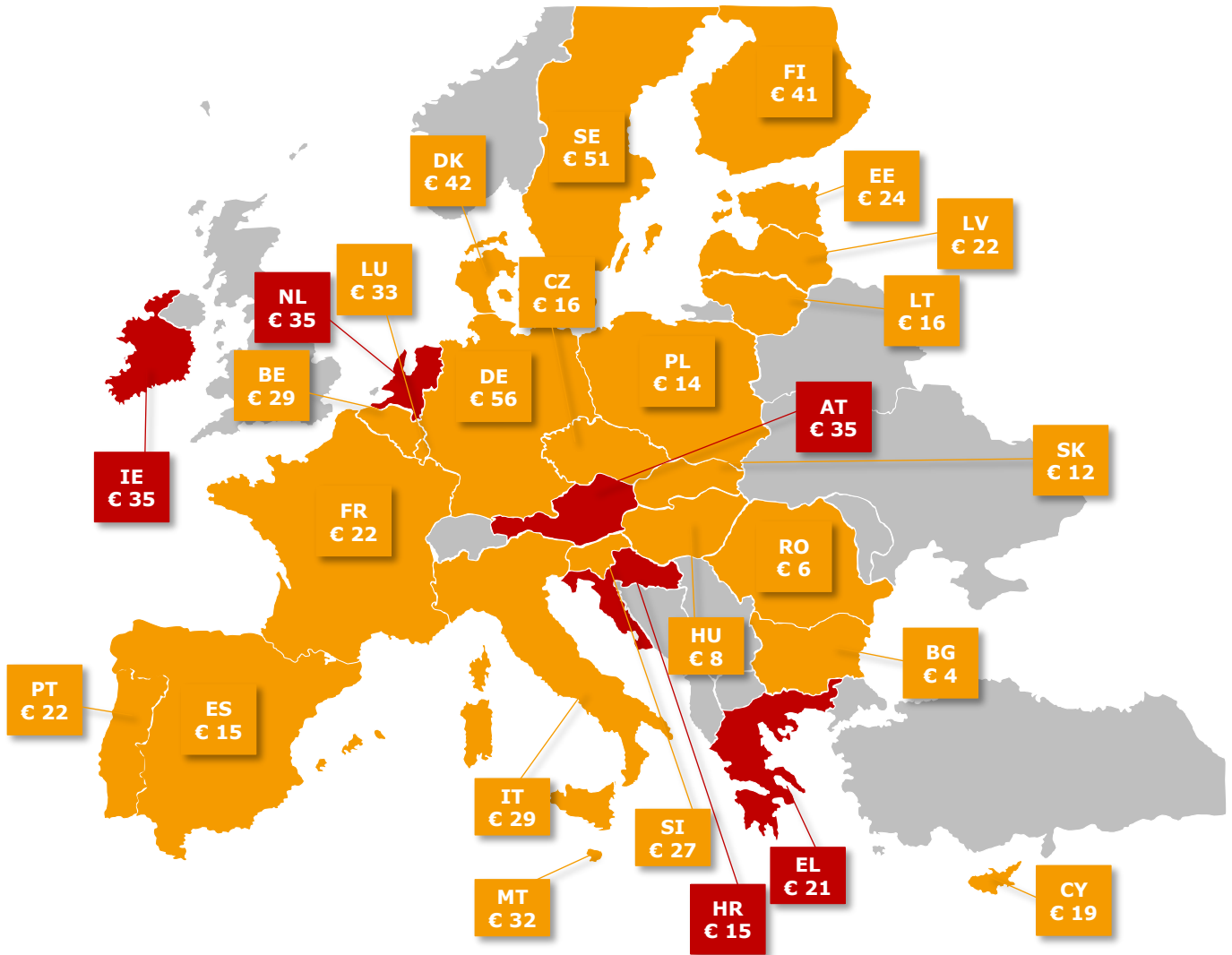
**Alternative B: Hourly cost of training per one asylum case worker**

	<p><b>Description</b></p> <p>This SCO covers the cost of one participant hour of training provided to asylum case workers. Training may consist of face-to-face meetings, classroom training, exchanges, workshops and blended learning, etc.</p>
	<p><b>Intended target groups</b></p> <p>Asylum case workers and other specific groups involved in the reception of people seeking international protection.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of hours of training per asylum case worker.</p>

	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs for trainers.</p> <p>Training equipment costs.</p> <p>Rent and real estate costs.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of asylum case workers who attended training courses: any document that officially confirms the identity of the participant.</li> <li>• (Digitally) signed attendance lists or similar proof of participation in training.</li> <li>• Training programme, including information on the date, time and agenda of the training course.</li> <li>• Proof of training duration: timesheets or any other verifiable time management system records.</li> </ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p> <ul style="list-style-type: none"> <li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: professional, scientific and technical activities.</li> </ul> <p>In addition, separate cost category adjustments can be made by utilising the following indicators:</p> <p><u>Training equipment costs:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – education.</li> </ul> <p><u>Rent and real estate costs:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – housing.</li> </ul>

The map below presents the SCO amounts (adjusted to 2021 price levels) established for one hour of training provided to one asylum case worker.





Legend:

Countries in **yellow**: Yellow coloured values denote cost approximation based on CVTS5 microdata

Countries in **red**: Red coloured values denote cost approximation based on extrapolations from the sample of microdata.

### 2.2.2 Conclusions for Area 2

**Both alternatives are a good fit for an EU-level SCO** in the area of training for asylum case workers. Each has some pros and cons that need to be weighed up.

Compared to Alternative B (hourly cost of training per asylum seeker), Alternative A (cost of a training course per asylum case worker) has higher simplification potential and would entail lower administrative costs. The underlying documentation required for the verifications and audits for this output-based unit cost does not include proof of training duration, such as timesheets or equivalent time-management system records. Instead, the only requirement is proof that the units delivered by projects – in the sense of quantified outputs covered by the unit cost (number of trained asylum case workers) – are properly documented and therefore verifiable. There is, however, a risk that shorter training courses may be organised for asylum case workers than training courses considered in the study.

Alternative B, on the other hand, is more flexible than Alternative A. Depending on the actual duration of a specific training programme attended by asylum case workers, both shorter and longer programmes can be reimbursed based on the proposed hourly rate.

This is particularly relevant if training needs change over time and the data used to establish the cost of an agreed output becomes obsolete, or if the data used to calculate the unit cost rates proves to be a poor proxy. The downside of an hourly rate is that it may incentivise inefficiently long training.

Alternative B may also be a more attractive option for an EU-level SCO, because it covers all Member States. Due to gaps in the data used for calculations, Alternative A does not cover Austria, Croatia, Greece, Ireland and the Netherlands.

Although unit cost rates proposed in this area are based on proxy data, the results of the analysis conducted offer an accurate and reliable approximation of the actual costs incurred by Member States. The sample used for calculations was drawn from a reliable source of data on continuing vocational training activities organised by enterprises – CVTS5 microdata. It included only those training activities that were deemed the best match of the training activities actually supported by Member States when training asylum case workers. The latter were identified from the small sample of historical data that was provided to the study team.

### **2.3 Area 3. Support to a migrant immediately after their arrival**

The proposed SCO under this area consists of the **daily cost of support per one third-country national** supported during the reception period after their arrival to the host country. The original hypothesis anticipated that this option should cover the first 24 hours of reception period. However, the data collected demonstrated that most Member States could not specify which services were provided in the first 24 hours, and therefore, what share of relevant costs in the historical data were incurred during the first 24 hours after a third-country national's arrival. We therefore, used data from alternative sources to complement the calculations, which would cover the average cost of support during one reception day for one third-country national.

#### **2.3.1 Overview of data**

After background research, an assessment of the historical data collected from the selected sample and consultations with the European Commission, the following cost categories were found to be the most common and therefore relevant for the development of this SCO alternative:

- staff costs for providing support to migrants;
- costs of providing health checks;
- subsistence costs.

The following **data sources** were used when calculating SCO values for this alternative:

- Historical data collected from Member States on projects that provided support to third-country nationals during the reception period;
- EMN Ad-Hoc Query on average cost and an average length of reception for asylum seekers<sup>8</sup> on social assistance, financial allowance and accommodation for the applicant. This source collected data from 21 Member States on average cost and average length of reception for asylum seekers. Nine Member States identified relevant activities that largely corresponded to the cost categories included in the calculations.

Data is not available for 15 Member States for this alternative. The cost estimates used to inform the SCO values in these countries were extrapolated from historical data and data from alternative sources to mitigate data limitations.

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<sup>8</sup> [https://ec.europa.eu/home-affairs/sites/default/files/2017.1229 - average cost and average length.pdf](https://ec.europa.eu/home-affairs/sites/default/files/2017.1229_-_average_cost_and_average_length.pdf)

The table below lists the Member States that either provided historical data for at least one of the relevant cost categories, had data within the alternative source identified or had their values interpolated. It is important to note that in cases such as Italy and Spain, no data on relevant cost categories was available from historical or alternative sources. Instead, only duration data was used in the calculations.


Table 4. The availability of historical and alternative-source data for relevant cost categories under Area 3 in the selected sample of Member States







Country	Staff costs	Subsistence costs	Healthcare costs
AT	I	A	I
BE	A	A	A
BG	H	I	I
FI	A	A	I
FR	I	A	I
HR	H	H	H
HU	A	A	A
IE	I	A	I
LV	H	I	I
NL	A	A	A
SE	A	A	I
SK	A	A	I

Notes: The cost categories for which Member States provided historical data are marked with 'H'. 'A' denotes instances where data was taken from the alternatives source. 'I' denotes instances where interpolations were applied based on the sample of historical and alternative source data.

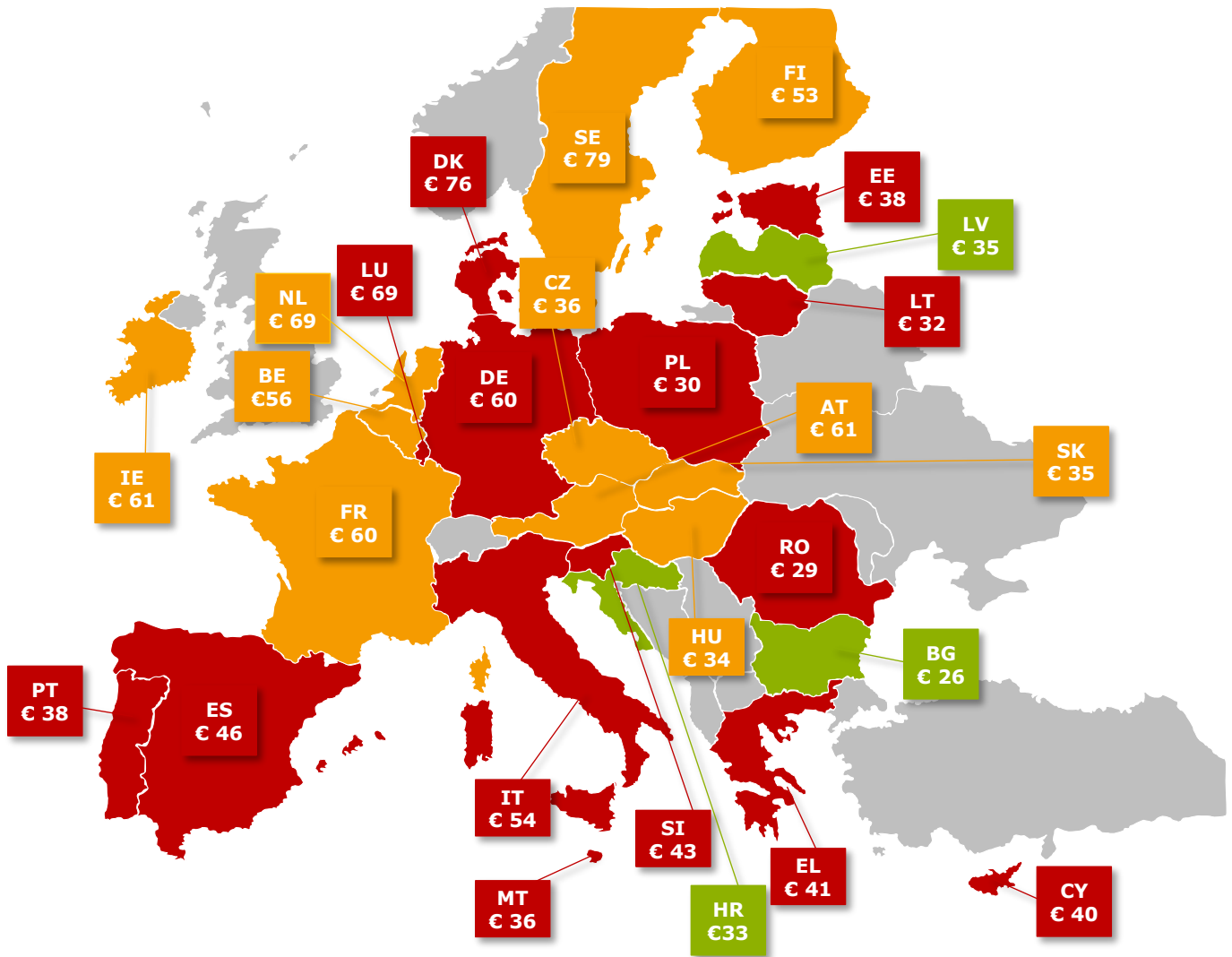
For more details on the precise calculation method of the Alternatives under this area, please see the Annex accompanying the report.

### Alternative A: Daily cost of support per one third-country national supported during the reception period

	<p><b>Description</b></p> <p>This SCO covers the cost of one day of assistance provided to third-country nationals during their reception period in the host country. The following items and services are covered:</p> <ul style="list-style-type: none"> <li>• Provision of non-food items.</li> <li>• Provision of food items.</li> <li>• Provision of information and counselling package.</li> <li>• Provision of medical examination.</li> </ul>
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	<p><b>Intended target groups</b></p> <p>Asylum seekers who have just arrived in the host country.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of days of support provided to one third-country national during the reception period.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs for providing support to migrants.</p> <p>Healthcare services.</p> <p>Subsistence costs.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of third-country nationals supported: any document that officially confirms the identity of the participant.</li> <li>• List of verified third-country nationals to receive assistance.</li> <li>• Proof of provided support: signed and dated checklist of provided food and non-food items, signed and dated counselling attendance sheet, signed and dated note issued by an authorised healthcare professional.</li> </ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p> <ul style="list-style-type: none"> <li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: administrative and support service activities.</li> </ul> <p>In addition, separate cost category adjustments can be made by utilising the following indicators:</p> <p><u>Healthcare services:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – health.</li> </ul> <p><u>Subsistence costs (incl. accommodation costs):</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – housing.</li> <li>• Harmonised index of consumer prices (HICP) – food.</li> </ul>

The map below presents the SCO amounts (adjusted to 2021 price levels) established for one day per one third-country national supported during the reception period after their arrival.



**Legend:**

Countries in **green**: Green coloured values denote cost approximation based on historical data enriched by interpolations at the level of pre-selected categories of costs.

Countries in **yellow**: Orange coloured values denote cost approximation based on data from alternative sources enriched by interpolations at the level of pre-selected categories of costs.

Countries in **red**: Red coloured values denote cost approximation based on extrapolations from the sample of historical data and alternative source data.

**2.3.2 Conclusions for Area 3**

The development of viable and robust alternatives for an EU-level SCO in this area was hampered by the limited availability and poor quality of historical data. As a result, only one alternative – a lump sum for reimbursement of the daily cost of support provided per one asylum seeker – is proposed by the study. This alternative is primarily based on data collected by the European Migration Network in the context of their ad hoc query on average cost and average length of reception for asylum seekers. The extent to which estimations reported by this source are accurate and calculated in the same way in all Member States included in the sample analysed in this study is difficult to verify.

Another important caveat of the proposed alternative is that the calculated amounts are estimations of the daily cost of reception support provided per one asylum seeker, not the cost of support during the first day after arrival. Nevertheless, this proxy should be relevant for establishing an EU-level SCO to reimburse the expenditure of relevant activities in this area. According to representatives of the Managing Authorities that attended the workshop, asylum seekers are typically provided with such support over

the course of the first week or similar period of time, not during the first day after their arrival.

## **2.4 Area 4. Preparatory classes for minors**

This area covers preparatory classes for minors (under 18 years of age) aimed at supporting their participation and integration in the host country's education system. Newly arrived migrant children can be placed in a different teaching setting depending on their host country. In some Member States, minors from migrant backgrounds may be put in mainstream classes with non-migrant students. Some Member States place them in preparatory classes that are provided separately from mainstream classes, and in some countries the education provision is mixed<sup>9</sup>.

The main activities identified in this area in the historical data sample consisted of language courses, learning aid and informal learning practices delivered both individually and in groups. Historical data also demonstrated that these classes are often organised on demand and not always in fixed groups of participants.

We propose three alternatives for this area:

- **Alternative A:** Cost of one 45-minute preparatory class per one minor.
- **Alternative B:** Cost of one 45-minute preparatory class per group of maximum 15 minors.
- **Alternative C:** Cost of one minor provided with preparatory classes.

Alternative A is the most flexible out of all three alternatives. This alternative could be applied to mixed classes, as it considers only one minor and therefore mitigates the differences between how preparatory classes are organised in Member States. Alternative B considers one classroom as its unit of measurement, which would reimburse the cost of providing preparatory classes and may be more preferable to Member States. Alternative C is an output-based SCO, which means that the administrative burden of collecting documentary evidence is lower than for the other proposed alternatives.

### **2.4.1 Overview of data**

After background research, an assessment of the historical data collected and consultations with the European Commission, the following **cost categories** were found to be the most common and therefore relevant for the development of this SCO alternative:

- staff costs for teachers;
- learning materials;
- classroom hire costs.

19 Member States provided no data on relevant cost categories for this area. If data for certain cost categories were not provided but other historical data was available, the missing values had to be interpolated, i.e. statistically estimated from the historical data for that cost category provided by other Member States. For countries that did not provide any historical data, the proposed unit costs had to be extrapolated. The Table below lists the Member States that provided historical data for relevant cost categories, or had these values interpolated.

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<sup>9</sup> Integrating Students from Migrant Backgrounds into Schools in Europe: National Policies and Measures (europa.eu).







Table 5. Availability of historical data for relevant cost categories under Area 4 in the selected sample of Member States

Country	Staff costs	Learning materials	Rent and real estate costs
AT	H	I	H
BG	H	I	H
CY	H	H	I
LV	H	H	H
ES	I	I	I
IT	I	I	I
MT	I	I	I
SI	I	I	I

Notes: The cost categories for which Member States provided historical data are marked with 'H'. 'I' denotes gaps in the data that had to be filled with an interpolated approximation of the analysed costs.

For more details on the precise calculation method of the Alternatives under this area, please see the Annex accompanying the report.

#### Alternative A: Cost of one 45-minute preparatory class per one minor

	<p><b>Description</b></p> <p>This SCO would cover one 45-minute preparatory class for one minor who is an asylum seeker.</p>
	<p><b>Intended target groups</b></p> <p>Asylum seekers who are minors (under 18 years of age).</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of 45-minute preparatory classes for provided one minor asylum seeker.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs for teachers.</p> <p>Learning materials.</p> <p>Classroom hire costs.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>Official and unique identification of minors who attended preparatory classes: any document that officially confirms the identity of the participant.</li> </ul>

- Participant enrolment and attendance records: attendance sheet with names and identifications of minors.
- Curriculum for preparatory classes: documentation prepared at the beginning of the action that specifies the number of minors that are registered to be provided the service, the scheduled period of the provision of the service and information about the organisation of the action.
- Documentation regulating the standard length of a lesson (45 minutes) or timesheets/any other verifiable time management system records.

### **Method for regular adjustment of the SCO amounts/rates**

SCO values can be adjusted regularly based on the following indicator:

- LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: education.



In addition, separate cost category adjustments can be made by utilising the following indicators:

#### Learning materials:

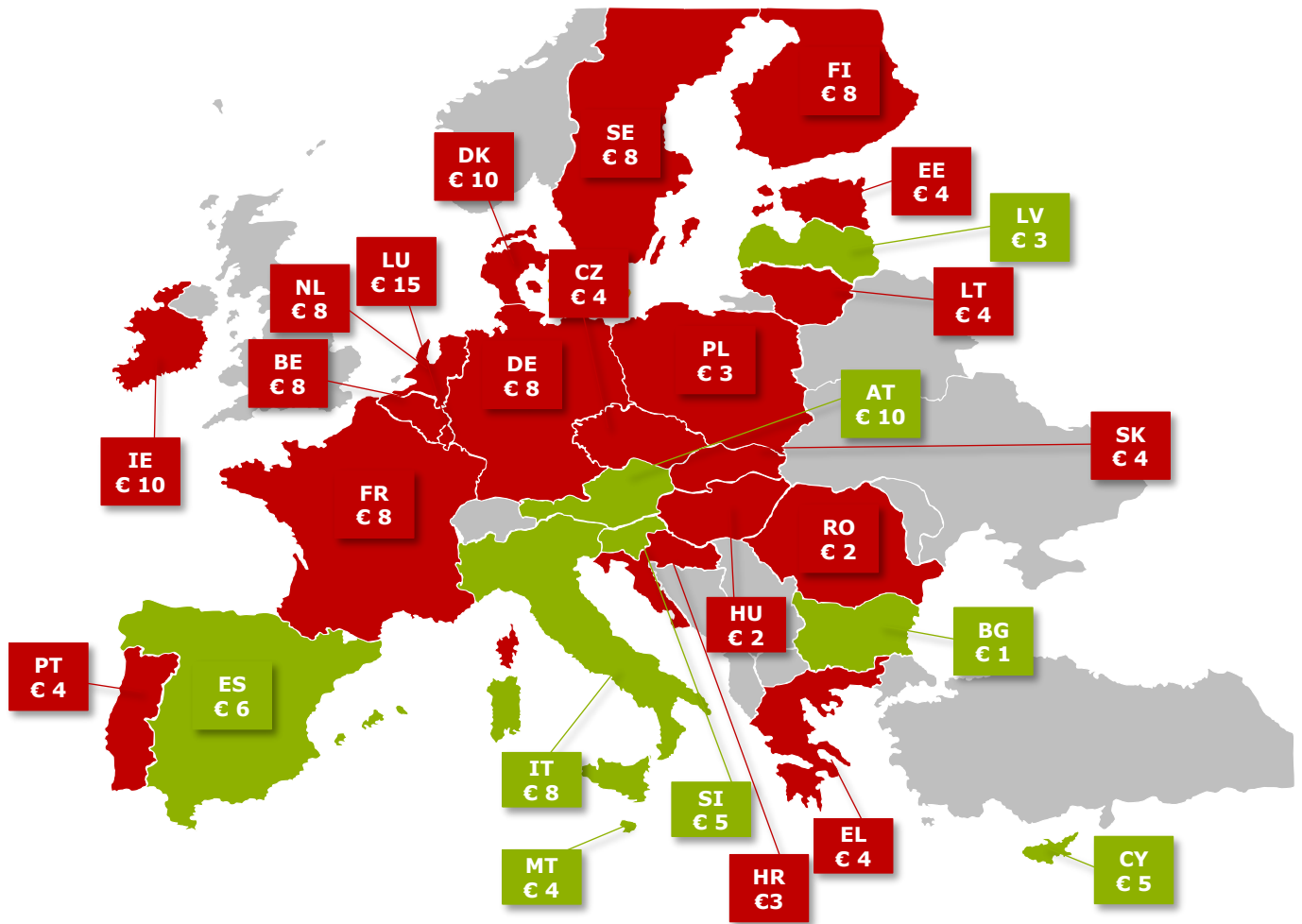
- Harmonised index of consumer prices (HICP) – education.

#### Classroom rent costs:

- Harmonised index of consumer prices (HICP) – housing.

The map below presents the SCO values (adjusted to 2021 price levels) for one 45-minute preparatory class for one minor based on historical data collected from Member States.












**Legend:**

Countries in **green**: Green coloured values denote cost approximation based on historical data enriched by interpolations at the level of pre-selected categories of costs.

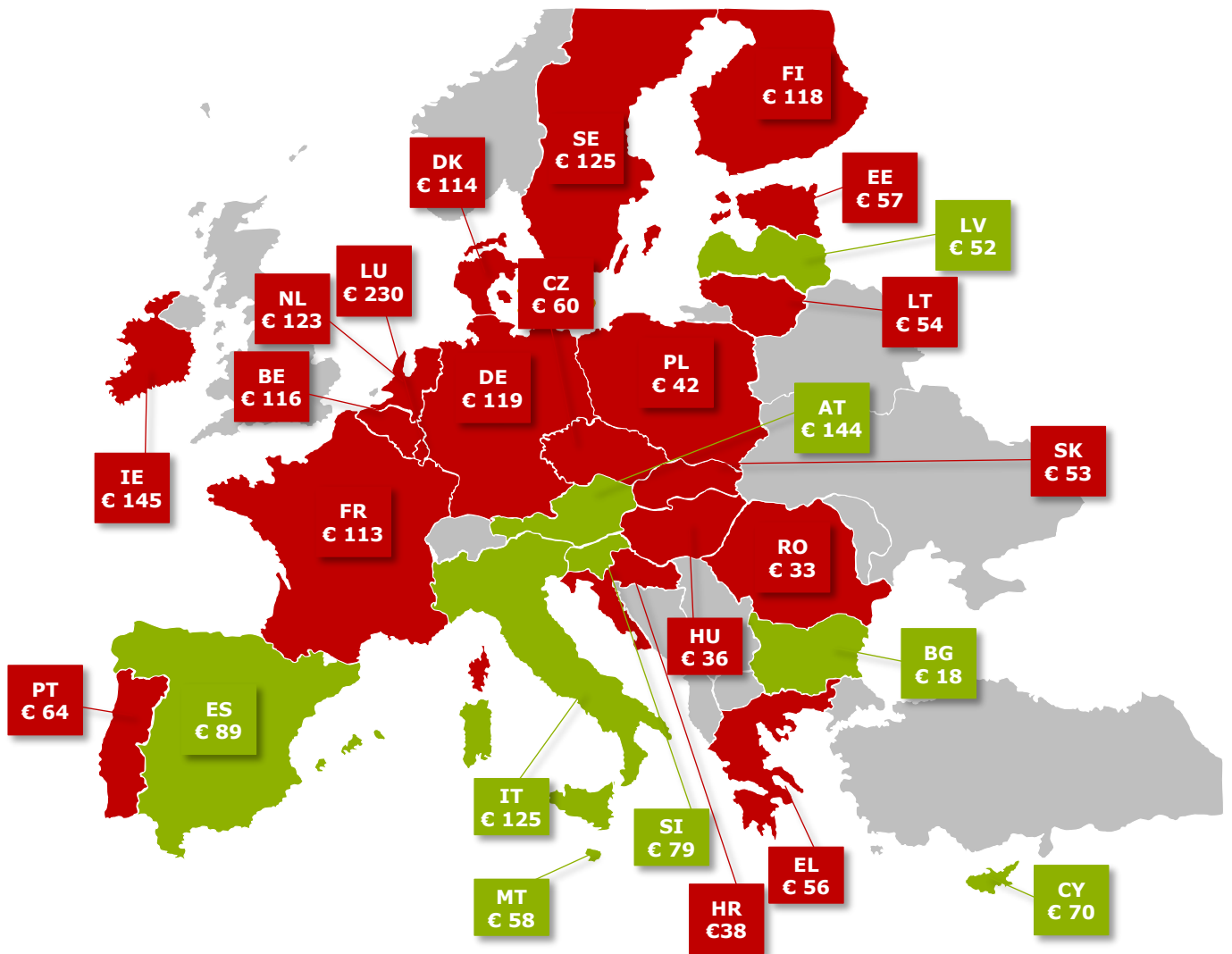
Countries in **red**: Red coloured values denote cost approximation based on extrapolations from the sample of historical data.

**Alternative B: Cost of one 45-minute preparatory class per group of maximum 15 minors**

	<p><b>Description</b></p> <p>This SCO covers the cost of one preparatory class of 45 minutes per group of 15 minors who are also asylum seekers.</p>
	<p><b>Intended target groups</b></p> <p>Asylum seekers who are minors (under 18 years of age).</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of 45-minute classes organised.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>

	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs for teachers.</p> <p>Learning materials.</p> <p>Classroom hire costs.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"><li>• Official and unique identification of minors who attended preparatory classes: any document that officially confirms the identity of the participant</li><li>• Participant enrolment and attendance records per class: attendance sheet with names and identifications of minors</li><li>• Curriculum for preparatory classes: documentation prepared at the beginning of the action that specifies the number of minors that are registered to be provided the service, the scheduled period of the provision of the service and information about the organisation of the action</li><li>• Documentation regulating the standard length of a lesson (45 minutes)</li></ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p> <ul style="list-style-type: none"><li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: education.</li></ul> <p>In addition, separate cost category adjustments can be made by utilising the following indicators:</p> <p><u>Learning materials:</u></p> <ul style="list-style-type: none"><li>• Harmonised index of consumer prices (HICP) – education.</li></ul> <p><u>Classroom rent costs:</u></p> <ul style="list-style-type: none"><li>• Harmonised index of consumer prices (HICP) – housing.</li></ul>

The map below presents SCO (adjusted to 2021 price levels) amounts established for one 45-minutes preparatory class for a group of maximum 15 minors.










**Legend:**

Countries in **green**: Green coloured values denote cost approximation based on historical data enriched by interpolations at the level of pre-selected categories of costs.

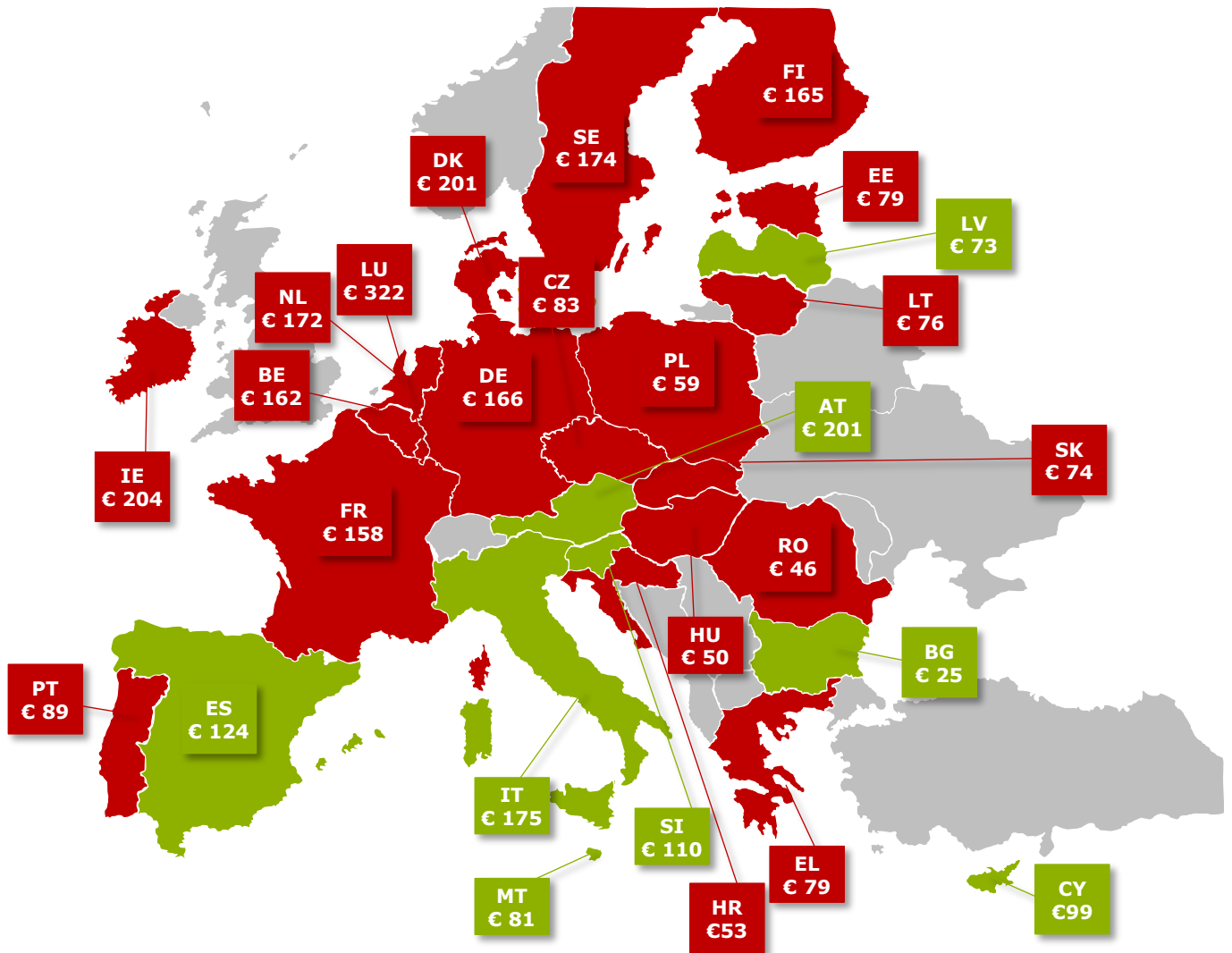
Countries in **red**: Red coloured values denote cost approximation based on extrapolations from the sample of countries with green coloured values.

**Alternative C: Cost of one minor provided with preparatory classes**

	<p><b>Description</b></p> <p>This SCO covers the cost of 21 preparatory classes of 45 minutes provided per one minor who is also an asylum seeker.</p>
	<p><b>Intended target groups</b></p> <p>Asylum seekers who are minors (under 18 years of age).</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of minors provided with the pre-defined number of preparatory classes.</p>

	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs for teachers.</p> <p>Learning materials.</p> <p>Classroom hire costs.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of minors who attended preparatory classes: any document that officially confirms the identity of the participant.</li> <li>• Participant enrolment and attendance records: attendance sheet with names and identifications of minors.</li> <li>• Curriculum for preparatory classes: documentation prepared at the beginning of the action that specifies the number of minors that are registered to be provided the service, the scheduled period of the provision of the service and information about the organisation of the action.</li> </ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p> <ul style="list-style-type: none"> <li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: education.</li> </ul> <p>In addition, separate cost category adjustments can be made by utilising the following indicators:</p> <p><u>Learning materials:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – education.</li> </ul> <p><u>Classroom rent costs:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – housing.</li> </ul>

The map below presents SCO amounts (adjusted to 2021 price levels) established for one minor receiving preparatory classes.



**Legend:**

Countries in **green**: Green coloured values denote cost approximation based on historical data enriched by interpolations at the level of pre-selected categories of costs.

Countries in **red**: Red coloured values denote cost approximation based on extrapolations from the sample of countries with green coloured values.

**2.4.2 Conclusions for Area 4**

In the case of preparatory classes for minors, **a process-based unit cost (Alternative A) is recommended** as the most suitable option for an EU-level SCO. The buy-in of Member States to use one of the proposed output-based options is unlikely. The main advantage of Alternative A over Alternative B (cost of one 45-minute preparatory class per group of maximum 15 minors) is that it is also applicable to mixed classes attended by both foreign-born minors and their native-born peers. Also, it does not impose any additional conditions concerning the group size or the required minimum number of classes that each minor must attend (as opposed to the requirement for 21 classes in Alternative C).

Based on the information collected about activities supported, and findings from other studies, national practices in relation to preparatory classes for minors and integration of students from migrant backgrounds more broadly can vary a lot. In some Member States, preparatory classes are limited to language training, while others offer more

comprehensive integration<sup>10</sup>. As a result, the typical number of classes offered to students from migrant backgrounds, or the total duration of these classes, can vary widely between Member States. The formal requirement to organise 21 preparatory classes per minor may be unacceptable to some Member States.

The estimated rates are equally reliable and robust for both alternatives. All calculations in this area are based on the same historical data collected from a sample of Member States. For all Member States that did not provide historical data (or provided insufficient data), the proposed rates were extrapolated, i.e. inferred from values within an interval observed in the sample. Due to small sample size, the accuracy of extrapolated values may vary, and there is a rather significant margin of error.

## **2.5 Area 5. Pre-departure measures in third countries**

This area covers pre-departure measures provided to third-country nationals before their departure to an EU Member State in the country in which they are staying. Pre-departure measures in third countries include the following activities:

- pre-departure orientation course or workshop (including teachers, classroom and learning materials);
- travel to the pre-departure course or workshop;
- health check and relevant documentation (fit-to-travel check);

These measures aim to assist third-country nationals who have been admitted by a Member State for immigration purposes (including individuals in need of international protection who are admitted through resettlement or humanitarian admission programmes), prior to their departure to the Member State concerned. With the exception of projects received from Germany and Italy, where the people who received these services moved for family reunification purposes or professional reasons, the projects we received are mainly focused on activities for people in need of international protection.

We propose two alternatives for this area:

- **Alternative A:** Cost of one third-country national supported prior to their departure to the Member State (including a 45-minute pre-departure workshop).
- **Alternative B:** Cost of one third-country national supported prior to their departure to the Member State (including a pre-departure workshop of 6.5 hours).

Both alternatives consider an outcome-based SCO (cost of a third-country national receiving the services), which is preferable for increasing simplification and lowering the administrative burden. The key difference between the two alternatives is the duration of the pre-departure workshop. Alternative A specifies a standard 45-minute duration, which was the working hypothesis in the Terms of Reference. Alternative B considers the average duration of pre-departure workshops based on historical data collected from Member States.

### **2.5.1 Overview of data**

The following **data sources** were used to calculate SCO values for the alternatives presented.

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<sup>10</sup> Integrating Students from Migrant Backgrounds into Schools in Europe: National Policies and Measures (europa.eu).

- Historical data on projects that supported pre-departure measures for third-country nationals in third countries collected from the Member States. The following cost category is used in the calculations:
  - staff costs for staff providing pre-departure workshops.
- Historical data collected in Area 3. The following cost category is used in the calculations:
  - medical costs of health checks for participants (fit-to-travel checks).
- Microdata obtained from Eurostat for CVTS5 that was used to calculate cost values for selected cost categories:
  - travel and subsistence costs;
  - classroom renting costs;
  - costs of learning materials.

As shown in the table below, only two Member States provided partial historical data that we could use for calculations. We used the information on staff costs and workshop duration provided by Germany and Finland, as these were the only ones that were complete and could therefore be used. The cost estimates for the other countries, which were used to inform the SCO values, were calculated using interpolations within the sample i.e. statistically estimated from the historical data for that cost category provided by other Member States. Extrapolation was used for the countries that provided no historical data.

Table 6. Availability of historical data for relevant cost categories under Area 5 in the selected sample of Member States

Country	Staff costs
DE	H
FI	H
IT	I
LU	I
PT	I
RO	I

Notes: The cost categories for which Member States provided historical data are marked with 'H'. 'I' denotes gaps in the data that had to be filled with an interpolated approximation of the analysed costs.

As indicated earlier, the final SCO values included data for staff costs for legal professionals extracted from the CVTS survey. The table below presents the number of observations (i.e. the sample size) for each Member State within the sample used for calculations.

Table 7. Number of observations in the microdata for each Member State

Country	Number of observations in the CVTS microdata
AT	-
BE	164

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<b>BG</b>	24
<b>CY</b>	32
<b>CZ</b>	106
<b>DE</b>	29
<b>DK</b>	48
<b>EE</b>	102
<b>EL</b>	-
<b>ES</b>	481
<b>FI</b>	50
<b>FR</b>	96
<b>HR</b>	-
<b>HU</b>	149
<b>IE</b>	-
<b>IT</b>	349
<b>LT</b>	132
<b>LU</b>	56
<b>LV</b>	35
<b>MT</b>	31
<b>NL</b>	-
<b>PL</b>	171
<b>PT</b>	144
<b>RO</b>	215
<b>SE</b>	188
<b>SI</b>	30
<b>SK</b>	38

For more details on the precise calculation method of the Alternatives under this area, please see the Annex accompanying the report.



**Alternative A: Cost of one third-country national supported prior to their departure to the Member State (including a 45-minute pre-departure workshop)**

	<p><b>Description</b></p> <p>This SCO covers the cost of one third-country national supported prior to their departure to the Member State, including a 45-minute pre-departure workshop or course. The activities covered are a pre-departure orientation course or workshop, travel, a health check and the relevant documentation.</p>
	<p><b>Intended target groups</b></p> <p>Third-country nationals who have been admitted by a Member State for immigration purposes (including individuals in need of international protection who are admitted through resettlement or humanitarian admission programmes), prior to their departure to the Member State concerned.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>The number of third-country nationals provided with pre-departure workshops.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Costs of staff providing pre-departure workshops.</p> <p>Travel and subsistence costs for workshop participants.</p> <p>Rental costs for the premises where pre-departure workshops and courses are held.</p> <p>Costs of learning materials needed for the orientation course or pre-departure workshop for third-country nationals.</p> <p>Medical costs for third-country national health checks (fit-to-travel checks).</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of third-country nationals supported prior to their departure to one of the EU Member States: any document that officially confirms the identity of the participant</li> <li>• Workshop/course programme, including information on the date, time, agenda and a high-level description of the material covered</li> <li>• Signed and dated workshop/course attendance lists or similar proof of participation</li> <li>• Proof of provided support and assistance: signed and dated checklist of provided non-financial assistance (45 minutes orientation course/workshop, health check, transport to the airport), signed and dated note issued by an authorised healthcare professional.</li> </ul>

### **Method for regular adjustment of the SCO amounts/rates**

SCO values can be adjusted regularly on the basis of the following indicator:

- LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: Administrative and support service activities.

In addition, separate cost category adjustments can be made by utilising the following indicators:

#### Travel and subsistence costs for workshop participants:

- Harmonised index of consumer prices (HICP) – transport.
- Harmonised index of consumer prices (HICP) – food.

#### Costs of learning materials needed for the orientation course or pre-departure workshop for third-country nationals:

- Harmonised index of consumer prices (HICP) – education.

#### Rent costs for the premises where pre-departure workshops and courses are held:

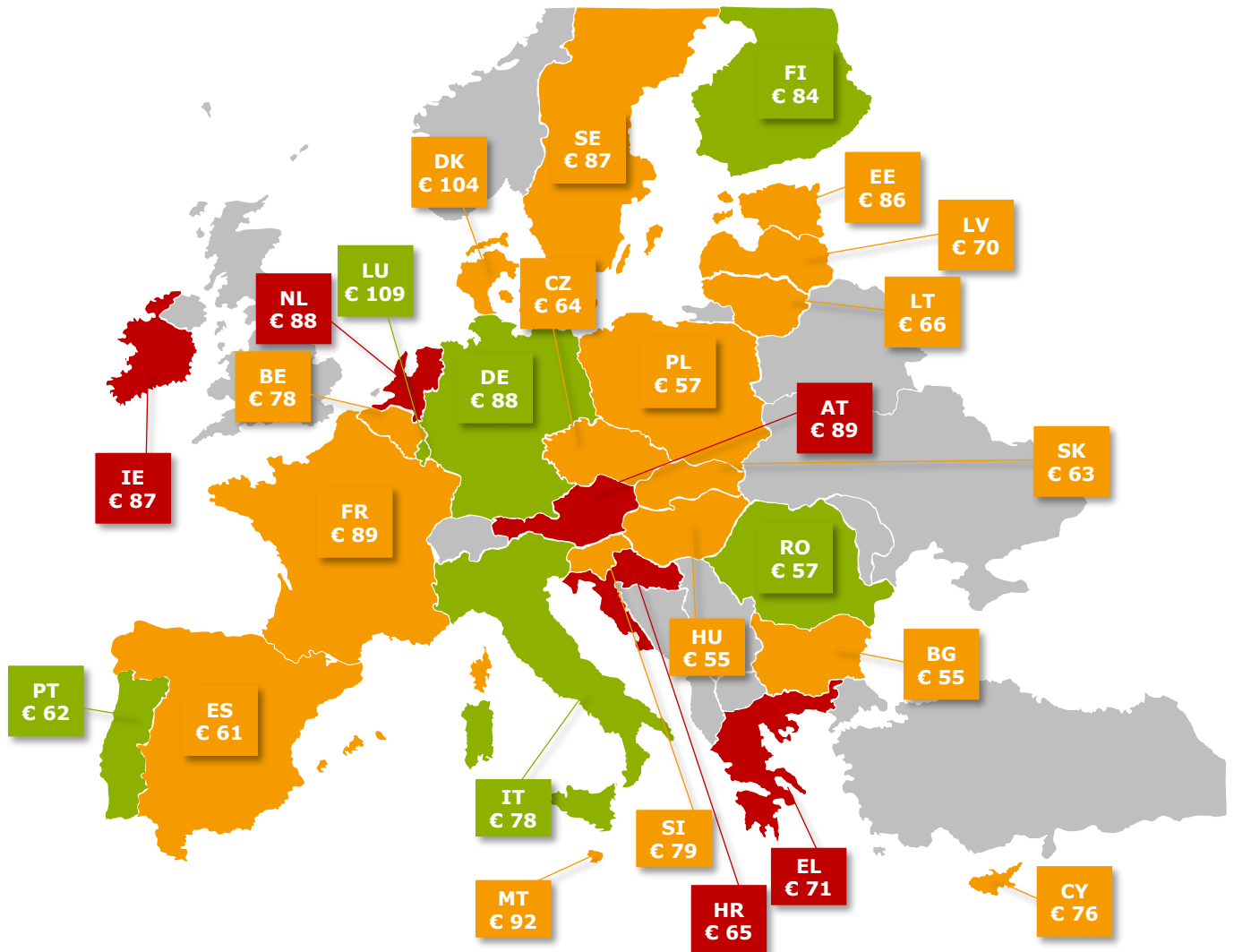
- Harmonised index of consumer prices (HICP) – housing.

#### Medical costs for third-country national health checks (fit-to-travel checks):

- Harmonised index of consumer prices (HICP) – health.



The map below presents the SCO amounts (adjusted to 2021 price levels) established for one third-country national supported prior to their departure to the Member State (45 minutes of pre-departure workshop).





**Legend:**






Countries in **green**: Green coloured values denote cost approximation based on historical data enriched by interpolations at the level of pre-selected categories of costs.

Countries in **yellow**: Yellow coloured values denote cost approximation based on historical data complemented by CVTS5 microdata

Countries in **red**: Red coloured values denote cost approximation based on extrapolations from the sample of countries with green coloured and yellow coloured values

**Alternative B: Cost of one third-country national supported prior to their departure to the Member State (including a pre-departure workshop of 6.5 hours)**

	<p><b>Description</b></p> <p>This SCO covers the cost of one third-country national supported to their departure to the Member State, covering a pre-departure workshop or course, travel to the workshop location, health check and the relevant documentation.</p>
	<p><b>Intended target groups</b></p> <p>Third-country nationals who have been admitted by a Member State for immigration purposes, including persons in need of international protection, admitted through resettlement or humanitarian admission</p>

	<p>programmes prior to their actual departure to the Member State concerned.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of third-country nationals that received pre-departure measures.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Costs of staff providing pre-departure workshops.</p> <p>Travel and subsistence costs for workshop participants.</p> <p>Rent costs for the premises where pre-departure workshops and courses are held.</p> <p>Costs of learning materials for third-country national needed for the orientation course or pre-departure workshop.</p> <p>Medical costs of health checks for participants (fit-to-travel checks).</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of third-country nationals supported prior to their departure to one of the EU Member States: any document that officially confirms the identity of the participant</li> <li>• Workshop/course programme, including information on the date, time, agenda and a high-level description of the material covered</li> <li>• Signed and dated workshop/course attendance lists or similar proof of participation</li> <li>• Proof of provided support and assistance: signed and dated checklist of provided non-financial assistance (6.5 hours orientation course/workshop, health check, transport to the airport), signed and dated note issued by an authorised healthcare professional.</li> </ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly on the basis of the following indicator:</p> <ul style="list-style-type: none"> <li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: Administrative and support service activities</li> </ul> <p>In addition, separate cost category adjustments can be made by utilising the following indicators:</p> <p><u>Travel and subsistence costs for workshop participants:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – transport.</li> <li>• Harmonised index of consumer prices (HICP) – food.</li> </ul> <p><u>Costs of learning materials needed for the orientation course or pre-departure workshop for third-country nationals:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – education.</li> </ul>

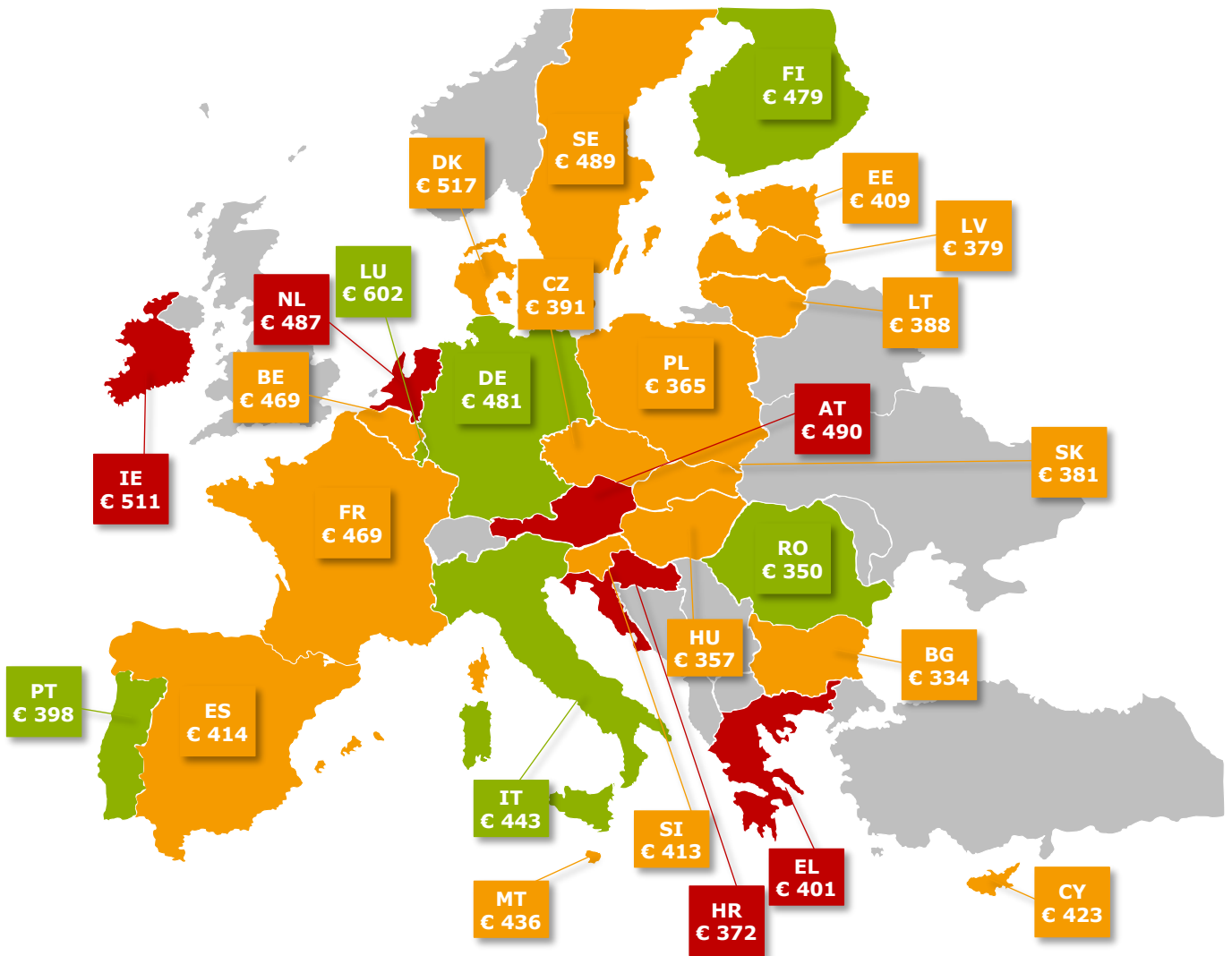
Rent costs for the premises where pre-departure workshops and courses are held:

- Harmonised index of consumer prices (HICP) – housing.

Medical costs for third-country national health checks (fit-to-travel checks):

- Harmonised index of consumer prices (HICP) – health.

The map below presents the SCO amounts (adjusted to 2021 price levels) established for one third-country national supported prior to their departure to the Member State covering pre-departure workshop of 6.5 hours.



**Legend:**

Countries in **green**: Green coloured values denote cost approximation based on historical data enriched by interpolations at the level of pre-selected categories of costs.

Countries in **yellow**: Yellow coloured values denote cost approximation based on historical data complemented by CVTS5 microdata

Countries in **red**: Red coloured values denote cost approximation based on extrapolations from the sample of historical data and microdata.

## 2.5.2 Conclusions for Area 5

There is **insufficient evidence to recommend any of the two alternatives** developed for pre-departure measures in third countries. The lump sum amounts in both cases are based on data coming from a large variety of sources: historical data on staff costs, CVTS 5 microdata on travel, subsistence, rental and learning material costs, and data from alternative sources on health check costs<sup>11</sup>. As the historical data has been available only for one of these cost items, the study cannot verify if and to what extent the calculated lump sum amounts are comparable to the actual costs incurred when providing support to third-country nationals prior to their departure to one of the Member States.

## 2.6 Area 6. Language training for third-country nationals

Area 6 covers SCOs for language training for third-country nationals. Two output-based SCOs were developed as alternatives in this area:

- **Alternative A:** Unit cost of one hour of language training for one third-country national.
- **Alternative B:** Unit cost of one language training course provided to one third-country national.

### 2.6.1 Overview of data

Under Area 6, 11 Member States provided the study team with sufficient historical data for at least one of the preselected cost categories. Only four Member States (DE, HU, LV, RO) provided historical data for all cost categories covered by the SCO. For 17 Member States, no data was provided or their data was not detailed enough for the analysis (e.g. it was missing a breakdown into cost categories or one of the key data points, such as total direct costs, number of participants or duration).

Table 8. Availability of historical data for relevant cost categories

Country	Staff costs	Training materials	Rental costs
AT	H	H	H
BG	H	H	I
CY	H	H	H
DE	H	H	H
EE	H	I	I
IT	H	H	H
FI	H	H	H
HU	H	H	H
LV	H	H	I
RO	H	H	H
SK	I	H	H

Notes: The cost categories for which Member States provided historical data are marked with 'H'. 'I' denotes gaps in the data that had to be filled with an interpolated approximation of the analysed costs.

<sup>11</sup> As explained in the description of the calculation method and data used for the analysis, the data on health checks was taken from Area 3, where information from alternative sources has been available on their actual expenditure incurred while providing healthcare services to third-country nationals during their reception period.

Given the lack of comprehensive historical data, the SCO for this area was calculated using the CVTS5 dataset<sup>12</sup>. Microdata was available on training activities from 24 countries. To ensure that the costs derived from the microdata functioned as a proxy for area-specific costs, the data was filtered by the following variables:


- NACE classification (to include only professional, scientific and technical activities);
- type of training (only external training);
- training that does not include health and safety training (25% or less);
- skills and competences covered in the training (foreign language skills).

The table below presents the number of observations in the microdata for each Member State.







Table 9. Number of observations in the microdata for each Member State

Country	Number of observations in the CVTS microdata
AT	-
BE	3,373
BG	1,136
CY	680
CZ	6,757
DE	1,882
DK	984
EE	1,270
EL	-
ES	7,036
FI	1,247
FR	2,604
HR	-
HU	2,292
IE	-
IT	10,711
LT	1,626
LU	627
LV	923
MT	-
NL	402
PL	4,571
PT	2,134
RO	2,671
SE	3,855
SI	1,175
SK	1,449

### Alternative A: Unit cost of one hour of language training for one third-country national

	<p><b>Description</b></p> <p>This SCO covers the cost one hour of language training for one third-country national in a group setting. Activities included under this SCO:</p>
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<sup>12</sup> Results calculated using historical data are presented in Annex 3.

	<p>while the key component of the activities is language training it can be combined with activities aiming to increase communication skills such as conversation classes. The language class is delivered in a group format with up to 15 participants.</p>
	<p><b>Intended target groups</b></p> <p>Third-country nationals.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of hours of language classes for one third-country national.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs.</p> <p>Rental cost of training premises</p> <p>Training materials.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of third-country nationals who attended the language class: any document that officially confirms the identity of the participant is sufficient.</li> <li>• Proof of accreditation of the academic programme or educational institution providing these classes: to prove experience and knowledge of the expert providing the service (optional).</li> <li>• Participant enrolment and attendance records: verified by course provider to prove completion of actions.</li> <li>• Curriculum: standardised document prepared at the beginning of the action that includes the number of participants that are registered to be provided the service, the scheduled period of the provision of the service and data about the organisation of the action.</li> <li>• Proof of class duration (timesheets or equivalent verifiable time management system records): any document that monitors time of the activity and is signed by the activity supervisor.</li> <li>• Documentation regulating the standard length of a lesson (60 minutes) or timesheets/any other verifiable time management system records.</li> </ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p> <ul style="list-style-type: none"> <li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: education.</li> </ul> <p>In addition, separate cost category adjustments can be made by utilising the following indicators:</p>



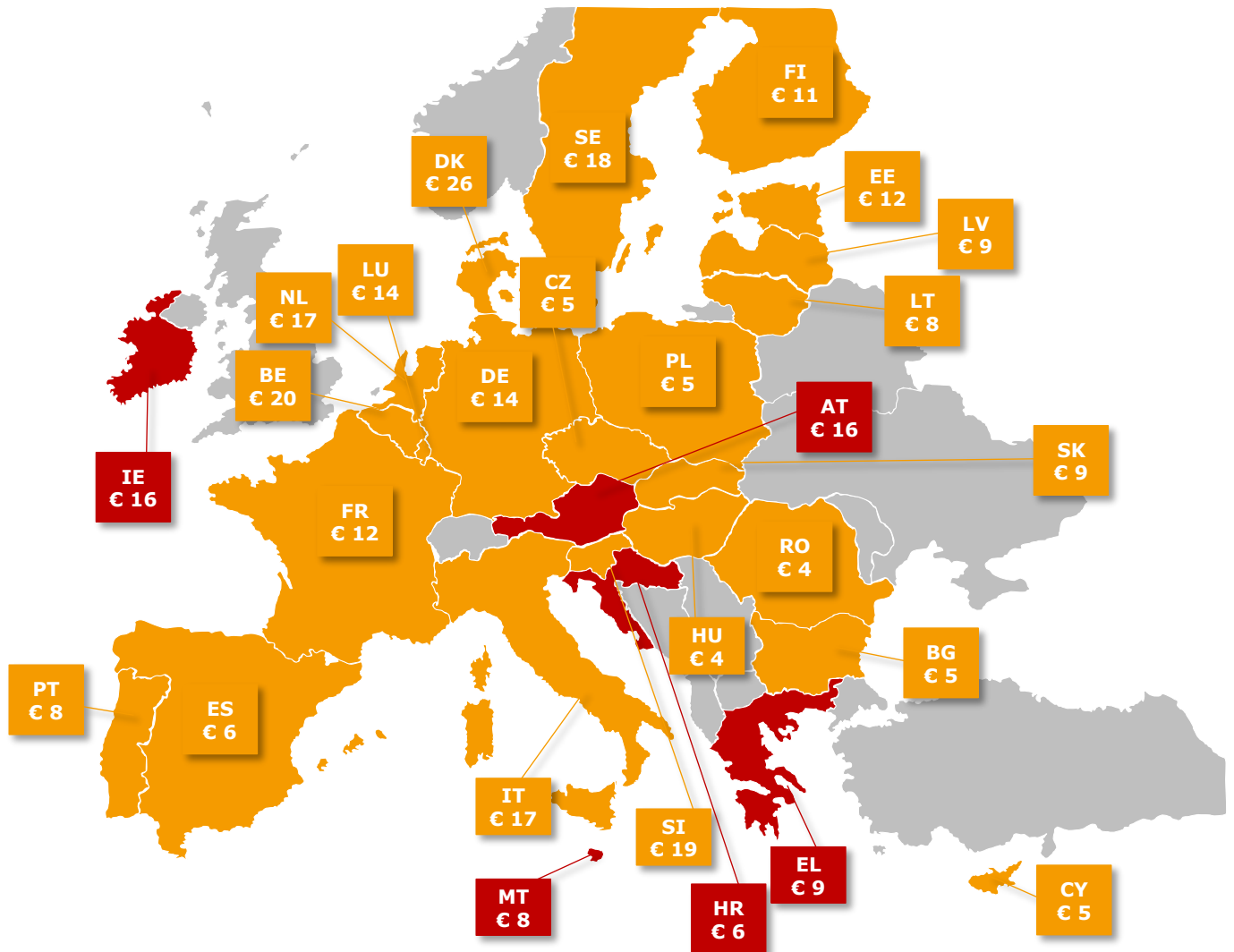
Training material costs:

- Harmonised index of consumer prices (HICP) – education.

Rent and real estate costs:

- Harmonised index of consumer prices (HICP) – housing.

The map below presents the SCO amounts (adjusted to 2021 price levels) established for the unit cost of one hour of language training for one third-country national from microdata.










*Legend:*

Countries in **yellow**: SCO amounts are based on the microdata complemented/enriched by interpolations at the level of pre-selected categories of costs.

Countries in **red**: SCO amounts/rates are based on extrapolations from the sample of microdata.

## Alternative B: Unit cost of one language training course provided to one third-country national

	<p><b>Description</b></p> <p>This output-based SCO covers the costs of one language course in the host country for one third-country national covering the staff costs for trainers, training materials rental of training premises.</p> <p>The language course consists of at least 60 lessons (60 minutes per lesson) in a group with maximum 15 participants. The key component of the activities is language training in addition it can also cover activities aiming to increase communication skills such as conversation classes.</p>
	<p><b>Intended target groups</b></p> <p>Eligible target groups include all third-country nationals residing in the Member State.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of third-country nationals having completed the language course.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs for trainers.</p> <p>Cost of training materials.</p> <p>Rental costs for training premises.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of third-country nationals who attended the language class: any document that officially confirms the identity of the participant is sufficient.</li> <li>• Proof of accreditation of the academic programme or educational institution providing these classes: to prove experience and knowledge of the expert providing the service (optional).</li> <li>• Participant enrolment and attendance records: verified by course provider to prove completion of actions and to prove minimum attendance of 15 third-country nationals.</li> <li>• Curriculum: standardised document prepared at the beginning of the action that includes the number of participants that are registered to be provided the service, the scheduled period of the provision of the service and data about the organisation of the action.</li> </ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p>

- LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: education

In addition, separate cost category adjustments can be made by utilising the following indicators:

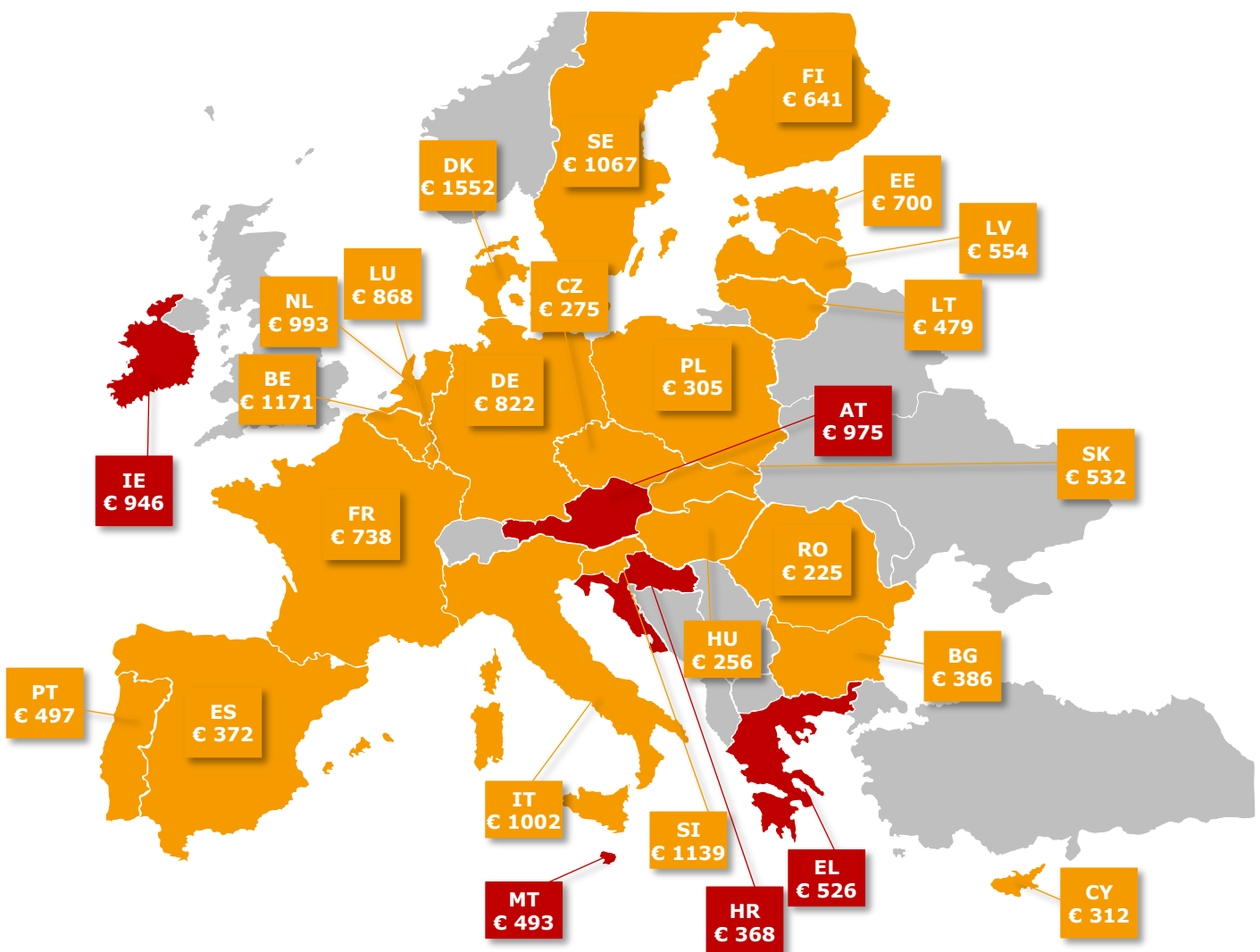
Training material costs:

- Harmonised index of consumer prices (HICP) – education.

Rent and real estate costs:

- Harmonised index of consumer prices (HICP) – housing.

The map below presents the SCO amounts (adjusted to 2021 price levels) established for the unit cost of one language training course provided to one third-country national from microdata.



Legend:

Countries in **yellow**: SCO amounts are based on the microdata complemented/enriched by interpolations at the level of pre-selected categories of costs.

Countries in **red**: SCO amounts/rates are based on extrapolations from the sample of microdata (see section 'Methods for calculation of SCOs' for more details on the socio-economic extrapolation index applied).

## 2.6.2 Conclusions for Area 6

For language trainings of third country nationals **Alternative A Unit cost of on hour of training is recommended as a preferred option for EU-level SCO in this area.** Both alternatives in area 6 were well received by stakeholders in the final workshop of the study. While language trainings from DG HOME funds are frequently implemented in Member States the key challenge in developing SCOs in this area was the lack of robust historical data to calculate SCO values. While historical project data was received from several countries the limited breakdown of cost categories made it difficult to use this data for the calculations.

Regarding the potential uptake of the alternatives, Alternative A was favoured by stakeholders. The hourly unit cost allows for more flexibility and can be adjusted to different implementation methods while still ensuring the same standards for reporting are met. As the maximum number of hours per participant is not defined in this alternative there is a risk of prolonged duration. To ensure that funding is efficiently spent we recommend setting a maximum limit on contract hours that programme participants can receive.

The most prominent added value of Alternative B compared to Alternative A is the relatively lower administrative burden when it comes to audit trail and reporting requirement. Participation is verified by participant enrolment and attendance records, but no hourly timesheets are required. The limitation identified by stakeholders regarding Alternative B was the fixed duration of the training and fixed class size. This limits the uptake in Member States where language trainings are delivered in a different format and structure. A risk identified for both alternatives is that the outputs are not tied to results i.e. language exam at the end of the course. This could lead to locking in current, inefficient practices in Member States.

## 2.7 Area 7. Orientation training

Area 7 covers SCOs on orientation training for third-country nationals. In this area three output-based SCO were developed:

- **Alternative A:** Unit cost of one hour of orientation course for one third-country national.
- **Alternative B:** Unit cost of provision of orientation course to one third-country national.
- **Alternative C:** Lump sum of orientations services provided to a group of 15 third-country nationals.

### 2.7.1 Overview of data

Overall, seven Member States provided the study team with **sufficient historical data for at least one of the preselected cost categories.** Only one Member State (AT) provided historical data for all cost categories covered by the SCO. 20 Member States did not provide data, or the data detail was insufficient for the analysis (e.g. a breakdown into cost categories or one of the key data points such as total direct costs, number of participants or duration were missing).

Table 10. Data availability of relevant cost categories

Country	Staff costs	Training materials	Rental costs
AT	H	H	H
CY	H	H	H
CZ	H	H	I

DE	H	H	H
HR	H	H	H
SK	H	I	I

Given the lack of comprehensive historical data, the SCO for this area was calculated using the CVTS5 dataset. Microdata on training activities from 23 countries were available<sup>13</sup>. In order to ensure that the costs derived from the microdata functioned as an accurate proxy for area-specific costs, the data was filtered by the following variables:

- NACE classification (to include only professional, scientific and technical activities);
- training that does not include health and safety training (25% or less);
- skills and competences covered in the training, including:
  - numeracy and/or literacy skills
  - technical, practical or job specific skills
  - oral or written communication skills.

The table below presents the number of observations in the microdata for each Member State.







Table 11. Number of observations in the microdata in each Member State

Country	Number of observations in the CVTS microdata
AT	-
BE	-
BG	1,287
CY	523
CZ	4,374
DE	1,519
DK	770
EE	1,078
EL	-
ES	5,073
FI	1,000
FR	2,299
HR	-
HU	1,586
IE	-
IT	8,006

<sup>13</sup> Bulgaria, Czechia, Denmark, Germany, Estonia, Spain, France, Italy, Cyprus, Latvia, Lithuania, Luxembourg, Hungary, Malta, Poland, Portugal, Romania, Slovenia, Slovakia, Finland, Sweden, United Kingdom and Norway.

LT	1,343
LU	564
LV	804
MT	-
NL	331
PL	3,353
PT	1,716
RO	2,713
SE	2,945
SI	852
SK	1,156

**Alternative A: Unit cost of one hour of orientation course for one third-country national**

	<p><b>Description</b></p> <p>This SCO would cover the costs of one third-country national attending 60 minutes of orientation class on promoting access to employment and further education and training, as well as enhancing civic, cultural and life-management skills including labour cost of trainers, training materials and classroom rental. The course is delivered in a group setting with maximum 15 participants.</p>
	<p><b>Intended target groups</b></p> <p>Third-country nationals.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of one-hour orientation classes followed by one third-country national.</p>
	<p><b>Eligible costs</b></p> <ul style="list-style-type: none"> <li>All eligible direct and indirect cost of operation.</li> </ul>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff cost trainers.</p> <p>Cost of training materials.</p> <p>Rental of training premises.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>Official and unique identification of third-country nationals who attended the orientation class: any document that officially confirms the identity of the participant is sufficient.</li> <li>Participant enrolment and attendance records: verified by course provider to prove completion of actions and min/max number of third-country national participants.</li> </ul>

- Curriculum: standardised document prepared at the beginning of the action that includes the number of participants that are registered to be provided the service, the scheduled period of the provision of the service and data about the organisation of the action.
- Documentation regulating the standard length of a lesson (60 minutes) or timesheets/any other verifiable time management system records.

### **Method for a regular adjustment of the SCO amounts/rates**

SCO values can be adjusted regularly based on the following indicator:

- LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: education

In addition, separate cost category adjustments can be made by utilising the following indicators:

#### Training material costs:

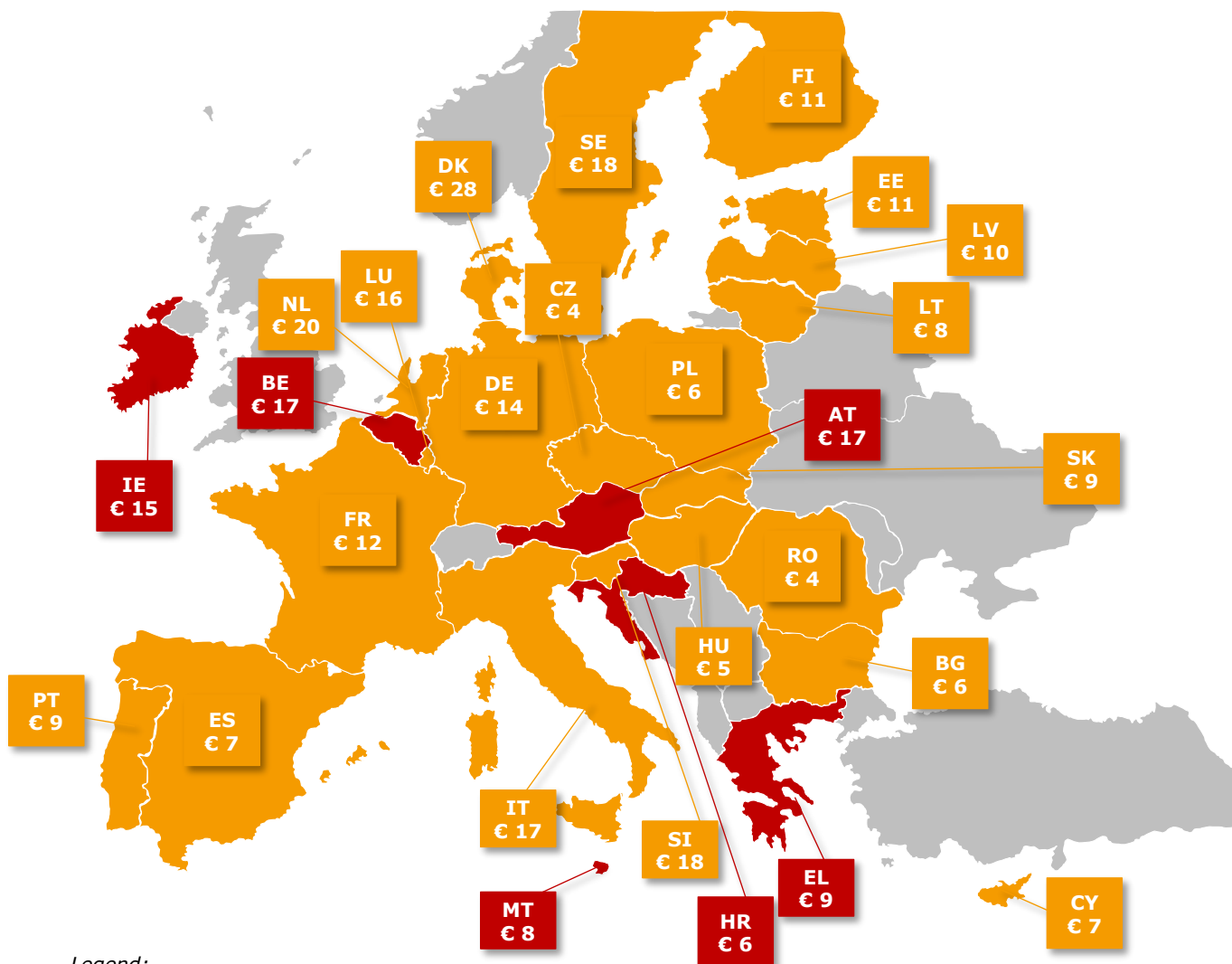
- Harmonised index of consumer prices (HICP) – education.

#### Rent and real estate costs:

- Harmonised index of consumer prices (HICP) – housing.



The map below presents the SCO amounts (adjusted to 2021 price levels) established for the unit cost of one hour of orientation course for one third-country national.



**Legend:**







Countries in **yellow**: SCO amounts are based on the microdata complemented/enriched by interpolations at the level of pre-selected categories of costs.

Countries in **red**: SCO amounts/rates are based on extrapolations from the sample of microdata (see section 'Methods for calculation of SCOs' for more details on the socio-economic extrapolation index applied).

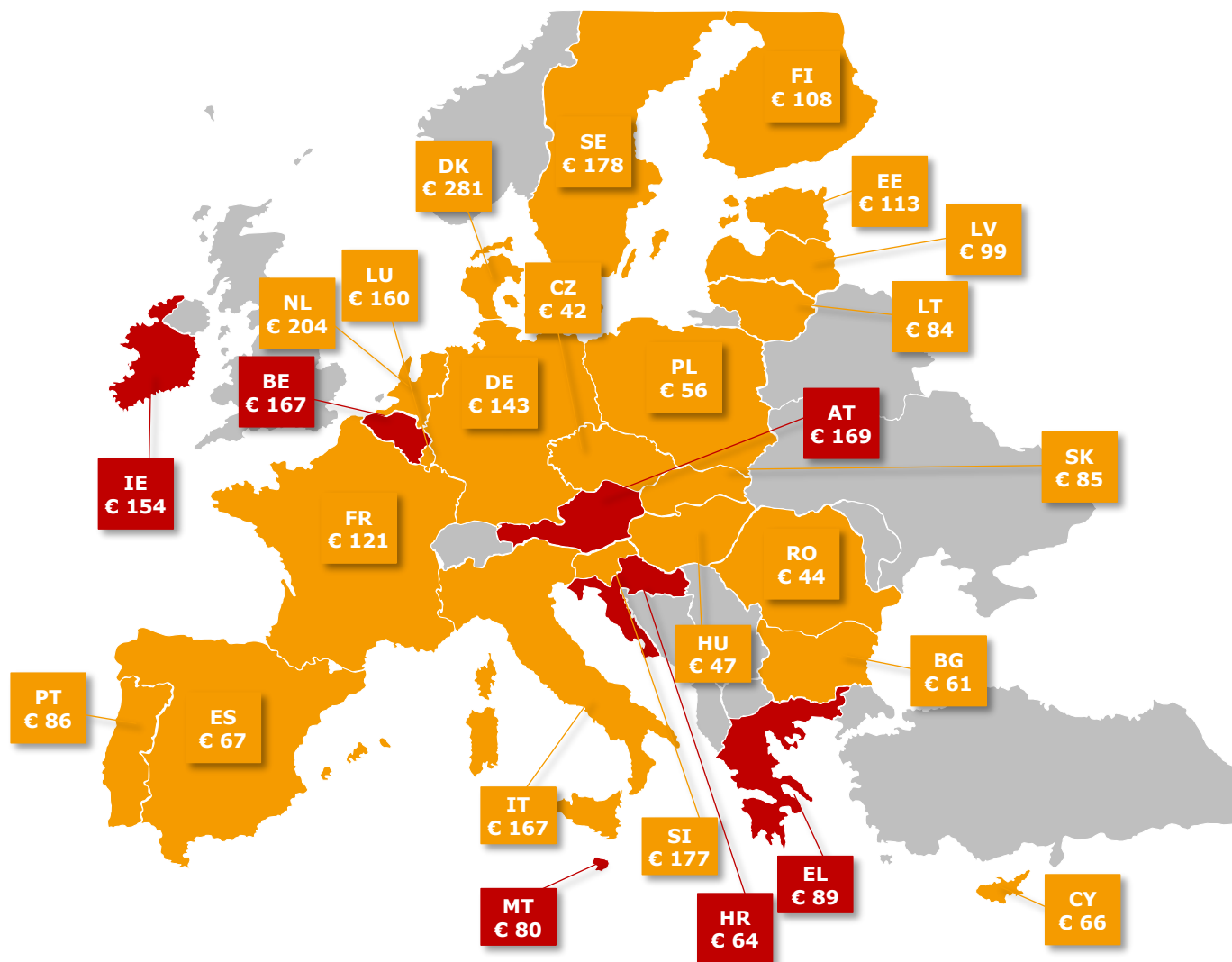
**Alternative B: Unit cost of provision of orientation course to one third-country national**

Description
<div style="display: flex; align-items: center;"> <p>This output-based SCO covers the costs of one third-country national completing an orientation course including the labour cost of trainers, training materials and classroom rental. The orientation course must meet the following standard requirements:</p> <ul style="list-style-type: none"> <li>At least 10 hours of lessons (60 minutes per lesson);</li> <li>Maximum 15 participants per course.</li> </ul> <p>Activities: could include activities on promoting access to employment and further education and training, as well as training on civic, cultural and life-management skills.</p> </div>



	<p><b>Intended target groups</b></p> <p>Third-country nationals.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of third-country nationals having completed the orientation course.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff cost of trainers.          Cost of training materials.          Rental cost of training premises.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of third-country nationals who attended the orientation class: any document that officially confirms the identity of the participant is sufficient.</li> <li>• Participant enrolment and attendance records: verified by course provider to prove completion of actions and the max number of participants.</li> <li>• Curriculum: standardised document prepared at the beginning of the action that includes the number of participants that are registered to be provided the service, the scheduled period of the provision of the service and data about the organisation of the action.</li> </ul>
	<p><b>Method for a regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p> <ul style="list-style-type: none"> <li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: education</li> </ul> <p>In addition, separate cost category adjustments can be made by utilising the following indicators:</p> <p><u>Training material costs:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – education.</li> </ul> <p><u>Rent and real estate costs:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – housing.</li> </ul>

The map below presents the SCO amounts (adjusted to 2021 price levels) established for the unit cost of provision of orientation course to one third-country national from microdata.







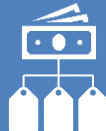


**Legend:**

Countries in **yellow**: SCO amounts are based on the microdata complemented/enriched by interpolations at the level of pre-selected categories of costs.

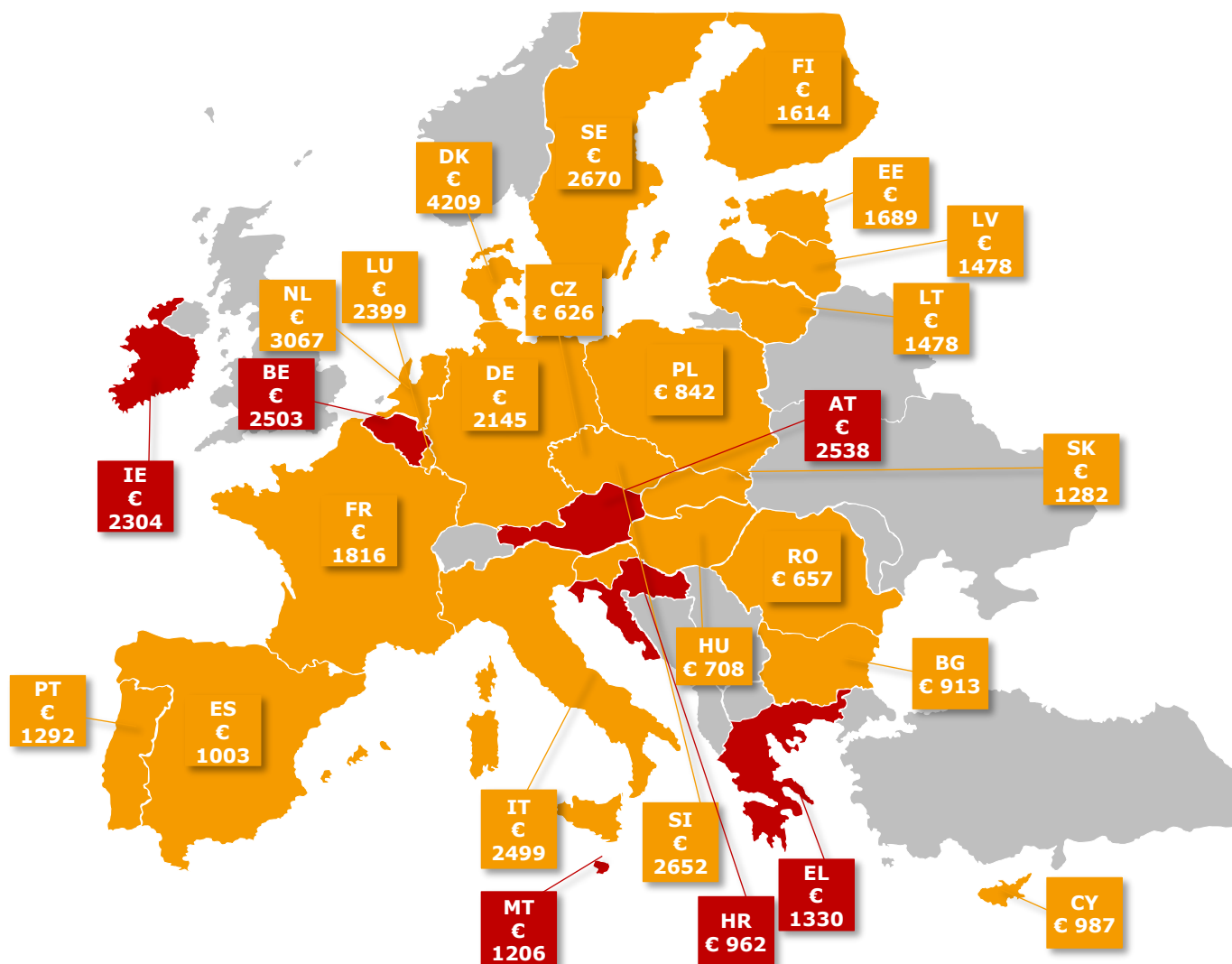
Countries in **red**: SCO amounts/rates are based on extrapolations from the sample of microdata.

**Alternative C: Lump sum of orientation course provided to a group of 15 third-country nationals**

	<p><b>Description</b></p> <p>This SCO would cover the costs of 15 third-country nationals provided with at least 10 lessons (60 minutes per lesson) of orientation course on promoting access to employment and further education and training as well as enhancing civic, cultural and life-management skills including staff cost for trainers, training materials and rental of training premises.</p>
	<p><b>Intended target groups</b></p> <p>Third-country nationals.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p>

	Number of orientation courses of at least 10 lessons provided to 15 third-country nationals.
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs for trainers.</p> <p>Costs of training materials.</p> <p>Rental costs for training premises.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of third-country nationals who attended the orientation class: any document that officially confirms the identity of the participant is sufficient.</li> <li>• Participant enrolment and attendance records: verified by course provider to prove completion of actions and the max number of participants.</li> <li>• Curriculum: standardised document prepared at the beginning of the action that includes the number of participants that are registered to be provided the service, the scheduled period of the provision of the service and data about the organisation of the action.</li> </ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p> <ul style="list-style-type: none"> <li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: education</li> </ul> <p>In addition, separate cost category adjustments can be made by utilising the following indicators:</p> <p><u>Training material costs:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – education.</li> </ul> <p><u>Rent and real estate costs:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – housing.</li> </ul>

The map below presents the SCO amounts (adjusted to 2021 price levels) established for lump sum of orientation services provided to 15 third-country nationals based on microdata.



*Legend:*

Countries in *yellow*: SCO amounts are based on the microdata complemented/enriched by interpolations at the level of pre-selected categories of costs.

Countries in *red*: SCO amounts/rates are based on extrapolations from the sample of microdata.

### 2.7.2 Conclusions for Area 7

For simplified cost options in the area of orientation courses **Alternative A is the best suited for EU-level SCO**. This alternative provides the most flexibility for Member States and can be easily tailored to different practices across countries. On the other hand, alternative C was also well received by stakeholders in the final workshop highlighting that this alternative can be useful for small-scale projects where this alternative can minimise administrative burden for beneficiaries.

The main challenges in developing SCOs for this area stemmed from the great variety of activities implemented by Member States. A broad range of activities was implemented across countries which meant the historical data sample was not sufficient to develop SCOs based on the selected cost categories. Hence the values presented in this report are based on microdata.

Similarly, to area 6, the limitation identified by stakeholders regarding Alternative B was the fixed duration of the training and fixed class size. This limits the uptake in Member States where language trainings are delivered in a different format and structure. A risk

identified for both alternatives is that the outputs are not tied to results. This could lead to locking in current, inefficient practices in Member States.

## 2.8 Area 8. Voluntary return

Area 8 presented SCOs for the voluntary return of third-country nationals.

In this area we propose two different alternatives:

- **Alternative A:** Unit cost of support provided to one third-country national prior to voluntary return.
- **Alternative B:** Lump sum for services provided to a group of ten third-country nationals prior to voluntary return.

### 2.8.1 Overview of data

Historical data on projects supporting the voluntary return of third-country nationals from the host Member States was used to develop the SCOs for this area. This data covered the following cost categories:

- travel costs;
- staff costs;
- rent and material costs;
- medical costs;
- in-kind assistance.








A main challenge during the historical data collection was that Member States often could not disaggregate the costs by the type of return, which limited the size of the sample for both forced and voluntary return.

For this area, no Member States provided historical data for all cost categories covered by the SCO. Seven Member States provided historical data for at least one of the cost categories. Where partial data was provided by Member States, missing cost category values were calculated using interpolation. For the remaining Member States, no data was provided in any cost category, or what was provided was excluded as an outlier. The SCO estimates for these countries were extrapolated using a socioeconomic index constructed using CPI and LCI.

Table 12. Data availability of relevant cost categories

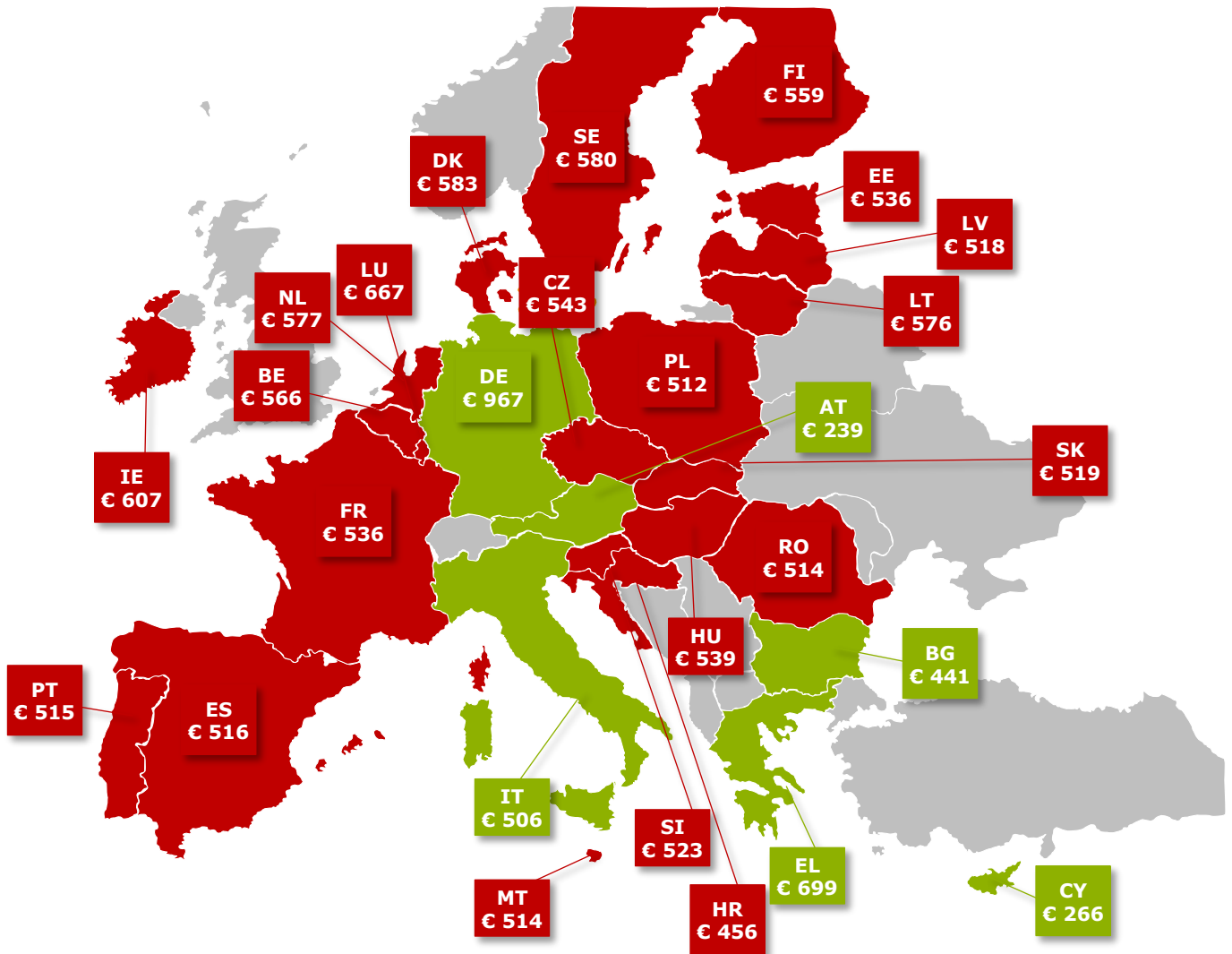
Country	Staff costs	Travel costs	Medical costs	In-kind assistance
AT	I	I	H	H
BG	H	I	H	I
CY	H	I	I	H
DE	I	H	I	I
HU	I	H	I	I
IT	I	H	I	I
LU	I	H	I	I

**Alternative A Unit cost of support provided to one third-country national prior to voluntary return**

	<p><b>Description</b></p> <p>This SCO will be used to cover assistance offered to one third-country national. The support includes one information session or one-to-one counselling (45 minutes), health assistance, transport and in-kind assistance.</p>
	<p><b>Intended target groups</b></p> <p>Third-country nationals.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of supported third-country nationals receiving assistance prior to their voluntary return.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs.  Travel and subsistence.  Medical examination.  In-kind assistance.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of third-country national.</li> <li>• Proof of participation in information session, i.e. signature on attendance.</li> <li>• Report by assistance provider with a high-level description of the support provided per third-country national for in-kind benefits and travel expenses</li> <li>• Proof of information session duration (timesheet).</li> <li>• Proof of medical examination.</li> </ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p> <ul style="list-style-type: none"> <li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: administrative and support service activities.</li> </ul> <p>In addition, separate cost category adjustments can be made by utilising the following indicators:</p> <p><u>Healthcare services:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – health.</li> </ul> <p><u>Subsistence costs (incl. accommodation costs):</u></p>

- Harmonised index of consumer prices (HICP) – housing.
- Harmonised index of consumer prices (HICP) – food.

The map below presents the SCO amounts (adjusted to 2021 price levels) established for unit cost of support provided to one third-country national prior voluntary return.










Legend:

Countries in **green**: SCO amounts are based on the historical data complemented/enriched by interpolations at the level of pre-selected categories of costs.

Countries in **red**: SCO amounts/rates are based on extrapolations from the sample of historical data (see section 'Methods for calculation of SCOs' for more details on the socio-economic extrapolation index applied).

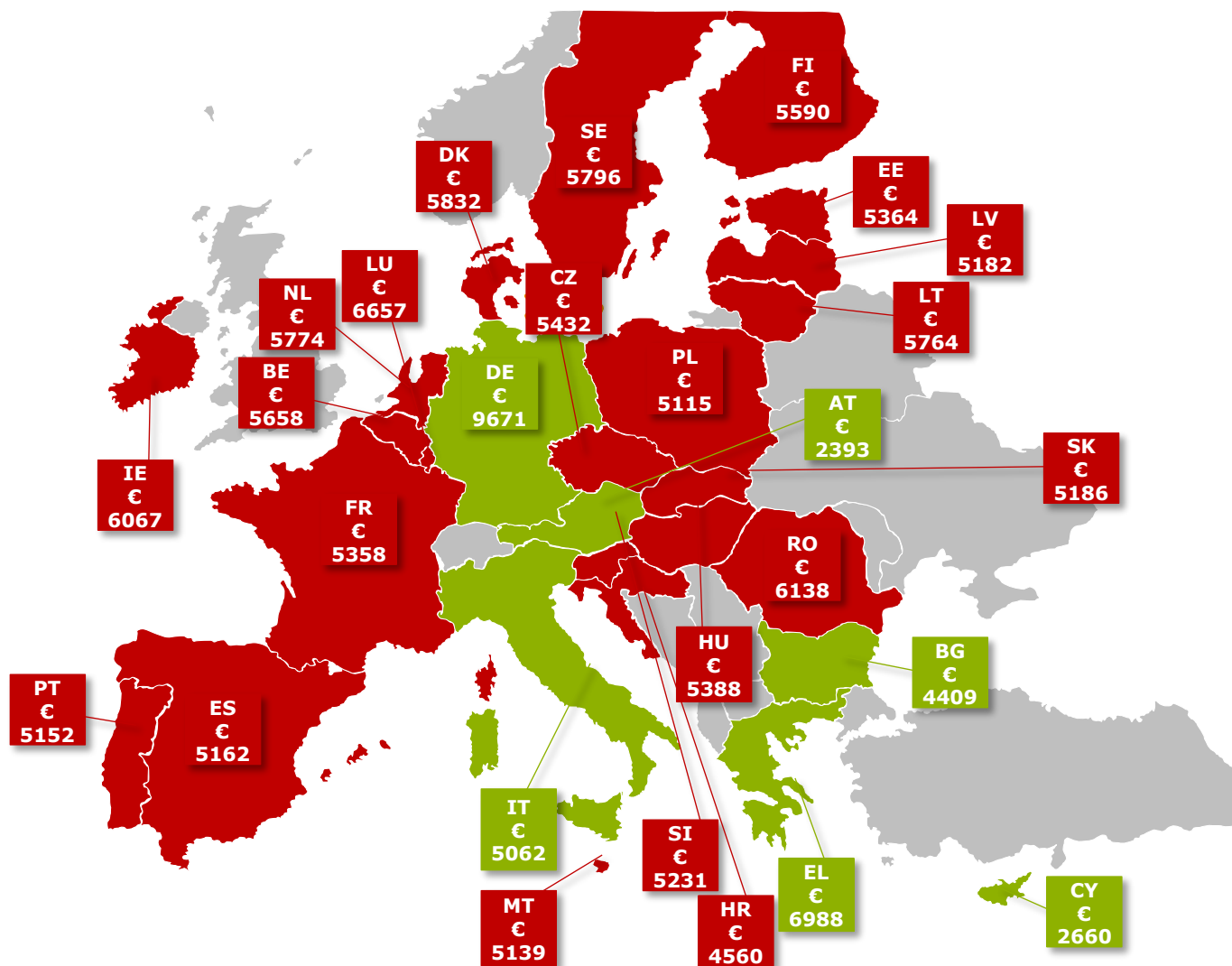
**Alternative B Lump sum for services provided to a group of ten third-country nationals prior voluntary return**

	<b>Description</b> The lump sum will cover the total cost of assistance offered to 10 third-country national in the following areas prior to their voluntary return to their country of origin. The support includes one information session or one-to-one counselling (45 minutes), health assistance, transport and in-kind assistance.
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	<p><b>Intended target groups</b></p> <p>Third-country nationals.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of groups of 10 third-country nationals receiving assistance prior to their voluntary return.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs. Travel and subsistence. Medical examination. In-kind assistance.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of third-country national.</li> <li>• Proof of participation in information session, i.e. signature on attendance.</li> <li>• Report by assistance provider with a high-level description of the support provided per third-country national for in-kind benefits and travel expenses.</li> <li>• Proof of information session duration (timesheet) and attendance.</li> <li>• Proof of medical examination per third-country national.</li> </ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p> <ul style="list-style-type: none"> <li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: administrative and support service activities.</li> </ul> <p>In addition, separate cost category adjustments can be made by utilising the following indicators:</p> <p><u>Healthcare services:</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – health.</li> </ul> <p><u>Subsistence costs (incl. accommodation costs):</u></p> <ul style="list-style-type: none"> <li>• Harmonised index of consumer prices (HICP) – housing.</li> <li>• Harmonised index of consumer prices (HICP) – food.</li> </ul>

The map below presents the SCO amounts (adjusted to 2021 price levels) established for the lump sum of services provided for a group of ten third-country nationals prior voluntary return.





Legend:

Countries in **green**: SCO amounts are based on the historical data complemented/enriched by interpolations at the level of pre-selected categories of costs.

Countries in **red**: SCO amounts/rates are based on extrapolations from the sample of historical data.

### 2.8.2 Conclusions for Area 8

Both alternative SCOs are a good fit for an EU-level SCO in the area of voluntary return. **Overall Alternative A is the preferred SCO option as it allows for more flexibility** and can be adjusted easily to align with Member State practices based on the number of people return.

After reviewing Member State practices for voluntary return Alternative B was developed as a lump sum for 10 third-country nationals with the underlying assumption that this would facilitate providing support to family units with less administrative burden. This alternative, however, does not allow for as much flexibility as Alternative A and could be less attractive for some Member States.

The limitations on the availability of historical data however challenge the robustness of these findings. The estimated rates are based on historical data complemented by microdata. Due to the small sample size the accuracy of extrapolated values may vary, and there is a rather significant margin of error.

### 2.9 Area 9. Training of border guards

Area 9 covers the training for border guards. In this area only one alternative was developed:

- Alternative A: unit cost of one hour of training to one member of staff responsible for external border controls.

### **2.9.1 Overview of data**

In total, 21 Member States provided no or insufficiently detailed data on cost categories for this area. Only two Member States (DE and HU) provided a sufficient amount of data with which to construct a SCO value based on historical data. Therefore, it was not possible to develop an alternative using historical data. Therefore, the SCO proposed for Area 9 is constructed entirely using CVTS microdata as a standalone option. The cost categories covered by the CVTS microdata include:

- staff costs;
- rent and material costs.

Due to the diverse nature of the trainings of border guards undergone in Member States, it was not possible to fix a standardised duration for these activities. As a result, it was only feasible to calculate the hourly unit cost per training, and not the unit cost per whole training session.

In order to ensure that the costs derived from the microdata functioned as an accurate proxy for area-specific costs, the data was filtered by the following variables:

- NACE classification (only professional, scientific and technical activities);
- type of training (only guided on-the-job training);
- training which does not include health and safety training (25% or less);
- skills and competences (technical, practical, or job specific skills, office administration skills, oral or written communication skills);
- training provider (public training institutions).







The table below presents the number of observations in the microdata for each Member State.


*Table 13. Number of observations in the microdata in each Member State*

<b>Country</b>	<b>Number of observations in the CVTS microdata</b>
<b>AT</b>	-
<b>BE</b>	-
<b>BG</b>	1,454
<b>CY</b>	653
<b>CZ</b>	5,150
<b>DE</b>	1,974
<b>DK</b>	1,034
<b>EE</b>	1,289
<b>EL</b>	-
<b>ES</b>	6,311
<b>FI</b>	1,191
<b>FR</b>	2,491
<b>HR</b>	-
<b>HU</b>	2,002
<b>IE</b>	-

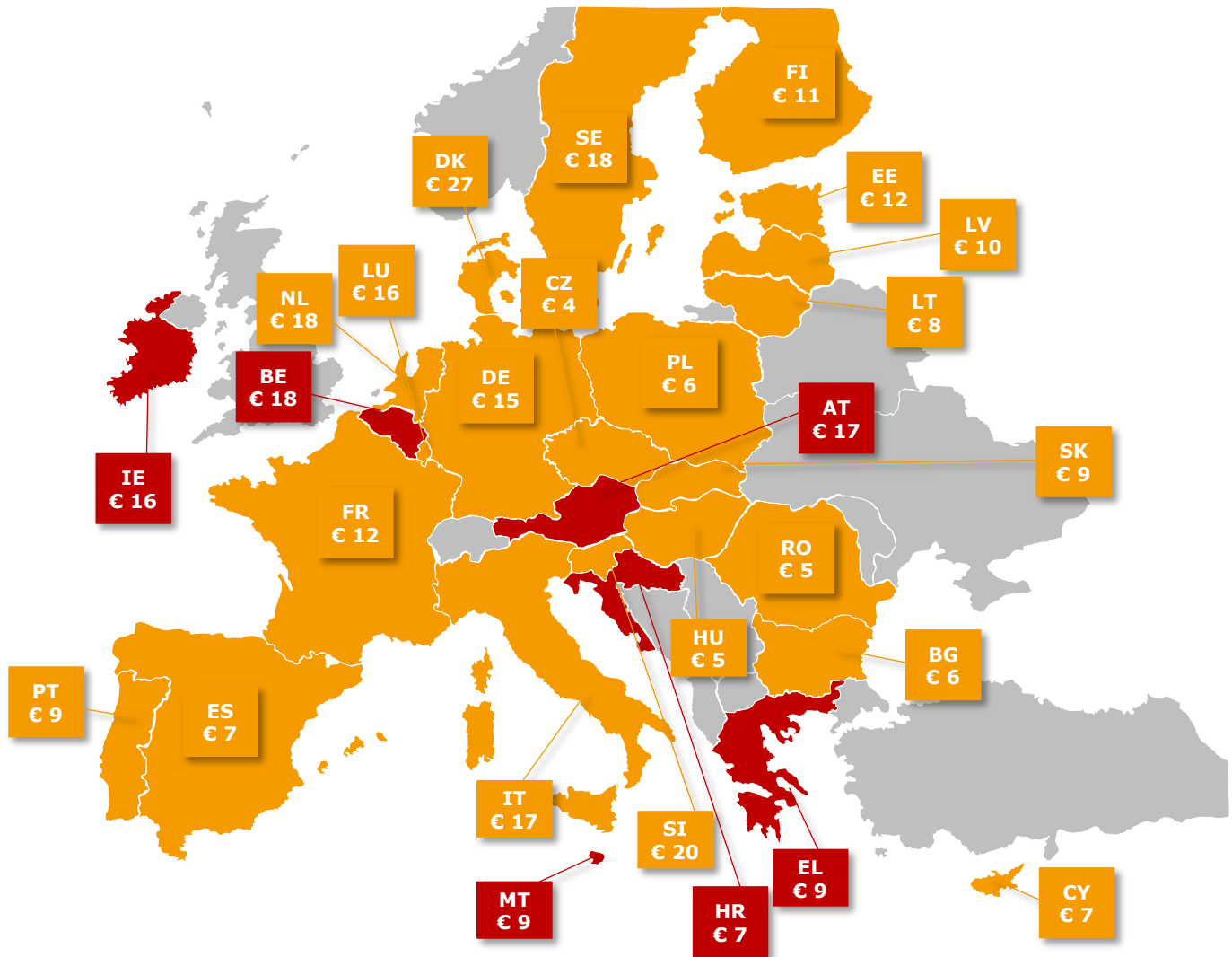
IT	9,799
LT	1,622
LU	662
LV	1,060
MT	-
NL	433
PL	4,605
PT	2,204
RO	3,058
SE	3,930
SI	1,139
SK	1,365

**Alternative A: Unit cost of one hour of training to one member of staff responsible for external border controls**

	<p><b>Description</b></p> <p>This process-based SCO covers the unit cost of one hour of training for staff responsible for external border controls. This includes staff cost of trainers, rent of training premises and training materials.</p>
	<p><b>Intended target groups</b></p> <p>Staff responsible for external border controls.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of hours of training completed by border guards.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <p>Staff costs for staff providing training sessions.</p> <p>Costs of training materials.</p> <p>Rent of training premises.</p>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of border guard who attended the training: any document that officially confirms the identity of the participant is sufficient.</li> <li>• Participant enrolment and attendance records: verified by course provider to prove completion of actions.</li> <li>• Curriculum: standardised document prepared at the beginning of the action that includes the number of participants that are registered to be provided the service, the scheduled period of the</li> </ul>

	<p>provision of the service and data about the organisation of the action.</p> <ul style="list-style-type: none"><li>• Documentation regulating the standard length of a lesson (60 minutes) or timesheets/any other verifiable time management system records.</li></ul>
	<p><b>Method for regular adjustment of the SCO amounts/rates</b></p> <p>SCO values can be adjusted regularly based on the following indicator:</p> <ul style="list-style-type: none"><li>• LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: education</li></ul> <p>In addition, separate cost category adjustments can be made by utilising the following indicators:</p> <p><u>Training equipment costs:</u></p> <ul style="list-style-type: none"><li>• Harmonised index of consumer prices (HICP) – education.</li></ul> <p><u>Rent and real estate costs:</u></p> <ul style="list-style-type: none"><li>• Harmonised index of consumer prices (HICP) – housing.</li></ul>

The map below presents the SCO amounts (adjusted to 2021 price levels) established for the unit cost of one hour of training to one member of staff responsible for external border control.



Legend:

Countries in **yellow**: SCO amounts are based on the microdata complemented/enriched by interpolations at the level of pre-selected categories of costs.

Countries in **red**: SCO amounts/rates are based on extrapolations from the sample of microdata (see section 'Methods for calculation of SCOs' for more details on the socio-economic extrapolation index applied).

### 2.9.2 Conclusions for Area 9

In the area of training of border guards one option was proposed for the hourly unit cost of training for one border guard. Due to the limitations in historical data microdata was used to estimate values for this SCO across countries. **While the values reliable and robust this area might not be the best fit for an EU-level SCO.** Overall, the buy-in for member States for this alternative is lower than other areas. Due to these vast differences in the scope of activities implemented across countries a one size fits all approach might not suit all countries and the uptake of such EU-level SCO might be low.

### 2.10 Area 10. Training of consular staff

Area 10 covers the training of consular staff. In this area only one alternative was developed:

- **Alternative A:** Unit cost of one hour of training to one member of staff responsible for external border controls.

### **2.10.1 Overview of data**

Only two Member States (DE and HU) provided a sufficient amount of data to construct a SCO value based on historical data. It was not possible to develop an alternative by using historical data. Therefore, the SCO proposed for Area 10 is constructed entirely on CVTS microdata as a standalone option. The cost categories covered by the CVTS microdata include:

- staff costs;
- material and rent cost.

Due to the diverse nature of the trainings for consular staff undergone in Member States, it was not possible to fix a standardised duration for these activities. As a result, it was only feasible to calculate the hourly unit cost per training, and not the unit cost per whole training session.

In order to ensure that the costs derived from the microdata functioned as an accurate proxy for area-specific costs, the data was filtered by the following variables:

- NACE classification (only professional, scientific and technical activities);
- type of training (only guided on-the-job training);
- training which does not include health and safety training (25% or less);
- skills and competences (technical, practical, or job specific skills, office administration skills, oral or written communication skills);
- training provider (public training institutions).

The costs data derived from the CVTS is not directly related to consular staff training for third-country nationals, and thus the costs presented below can only be used as a very general proxy rather than specific costs pertaining to the activities under Area 10.

For Member States where microdata was not available, it was necessary to conduct extrapolations as opposed to using data directly from CVTS. The accuracy of these estimates is therefore lower than those using microdata.






The table below presents the number of observations in the microdata for each Member State.

*Table 14. Number of observations in the microdata in each Member State*

<b>Country</b>	<b>Number of observations in the CVTS microdata</b>
<b>AT</b>	-
<b>BE</b>	-
<b>BG</b>	1,454
<b>CY</b>	653
<b>CZ</b>	5,150
<b>DE</b>	1,974
<b>DK</b>	1,034
<b>EE</b>	1,289
<b>EL</b>	-
<b>ES</b>	6,311
<b>FI</b>	1,191
<b>FR</b>	2,491
<b>HR</b>	-

HU	2,002
IE	-
IT	9,799
LT	1,622
LU	662
LV	1,060
MT	-
NL	433
PL	4,605
PT	2,204
RO	3,058
SE	3,930
SI	1,139
SK	1,365

#### Alternative A: Unit cost of one hour of training to one member of consular staff

	<p><b>Description</b></p> <p>This process based SCO covers the unit cost of one hour of training for one member of consular staff. This includes staff cost of trainers, training materials and rental cost for training premises.</p>
	<p><b>Intended target groups</b></p> <p>Consular staff.</p>
	<p><b>Indicator(s) used to account for relevant inputs or outputs</b></p> <p>Number of consular staff completing the training course.</p>
	<p><b>Eligible costs</b></p> <p>All eligible direct and indirect costs of operation.</p>
	<p><b>Categories of costs included in the calculations</b></p> <ul style="list-style-type: none"> <li>• Staff costs for staff providing training sessions.</li> <li>• Costs of training materials.</li> <li>• Rent of training premises.</li> </ul>
	<p><b>Requirements for the audit trail</b></p> <ul style="list-style-type: none"> <li>• Official and unique identification of staff member who attended the training: any document that officially confirms the identity of the participant is sufficient.</li> <li>• Participant enrolment and attendance records: verified by course provider to prove completion of actions.</li> </ul>

- Curriculum: standardised document prepared at the beginning of the action that includes the number of participants that are registered to be provided the service, the scheduled period of the provision of the service and data about the organisation of the action.
- Documentation regulating the standard length of a lesson (60 minutes) or timesheets/any other verifiable time management system records.

#### **Method for regular adjustment of the SCO amounts/rates**

SCO values can be adjusted regularly based on the following indicator:

- LCI (compensation of employees plus taxes, minus subsidies), percentage change on previous period for the following sectors: education.

In addition, separate cost category adjustments can be made by utilising the following indicators:

##### Training equipment costs:

- Harmonised index of consumer prices (HICP) – education.

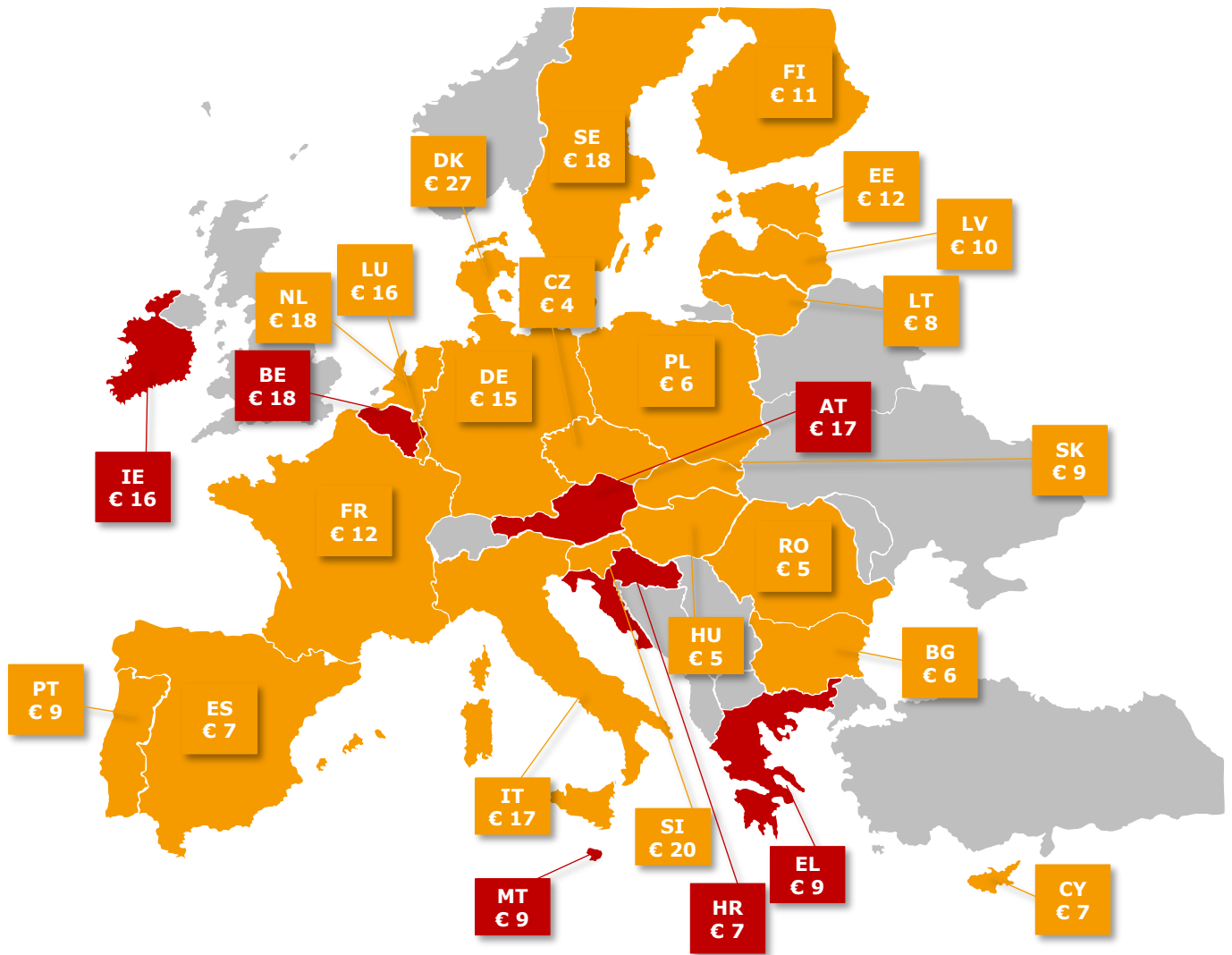
##### Rent and real estate costs:

- Harmonised index of consumer prices (HICP) – housing.



The map below presents the SCO amounts (adjusted to 2021 price levels) established for the unit cost of one hour of training to one member of consular staff.





*Legend:*

Countries in **yellow**: SCO amounts are based on the microdata complemented/enriched by interpolations at the level of pre-selected categories of costs.

Countries in **red**: SCO amounts/rates are based on extrapolations from the sample of microdata.

**2.10.2 Conclusions for Area 10**

Similarly, to Area 9, due to the limitations in historical data, microdata was used to estimate values for this SCO across countries. **While the values are reliable and robust, this area might not be the best fit for an EU-level SCO.** The alternative itself offers high simplification and lower administrative costs.

In the case of area 10, practices across countries vary greatly both in terms of duration as well as content. In many cases different cost categories are covered compared to those included in the current definition. Due to these vast differences, a one-size-fits-all approach might not suit all countries and the uptake of such an EU-level SCO might be low.

### **3 Feasibility studies**

In addition to developing SCOs for ten areas of activity, feasibility studies were carried out to explore additional areas where SCOs could be developed. These SCOs go beyond the 10 areas covered in Section 2, and centre around two main additional areas:

- Joint Investigation Teams for police cooperation; and
- Training of law enforcement officials.

The last section, 3.3, goes into other SCOs that could be developed beyond these two areas. The methodological approach to carrying out the assessment of these possible other SCOs is shown in Annex 4. That annex shows the scope of the SCO, the data sample available and overview of data collected, and the relevant detailed estimates.

#### **3.1 Joint Investigation Teams**

This feasibility study analysed activities that have taken place within the scope of Joint Investigation Teams (JIT). It examines three JIT related projects implemented under the Instrument for financial support for police cooperation, preventing and combating crime and crisis management (ISF-P) and JIT related activities that have taken place with the financial support of Eurojust.

The study team identified potential for SCO development, specifically for logistical activities supporting police cooperation within the scope of a JIT – travel and accommodation. All other activity areas taking place within typical JITs are too diverse and differ across Member States to an extent that makes SCOs unfeasible.

The following sections outline our methodological approach to the assignment and conclusions about possible options for SCO approaches.

##### **3.1.1 Methodological approach**

The activities of a Joint Investigation Team (JIT) may cover a very wide range of coordination and investigatory activities depending on the type of crime and the importance of criminal groups targeted. The coordination activities could involve only meetings (and the respective logistics costs) but on occasions may require joint cross-border police work and extensive stay of representatives of one Member State in another. The investigative activities may include surveillance, use of confidential informants, undercover investigations, forensics, use of experts / staff costs. The current feasibility study presents results on development of SCOs for travel and accommodation costs, translation and interpretation costs and other costs, such as use of experts / staff costs, use of equipment, special investigative tools, transfer or evidence.

JITs have been supported financially in the past years through a mix of funding, primarily from Eurojust, and to a lesser extent through grants from Europol, ISF-Police, and national funding. The assessment of the feasibility of developing SCOs for JITs, therefore, draws on two categories of data:

- quantitative data on a sample of JITs, provided by Eurojust;
- qualitative data on JITs collected via interviews and data collections sheets from Member States (BG, AT, DE, RO, NL, DK) and Europol.

Detailed description of the quantitative and qualitative methodological approaches to data collection, and samples of data used for the calculations is presented in Annex 4.

##### **3.1.2 Travel and accommodation costs**

Since Eurojust is using SCOs for travel and accommodation (see Box 1), the feasibility analysis focused on the difference between actual and eligible costs for travel and

accommodation<sup>14</sup> incurred within JITs. The data showed that **the currently used rates for travel and accommodation rarely reflect the actual costs incurred for these activities** within a JIT.

### Box1. Eurojust SCOs

Eurojust has developed SCOs for two categories of eligible costs: travel and accommodation. Translation, interpretation, or transfer of items costs are reimbursed based on actual costs. For the purpose of travel, Eurojust has developed several categories simplified (unit) cost options, without accounting for cost differences between Member States.

Type of cost	Unit reimbursement rate
Return flight within EU	€280 per person (ceiling cost €400)
Return trip by car	€180 per vehicle; one car shall be deemed to carry up to three passengers. As such, the unit cost of €180 will be reimbursed on the basis of multiples of three passengers (with four to six passengers being reimbursed €360 and so on).
Return trip by train/bus	€230 per person
Return trip by boat (EU/non-EU)	€80 per person

Source: Eurojust<sup>1</sup>

Regarding accommodation unit costs reimbursement rates– Eurojust has differentiated the rates for each Member State, and the unit costs for one night of accommodation vary between EUR 77 per night (SI) and EUR 143.50 (BG).<sup>1</sup>

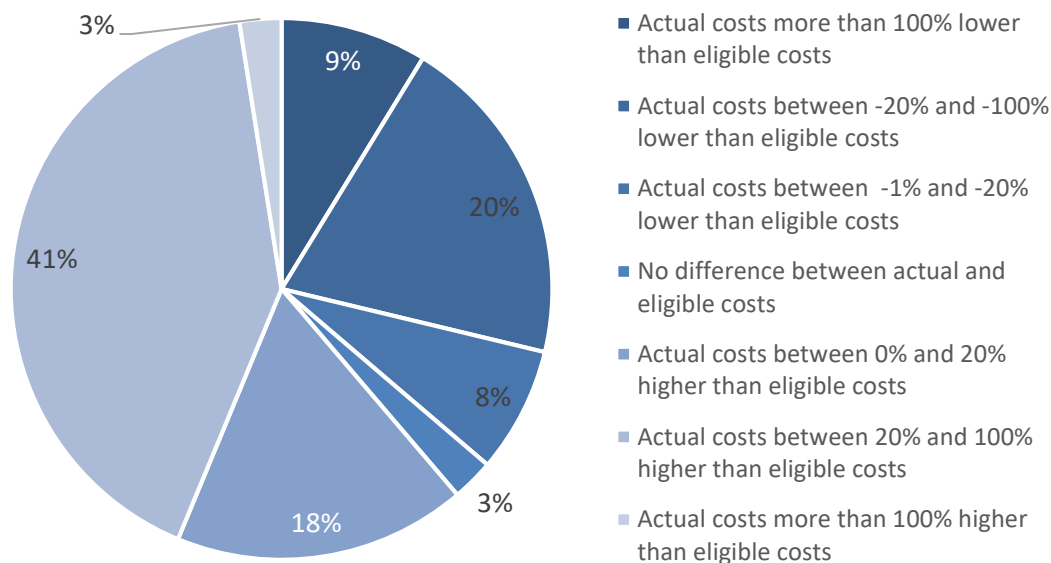
The costs reported by Member States upon the completion of a JIT include both unit costs (for travel and accommodation) and actual costs (for translation, interpretation, and transfer of evidence). Besides the above listed types of costs being reimbursed, Eurojust also provides logistical support in the form of equipment loaned to the JIT participants. It includes secure laptops or mobile phones (including line charges), mobile document scanners or printers.

Source: Eurojust

Regarding travel, the Figure below shows that in only 3% of the cases the actual costs are as much as the eligible costs. In most cases (61%) the actual costs for travel are higher than the eligible costs, with 41% of the cases the actual costs being more than 20% higher. In 29% of the cases, the actual costs were more than 20% lower than the eligible costs. In 26% of the cases, the actual costs are between 0 and 20% higher or lower than the eligible costs.

<sup>14</sup> Travel incurred within 44 Joint Investigation Teams (JITs) taking place between 2017 and 2019 and funded by Eurojust. The analysis covered 80 cases of travel costs incurred during JITs and 165 cases of accommodation costs.

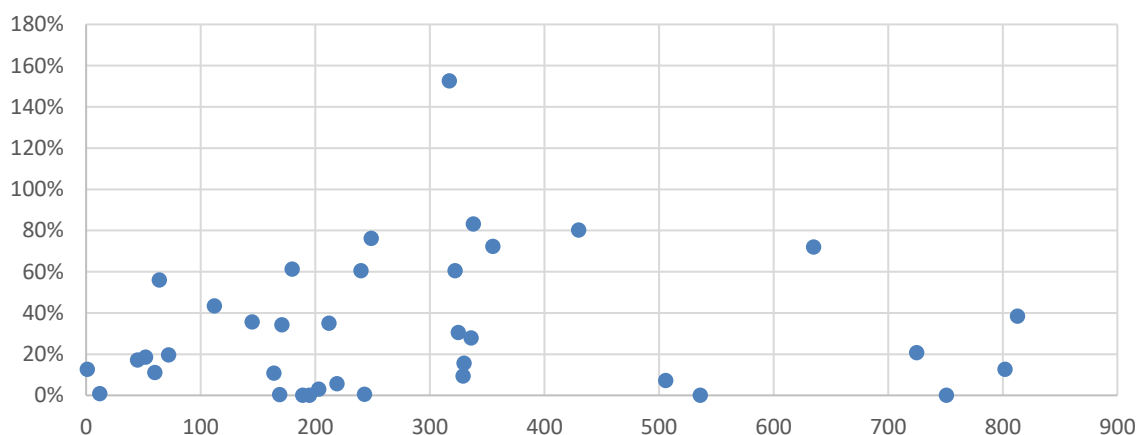
Figure 2. Frequency of differences between actual and eligible cost for travel (% of cases, where travel costs were incurred)



Source: ICF elaboration of Eurojust data on eligible and actual travel costs

The spread of the out-of-pocket payments<sup>15</sup> (i.e. not eligible costs) by JIT in the graph below, indicates that probably **a single SCO for all Member States may not necessarily be the best solution**. Figure 3 shows the percentage of pocket payments for travel and accommodation. Each point represents a cost item, while the numbering at the bottom is arbitrary. The vertical axis shows the % of out-of-pocket payments, which is the difference between eligible and actual costs, for each cost item. Additional data and analysis are necessary to determine whether different SCOs could be developed for instance for certain Member States or flight distances.

Figure 3. % out of pocket payments for travel and accommodation (ineligible costs)

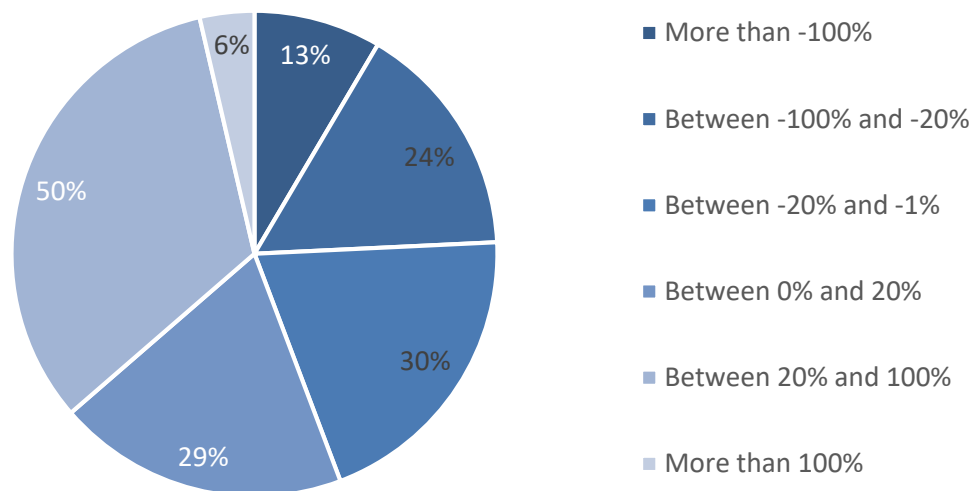


Source: ICF elaboration of Eurojust data on eligible and actual travel costs.

Similarly, **actual accommodation costs are higher than the amount eligible for reimbursement**. Figure 4 shows that in most cases (56%) the actual costs are more than 20% higher than the eligible costs. In 39% of the cases, the actual costs for accommodation are between 0 and 20% higher or lower than the eligible costs.

<sup>15</sup> % out-of-pocket payments = (total costs-eligible costs)/total costs.

Figure 4. Frequency of the differences between actual and eligible cost for accommodation (% of cases, where accommodation costs were incurred)



Source: ICF elaboration of Eurojust data on eligible and actual accommodation costs.

The data showed that SCOs for travel and accommodation used by Eurojust led to actual costs for these items being co-funded by the national authorities, especially with regard to travel costs. Costs of flight are not determined by distance, but by volume of traffic that a destination attracts, or availability of low-cost or sufficient competitive options. Flights between neighbouring Member States may be more expensive (if other modes of travel are available) than longer-distance travel (especially to destinations where many airlines compete). The time of purchase of the flight ticket also determines the price of the ticket with some investigation activities requiring last-minute flight reservations. COVID-19 has also significantly changed air travel, which might have also affected air travel costs. Therefore, a single rate for all EU air travel may be an appropriate approach but this single rate should be regularly synchronised with market prices.

On the other hand, the approach to accommodation costs 'per night' should differentiate between Member States, and account for differences in accommodation costs. The data used in the analysis is not sufficient to assess the feasibility of past rates for each Member State. Further data would be needed to propose Member State-specific accommodation rates.

**One alternative to travel** mentioned by respondents is **remote collaboration**, using online communication platforms or other services which provide more flexible options for simultaneous interpretation. The costs of such services could be significant when using all possible options – therefore, the possibility for such reimbursement should be planned for in ISF. Nevertheless, there was no historical data for such costs in the information provided. **As many of these platforms are provided by multinational companies, a single rate for the European Union could be calculated.** The selection and rates should take into account the secure communication requirements that JITs might have.

One possible alternative to accommodation rates discussed in the course of interviews was the '**daily subsistence allowance**'. While for some Member States (e.g. DE) that seemed to be a preferred approach, others stated that such an option would not be feasible (RO, BG) – the main reason being that national legislation prescribes fixed per-diems for foreign travel for police / civil servants, or even puts a limit on the maximum number of days that a per-diem can be used (RO). Therefore, in such Member States, accommodation may be reimbursed based on actual costs, while meals need to fall

within the prescribed per-diems. Another reason why daily subsistence allowance may not be useful is that almost always the hosting Member State covers the majority of costs linked to typical business travel – e.g. transportation, meeting rooms, and often even meals are provided free of charge to the visiting colleagues by hosting police services.

### **3.1.3 Translation and Interpretation costs**

The feasibility of developing SCOs for the translation and interpretation services used for JITs was examined by calculating the maximum, minimum and average costs by unit (words, lines, pages, hours, days, entire job) and by language pairs (see Annex 4).

Given the limited number of observations on unit types 'words' and 'days' in the dataset, no meaningful conclusions could be made for them. There is a significant variation of costs for the category of 'entire job' (standard deviation €1,452.49), which is expected as the category presupposes individual arrangements for different volumes of translation work.

The unit type 'hours' is mostly used for budgeting interpretation costs. While there is a considerable difference between minimum and maximum cost per 'hour', the costs per 'hour' are stable for different language pairs.

The unit types 'lines' and 'pages' are used for budgeting translation costs. There is low variability in costs per 'line' (standard deviation is 11% of the average cost). The variation of costs per 'page' is high (standard deviation is 46% of the average cost). This variation seems to decrease when the data is broken down by language pairs, but the number of observations under each language pair is not sufficient to make any meaningful conclusions.

**The data suggests that developing SCOs for the translation and interpretation services would be challenging.** Standard scales could be developed for the 'hours' type of unit (interpretation) and the 'pages' type of unit (translation) only if these scales differ by language pairs. The available data does not allow the examination of whether scales could be developed for groups of languages. At the same time, it is advisable that the development of such standard scales does not only take into account historical data from JITs, but is also based on market research on translation and interpretation services. During the interviews, German respondents indicated that on the national level SCOs for 'translation and interpretation costs' were feasible.

Another issue to be considered is that besides the interpretation and translation costs related to the coordination activities, on many occasions the most significant translation and interpretation costs are accrued during the investigations. Lengthy electronic surveillance operations, where translation from non-European languages is needed, may result in substantial costs, or even prevent effective JIT. Similarly, the costs of translation or interpretation for non-European languages vary widely between languages and Member States.

### **3.1.4 Other Cost**

In addition to the types of costs reimbursed by Eurojust, there are various other types of costs related to JITs that may be funded via ISF\*Police:<sup>16</sup>

- Use of special investigative tools: confidential informants, controlled deliveries, controlled purchase, undercover investigation, surveillance, wiretapping;
- Forensics and cyber forensics;
- Transfer of evidence/witnesses across borders;
- Witness protection:

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<sup>16</sup> Based on data gathered on three Member States (AT, DE, BG).

- Other external expertise (financial, legal, technical).

The data also shows that besides the four categories of costs reimbursed by Eurojust (travel, accommodation, interpretation, and translation), a range of other costs have been reimbursed via EU funding (Europol and ISF-Police).

Table 15. Type of Activity Funded via EU funding (ISF Police, Eurojust, Europol)

Type of activity funded	Yes / No	Yes / No	Yes / No
	Germany	Bulgaria	Austria
Travel	X	X	X
Accommodation	X	X	X
DSA	X	No	X
Interpretation / translation	X	X	X
Fees for experts	X	No	No
Operational support	X	X	X
Staff costs (including additional / temporary staff hired)	X	No	No
Informant fees	No	X	No
Pseudo-purchase	No	X	No
Witness protection	No	No	No
Special investigative equipment	X	X	No
Technical / cyber investigation	X	No	No

Source: Written response provided to ICF by Member States

While the above data provides an indication of a wide range of possible areas for financing of JITs, the interviews revealed that **none of them could practically be used for SCOs.**

### Transfer of evidence

Interviews indicated that such an expense seems to be fairly rare. On the one hand, most of the evidence is typically used for the legal procedure in the Member States where the JIT is taking place. Cross-border use of evidence is fairly rare, and therefore not needed. To the extent that some evidence (in terms of witness statements, forensic information, or documentation) may be provided, such evidence can often be shared in electronic format. Further, some Member States' respondents indicated that in cases where the evidence is sensitive or classified, formal protocols may require that diplomatic mail services are used. **Therefore, it is deemed that the development of an SCO is not worthwhile for the costs linked to the cost category 'transfer of evidence'.**

### Fees for experts

In some Member States, external experts (such as financial, cyber, or technical experts) were used in investigations. In some Member States, their fees are fixed, and the experts need to be in approved registries (RO, BG). **The nature of such investigative activity is strongly local, it is not directly linked to the cross-border cooperation aspect of the JIT, and therefore is not feasible for an SCO.**

### **Additional staff support**

In addition to staff assigned to an investigation, some Member States suggested that hiring additional/part-time support for JITs may be useful. While average day-rates for staff costs could be calculated for each Member State, many interviewees were sceptical about the feasibility of such costs. They noted that only staff with proper security clearance and training are allowed to work on JITs, therefore **making ad hoc hiring only for the purpose of a JIT not a feasible option.**

### **Use of special investigative tools**

In the course of JITs the use of special investigative tools (surveillance, confidential informants, pseudo-purchase, under-cover agents, controlled deliveries, etc.) take place quite often. In the majority of cases these are strictly local investigative activities and are part of parallel investigatory activities that may be taking place in each Member State participating in a JIT. Only on rare occasions might there be a collaborative component such as placing an undercover agent abroad or carrying out surveillance activities. The costs for the use of such tools are typically covered and regulated by the hosting Member States where such activities take place.

In the cases **where payments may be involved** (e.g. to informants or for the purposes of pseudo-purchases), **the amounts are typically unique for each situation, making SCOs not feasible.** In cases of organised crime investigations, unlike with other types of crime, such expenses vary from case to case. While paying a confidential informant regarding local street crime may be subject to internal regulations and fixed costs, this is not the case when it comes to organised crime and cross-border investigations, where sums may be significant. In some Member States, it is even considered illegal to pay informants.

**Undercover investigations** could also be very costly – building a legend in the criminal world may involve significant expenses to demonstrate a lavish lifestyle. Again, **such costs are unique to each situation and an SCO is not feasible.**

### **Equipment costs**

As already noted, Eurojust provides certain types of equipment (e.g. secure phones and computer equipment) 'free of charge' to JIT participants. While no historical data was examined from Member States or Eurojust, some respondents considered the purchase of standard equipment (such as laptops or communication equipment) for the purpose of a JIT well justified (NL, RO, BG). Respondents expressed opinion that the opportunity to purchase such equipment puts all Member States on par with one another and improves collaboration where Member States involved may have very different levels and standards for police/investigator equipment. **The use of SCOs for standard equipment such as laptops and communication equipment is feasible and could be considered.**

One of the more general risks noted by one of the interviewees was the **risk of 'double financing'**. It was noted that some criminal codes provided for convicted perpetrators to also reimburse police and judicial expenses as part of the penalty. Financing of regular investigatory activities through European funding may run the risk of the state being double reimbursed for the same activities.

## **3.2 Training of Law Enforcement Officials**

In this feasibility study, we analysed training activities for law enforcement officials implemented under the Instrument for financial support for police cooperation, preventing and combating crime and crisis management (ISF-P). The feasibility study explores several possible calculation scenarios and alternatives for establishing SCOs for training of law enforcement officials which were not covered by any of the 10 areas set out in the study where SCOs were developed.



The study team identified possibilities for SCO development in this area, especially for common training activities such as classroom, practical and language training, study visits and exchanges of best practice conducted in groups. Analysis of cost data on training projects funded by ISF-P in 10 Member States shows that EU-level SCOs for one law enforcement official or one hour of training would be feasible to develop.

### 3.2.1 Methodological approach

The methodological approach to the feasibility study on development of SCOs for training of law enforcement officials is similar to that of Task 1. It builds on analysis of historical data on training activities funded by ISF-P in the period 2014-2020 collected from ten Member States.

The study team collected data for the ISF-P projects classified as training activities implemented in 2014-2020 under Specific Objective 5 National Objective 3 (Preventing and combating crime – training) and Specific Objective 6 National Objective 3 (Risks and crisis – training) in the SFC database.

Based on selection criteria such as size of the ISF-P portfolio and size of the economy, the final sample of 10 Member States is presented in the table below.

Table 16. Sample of 10 Member States selected for the feasibility study

Country	Region <sup>17</sup>	Size <sup>18</sup>	GDP <sup>19</sup>
Austria	EU15/Western Europe	Medium	127
Estonia	EU13/Northern Europe/Baltic	Small	84
Finland	EU15/Northern Europe	Medium	111
France	EU15/Western Europe	Large	106
Germany	EU15/Western Europe	Large	121
Hungary	EU13/Central and Eastern Europe	Medium	73
Netherlands	EU15/Western Europe	Medium	128
Portugal	EU15/Southern Europe	Medium	79
Romania	EU13/Central and Eastern Europe	Large	69
Spain	EU15/Southern Europe	Large	91

Source: Compiled by the Consortium.

In total, we collected data on **59 ISF-P training projects** for law enforcement officials from 10 Member States. The data sample covers a wide range of trainings on different subjects. Some of the recurring **training topics** include CBRNE (chemical, biological, radiological, nuclear and high yield explosives) (Estonia, Finland and Hungary), cybersecurity (Germany, Spain), anti-corruption (Austria and Romania), organised

<sup>17</sup> Regional distribution based on: <https://op.europa.eu/en/web/eu-vocabularies/th-concept-scheme/-/resource/eurovoc/100277?uri=http://eurovoc.europa.eu/100277>

<sup>18</sup> A country is classified as small if its population is under 5 million, medium if its population is 5-20 million and large if the population is above 20 million.

<sup>19</sup> Data on GDP per capita in PPS as a percentage share of EU average obtained from: <https://ec.europa.eu/eurostat/databrowser/view/tec00114/default/table?lang=en>

crime (Austria, Germany and Hungary) and terrorism prevention (Hungary, Romania). Other topics include criminal financial investigation (France), police cooperation (Spain) and victim support (Netherlands).

### 3.2.2 Scenario-based calculations

Based on the collected data sample, two calculation scenarios were analysed in this feasibility study:

*Scenario 1:* SCO amount/rate calculations in this scenario are based on historical data from **41 out of 59 projects from 10 Member States**. This scenario includes **only projects that have complete data** on duration, number of participants and total direct costs.

*Scenario 2:* SCO amount/rate calculations in this scenario are based on historical data on the **most typical projects** as identified in the previous section. The sample of **28 projects** (out of 59 projects) **from 9** (out of 10) **Member States**. This scenario includes **only projects that have complete data**, but also removes **outliers** in terms of **duration** and **number of participants** as well as training projects of **atypical delivery modes**.

Each scenario has **two sub-scenarios**, which dictate upon which data point(s) related to direct costs would be utilised for the calculations:

Calculations based on sub-scenarios 1.1 and 2.1 are based on *total direct costs*, as a single data point denoting costs

Calculations based on sub-scenarios 1.2 and 2.2 are based on direct costs of pre-selected *cost categories*, as five separate data points denoting costs. These are:

- staff costs;
- rental costs;
- equipment costs;
- subsistence costs and consumables;
- travel and accommodation.

### Longlist of SCO alternatives

The study team then utilised the different samples set by the scenarios and calculated SCO values. To that end, a longlist of SCO options was drafted first. The four alternatives analysed in this feasibility study were:

- **Alternative A:** A process-based SCO to cover the cost of one hour of training for one participant.
- **Alternative B:** A process-based SCO to cover the cost of one hour of training.
- **Alternative C:** An outcome-based SCO to cover the cost of one training course.
- **Alternative D:** An outcome-based SCO to cover the cost of one participant in training.

### 3.2.3 Assessment of suitability of calculation scenarios

As one of the final steps, the study team assesses the suitability of the selected samples and the implications of their usage in further SCO development stages.

The feasibility study introduced two scenarios using different data samples for SCO rate calculations. Scenario 1 includes all the complete historical data collected from ten Member States while Scenario 2 includes most typical training projects. In the latter case, several exclusion criteria are applied to filter the sample removing any atypical projects and statistical outliers in terms of delivery mode, duration and number of participants.

The sample used under Scenario 1 better reflects the status quo and the activities currently implemented in the Member States. Furthermore, the sample is larger than under Scenario 2 allowing for statistically more powerful estimates. On the other hand, Scenario 2 introduces some harmonisation of activities by only including the more common and standard training projects.

We **recommend utilising Scenario 2** moving further because it offers a more standardised sample of comparable training activities that is better suited for SCO development and may result in less skewed rates than Scenario 1 including individual and group training as well as projects of very different duration (from several hours to multiple months) or scope in terms of number of participants (three to 21 000). It is noteworthy that the exclusion criteria applied here are sample-specific (e.g. relate to the data distribution of this specific sample of ten Member States) and could be redefined if the sample is expanded.

Each Scenario has two sub-scenarios. Scenario 2.1 uses total direct costs to estimate the SCO values and so better reflects the status quo and specific training activities organised in the Member States. Scenario 2.2, on the other hand, estimates the SCO values based on selected cost categories that were identified as relevant for training excluding any other costs such as course fees or project management costs. Selected cost categories under **Scenario 2.2** ensure that the same kind of activities are covered by the SCOs and so they are better comparable across Member States. Most importantly, focus on a unified set of cost categories facilitates application of interpolation and extrapolation techniques if the SCOs are to be further developed.

#### **3.2.4 Assessment of feasibility of SCO alternatives**

Lastly, the study team adapted feasibility criteria and analysed each proposed SCO alternative. After, final recommendations have been made regarding the specific SCO alternatives would be best fit for further SCO development in the area of training of law enforcement officials. The criteria used for the feasibility assessment is presented below:

- **Detail and quality** of the historical data;
- **Data reliability** reflecting in the accuracy and logic of the calculations based on the historical data sample;
- **Complexity of the proposed audit trail** assessing the documentation required to claim funding for the proposed SCO alternative;
- **Risks of perverse incentives**, or unintended negative effects of applying the proposed SCO alternative such as creaming in the selection of participants, slicing or locking-in of operations;
- **Data or methodological needs** in order to further develop the proposed SCO alternative.

In terms of **data availability**, the current sample of 10 Member States is of good quality and includes the key data points needed for SCO development under the sub-scenarios that do not require cost category data and instead utilise total direct costs as a single data point (1.1 and 2.1). However, the breakdown into cost categories is patchy. This has implications for sub-scenarios 1.2 and 2.2.

The SCO values under these scenarios may be skewed if interpolation within the sample or data from alternative sources are not used to fill in the data gaps. Interpolation and extrapolation (for Member States that provided no historical data) are also complicated in case of output-based SCOs (Alternatives C and D). Therefore, Alternatives A and B would be feasible to further develop, while Alternatives C and D would require detailed data collection from all Member States first. Furthermore, **Alternative A** has less limitations than Alternative B since it does not require information on average size of the training group, which is currently patchy.

Concerning **data reliability**, the development of **Alternatives A and D** appears to be the most feasible based on the collected data sample. However, please note that the findings regarding data reliability are only made on the basis of the selected sample of 10 Member States. This means that the reliability of data needed for Alternative D, which is more susceptible to data reliability issues as an output-based SCO, may vary for the remaining Member States not covered by the data sample chosen for this feasibility study. While the resulting rates vary greatly across Member States, these differences can largely be contextualised and explained using qualitative information on the respective training projects in the sample. Alternative D relies on average duration of activities organised within each Member State and does not include any fixed duration parameter like the hourly rates under Alternatives A and B resulting in very different rates. These differences can be explained by varying scope and duration of the training projects in the sample. Due to data limitations, it is assumed that the size of a training group is consistent within a project under Alternatives B and C, which poses a limitation if compared to Alternatives A and D. In case of all the alternatives, further comparative analysis with alternative sources and other EU-level SCOs should be conducted before developing them further

The **prospective audit trail** is most straightforward for **Alternatives C and D** since no indication of duration of activities is necessary. Here, participant lists or participant contracts would be sufficient to prove that the activities took place and the participants took the training. Audit trails for Alternatives A and B are more complex because an indication of duration (in the form of timesheets or equivalent) would be necessary for reimbursement of an hourly SCO rate. In addition, to prevent perverse incentives (see below), group size should be set and controlled under Alternatives A and B to prevent organising training for disproportionately sized groups.

As for the **risk of perverse incentives**, creaming in the selection of participants, slicing or locking-in of operations is present to a varying extent for all the proposed SCO alternatives. Alternatives A and B are input-based, so there is no significant risk of creaming of participants or slicing of operations. However, the focus on entries to the training rather than exits or results may incentivise the organisers to inflate the number of entries and hourly reimbursements may incentivise organisation of unnecessarily long training programmes. These risks can be mitigated by setting the limits on minimum (relevant for Alternative B) and maximum (relevant for Alternative A) group size as well as maximum training duration (relevant for both Alternatives A and B). Alternatives C and D are output-based SCOs where the beneficiaries might be incentivised to organise shorter training activities since the SCOs do not account for duration of training. This risk can be mitigated by setting a minimum duration requirement for training programmes. Overall, **Alternatives C and D** pose the least risks in terms of perverse incentives. However, also under Alternatives A and B the risks can be mitigated.

With regard to further development of the SCOs, application of statistical methods and data needs, **Alternative A** is the most feasible option. It can be most reliably interpolated, which would be relevant for further development of scenarios utilising cost categories (1.2 and 2.2). Furthermore, the SCO rates for Member States that provided no data can be extrapolated allowing to work with a limited data sample. The values could also regularly be adjusted to current price levels using Eurostat data. Alternative B is similar to Alternative A but constrained by the patchy information on the size of the group within training projects. In the cases of Alternatives C and D, interpolation and extrapolation would not be possible. This poses a significant limitation meaning that detailed data must be collected from all Member States to develop these alternatives.

Overall, **Alternative A** could be developed with the **fewest limiting factors**. The key data points needed to develop this alternative are available in the current sample of ten Member States and interpolation and extrapolation could be applied to fill the data gaps and estimate SCO values for other Member States. On the other hand, an output-based **Alternative D** would have a significant simplification effect and best reflect the status quo in the Member States. However, since data no statistical methods can be applied to

cover the data gaps, a data sample including all Member States must be collected to develop this alternative.

For further details on the feasibility study, including the detailed overview of collected data, elaboration on the scenarios, methodologies of the alternatives and the preliminary SCO values can be seen under Annex 4.

### **3.3 Additional areas where SCOs could be developed**

To complement the feasibility studies additional research was carried out to explore further areas where SCOs could be developed in the 2021-2027 programming period for AMIF, ISF and BMVI.

As a first step eligible actions were mapped as follows:

- Annex II 'Implementation measures' and Annex III 'Scope of support' of the Regulation establishing the Asylum and Migration Fund<sup>20</sup>.
- Annex II 'Implementation measures' and Annex III 'Scope of support' of the Regulation establishing as part of the Integrated Border Management Fund, the instrument for financial support for border management and visa<sup>21</sup>.
- Annex II 'Implementation measures' and Annex III 'Scope of support' of the Regulation establishing Internal Security Fund<sup>22</sup>.

Mapping was followed by consultation with Managing Authorities to collect feedback on relevant areas or activities where the development of SCOs could be an added value.

Finally, a thorough desk research was carried out including review of Programme documentation (including National Programmes, Accounts data, Audit reports and mid-term evaluation reports, etc.). Based on the above data collection a list of focus areas where identified which are presented in the table below.

*Table 17. Long list of potential SCOs*

<b>Fund</b>	<b>Focus Area</b>	<b>Potential SCO</b>
<b>AMIF, ISF, BMVI</b>	Training for civil servants	<ol style="list-style-type: none"> <li>1. Lump sum of training package</li> <li>2. Unit cost of one staff member completing training</li> <li>3. Unit cost of one hour of training for one staff member</li> </ol>
<b>BMVI</b>	Actions aimed at enhancing awareness of external border policies among stakeholders and the general public	<ol style="list-style-type: none"> <li>1. Lump sum of communication activities through own channels, online</li> <li>2. Lump sum of communication activities, paid advertising, online</li> </ol>
<b>AMIF</b>	Information packages and campaigns to raise awareness of legal migration channels to the Union	

<sup>20</sup> Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund.

<sup>21</sup> Regulation (EU) 2021/1148 of the European Parliament and of the Council of 7 July 2021 establishing, as part of the Integrated Border Management Fund, the Instrument for Financial Support for Border Management and Visa Policy .

<sup>22</sup> Regulation (EU) 2021/1149 of the European Parliament and of the Council of 7 July 2021 establishing the Internal Security Fund.

<b>AMIF</b>	Actions aimed at enhancing awareness of asylum, integration, legal migration and return policies among stakeholders and the general public	3. Lump sum of communication activities, offline
<b>AMIF</b>	Measures aimed at raising awareness of the risks of illegal immigration	
<b>BMVI</b>	Awareness-raising activities on visa policies among stakeholders and the general public	
<b>ISF</b>	Actions empowering communities to develop local approaches and prevention policies, and awareness-raising and communication activities among stakeholders and the general public on Union security policies	
<b>AMIF</b>	Establishing or improving reception accommodation infrastructure, including the possible joint use of such facilities by more than one Member State	1. Lump sum for establishment of new reception facilities 2. Cost of establishing new reception facilities per third-country national (cost of one third-country national supported)
<b>BMVI</b>	Secondment of joint liaison officers to third countries, reinforcement of cooperation and operational capacity of networks of experts or liaison officers, as well as exchange of best practices and boosting the capacity of European networks to assess, promote, support and develop Union policies	1. Unit cost of one liaison officer to third country
<b>AMIF</b>	Introduction and reinforcement of independent and effective systems for monitoring forced return, as laid down in Article 8(6) of Directive 2008/115/EC	1. Unit cost of monitoring one removal
<b>AMIF</b>	Measures to support the returnee's durable return and reintegration	1. Lump sum of services provided to third-country nationals upon their return

Following the mapping of focus areas and establishing the long list of potential SCO options an online survey<sup>23</sup> was designed to assess stakeholders view on these options.

<sup>23</sup> The survey was distributed to Managing Authorities who participated in Task 1 data collection. The survey was open for 4 weeks over April and May 2021. As a result, 22 responses were received from 20 countries: Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Finland, France, Germany, Italy, Latvia, Lithuania, Luxembourg, Netherlands, Norway, Poland, Slovakia, Slovenia, Spain, Switzerland.

For all the options identified in the long list the survey explored the following questions:

- Data availability<sup>24</sup>;
- Potential for simplification (0-5 scale);
- Feasibility (0-5 scale);
- Overall usefulness (not useful at all to very useful)<sup>25</sup>.

As a follow up to the online survey an online discussion was organised with representatives for national authorities. The findings of the survey and the online discussion are presented below.

### **Training of civil servants**

This area of activities explores the SCO options that could be developed to use for training of civil servants. This option could be used under all three Funds: AMIF, BMVI and ISF.

There are three SCO alternatives proposed under this activity:

- Lump sum of training package;
- Unit cost of one staff member completing training;
- Unit cost of one hour of training for one staff member.

Out of the three alternatives explored under training of staff members, the hourly cost of one staff member was the most favoured by survey respondents. 14 out of 22 respondents indicated that they do not have data available to contribute to the calculation of this SCO but all three aspects of the SCO, namely potential for simplification, feasibility and overall usefulness, were highly rated by respondents compared to the other two options.

### **Awareness raising activities**

Under awareness raising activities a number of focus areas were identified during the mapping where SCOs could be developed:

- AMIF:
  - information packages and campaigns to raise awareness of legal migration channels to the Union;
  - actions aimed at enhancing awareness of asylum, integration, legal migration and return policies among stakeholders and the general public;
  - measures aimed at raising awareness of the risks of illegal immigration;
- BMVI:
  - awareness-raising activities on visa policies among stakeholders and the general public
  - actions aimed at enhancing awareness of external border policies among stakeholders and the general public;
- ISF:
  - actions empowering communities to develop local approaches and prevention policies, and awareness-raising and communication activities among stakeholders and the general public on Union security policies.

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<sup>24</sup> Closed question with yes/no answers, where participants were asked whether they have any data that would help to calculate the SCO. No data was collected as part of this exercise.

<sup>25</sup> To allow for a comparison with the results that were provided on a 0-5 scale these responses were converted Not useful at all=0; not useful=1; neutral=2; useful=3; very useful=4.

Based on the above three SCO alternatives were proposed and explored in the survey:

- Lump sum of communication activities through own channels, online;
- Lump sum of communication activities, paid advertising, online;
- Lump sum of communication activities, offline.

Overall feedback from national stakeholders shows that feasibility of this SCO low and similarly the potential for simplification and overall usefulness received low ratings.

In addition, almost all Member States indicated that they do not have available data to contribute to the calculation of this SCO.

Respondents argued that the lack of interest in this alternative is due to the diverse range of costs and activities to be covered. It seems difficult to have a lump sum on paid advertising, since this can be done via many different channels (TV, radio, flyers, rollups, posters etc.) at varying costs, not least because it depends on the length/the format of the advert.

### **Establishing reception facilities**

This focus area covers establishing or improving reception accommodation infrastructure, including the possible joint use of such facilities by more than one Member State and would be used only under AMIF. There are two proposed SCO options under this area:

- Lump sum for establishment of new reception facilities;
- Cost of establishing new reception facilities per third-country national (cost of one third-country national supported).

While overall stakeholders consider SCOs in this area useful concerns were raised for both potential for simplification and feasibility. This is due to the great variety cost categories involved. Cost for each facility varies, depending on where it is build and all the technical aspects related to the construction process (access, water electricity lines already established or not etc.). Smaller Member States (e.g. Latvia and Luxembourg) noted that the usefulness of this SCO is limited in their case as their reception capacity is small compared to other Member States.

### **Secondment of Joint Liaison Officers**

This focus area covers secondment of joint liaison officers to third countries, reinforcement of cooperation and operational capacity of networks of experts or liaison officers, as well as exchange of best practices and boosting the capacity of European networks to assess, promote, support and develop Union policies financed from BMVI. For this focus area one SCO option was proposed:

- Unit cost of one liaison officer to third country.

Almost half of respondents (9 out of 22) indicated that they have available data that could contribute to the calculation of this SCO. The overall usefulness of this SCO was rated 4 out of 5 and both potential for simplification and feasibility were rated 3 out of 5. Two Member States noted that due to the small and limited number of projects the usefulness of this SCO would also be limited.

### **Removal Operations**

This focus area covers the introduction and reinforcement of independent and effective systems for monitoring forced return, as laid down in Article 8(6) of Directive 2008/115/EC finance from AMIF. For this focus area one SCO was proposed:

- Unit cost of monitoring one removal.



The potential to develop SCO in for removal operations is rather low based on the evidence collected mostly due to diverse cost categories. Overall responding countries did not consider it useful to have a SCO in this area.

### **Return and reintegration**

This section covers measures to support the returnee's durable return and reintegration under AMIF. There is one SCO alternatives proposed under this focus area:

- Lump sum of services provided to third-country nationals upon their return.

This SCO would cover the cost of predefined support services to facilitate the durable reintegration of one third-country national to their country of origin if all predefined terms for support services are met. The reimbursement would be based on a standard pre-established rate for provision of such services.

Support services would include:

- One information session or one-to-one counselling of returnees;
- Stipend to support education or employment;
- In-kind assistance (e.g., clothes, phone card);
- Housing assistance.

Member States noted that currently the administration of reintegration brings huge administrative burden including invoices and accounting documents in many language, different currencies, accounting rules, the original documents are stored at the other side of the world.

As a challenge it was highlighted that there is problem with the different costs in different countries of destination, there would have to be some index or categorisation.

Overall **staff trainings** were the most favoured options across all three Funds based on stakeholder feedback. Both unit cost of one hour of training for staff member as well as unit cost of one staff member completing training was preferred compared to other alternatives. The added benefit of this option is that it could be used across all three funds which could result in a higher uptake compared to fund specific SCO options.

Unit cost of one **liaison officer to third country** was one such fund specific SCO option which could only be used under BMVI but was nevertheless favoured by national stakeholders. As a potential challenge it was highlighted that the audit trail for this SCO option could be difficult depending on the method for invoicing as sometimes invoices would come from third countries. It was also noted that it is unclear what cost categories could be useful to be included in the definition of this SCO.

The third preferred area where SCO could be established is **lump sum of services provided to third-country nationals upon their return**. National authorities highlighted that they implement these type of projects often and would welcome the simplification in this regard. Challenges were also identified during the online discussion regarding this alternative. According to respondents one of the main challenge would be collecting historical project data due to the diverse range of activities. Stakeholders highlighted that they would prefer to have a SCO which also covers training and education, business support and in-kind benefits.

**Establishing new reception facilities** was also a preferred area for potential SCOs. While stakeholders agreed that overall it would be useful to have a lump sum for establishment of new reception facilities. Several challenges were identified in this regard. Most important how the scope of the SCO would be defined and what 'establishing' a reception facility would entail.

Finally, unit cost of **monitoring one removal operation** was also selected by stakeholders as having a high potential for simplification and overall usefulness.

These five areas will be presented to participants of the next workshop to validate the findings of our research and finalise the five areas where SCOs could be developed.

### **Potential overlap with ESF SCOs**

A thorough overview of SCOs established by the Commission Delegated Regulation (EU) 2015/2195<sup>26</sup> was carried out to map any potential overlaps with SCOs already used at national level.

### **Training of civil servants**

The review of SCOs established by the Commission Delegated Regulation (EU) 2015/2195<sup>27</sup> revealed that Member States use SCOs to support staff training in the following areas:

- All Member States are being reimbursed on the basis of unit costs that cover:
  - Participants who have successfully completed a training course.
  - France is being reimbursed on the basis of unit costs that cover:
    - Provision of training leading to a qualification, skill or certification.
    - Participants who have successfully completed individual professional training.
    - Participants with a successful outcome following a training course.
  - The Czech Republic is being reimbursed on the basis of unit costs that cover: Achievement of a qualification as caregiver in a childcare facility:
  - One hour (60 minutes) of participation of an employee in a training course provided by an internal trainer in any of the following areas: general information technologies (IT); soft and managerial skills; languages; specialised IT; accountancy, economy and law; technical and other professional.
  - Belgium is being reimbursed on the basis of unit costs that cover: Participants successfully completing vocational training, Participation in one hour of accredited or non-accredited internal or external training.
  - Italy is being reimbursed on the basis of unit costs that cover: Hourly rate for the following trainings: training focused on integration in the labour market; reintegration in the schooling and training system for young people aged between 15 and 18; apprenticeship for qualification and professional diploma; apprenticeship for higher training and research; training for self-employment and self-entrepreneurship; employment and training; linguistic training for voluntary civilian service in the EU; linguistic training for professional transnational mobility; linguistic training for traineeships in transnational mobility.
  - Slovakia is being reimbursed on the basis of unit costs that cover: One hour of participation in training for teaching and specialised staff.
  - Germany is being reimbursed on the basis of unit costs that cover: Participants who successfully complete training for class teachers and for teachers with management responsibilities.
  - Spain is being reimbursed on the basis of unit costs that cover: Hours of participation in a training course for Vocational Training included in the Catalogue of Training Specialities of the State Public Employment Service.

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<sup>26</sup> A consolidated version of Delegated Regulation (EU) 2015/2195. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02015R2195-20200108>

<sup>27</sup> A consolidated version of Delegated Regulation (EU) 2015/2195. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02015R2195-20200108>

- Bulgaria is being reimbursed on the basis of unit costs that cover: Participants gaining qualification upon leaving vocational training.
- Portugal is being reimbursed on the basis of unit costs that cover: The hourly rate for training provided to people employed in the public sector. The hourly rate for salaries paid to people employed in the public sector while on a training course.

A thorough overview of SCOs established by the Commission Delegated Regulation (EU) 2015/2195<sup>28</sup> and their comparison with SCOs considered under Task 3 has revealed no potential overlap in the following areas:

- Awareness raising activities;
- Establishing new reception facilities;
- Secondment of Joint Liaison Officers;
- Removal operations;
- Return and reintegration.

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<sup>28</sup> A consolidated version of Delegated Regulation (EU) 2015/2195. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02015R2195-20200108>

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