



Център Амалипе

DEYAN
KOLEV
TEODORA
KRUMOVA
VIOLETKA
MIRCHEVA

AMALIPE CENTER
Veliko Turnovo 5000, 4 Samuil Str., fl. 1, app.16, p.o.box 113
Center_amalipe@yahoo.com, office@amalipe.com
www.amalipe.com
FB: Amalipe—Veliko Turnovo

The implementation of the National Roma Integration Strategy in Bulgaria in 2012 – 2014 : # *The requested action takes too long time*

AMALIPE CENTER

FEBRUARY 2015

On April 5, 2011 the European Commission announced its communication “EU Framework for National Roma Integration Strategies”. After long and controversial consultation process that took place during the second half of 2011, Bulgarian Council of Ministers adopted National Strategy of Republic of Bulgaria for Roma Integration (NRIS) and Action Plan (AP) on December 21, 2011. Following the request of Roma NGOs, the Strategy was proposed to the Parliament and approved with Decision of the Parliament from March 1, 2012. In this way the NRIS became the first Roma integration document in Bulgaria approved by the National Assembly that is an important positive development (all previous documents were approved with decisions of the Council of Ministers or Decree of the Council of Ministers). Thus



the Strategy could oblige and engage broader set of institutions in its implementation, such as municipalities, etc.

The overall assessment of Roma NGOs about the NRIS is that it is step forward: it demonstrates political will for putting Roma integration higher in the agenda of Bulgarian government and defines proper strategic approach and directions for action. In these terms the NRIS continues and further develops the strengths of the previous Roma integration documents adopted by 3 Bulgarian governments. At the same time the Strategy does not propose change in the Roma integration institutional infrastruc-

ture as well as in the monitoring and evaluation mechanisms that proved their inefficiency during the previous years. Important chances in these directions seemed omitted and should be advanced. The added value of the Action Plan is sharply decreased by the lack of financial back up for most of the activities and the absence of new activities, different from the ones performed at present. The Plan is not coherent: some of its parts are relatively reach of activities unlike the others that are modest and formal. It seems that the AP is rather explanatory than planning document. The Appendix “Programs for implementation of the NRIS” would plan concrete and comprehensive operations for Roma integration binding them with European



funds absorption and state budget. Nevertheless, the Appendix (proposed by the Roma NGOs) was not included in the final version of the documents.

On May 21 the European Commission published its communication "National Roma Integration Strategies: a step forward in the implementation of the EU framework" that assessed the NRISs submitted by 27 Member States and recommended following actions for improving the quality of the Strategies and their implementation. The 2013 Commission assessment report "Steps forward in implementing National Roma Integration Strategies" adopted on 26 June 2013 focuses on progress made by the Member States in setting the necessary pre-conditions for a successful implementation of the strategies.

The first European Commission evaluation of the implementation of NRISs was published on April 4, 2014. It is called *Report on the implementation of the EU Framework for National Roma Integration Strategies*. The report, like all similar European documents is tight and short: 10 pages, plus 2 to 3 pages tables synthesized assessments and recommendations for each Member State, united in the so-called. "Commission Staff Working Document". The language used is "Brussels" one: i.e. diplomatic, it should be read what said and not said.

The name of Bulgaria is present in many places in the report. Explicitly (in boxes) are listed three good examples from Bulgaria produced from different types of organizations - Ministry of Education, Municipality Kavarna (one of the three municipalities in the EU explicitly stated in the report) and the Center for Interethnic Dialogue and Tolerance AMALIPE (only one more NGO is explicitly included with good practice in the document). In Education section Bulgaria is referred to as a good example - along with Hungary: namely, the introduction of a mandatory two-year preschool education. In the field of Securing financial support are included the activities of the Municipality of Kavarna and its merits to improve the lives of local Roma incl. by attracting European funds. In Employment field as a good example are mentioned the Community Development Centers, established in 11 municipalities by AMALIPE, supported by the European Commission.

The steps that Bulgaria should do in the near future are also outlined. Table of Commission Staff Working Document accompanying the Report identifies the following necessary actions:

- **Education:** support for desegregation and inclusive education, improving the coverage of Roma children in quality pre-school education and training, expanding proven successful measures to reduce school drop-out, targeted schemes for the inclusion of Roma young people in different forms of vocational and higher education. *One cannot deny that the experts who produced these documents have caught exactly the problems facing educational integration nowadays: slipping of the desegregation process and the gradual increase in secondary segregated "Roma" schools, lack of support from the state to implement a nationwide successful NGO projects, the low number of Roma with secondary and university education, which increases very slowly without the existence of any state support;*

- **Employment:** increasing the employment rates of Roma in rural areas, targeted active policies on the labor market to include more Roma, social enterprises, self-employment and use of opportunities from the "Youth Guarantee" initiative. *That probably sounds scary for the institutions of the labor market in Bulgaria, who generally avoid targeted measures to increase employment in the Roma community. I hope that the explicit recommendations of the European Commission will encourage these institutions at least to consider Roma targeted initiatives;*

- **Health:** here the document is adamant that "The main challenge remains the inclusion of all in the health insurance system." Short and clear: it is unacceptable to say that we have a working health insurance system, given the fact that between 1 and 2 million Bulgarian citizens (not only Roma) are outside it. This problem (even be diplomatically called "challenges") must be urgently resolved;

- **Housing:** wider actions are needed to improve the living conditions that follow an integrated approach (i.e. combine social housing, education, employment and health), similar to the on-going intervention in Devnya, Vidin and Dupnitsa. *The document rightly recommends the inclusion of Roma and non-Roma in Bulgaria which proved a serious problem: the reader may think of the example of the city of Burgas, which refused to implement such intervention (well-conceived and planned) because of the reaction of ultra-nationalists.;*

- **Anti-discrimination:** effective actions against hate speech and discriminatory speech. *If anyone doubts that this is necessary - let's read the press in random day;*

• **Funding:** efficient use of EU funds for 2014-20 in support of the integration policy, engaging Program for Rural Areas Development and others. *That is important in light of the limited capacity of the state budget. European Commission not only recommends the use of EU funds for Roma integration, but it puts this as a condition to the Member States to use EU funds;*

• **Structural priorities:** the document requires political leadership of the Working group to Resources Provision of Roma integration with EU funds. *This group was formed in 2012, chaired by the Minister for EU Funds T. Donchev, but in the autumn of 2013, the new minister with same portfolio refused to chair the Group, passing it to the administration officer - Secretary of the NCCEII. This practically meaningless of the Working group was noticed by the Commission. The Report also requires re-establishing the dialogue with the civil society. Clear indicator of abusive dialogue is that a year ago the leading Roma organizations left the National Council for Cooperation on Ethnic and Integration Issues by making its proposals for changes to this inefficient structure. Rather than discuss these ideas, the management of the structure began to fill the place of those who left with new organizations. This behavior, which can hardly be described as constructive, was clearly seen by the experts of the European Commission.*

Simultaneously, evaluation reports about the implementation of the National Strategy of the Republic of Bulgaria for Roma Integration were prepared also by Bulgarian government since the Strategy requires the Council of Ministers to submit such report to the Parliament on annual basis. In 2013 Evaluation report was not prepared. In 2014 the Secretariat of the National Council for Cooperation on Ethnic and Integration Issues prepared report for 2013 compiling reports submitted by municipalities and district administrations. It was submitted to the Parliament but was not discussed because of the parliamentary crisis and the extraordinary elections. The quality of the report could not be overestimated: it is a simple mechanic compilation of reports submitted by different municipal, district and ministerial administrations. Thus its main value is the proposed "picture" of what is done at grass-root level. The absence of any kind of proceeding and analysis shows the lack of capacity of the National Contact Point and the need of special monitoring and evaluation system. This need was included in the Partnership Contract as ex-ante conditionality with required deadline at the end of 2015. Answering this requirement, the Monitoring Committee of Human Resources Development OP approved Criteria for selection of operation "Developing and Introducing System for NRIS Monitoring, Evaluation and Control" The National Contact Point will be concrete beneficiary of this operation. Its implementation is designed for 2015.

The present report is prepared by AMALIPE Center for Interethnic Dialogue and Tolerance within the project "Participation of Civil Society and Roma Community in the Implementation of the National Roma Integration Strategy – Guarantee for Effectiveness" (BG05/625) financed within the Program for NGO support of the EEA Financial mechanism. It evaluates the implementation of the National Strategy of the Republic of Bulgaria for Roma Integration during 2012 – 2014 following the European Commission template for contributions. It also analyzes the first documents for the new planning period approved in 2014 – namely, the Partnership Contract and Human Resources Development OP with regard to Roma Integration. The report could be valuable contribution for the future System for NRIS Monitoring, Evaluation and Control since the last should incorporate not only administrative monitoring but also diverse forms of civil society contribution and administrative monitoring.



Проект „Участие на гражданското общество и ромската общност в изпълнението на Националната ромска стратегия – гаранция за ефективност“ (BG05/625) се финансира в рамките на Програмата за подкрепа на НПО в България по Финансовия механизъм на Европейското икономическо пространство 2009-2014 г. “



Този документ е създаден с финансовата подкрепа на Програмата за подкрепа на неправителствени организации в България по Финансовия механизъм на Европейското икономическо пространство.

Цялата отговорност за съдържанието на документа се носи от ЦМЕДТ „АМАЛИПЕ“ гр. Велико Търново и при никакви обстоятелства не може да се приема, че този документ отразява официалното становище на Финансовия механизъм на Европейското икономическо пространство и Оператора на Програмата за подкрепа на неправителствени организации в България.

CHAPTER 1. POLICY MEASURES

1.1. Education

Priority	Steps taken since 2011	Impact of measures
<i>Early childhood education and care</i>	<p>1. Introducing 2 year obligatory pre-school education: It started with change in the Public Education Act (art. 20) since 05.10.2010. The process is still not completed since some municipalities can not provide enough spaces in their kindergarten;</p> <p>2. "Social inclusion" project: financed by World Bank. It is directed at early childhood development (0-3 years). The project is implemented in 68 municipalities;</p> <p>3. In 2013 the Trust for Social Achievement started to implement project "Ready for School" for ensuring higher enrollment of Roma kids in pre-school education via paying the fees for kindergartens and cash conditional transfers. The project is supported by TSA and World Bank. It is implemented in 240 places by local NGOs</p>	<p>1. This is mainstream measure that would benefit also the Roma children. The idea is to make children better prepared for the school, incl. to help them obtain better command of Bulgarian language. In this regard the measure is strongly positive. Nevertheless, most of Roma children continue to not attend pre-school groups and no steps are undertaken at community level to ensure the higher enrollment rate of Roma children</p> <p>2. The project is ongoing at present and no final evaluation of its impact could be done. Our preliminary observations are that it is attractive for the municipalities mainly because of its "hard" component that allows them to make renovations in the buildings. Less attention is paid on introducing new methodologies and new community-based social services for supporting the family although this should be the core of the project.</p> <p>3. The project is ongoing at present (since September 2014) and no final evaluation of its impact could be done. Preliminary observations of the organizations that implement the project and participating kindergartens show that it raises the frequency of attendance as well as the enrollment of Roma and other vulnerable groups of children</p>
<i>Reducing early school leaving</i>	<p>1. Strategy for Decreasing the Early School Leaving and Action Plan were approved in 2013.</p> <p>2. Full-day schooling for all students in the focal-point schools is introduced: initially this was done with state budget funds. Since 2012 it happens with financing from Human Resources Development OP. "Focal point schools" are around 700 schools that educate students from places where no school exist – mainly in the rural areas</p>	<p>1. The added value of this document is limited since it summarizes existing measures and foresees only few new ones. At the end of 2014 the MoE and its Regional Inspectorates organized forums for sharing good practices for reducing the early school leaving. They involved hundreds of teachers, provided space for useful discussions and showed political attention for solving this problem.</p> <p>2. This is mainstream measure that benefits also the Roma children. It has good impact of keeping the children at school and plays important preventive role. As weakness should be outlined that it does not contain any element for introducing innovative pedagogical methodologies, for example intercultural education. This decreases its efficiency. Additional weakness is the fact that the commitment for full-day schooling was transformed from state budget to Human Resources Development OP</p>

Reducing early school leaving

3. Full-day schooling for the students from 1 to 4 grade is introduced in all schools with state budget

4. The National program “At school without absences” is managed by Ministry of Education since 2012 to support schools with many absences per student to prepare and implement school programs for reducing the early school leaving

5. Within Human Resources Development OP three targeted calls were implemented in 2011- 2013 with the purpose to ensure the quality integration of Roma children in primary schools:

“Integration of children and students from the ethnic minorities in the school system”

“Educational integration of children and students from the ethnic minorities”

“Re-integration of school dropout”

Within these calls projects of schools, municipalities and NGOs were supported

6. Within HRDOP certain mainstream measures supported the early school leaving: among them USPEH (SUCCESS) Project became very popular

7. The Center for Educational Integration of Children and Students from the Ethnic Minorities - COIDUEM (structure of Ministry of Education) announced several call for proposals for decreasing the early school leaving, introducing intercultural education and desegregation. The calls were open to schools and municipalities. They were announced on annual basis

8. Certain NGO initiatives contributed significantly for designing and testing activities for ensuring that Roma children will fulfill at least primary education. The project of Center Amalipe “Decreasing the dropout rate of Roma students” (financed by America for Bulgaria Foundation) continued with the project “Every Student Can be a Winner” (supported by Trust for Social Achievement) were the biggest ones. In 2013 – 2014 it was implemented in 170 schools all over Bulgaria. Roma Education Fund also financed local initiatives for preventing early school leaving

3. See the comment above.

4. The program supports schools with absenteeism problem providing additional funds for diverse extra-class activities to decrease the so-called “unexcused absences”. No independent assessment is done until now to measure its impact. The existence of such a program is positive fact. At the same time the eligibility criteria restricts the participation of schools that have decreased its absenteeism problem but are in menace to renew it again. In addition, the program does not apply a set of activities that are proven in decreasing the attendance problem: it leaves the choice of activities entirely to the schools themselves. This approach could be problematic regarding the schools with limited administrative capacity that is very often the case of the schools with high early school leaving

5. HRD OP became important tool for supporting the policy for educational integration that is strongly positive fact. Nevertheless, several weaknesses are visible:

- the projects are only locally based / municipal ones that limits their effectiveness regarding the national aspect of the policy;
- the bureaucratic procedures for reporting discouraged many beneficiaries to implement projects;
- the financial rules are limiting the possibilities for participation of smaller beneficiaries: smaller schools and NGOs
- there was a discouraging example with the scheme “Integration of children and students from the ethnic minorities in the school system” that was converted from desegregational to segregational one because of mistake in interpretation done by Ministry of Education. This was a sign for very low political commitment

6. USPEH Program supported a broad set of extra-class activities implemented in non-focal-point schools. One of its main objectives was to decrease the drop-out-of-school rate. Most probably it contributed for achieving this objective since the extra-class activities are one of the useful means. Nevertheless, the program lacked real focus and as result its effectiveness was low: in one the same way it was implemented in schools with no school leavers and in school with significant number of dropouts.

7. The impact of these calls was positive. The projects supported were small-scale. Since the application procedures were flexible and well-designed, they gave the chance even of small village schools to implement certain initiatives. There is clear need for extending the budget of COIDUEM in order to reach more schools, especially the rural ones

8. The impact and results achieved are strongly positive. For example, the dropout rate in the participating schools decreased from 2,20 % to 0,6 %, etc.; in many schools there was no single dropout The biggest challenge in this case remained how to involve Ministry of Education in ensuring that the model would be applied in bigger number of schools

CHAPTER 1. POLICY MEASURES

<p><i>Encouraging Roma participation in secondary and tertiary education</i></p>	<p>1. Only few NGO initiatives contributed for raising the number of Roma who study secondary education. State funded initiatives in this direction did not exist. For example the Trust for Social Achievement financed several NGOs to carry out Scholarship Program for Secondary School Students. Within the program textbooks and transportation pass (for students from the rural areas) is provided.</p> <p>2. Regarding Roma participation in high school / university education, only private donors / NGO initiatives existed. They were supported by Roma Education Fund. For example REF continues its Roma Memorial Scholarship Program for providing scholarships to students from Roma origin The Ministry of Education has not contributed and has not planned similar programs.</p> <p>3. Roma Health Scholarship Program was implemented in Bulgaria by OSI – Sofia and Center Amalipe with the financial support of REF and OSI – Budapest. Since October 2014 it will be supported within the EEA Grants / Norwegian Grants program</p>	<p>1. These initiatives had positive impact. Nevertheless, it was limited in scope since they covered relatively few municipalities and students. The absence of Ministry of Education in developing such policies is disturbing fact</p> <p>2. These initiatives had strongly positive impact. Nevertheless, they were limited in scope since they covered relatively few students: for example RMUSP provided around 250 scholarships per year while more than 500 students applied. The absence of Ministry of Education in developing such policies is extremely disturbing fact. MoE could use ESF funds with this purpose and Roma NGOs suggested it many times. The answer from MoE was that targeted support means discrimination towards ethnic Bulgarians</p> <p>3. The engagement of EEA Grants / Norwegian Grants program is very positive fact since it engages the Ministry of Health and the Council of Ministers. This engagement should continue and to cover also other similar initiatives</p>
<p><i>Desegregation measures</i></p>	<p>1. In the draft for new Public Education Act discussed in 2011 -2012 there were provisions that outlawed the segregation proposed by Roma NGOs. The Act was not voted in the Parliament because of the extraordinary elections. It was proposed again in November 2014</p> <p>2. One of the calls for proposals announced by Ministry of Education within HRD OP, namely “Educational integration of children and students from the ethnic minorities” has as key goal to support the desegregation process in education.</p>	<p>1. It is discouraging fact that the new Public Education Act was not voted in the Parliament in 2013. Owing to the advocacy efforts undertaken by Center Amalipe, OSI and other Roma and pro-Roma NGOs the draft presented in the Parliament in 2012 contained several important points that would foster the educational integration (including article that outlawed the segregated classes). These texts were approved by the Parliamentary Commission on Education as well as the entire Act. Nevertheless, the resign of the Parliament and the lack of enough political attention to the development of Bulgarian education left the Public Education Act out of the parliamentary agenda and it was not voted. The anti-segregation texts are preserved in the draft proposed in November 2014. Hopefully the Act will be voted in 2015</p>

<p><i>Desegregation measures</i></p>	<p>3. The biggest investment in educational desegregation is done by Roma Education Fund that supported Roma NGOs to implement desegregation initiatives in different regions of the country. REFF re-oriented this support at Center for Educational Integration of Children and Students from the Ethnic Minorities: in 2012 and 2013 the Center announced calls for municipal projects for desegregation</p>	<p>2. Since some of the projects are in their implementation phase it is difficult to evaluate their effect. Nevertheless, it is clear that they contributed for the desegregation at local level. Such calls should be announced within the new Science and Education for Smart Growth OP 3. These initiatives had positive impact. Nevertheless, they were limited in scope since they covered relatively few municipalities and students. The absence of Ministry of Education in developing such policies is disturbing fact</p>
<p><i>Other measures</i></p>	<p>In July 2014 Ministry of Education and Science started process of updating the Strategy for Educational Integration. Ministry representatives, academia scholars and NGOs were included in the working group. Roma organizations were present through Center Amalipe. Until the end of 2014 the Group carried out intensive work. It is expected that the updated Strategy will be approved in 2015</p>	<p>The updated Strategy was not approved before the end of 2014 and its impact could not be evaluated. It is positive fact that the work for its preparation did not stop although 3 governments changed for the period.</p>

1.1.4. Brief description of one or two most relevant good practice(s) in the area of education and its/their impact.

Most of the successful practices are generated by Roma and pro-Roma NGOs. For example:

“EVERY STUDENT CAN BE A WINNER” DECREASING THE DROP-OUT RATE AMONG ROMA CHILDREN Program: it is implemented by AMALIPE Center for Interethnic Dialogue and Tolerance with support of America for Bulgaria Foundation (2010-13) and Trust for Social Achievement (2013-15). The program addresses the high drop-out rate of Roma children in school age. The project activities further address infrequent attendance of school, low school grades of Roma students, low representation of Roma students in high schools and the low representation of Roma parents in school structures and school life in general. The project is based on the experience Center Amalipe has accumulated during the last years and explicitly the experience accumulated with the development of the “Folklore of ethnoi - Roma folklore” SIP program which includes schools from the territory of all Bulgarian regions.

The School programs for dropout prevention and student retention is are the framework for planning activities targeted at keeping students in school. Each school identifies initially its specific objectives and target group, then the specific activities targeted at retaining and attracting the children depending on the specific problems it faces. General trend of all school programs is that they envisage activities in four key areas:

- Working with teachers - training for all teachers to work effectively in a multicultural environment. This training is conducted on the basis of the peer (“Teachers train teacher”) method: mentoring teachers have been trained after which they are due to conduct a training module once a month in the pilot schools following a preliminarily set plan;

CHAPTER 1. POLICY MEASURES

- Engaging parents - empowerment and involvement of parents to participate actively in school life by creating a Parent Club which meets on a regular basis to plan activities targeted at cases of children at risk of dropping out; participation of parents of Roma ethnicity in a Board of Trustees, establishment and conducting "School for Parents" on specific topics and problems or on their own initiative. Each school has the option to choose which of these three forms to use depending on the state of its parent community despite that Parental club appeared to be the most popular form. Center Amalipe is organizing training for the Parental Clubs heads and provides methodological support for their efficient work;

- Maintaining high levels of activity among students - through the establishment of Student Parliament/Council and its active work on dropout prevention; through applying 'peer education' approach, etc.;

- Introduction of intercultural and interactive education - in all project schools 'Ethnic Folklore - Roma Folklore' classes have been introduced which played key role in keeping children at school. In addition, intercultural elements have been incorporated in the mandatory school subjects. Many extracurricular activities brought about variety in the learning process.

After four years implementing the program (2010-2014) the results were:

- Reduced number of dropout children - with 80%!

- Dropped out level in the past year in those 170 schools (when they were not involved in the project) was 2.20%, while in the end of the school year 2013/2014 - 0.48%. The percentage of dropouts included in the "Ethnic Folklore" elective subject in the past year was 0.26%

- The number of resolved cases of children in risk were more than 300 of about 1,000 children; most of them were cases which needed permanent care and prevention for children.

- The average number of absences (including all absences - excused and unexcused) in project schools decreased to 28 absences per student, compared to 110, which is a critical limit adopted by the Ministry of Education. At the same time, the average number of absences per student for those attending "Romani folklore" elective subject was less than 10 (including all absences, excused and unexcused), indicating that the project intervention significantly reduced absenteeism.

- Increased percentage of Roma who continued their education in gymnasiums: this percentage raised from 39 % (before the schools to join the program) to more than 80 %

1.1.5. Brief description of one or two relevant lesson(s) learnt leading to policy review in the field of education.

Education is one of the strongest fields in the entire Roma integration process in Bulgaria. Since 1999 Roma NGOs generated successful models for educational integration: desegregation projects, introducing intercultural education (through Roma folklore elective classes and other forms), decreasing the drop-out rate of Roma, etc. The Ministry of Education prepared Strategy for Educational Integration and paid certain level of political attention.

During the reported period the following strengths could be outlined:

- Financial opportunities for Roma educational initiatives were opened: mainly through Human Resources Development OP and the Center for Educational Integration - COIDUEM. They provided tools for implementing the policy for educational integration;

- the cooperation between Ministry of Education and NGOs was remained and extended.

At the same time certain weaknesses appeared:

- the MoE commitment to implement and require measures for desegregation of the "Roma schools" situated in the big cities decreased. MoE did not react in a proper way to the tendency of secondary segregation and "white flight" in many schools that became segregated after Bulgarian parents removed their children;

- the closure of hundreds of village schools after the system of per capita financing was introduced increased significantly the number of drop-outs. MoE did not react in a proper way. Most probably this problem will significantly deteriorate with the so-called “new educational structure” that moves the end of primary education from 8th to 7th grade. If this happens (through the new Public Education Act) many village schools will be closed that will increase the early school leaving in the rural areas;

- the new Public Education Act was not voted: the process of preparing new Public Education Act started in 2009. Owing to the advocacy efforts undertaken by Center Amalipe, SEGA

Foundation and other Roma and pro-Roma NGOs the draft presented in the Parliament in 2012 contained several important points that would foster the educational integration (including article that outlawed the segregated classes). These texts were approved by the Parliamentary Commission on Education as well as the entire Act. Nevertheless, the resign of the Parliament and the lack of enough political attention to the development of Bulgarian education left the Public Education Act out of the parliamentary agenda and it was not voted.

The same draft was proposed in the new Parliament in November 2014. It is expected to be voted in 2015

On the basis of all described above certain recommendations could be outlined:

1. The new Public Education Act should open enough space for the policy of Roma educational integration through introducing State standard for intercultural education, outlawing the school segregation, and incorporating the other suggestions of Roma NGOs.

In addition, the new Public Education Act should provide enough guarantees for preserving and developing the school system in the rural areas as well as avoid deteriorating the early school leaving;

2. The new Science and Education for Smart Growth OP should provide the necessary resources for implementing the provisions of chapter Education of the NRIS as well as to envisage active role of NGOs in implementing it;

3. The administrative capacity of the Center for Educational Integration of Children and Students from the Ethnic Minorities should be strengthened and its budget – significantly increased;

4. The Ministry of Education should implement its Strategy for Educational Integration through raising its administrative capacity (through forming special branch or directorate that deals with educational integration plus appointing special experts in the Regional Inspectorates of Education) and providing enough financial resources;

5. The political commitment for desegregating the so-called “Roma schools” should be raised. Special attention should be paid at stopping the process of secondary segregation;

6. Special attention to pre-school education and early childhood development should be paid. The obligatory pre-schooling should be free of any fees and include intercultural child friendly form and content;

7. Special attention to involving Roma youths in secondary and tertiary as well as in university education should be paid. This needs to include also Roma targeted programs;

8. The Ministry of Education should extend its support for NGO initiatives. Introducing mechanism for cooperation between MoE and the organizations that have educational programs at national level is an objective need.

CHAPTER 1. POLICY MEASURES

1.2. Employment

Priority	1.2.1. Steps taken since 2011	1.2.2. Impact of measures
<p><i>ensuring an equal access to mainstream public employment services</i></p>	<p>1. Roma labor mediators were appointed in the local Labor offices within the national program "Activation of inactive people" (financed annually by the state budget within the National Employment Action Plan). Their job is to encourage unemployed Roma to subscribe in the Labor office. Their number varies since many mediators left the position because of the low salary: in 2011 the number decreased to 60, in 2012 it was raised to 95, in 2013 it was around 80-85, at the end of 2014 it dropped to 54.</p> <p>2. Within Priority Axis 5 of HRD-OP a call for proposals for social enterprises BG051P0001-5.2.06 "Social services for social inclusion" was implemented in 2011-2013. Another similar scheme was called "New opportunities"</p> <p>3. In 2011 – 2013 targeted call for proposals BG051P0001-1.1.07 "Take the life in your hands" was implemented with financing from Human Resources Development OP. It aimed to reach the most marginalized part of Roma community, namely the inactive long-term unemployed. The call proposed comprehensive set of measures to turn them back to the labor market: community work, qualification, professional orientation and subsidized employment.</p>	<p>1. The practice is recognized as effective by the Employment Agency. Nevertheless, certain weaknesses disturb the work of the labor mediators:</p> <ul style="list-style-type: none"> - their job place is in the Labor offices and no community work / outreach at grass-root level within the Roma neighborhoods is included in their job description. There is need to change the job description and to let them work within the community; - as result, the directors of local Labor Offices often do not see the importance of this position and do not apply for it. This is one of the reasons the number of Roma mediators to decrease - the salary is very low: around 160 euro (in 2015 it was raised to 200 euro) that is below the average in the country. As result the mediators often left the position <p>2. Although Roma were mentioned among the target groups of these measures, the Roma participation was very low: for example in 2011 only 886 Roma took part in measures supported within Priority Axis 5 of HRDOP out of 13 247 people. It is clear that the Agency for Social Assistance as intermediate body of Priority Axis 5 of HRDOP did not develop targeted activities to include Roma and failed in this important task</p> <p>3. The scheme was well-designed owing to the cooperation between the Managing Authority and Roma NGOs (it was proposed by the Roma NGO representative in the Monitoring Committee of HRDOP Deyan Kolev). Nevertheless, it was not attractive enough and the number of applications was low that led to decrease in the budget of the scheme. The projects reached certain most excluded Roma groups that is very important outcome. It is necessary in the future similar scheme to be announced with more attractive provisions</p>

<p><i>measures supporting self-employment and entrepreneurship</i></p>	<p>1. No Roma targeted measures were implemented by the state institutions. No targeted measures for encouraging Roma self-employment were announced within HRD OP although the indicators for measuring the impact of HRDOP in Roma community required such measures</p> <p>2. The “Land – Source of Income” Foundation was providing small loans to Roma who want to buy land and start small-scale business initiatives. The program was open mainly to Roma from the rural municipalities but also supported some initiatives of Roma who live in cities. The program was financed by America for Bulgaria Foundation and (in 2013-15) by the Trust for Social Achievement</p>	<p>1. This resistance to announce Roma targeted measures in the field of employment was “justified” by the state institutions with the argument that such measures would be discrimination towards the majority. This sharply contradicted the EU Framework for NRIS as well as the principle 2 “Explicit but not exclusive targeting”. As result, the implementation of the indicators for Roma self-employment set in Human Resources Development OP was close to zero: see the information below</p> <p>2. This initiative had strongly positive impact. It created efficient and effective model for supporting Roma self-employment. It was necessary this model to be extended in other municipalities and regions. Funds from ESF should be used for this purpose</p>
<p><i>measures promoting employment of qualified Roma civil servants</i></p>	<p>1. No Roma targeted measures were implemented by the state institutions.</p> <p>2. The program “Start in the career” managed by Ministry of Labor and Employment Agency encourages all qualified graduated students to start work as civil servants, including Roma</p> <p>3. HRDOP supported measure for raising the capacity of Employment Agency to work with vulnerable groups: BG051P0001-6.1.05 Raising the quality of the services delivered by Employment agency with accent on the vulnerable groups (Phase 1 approved by the Monitoring Committee of HRDOP in May 2010 and Phase 2 approved in November 2011). Within the measure 350 labor mediators were assigned in the local Labor Offices to work with the vulnerable groups;</p>	<p>1. See the comment above. Although there was no available information, it is well recognized that the percentage of qualified Roma who are employed as civil servants is insignificant</p> <p>2. Although there are positive examples, the number of Roma who participate in the program “Start in the career” is very low</p> <p>3. Although there was a provision that representatives of vulnerable groups would be selected preferable if they cover all the criteria, the number of employed Roma was insignificant: around 10 out of 350. In 2012 Center Amalipe encouraged 37 Roma to apply for the position of labor mediator within the scheme BG051P0001-6.1.05. Only 2 of them were employed although all of them met the necessary criteria. This could be defined as indirect discrimination.</p>

CHAPTER 1. POLICY MEASURES

<p><i>measures promoting employment of qualified Roma civil servants</i></p>	<p>1. No Roma targeted measures were implemented by the state institutions.</p> <p>2. The program “Start in the career” managed by Ministry of Labor and Employment Agency encourages all qualified graduated students to start work as civil servants, including Roma</p> <p>3. HRDOP supported measure for raising the capacity of Employment Agency to work with vulnerable groups: BG051P0001-6.1.05 Raising the quality of the services delivered by Employment agency with accent on the vulnerable groups (Phase 1 approved by the Monitoring Committee of HRDOP in May 2010 and Phase 2 approved in November 2011). Within the measure 350 labor mediators were assigned in the local Labor Offices to work with the vul-</p>	<p>1. See the comment above. Although there was no available information, it is well recognized that the percentage of qualified Roma who are employed as civil servants is insignificant</p> <p>2. Although there are positive examples, the number of Roma who participate in the program “Start in the career” is very low</p> <p>3. Although there was a provision that representatives of vulnerable groups would be selected preferable if they cover all the criteria, the number of employed Roma was insignificant: around 10 out of 350. In 2012 Center Amalipe encouraged 37 Roma to apply for the position of labor mediator within the scheme BG051P0001-6.1.05. Only 2 of them were employed although all of them met the necessary criteria. This could be defined as indirect discrimination.</p>
<p><i>eliminating barriers, including discrimination, to entering to the labour market</i></p>	<p>1. No Roma women targeted measures were implemented by the state institutions;</p> <p>2. In 2011 – 2013 Center Amalie established Community Development Centers (CDCs) in 11 municipalities (with financial support of the European Commission within Daphne and PROGRESS Programs) in which 22 community moderators were employed. They worked for eliminating certain barriers before Roma people (with accent on Roma women and youth) to enter labor market. Since the beginning of 2015 (when the projects finished) most of the municipalities started to pay for the salaries of the community moderators by their budget while Amalipe continued their supervision</p>	<p>1. The employment rate of Roma women is twice lower compared to the one of Roma men. There is huge need of targeted measures to eliminate the barriers before employing Roma women and youths</p> <p>2. The model of CDCs was recognized as strongly effective by the state institutions and the respective municipalities. There was big interest from many municipalities to have CDCs. Nevertheless, until now the model is not institutionalized. It is necessary methodology and financial standard for CDC to be prepared on the basis of the experience generated. It is necessary funds for establishing CDCs in all municipalities with such need to be ensured. ESF and EAFRD should contribute in this direction</p>

1.2.4. Brief description of one or two most relevant good practice(s) in the area of employment and its/their impact: the field of employment is relatively poor in regard of the so-called “good practices”. The Roma labor mediators could be perceived as such a practice although it meets serious challenges described above. The other successful experience is accumulated mainly within NGO initiatives implemented in cooperation with local / municipal authorities, business and other stakeholders.

Community Development Centers (CDCs) in Roma community

This was initiative implemented by AMALIPE Center for Interethnic Dialogue and Tolerance within the frames of two projects supported by European Commission within Daphne and PROGRESS programs since 2011. The main goal of the initiative was to empower young people and women in marginalized and traditional Roma communities to fight harmful traditional practices, to raise the level of employment of the young people and women as well as to develop the communities concerned. This happened through:

- strengthening the field work at grass-root level in marginalized and traditional Roma communities via establishing the position of Community moderator,
- developing informal community support mechanisms: such as volunteer Women clubs, Youth clubs, Leaders groups, etc.,
- establishing cooperation with the existing employment and social protection institutions
- implementing joint programs for community development.

Within the initiative 11 Community Development Centers were established in 11 municipalities situated in the 6 NUTS 2 regions of Bulgaria: Lyaskovetz, Strajitza, Novi Pazar, Kameno, Peshtera, Etropole, Dolna Banya, Byala Slatina, Kneja, Pavlikeni and Veliko Turnovo. From 2 to 5 community moderators were assigned in every CDC.

The Community Development Center is innovative service, that is based in the community for strengthening the field work at the grass-root level. They work for both – the single individual and family and for the entire local community. The main engine in their functioning is the idea of activating the entire community: from the youngest child in the neighborhood, village, town and municipality, adolescents to the oldest local resident. The work focus of the centers and community moderators is not the individuals themselves but the community as a whole. The community moderators are in constant contact with the community, with its problems and successes.

The activity of the moderators of the Community Development Centers is aimed primarily at:

- Mapping the Roma community – for this purpose the moderators are visiting every house in the Roma community and based on a survey and conversations they identify risks and develop appropriate prevention activities;
- Creating Community mechanisms for mutual assistance, interest groups and social structures in the Roma community: essential part of their work is to form working habits, skills and discipline in order to promote Roma people at the labor market;
- Performing field work - finding cases, "primary intervention" work, establishing initial contact, mediation between the local community and institutions. Essential part from this work is to promote certain Roma people who participate in the community groups for mutual assistance at the labor market
- Establishing cooperation with the mainstream education, health care, social assistance and employment institutions as well as with the local business. Implementing joint programs and initiatives

After two year the results from implementing the program are:

- 74 children and young people were reintegrated in school;
- More than 160 Roma were employed;
- 12 Roma were assisted in starting own business;
- 122 cases of prevention of school dropout;
- 60 children are attending preparatory group for school readiness after the intervention of the moderators;
- 90 children are registered in kindergarten;
- 4 cases of prevention of child abandonment in institutions;
- 18 cases of prevention of violence against children;
- Successfully resolved 28 cases of early marriages, as the young people were returned back to school;
- Assisted 21 young people to continue their education at universities;
- Creation of Youth Clubs to CDC;
- Creation of sports clubs to CDC, with the idea young people from the community to build team skills, communication skills and self-improvement;
- Establishment of creative workshops to CDC, for rationalization of leisure time, for developing imagination and thinking, prevention of school dropout, preventing aggression.
- Established are 10 computer clubs for the local community to develop computer skills and to promote information culture of the local population. The clubs are equipped with computers donated by the municipality of Lausanne, Swiss Embassy and the Bulgarian-Swiss Chamber of Commerce.

The Community Development Centers at present are well recognized as successful practice by Bulgarian government and by the municipalities as well as by European Commission. The Interministerial Task Force for Resources Provision of Roma Integration approved methodology for Community Center and the new Human Resources Development OP contains possibilities for financing such Centers. There is interest by huge number of municipalities.

Since the project of Center Amalipe finished in January 2015, 10 of these 11 municipalities decided to finance from their budget the salaries of community moderators while Amalipe is contracted to provide supervision and management. This is a clear indicator for the interest of municipalities to have such community structures

Based on the stated above we can recommend:

1. The institutions in the field of employment and health care need to extend the scope of Roma targeted measures. Extending the program "Activation of inactive people" (which supports the position of Roma labor mediators) and its re-design could be a good first step. Nevertheless, much more activities and programs are necessary;
2. Special accent should be put on the inclusion of inactive people. Activities for their motivation and activation should be delegated to NGOs and community based organizations;
3. The Ministry of Labor and Social Policy should extend its support for successful NGO initiatives.

1.3. HEALTHCARE

Priority	1.3.1. Steps taken since 2011	1.3.2. Impact of measures
<p><i>Ensuring an equal access to quality healthcare</i></p>	<p>1. The number of health mediators was increased from 105 (2011 and 2012) to 130 (2013) and 150 (2014). They were financed by the state budget that is important asset. Their employer was the respective municipality: it received delegated financing from the central state budget about the salary of the health mediator.</p> <p>2. Eight Social and Health Centers in 8 big Roma neighborhoods functioned. They were managed by Roma NGOs in cooperation with the respective municipality. The Centers were financed by MoH with funds from the Global Fund for Prevention of HIV, TB and malaria. The Social and Health Centers were part of the National Program for Prevention of HIV, TB and Malaria. The Program had to end in 2014; non-cost extension for 2015 was negotiated. The Ministry of Health did not ensure continuation of the National program although it had many chances to do it.</p> <p>3. Open Society Institute – Sofia and Center Amalipe implement Roma Health Scholarship Program. Within it around 80 Roma medical students were supported to study in medical universities. Since the financial support from Roma Education Fund and OSF was close to its end, the program was included in Health care component of EEA Grants / Norwegian Grants and would be supported from Ministry of Education within this financial mechanism</p>	<p>1. The health mediators are well-established and recognized successful practice. Nevertheless, the health mediators meet certain problems:</p> <ul style="list-style-type: none"> - low salary; - in some municipalities the employer (the municipal mayor) delegates them only technical tasks that are far from their main responsibilities; - the distribution of health mediators is unequal: there are entire districts without mediator. The needs are much bigger compared to the resources provided by the state budget; - often the state institutions use health mediators as an excuse for the lack of other activities for improving the health status of Roma <p>2. The National Program for Prevention of HIV, TB and Malaria was a widely recognized successful example of national level program steered by Ministry of Health and implemented by NGOs. It reached thousands of people and achieved its main goal to prevent the extension of HIV and TB. The Program included special components for targeted work in Roma community. The Social and Health Centers had positive impact among the local communities. They could be defined as one of the main successful models in the field of health integration. Nevertheless, their financing as well as the one of the entire Program ended in 2014. Non-cost extension for 2015 was negotiated with the Global fund. Since 2016 the Program will be implemented in very limited extend with small funds provided by Ministry of Health. In this way the successful practice of Social and Health Centers would be lost.</p> <p>3. RHSP has strongly positive impact on raising the number of Roma health professionals, overcoming discrimination and fostering the entire process of Roma Health Integration. The fact that the program is included in Health care component of EEA Grants / Norwegian Grants and will be supported from Ministry of Education within this financial mechanism is strongly positive. Since its implementation with EEA funds started in October 2014, it is early to assess how it works</p>
<p><i>Ensuring the basic social security coverage and comprehensive health services to Roma</i></p>	<p>1. Overall, no Roma targeted measures were implemented in this regard. The conditions for obtaining the status of health insured person deteriorated that raised significantly the number of health uninsured people. This is a common problem for many poor and unemployed Bulgarian citizens, including Roma</p> <p>2. The Program for TB prevention and HIV prevention operated by Ministry of Health (with funds from the Global Fund for Prevention of HIV, TB and malaria) had special component for Roma community. It was implemented by regional level NGOs. In 2012 it was implemented in almost all districts in Bulgaria. In 2013 the coverage of this component decreased only to several districts</p>	<p>1. It seems that there is no political will for ameliorating the conditions for obtaining the status of health insured person and for making the health insurance system more inclusive. At the end of 2014 the Ministry of Health announced plans for new restrictive measures that would make re-integration in the health insurance system impossible unless one is paying all health insurance taxes since 2000. If this measure is introduced the number of people outside the insurance system would rise significantly. The exclusive health insurance system appears as the one of the biggest problems that disturbs the access of Roma and many other citizens to quality health care. As result they use only the emergency care services</p> <p>2. The special Roma components of the National program for Prevention of HIV/AIDS and TB in Bulgaria had strongly positive impact. It was very important that the implementation was outsourced to Roma NGOs - crucial precondition for efficiency and effectiveness. Nevertheless, it is disturbing fact that the MoH has no vision how to continue the program and its Roma components after the end of Global Fund financing. Urgent steps in this direction are necessary</p>

<p><i>Preventive measures to ensure regular medical check-ups, prenatal and postnatal care and family planning</i></p>	<p>1. The Regional Health Inspections had to organize awareness raising and preventive campaigns in Roma community as part of the implementation of the Health Strategy for Integrations of Persons belonging to Vulnerable Ethnic Minorities approved in July 2011. They received modest budget for this. They organized such campaigns usually with the support of the local Roma NGOs.</p> <p>2. Within Phare Program special Mobile Cabinets and gynecological examinations in rural Roma communities were delivered. The Ministry of Health provides 200 000 BGN per year for their work setting the goal for 6 000 free examinations</p> <p>3. Several pro-Roma and Roma NGOs implement activities in these directions</p>	<p>1. Although such campaigns were highly necessary, their extend and efficiency was not high. As a whole, the Regional Healthcare Inspectorates seldom work within the Roma community. Outsourcing the campaigns to Roma NGOs would be proper solution</p> <p>2. The work of these cabinets is a positive fact having into account that immediately after the end of Phare program their future was not clear. Nevertheless, the amount provided by the state budget is far from enough that is the main reason the Cabinets to be used only several weeks per year. The MoH has not used HRD OP or other sources to ensure the funds necessary</p> <p>3. Some of these activities have positive impact but there sustainability remains a big challenge. The resources of HRDOP were not used to support such initiatives and no call for proposals within investment priority 5.3. "Employability through better health" was announced within the present planning period.</p>
<p><i>Monitoring of healthcare services</i></p>	<p>1. Since 2011 Center Amalipe organizes community monitoring of health care service delivery in 2 municipalities in Veliko Turnovo District. In 2014 the number of municipalities was increased to 5. In addition, LARGO Association and World Without Borders Association started similar activities in Kyustendil and Stara Zagora</p>	<p>1. Community monitoring appeared as powerful tool for organizing the local communities, improving their health habits and empowering them to advocate for improving the service delivery. The practice of community monitoring should be included in the system of monitoring the implementation of Roma integration policy</p>

1.3.4. Brief description of one or two most relevant good practice(s) in the area of healthcare and its/their impact

The field of Roma health integration provides several good models and practices: such as the Roma health mediator, the Health and Social Centers in Roma community, etc. Within the reported period another important positive practice was strengthened, namely the Roma Health Scholarship Program

ROMA HEALTH SCHOLARSHIP PROGRAM

In Bulgaria it is implemented by Open Society Institute – Sofia and Center Amalipe with financial support of REF and OSI – Budapest. Initially it started in Romania in 2008. In Bulgaria the RHSP started since 2009 with financing from Roma Education Fund and OSI. Since October 2014 it is implemented with funds from EEA Grants / Norwegian Grants.

The program aims to increase the number of Roma health professionals who work in the health care system. The program supports students from Roma origin who study in medical universities. The program contains the following elements: Preparatory courses; Advocacy camp for the students who are enrolled in university: during the summer. Roma history, Roma groups, specific health problems in Roma community, conflict solution, leadership skills, advocacy skills are taught during the camp; Scholarship; Mentorship: every student has mentor who is university professor

The RHSP achieved its main goal to increase the number of Roma students in medical universities. In 2009 their number was 23, in 2011 overall 117 students applied to be included in the Program. Although it started as NGO initiative (of OSI and Amalipe) at present it is recognized by Ministry of Health as one of the 3 leading practices for Roma health integration. That is why it was included in the memorandum for Health care component in EEA Grants / Norwegian Grants and since October 2014 is financed by them. This is a positive example of donor's / NGOs' initiative in the field of higher education transformed into program financed by Ministry of Health

1.3.5. Brief description of one or two relevant lesson(s) learnt leading to policy review in the field of healthcare.

During the last decade certain NGOs experienced different models for improving the access of Roma to health care. Ministry of Health approved Health Strategy for Integration of Persons belonging to Vulnerable Ethnic Minorities (2005) and later – Action Plan for Strategy implementation (2011).

During the reported period the state institutions tended to support and institutionalize some of the successful practices: the health mediators and RHSP. This is the main strength within the period. Another important strength was the usage of state budget funds for implementation of the Health Strategy for Integration ...: in July 2011 the Council of Ministers approved Action Plan for 2011-14 that envisages (although modest) financing for implementation of some measures.

In addition, during the reported period (especially during 2014) the new programs for the European structural and investment funds were planned. Among them Human Resources Development OP (ESF funded program) includes the Roma integration topic in the most structured way. Rural Areas Development Program (still in preparation) misses again the Roma topic. Regions in Development OP provides possibilities for social housing and improving the healthcare infrastructure;

HRD OP will support Roma integration through integrated projects: Investment priority “Socio-economic integration of marginalized communities such as Roma” will finance projects of municipalities, NGOs and other beneficiaries in 4 sub-priorities. “Improving the access to social and healthcare services” is obligatory sub-priority

At the same time several weaknesses appeared:

- in general the political commitment for implementing Roma targeted policies remained very low;
- the so-called “health care reform” did not happen: as result the general quality of health care services decreased and the access to them additionally deteriorated;
- at the end of the period MoH planed certain restrictive measures that would deteriorate the access to health care: they are still in design but show disturbing tendency to implement health care reform in an exclusive way;
- some of the good practices seem to left out of MoH agenda: for example the Health and Social Centers, the entire National Program for prevention of HIV / AIDS and TB in Roma community which future is unclear;
- MoH does not use the opportunities provided by HRDOP (measure 5.3.) to support the implementa-

tion of its Health Strategy for Integration ... Although MoH was direct beneficiary and organized several campaigns with HRDOP funds, they did not reach Roma and did not contribute for Roma integration;

- even the modest financing envisaged in the Action Plan was not fully used because of the lack of enough capacity of MoH: for example in 2012 tender for delivering preparatory courses for Roma who want to apply in medical universities was not organized and the money envisaged (100 000 euro) were lost

Based on everything described above we can recommend:

Targeted activities for implementing the Health Strategy for Integration to be included in the implementation of the new HRD OP: for example,

- HRD OP to announce special call for supporting Healthcare & Social Centers as well as other types of community centers. Community monitoring of service delivery to be included in the call;
- Science and Education for Smart Growth OP to finance the further extension of RHSP as well as the training of health mediators;
- New Action Plan for Implementing the Health Strategy for Integration to be prepared. Significant financing from the state budget, EU funds and other instruments to be ensured
- The continuation of the Health and Social Centers, the entire National Program for prevention of HIV / AIDS and TB in Roma community to be ensured and financially backed up



1.4. HOUSING

Priority	1.4.1. Steps taken since 2011	1.4.2. Impact of measures
<i>Promoting non-discriminatory access to social housing</i>	<p>1. The National Program for Improving the Living Conditions of Roma has not been implemented since 2009</p> <p>2. In 2001 the Minister of EU Funds Donchev initiated pilot scheme “Support for ensuring modern social houses...” supported with 16 mln BGN by Regional Development OP. Initially 4 municipalities were approved to take part of the scheme Burgas, Devnia, Vidin and Dupnitsa. After reaction of the ultra-nationalists the mayor of Burgas refused participation. The same happened in Varna Municipality. In 2014 five new municipalities were invited to prepare projects but in December 2014 contract was signed only with one of them. At present the implementation in the other 3 municipalities is in advanced stage but still is not finished</p> <p>3. No other targeted measures are implemented</p>	<p>1. The non-implementation of the National program is strongly disturbing fact. The Program and its Action Plan were examples of well prepared documents in the process of EU accession. For short period (2007-2009) it was implemented and after this was stopped.</p> <p>2. The measure is still in its implementing stage so its impact could not be assessed. Nevertheless, certain elements could be outlined:</p> <ul style="list-style-type: none"> - The operation combines “hard component”(building social houses) financed by RDOP with “soft component” (improving the access to labor market, general education and VET, social and health care services) financed by HRDOP. This is a good design; - the implementation met certain serious difficulties from the very beginning. For example, the ultra-nationalists in Burgas opposed to the project implementation and the mayor of Burgas denied the project. Similar development happened in Varna. This was a clear sign that the anti-Roma stereotypes could disturb the implementation of the Roma integration activities at municipal level; - In addition, no real reaction by the side of central government was undertaken that was a sign for low political commitment
<i>Eliminating spatial segregation and promoting de-segregation</i>	<p>1. The pilot scheme “Support for ensuring modern social houses...” is about desegregating Roma neighborhoods and promoting ethnically mixed social housing</p> <p>2. No other measures are implemented</p>	<p>See the comment above Housing appears as the least developed field in the entire Roma integration policy.</p>

1.4.4. Brief description of one or two most relevant good practice(s) in the area of housing and its/ their impact

The good practices in the field of housing are developed mainly at municipal level in some places. Kavarna is example in this direction. Several other municipalities develop similar model based on:

- regulation and legalization of the Roma neighborhoods;
- investing in the technical and social infrastructure;

In this way certain Roma neighborhoods are like normal neighborhoods. Nevertheless, usually this model works in relatively small rural municipalities. The experience from the big Roma neighborhoods (called “ghettos”) until now is not successful

Disturbing tendency started from Stara Zagora in July 2014 when around 50 illegal houses were destroyed without providing their inhabitants with the chance to prepare legal houses. Since such measures usually meet public support, there is a real danger certain other municipalities to apply it.

Another disturbing tendency is linked with the preparation of Integrated Urban Plans: a precondition for every urban municipality to use ERDF funds. Most of the Plans missed Roma neighborhoods from their “zone for social intervention” that would restrict any significant investment in their development during the next 7 years.

1.4.5. Brief description of one or two relevant lesson(s) learnt leading to policy review in the field of housing.

Although Bulgaria has some of the biggest Roma ghettos all over Europe, the housing appears as the worst and least developed part from the entire Roma integration policy. The National Program for Improving the Living Conditions of Roma has not implemented since 2009. The good practices in this field are limited in scope and number.

During the reported period the only significant initiative was the multi-funded intervention initiated by the minister of EU funds Donchev. It intended to create a model that could be extended during the new planning period. Except this initiative, the Regional Development OP was not used for improving the living conditions of Roma and seldom reached the Roma neigh-

borhoods. The Rural Areas Development Program also did not improve the situation in the Roma neighborhoods in the rural areas.

The new Regions in Development OP (ERDF funded program) contains possibilities for social housing. Nevertheless, it is limited as amount. In addition, the absence of Roma neighborhoods from the Integrated Urban Plans would result on no investment in these neighborhoods and their additional ghettoization.

The new Rural Areas Development Program (still in preparation) does not contain any measures for social housing and improving the infrastructure in the Roma neighborhoods in rural areas. This is important weakness having in regard the fact that 63 % of Romma live in rural municipalities.

Based on the stated above we can recommend:

1. Bulgarian government to restart the implementation of the National Program for Improving the Living Conditions of Roma. ERDF and EAFRD could and should be used for this purpose;

2. The new RD OP to support in targeted way the improving of living conditions of Roma in the urban municipalities. The pilot intervention from this planning period should be extended in significantly bigger number of municipalities. Assigning delegated budgets for infrastructure interventions in the Roma neighborhoods is a must: The presence of Roma neighborhoods is an objective fact that cannot be changed. De-concentration of most of them is practically impossible. Therefore, dispersion and removal of groups from these areas should be complemented by efforts to regulate and improve the infrastructure and housing conditions in the separated Roma neighborhoods.

Integrated intervention in this field must contain the elements of the above-described intervention and should be supplemented by:

- Activities targeted to alleviate the physical accessibility to other districts and central parts of the city;
- Renovation of social and cultural infrastructure;
- "Soft" measures for de-ghettoization

3. Introduction of "ex-ante conditionality" at municipal level associated with the integration of Roma: It is necessary at national level to introduce conditionalities to municipalities wishing to participate in the implementation of OPRD analogically with introduction of conditionality to the Member States. Some of these conventions should be related to the integration of Roma, for example.:

- Availability of the Municipal Plan for Roma integration / implementation of NSRIBR;
- Presentation of project proposals using funds from OPRD for implementation of the municipal plan

4. Proper measures for improving the infrastructure of the rural Roma neighborhoods to be included in the Rural Areas Development Program: the implementation of RADP should be strongly linked with the implementation of the NRIS;

Despite the broad public and media share the opinion that huge amounts of money are spent and misused for Roma, the estimations show that Roma integration policy is underfinanced. The funds dedicated for implementation of the National Roma Integration Strategy come mainly from the operational programs, financed by EU in Bulgaria, Norwegian / EEA Financial Mechanism, Swiss Contribution and World Bank. The engagement of the state budget is minimal. In the period 2012-2014 (as well as in the previous years) the funds invested were insufficient for real implementation of the NRIS.

2.1.1. EU funds: Human Resources Development OP (HRDOP) and partly Regional Development Operational Program (RDOP) appeared to be the biggest (although still modest) source for financing the Roma integration policy. This was done mainly through the Roma / minorities targeted calls and in much lesser degree through the mainstream calls. As the Annual Report for Implementation of HRD OP for 2011 outlines “Important clarification is that nearly 70 % of Roma included (*in HRD OP implementation*) come from schemes that target Roma community explicitly”.

In 2011-2014 six Roma targeted calls were implemented within HRD OP. Regional Development OP financed social housing scheme that targeted vulnerable groups, including Roma. The Rural Areas Development Program remained out of the efforts for Roma integration. It did not support the implementation of the NRIS in targeted way. For example, only 2 of the Local Development Strategies approved within Priority Axis 4 of the Program contained measures for Roma integration that were included mainly because of the activeness of Center Amalipe and OSI – Sofia.

Three assets could be outlined regarding the usage of EU funds for supporting Roma integration during the reported period:

1. For first time multilateral and multi-funded operation for Roma integration was prepared and approved: this was the operation for social housing for marginalized communities initiated by the Minister on EU funds Donchev in 2011. The operation combined “hard component”(building social houses) financed by RDOP with “soft component” (improving the access to labor market, general education and VET, social and health care services) financed by HRDOP. The measure was designed as anti-segregation one: it

aimed at supporting ethnically mixed social housing.

Four municipalities were selected as concrete beneficiaries after open procedure for pre-selection in 2011: Burgas, Devnia, Vidin and Dupnitsa. These municipalities were situated in different parts of Bulgaria and had diverse Roma population that would provide chance to test how the model works in different circumstances. In 2012 the mayor of Burgas Municipality denied participation after reaction from the ultra-nationalists. The nationalists’ reaction in Varna postponed the application of this municipality in 2013. That is why the operation started in 3 municipalities.

In 2014 the Managing authority of RDOP invited 5 new municipalities – Tundza, Lom, Kazanlak, Sofia and again Varna. Nevertheless, in December 2014 the Monitoring Committee decreased the available amount and limited the possibility for participation only to 1 new municipality. Even this is still problematic since the expenses should be done until the end of 2015.

The operation is still in its preparatory stage and it is not possible to analyze its implementation. The design was good but the implementation met certain serious difficulties from the very beginning. For example, the ultra-nationalists from Skat TV in Burgas opposed to the project implementation and the mayor of Burgas denied the project. This was a clear sign that the anti-Roma stereotypes could disturb the implementation of the Roma integration activities at municipal level. Nevertheless, no real reaction by the side of central government was undertaken. It appeared that the central government has no possibility to oblige the local / municipal power to participate in Roma integration projects and that a municipality could absorb EU funds without paying attention to its Roma population and without working for Roma integration. No type of conditionality exists at local level;

2. There is improvement in the engagement of Managing authorities and Intermediate bodies to announce Roma targeted calls: 4 out of 6 targeted calls implemented in 2011-2013 were proposed by the representative of Roma NGOs in the HRDOP Monitoring Committee Deyan Kolev in 2009 and 2011. Initially there were a lot of objections by the side of HRD OP Intermediate bodies (and even by the side of the

Managing authorities) to have minorities / Roma targeted calls. Gradually these objections were partly overcome and in 2012 and 2013 the institutions suggested to increase the budget of 2 calls. In this way the budget of the call "Educational integration of children and students from the ethnic minorities" that was approved at the amount of 6 mln BGN increased to 22 mln BGN;

3. Certain mainstream calls for proposals included significant number of Roma as final beneficiaries: one of them – "New Chance for Success" had as target group the elderly people without education. Although Roma were not mentioned explicitly, almost all final beneficiaries were Roma and Turks. Roma children were represented also within the scheme "USPEH" for supporting extra-curriculum activities as well as within the scheme "raising the quality of education in the focal-point schools ...". In the field of employment (Priority Axis 1) such a scheme was "Development" directed at subsidized employment for low-qualified people.

Nevertheless, the mainstream calls that include significantly big percentage of Roma remained to be exceptions. As a rule, Roma were deeply underrepresented in the mainstream schemes.

As pointed above important weakness could be pointed that the Rural Areas Development Program continued to stay aside from the topic of Roma integration and to not contribute for the implementation of the NRIS – although 60 % of Roma in Bulgaria live in rural areas. The only modest RADP contribution was in certain cases when municipalities and NGOs prepared projects directed at Roma

2.1.2. national funds: Special budget allocations for implementing the NRIS were not included in the state budget for 2012, 2013 and 2014. Unfortunately, such item was not envisaged also in the Budget 2015. The only modest support from the state budget for Roma integration activities was for:

- the implementation of the Health Strategy for Persons belonging to Vulnerable Ethnic Minorities: through the budget of Ministry of Health,
- state delegated financing for the work of Roma health mediators: through the budget of Ministry of Finance state delegated funds are provided to the municipalities that employ health mediators. The list is provided by Ministry of Health,
- financing for the work of the Center for Educational Integration of Children and Students from the Ethnic Minorities: within the budget of Ministry of Education special item is envisaged for the work of this

Center that is structure of Ministry of Education

2.1.3. other sources (where relevant): In 2011 and 2012 two additional European (but not EU) sources prepared to contribute for the implementation of NRIS. These were:

- EEA Financial Mechanism & Norwegian FM: in 6 Priority fields it contains the requirement for at least 10 % of the money dedicated to Roma: Health initiatives, Scholarships, Youth and Children at Risk, Cultural Heritage, Domestic Violence, NGO Fund. In 2013 these priority areas were still in its preparatory stage and did not contribute at the field. Nevertheless, most of the operators undertook consultations with NGOs regarding their concrete priorities that is a positive fact. In October 2013 they presented their plans during a conference organized by the Council of Ministers and Norway Embassy. As result, certain good practices were included: for example, the Health Initiatives component would support the continuation of Roma Health Scholarship Program in Bulgaria, etc.

At the end of 2013 and 2014 all of the Priority fields announced its Roma integration calls and measures. Since the projects supported are still at their beginning, it is not possible to evaluate their effect;

- Swiss Contribution to Bulgaria: it has specific Roma component. In 2012 Project Management Unite for this component was chosen after long procedure of selection. This was DG "Structural funds" within Ministry of Labor and Social Policy. The fact that no institution with focus on Roma in Bulgaria was selected by Swiss government to be Managing body for the Roma component is a proxy-indicator that these institutions need serious institutional reform. In 2013 experts in the Management unite were assigned and at present they design the concrete measures. The implementation started in 2014 with call directed at municipalities. Its results were announced at the beginning of 2015.

2.2. Estimate for the budget of planned measures in the context of the national Roma integration strategy or the sets of policy measures for improving the situation of Roma, for 2014-2020 (please indicate which of the 4 key areas, or which other area, is planned to benefit from the referred funding)

CHAPTER 2. FUNDING

Operation, financial instrument	NRIS priority and Explanation	Period of implementation	Financing BGN
Take the life in your hands	Employment: projects directed at the inactive long-term unemployed	2011-2012	6 526 073
Integration of children and students from the ethnic minorities in the school system, HRDOP	Education; Projects of schools, municipalities and NGOs to prevent early school leaving. Initially it was approved as scheme for supporting desegregation but owing to technical mistake of Ministry of Education only projects of segregated schools were approved	2011-2012	5 449 578, 20
Re-integration of school dropout; HRDOP	Education; Projects of schools, municipalities and NGOs to integrate back at school dropouts	2012 - 2014	2 955 272
Educational integration of children and students from the ethnic minorities; HRDOP	Education; Projects of schools, municipalities and NGOs to overcome school segregation, introduce intercultural education, etc.	2011 - 2015	22 207 222,32
New Chance for Success; HRDOP	Education; Literacy courses for illiterate people implemented by Ministry of Education	2012 - 2014	15 000 000
INTEGRA; HRDOP	Education, Employment, Health care; Soft measures (improving education, social services and employment) in 4 municipalities where social housing is supported by RD OP	2012 - 2015	4 814 043,03
Social housing ...; Regional Development OP	Living conditions; renovation or building social houses for marginalized groups in 3 municipalities	2012-2015	11 000 000
Developing complex measures for integration ...; HRD-OP	Implemented by Ministry of Labor for research of the most marginalized Roma neighborhoods design of complex measures	2012 - 2013	800 000

EU Funds

Overall: 68 752 188, 55 BGN or 35 257 532,59 euro

2.2.2. *national funds*

As pointed above, the state budget financing is limited to:

- the implementation of the Health Strategy for Persons belonging to Vulnerable Ethnic Minorities: the Action Plan for this Strategy approved in July 2011 envisaged 1051 000 BGN (or 539 000 euro) for 2012 and the same amount for 2013 to be provided by the state budget. Unfortunately even this modest amount was not fully absorbed: Ministry of Health did not organize the necessary public tenders at time and most of the money were not absorbed;
- state delegated financing for the work of Roma health mediators: The state budget provided financing for 105 mediators in 2012 – exactly the same number as in 2011 although much bigger need was identified. In 2013 their number was increased to 130, in 2014 it reached 150;
- financing for the work of the Center for Educational Integration of Children and Students from the Ethnic Minorities: the amount in 2012 did not exceed 1 266 511 BGN= The same amount was provided for 2013 and 2014

2.2.3. *other sources (where relevant):* Both EEA Financial Mechanism & Norwegian FM and Swiss Contribution in their Roma integration parts were at preparatory stage or at the beginning of the implementation stage within the reported period.

2.3 *Brief description of one or two most relevant good practices in the funding area.*

2.3.1. **Task Force / Working Group for Resources Provision of Roma Integration**

Task Force / Working Group for Resources Provision of Roma Integration was established with order of the Prime Minister P-193/02.08.2012. The Group was established at political level: it was chaired by the Minister on EU Funds and composed by Deputy-ministers and executive directors who chair the Managing authorities and Intermediate bodies of different EU funded programs. This was important asset and precondition for taking important political decisions. Another important asset was that the Group incorporated also representatives of Roma NGOs elected after special procedure of nominations. In this way the Roma participation in this political level Group was ensured. At the beginning of 2013 the Group updated and approved (On February 26) the Appendix “Programs for Implementation of the NRIS” that contained concrete programs (financed by EU funds and the state budget) to be announced up to

2020. The existence of this Interministerial Task-Force and the Plan with programs were included as the positive example from Bulgaria in the EC Communication “Steps forward in implementing National Roma Integration Strategies”

At the same time, after the governmental crisis (February 2013) and the extraordinary elections (May 2013) the Task Force stopped its work. In October 2013 the Groups was re-established that was a positive development. At the same time its political character was put under question: although the deputy ministers responsible for EU funds remained in the Group, it was chaired not by the Minister on EU Funds but by the Secretary of the NCCEII that is an administrative (not political position). As result the Group became expert group without real competences and carried out only one meeting in 2014. Thus, it did not contribute for planning the operational programs 2014-2020: this task was successfully fulfilled by Roma NGIO representatives. Obviously, the Task Force should be re-established as political body. Subcommittee “Roma Integration” within the Monitoring Committee of the Partnership Agreement is the best possible form.

2.3.2. **Roma integration in the ESF funded programs 2014-2020**

In 2012 Bulgaria started to prepare its programs for the next planning period. The following two years - 2013 and 2014 were crucial for the process. On November 2014 Human Resources Development OP became the first Bulgaria operational program for the new planning period approved by European Commission. The other two ESF funded programs – Science and Education for Smart Growth OP and Good Governance OP – were almost finalized until the end of 2014.

The process of preparing the new operational programs was managed by the respective Managing authorities and by the Minister on EU funds. Important asset of this process was that NGOs participated in it in a transparent way. There were procedures of selecting NGO representatives in the Working groups who were elected by the groups of NGOs. After this procedure the NGO representatives participated on equal basis in the Working groups that prepare the Partnership contract and the Programs. They advocated

successfully for incorporating Roma integration topics in the next planning documents:

- In the Working group for preparing the new HRD OP were elected Deyan Kolev (Amalipe) and Gancho Iliev (World without borders Association) as representatives of the group of Roma organizations. They participated actively in the process since August 2012;
- In the Working group for preparing the Science and Education for Smart Growth OP was included Deyan Kolev: in January 2013 Bulgarian government decided to propose this new Operational program that would combine funds from ESF and ERDF. Initially it was prepared without Roma NGOs participation. In September 2013 this mistake was repaired and Roma organizations were invited to participate in the process;
- In the Working group for preparing the new Good Governance OP was included Milena Ilieva (World without borders Association);

As result of the active participation of Roma NGO representatives, the support of DG EMPL of European Commission and the cooperation with the Managing authorities, significant results were achieved, for example:

1. Participating in the development of OPHRD Roma organizations have changed the essential elements of the original appearance of the program on Roma. This fact is stated in the operational program itself, which states that "At the proposal of the NGO from Group 1 - Social organizations working for the integration of minority ethnic groups and immigrants, the civil sector was included as a partner in the implementation of public policies for social inclusion. The group's proposals also supported the formulation of the target groups within the Priority axis 2 and IP 1, and the inclusion of the implementation of regional and municipal strategies for Roma integration in the guiding principles for the selection of operations in the same investment priority". It could be stated that in the section on Roma, Roma organizations in the full sense of the word were co-authors of OPHRD.

For example, the approved HRD OP contains investment priority "Integration of marginalized communities such as Roma". This priority will support the implementation of integrated multi-sectorial projects that cover 4 sub-priorities:

- improving the access to employment;
- improving the access to education;
- improving the access to social and health services;
- development of the local communities and overcoming the stereotypes

This provides unique chance for financing integrated projects for implementing the "soft measures" envisaged in the Municipal Roma Integration Plans. More information see in the chapter "Human Resources Development OP and Roma Integration"

2. The last draft of Science and Education for Smart Growth OP also contains the investment priority "Integration of marginalized communities such as Roma". This priority is well designed and contains all points suggested by Roma NGOs. In addition, this investment priority is backed up with significant amounts that was also achieved with the active participation of Roma NGOs.

2.4. Brief description of how lessons learnt from the current programming period will be taken forward.

At present EU funds are the biggest investment resources in Bulgaria: between 70 and 80 % of the investment initiatives are backed up with European funds. Having in regard that the

state budget finances very modestly any Roma related activities (even during the economic growth of Bulgaria before 2008 when the state budget had huge possibilities almost no Roma initiatives were supported), EU funds are the only realistic option for investment in developing the necessary skills for self-sufficiency among Roma community (for example, increasing the educational level, improving the access to health and employment).

In the period 2014-20 three programs will have direct links with the Roma empowerment:

-Human Resources Development OP: its Managing Authority is Ministry of Labor and Social Policy. Roma organizations are represented in the Monitoring Committee through Teodora Krumova (Amalipe) as representative and Spaska Petrova (New Road Association), Stefan Panayotov (Health of Roma Foundation) and Gancho Iliev (World without Borders Association) as deputies. It will be financed with 938 665 314 euro by European Commission (by European Social Fund) plus 15 % national co-financing. Owing to the successful advocacy efforts undertaken by Amalipe and other Roma organizations the Operational program contains Priority Axis for social inclusion (PA 2) as well as investment priority "2.1. Socio-economic integration of marginalized communities such as Roma". It will support integrated projects that cover at least 3 out of 4 sub-priorities: Access to employment, Access to education, Access to quality social services and healthcare, Development of the local communities and overcoming the stereotypes. The projects will be submitted by municipalities, NGOs and other beneficiaries. The indicative budget for this Priority Axis is 264 600 270 euro (plus 15 % national co-financing). At present Ministry of Labor proposes 130 000 000 BGN for IP 2.1;

- Science and Education for Smart Growth OP: its Managing Authority is Ministry of Education and Science. Roma organizations are represented in the Monitoring Committee through Deyan Kolev (Amalipe) as representative and Milena Ilieva (World without Borders Association) as deputy. It will be financed with 596 000 671 euro by European Commission (352 619 543 euro by European Social Fund that will be used for "soft" measures in school education and 243 381 138 euro by European Regional Development Fund for "hard" measures and technologies in the Universities) plus 15 % national co-financing.

Owing to the successful advocacy efforts undertaken by Amalipe and other Roma organizations the Operational program contains Priority Axis for educational integration (PA 3) as well as investment priority "3.2. Socio-economic integration of marginalized communities such as Roma". It will support projects for educational integration submitted by schools, municipalities and NGOs. The indicative budget for this Priority Axis is 255 000 000 BGN, the budget for IP 3.2. will be 200 000 000 BGN

- Regions in Development OP: its Managing Authority is Ministry of Regional Development. Roma organizations are represented by Lili Makaveeva (Integro) as voting member and Daniela Mihajlova (Amalipe) as deputy

CHAPTER 3: OPHRD AND ROMA INTEGRATION

On 28 of November 2014, the European Commission approved the "Human Resources Development" Operational Programme (OPHRD), making it the first approved Operational Programme for Bulgaria for the period 2014 - 2020. It outlines how the European Social Fund can be used to achieve smart, sustainable and inclusive growth in several key areas: labor market (incl. youth employment, education and training, combating unemployment), social inclusion (incl. Roma integration, deinstitutionalization, development of modern social services and social economy) and modernization of public policies. HRDOP is one of the three programs, co-financed by the European Social Fund in Bulgaria for the period 2014-2020, together with "Science and education for smart growth" OP and "Good Governance" OP. Given the limited capacity of the state budget, the three programs are likely to be the largest investment framework for innovation in the labor market, social inclusion, education and training, as well as the modernization of public policies in the coming years. According to the approved financial plan in the 2014-2020 period, HRDOP will have a budget of \$ 2 billion and 136 million levs, including national co-financing. This amount includes 258 million levs of the Initiative for Youth Employment. Nearly 60% of the budget of the Program is provided under Priority 1 for combating unemployment among vulnerable groups in the labor market, with special emphasis on young people, permanently unemployed and older people. Priorities in the program are also the measures to increase the skills of workers, according to business needs. Over 31% of the financing of the HRDOP 2014-2020 will be used for the measures under Priority 2, which will contribute to reducing poverty and promoting social inclusion. They are aimed at socio-economic integration of the Roma, migrants and most marginalized groups and communities, active inclusion of people, who are furthest from the labor market, integration of people with disabilities and deinstitutionalization of children and adults. Most of the resources under this axis will be used for social and health services and to promote social entrepreneurship. The Program will also invest in the modernization of public policies in the field of labor market, social services and health care, for which measures under Priority Axis 3 are provided. The fourth axis will support measures for cross-border cooperation.

Preparation of the operational program lasted more than two years: A Thematic Working Group was set for its preparation, which started work in August 2012 and the approved by the European Commission draft was the fourth in a row. The relevant line institutions, social partners (trade unions and employers' associations), and five groups of non-governmental organizations participated in the preparation of the Program. Roma organizations were presented in the Thematic Working Group of Deyan Kolev (Center for Interethnic Dialogue and Tolerance "Amalipe") and Gancho Iliev (NGO "World Without Borders"). "Human Resources Development" Operational Program is, and will continue to be of key importance for the integration of Roma for at least three reasons. First, it covers four of the six priority areas, set by the National Strategy of the Republic of Bulgaria for Roma integration: employment, education, health and antidiscrimination.

Second, the national budget has never committed to fully fund the implementation of integration policy. Even in years of budget surpluses, activities for Roma integration were funded mostly by pre-accession funds, and since 2007 - by the European Social Fund, as the contribution of national programs was modest. It is unlikely to expect that this will change in the coming years: especially taking into account the fact that after 2010 many system activities previously financed from the state budget were "transferred" to OPHRD: for example full day organization of the educational process in central schools and others. In this situation, the Program seems to be the main source of financial support for the implementation of the National Strategy for Roma integration. Although the presumption of European funding is that it should be complementary to national, regarding Roma integration, the European Commission has allowed exception and do not require evidence of systematic funding of the integration policy of national budgets. It is an exception (in the EU framework for national strategies for Roma integration is required "to provide sufficient resources from national budgets,

which will be complemented, where appropriate, by international funding or EU funding"), and it is not clear how long the Commission will agree with it. But it can be declared with high probability that in the current programming period the exception will be granted as a rule, which is proved by the fact that the interpretation of the pre-convention 9.2. "A national strategic framework for Roma Inclusion policy is introduced", the Commission has not included the requirement for funding from the state budget. Recommendations of the European Council of December 9, 2013 required national funding, but not imperatively and without classifying it as a "leading" one

Third, during the 2007-2013 period OPHRD made the first steps to finance operations supporting targeted Roma integration: 7 operations for a total of over 57 million BGN. There is reason to expect developing and expanding of these initial steps - as by OPHRD and by the independent "Science and education for smart growth" OP.

This chapter analyzes the text of the OP "Human Resources Development", which are related to the issue of Roma integration. It examines the strengths and weaknesses of the approved program and proposes concrete actions to secure funding by the European Social Fund for the implementation of integration policies.

The chapter states the following strengths of OPHRD:

1. The overall inclusion of Roma integration topic in the Program: through a combination of targeted and mainstreaming approach, defining Roma as a specific target group, inclusion of indicators and specific goals, related to Roma integration in all priority axes and the availability of indicative budget for targeted investment priority 2.1 .;

2. The inclusion of investment priority "2.1. Socio-economic integration of marginalized communities such as Roma";

3. The approach to support targeted projects for Roma integration: a decentralized approach to support multi-sectoral interventions, implementing municipal plans and regional strategies for Roma integration;

4. The created conditions for active involvement of civil society and the Roma community in the planning and implementation of the OP HRD.

At the same time, the chapter outlines certain challenges to the successful implementation of the OP HRD:

1. The capacity for implementation of integration policies at the local level in many municipalities is too low;

2. There is a lack of appropriate institutional and administrative framework at national level to assist municipalities in the preparation and implementation of multi-sectoral integration projects, to plan interventions and procedures, to monitor and evaluate;

3. The planned budget and indicators to investment priority 2.1. are relatively low;

4. There is no appropriate framework for integrated projects that bring together resources from OP HRD, OP "Science and education for smart growth" and OP

"Regions in growth" / the Program for rural areas development.

The chapter offers concrete solutions for overcoming the above weaknesses.

Roma in planning OPHRD

Roma organizations were actively involved in the preparation of the "Human Resources Development" OP by participating in the Thematic Working Group and through several public forums. In June 2012 the Ministry of Labour and Social Policy organized the selection of representatives of five groups of NGOs, one of which was "Social organizations working for integration of minority ethnic groups and immigrants". Organizations chose as their representative in the TWG Deyan Kolev (CIDT "Amalipe"), and as his deputy - Gancho Iliev (NGO "World Without Borders"), who participated actively in the work of the group. In addition, the organizations held forums, where they presented their demands and discussed them with various stakeholders at local and regional level, incl. regional forums in Veliko Tarnovo, Burgas, Stara Zagora, Pazardzhik and Vratsa.

Participating in the development of OPHRD Roma organizations have changed the essential elements of the original appearance of the program on Roma. This fact is stated in the operational program itself, which states that "Following a proposal by an NGO from Group 1 - Social organisations working for the integration of ethnic groups and immigrants - the civil sector was included as partner to the implementation of the government social inclusion policies. The proposals of the group were helpful in the formulation of the target groups under PA 2, IP 1 as well as in terms of including the implementation of the regional and municipal Roma Integration Strategies in the guiding principles for the selection of operations under the same investment priority. ". It could be stated that in the section on Roma, Roma organizations in the full sense of the word were co-authors of OPHRD.

Roma integration in OPHRD

The very first draft of the OP "Human Resources Development" contained texts related to Roma and Roma integration. This fact was not accidental: in the previous programming period 2007-2013, OPHRD was the program, which in the highest degree included the topic of social inclusion of Roma and the Managing Authority has accumulated positive experience in cooperation with Roma NGOs and in the management of procedures which strongly supported Roma integration. However, the initial versions of OPHRD contained significant weaknesses. For example,

"Roma" indicators and interventions were provided only to the IP 2.1., which would severely restrict the possibility of the other investment priorities to support activities in the Roma community. On the other hand, the text of the IP 2.1. "Socio-economic integration of marginalized communities such as Roma" had important shortcomings: it did not include activities for community development and tackling anti-Roma stereotypes, as well as the requirement to carry out projects to implement municipal plans for Roma integration, in the target groups of IP 2.1. were included a wide range of vulnerable groups and Roma were missed, etc. All this would probably distract the impact of OPHRD and would prevent targeted support for the implementation of policies for Roma integration.

Gradually, those weaknesses were removed and the final version of the operational program includes texts that create the necessary prerequisites to support the implementation of the National Strategy of the Republic of Bulgaria for Roma Integration with funds from the European Social Fund. The Roma issue is included in Section 1 "Strategy for the contribution of the operational program to the implementation of the Union strategy for smart, sustainable and inclusive growth and the achievement of economic, social and territorial cohesion", which outlines the main approaches of impact. Concerning the Roma, the section states that " In line with the EU Framework for National Roma Integration Strategies up to 2020 (COM (2011) 173 final) and the National Roma Integration Strategy of the Republic of Bulgaria (2012-2020) adopted by the National Assembly as part of the overall strategy for reducing poverty and promoting social inclusion, the HRD OP will focus on improving the Roma's access to employment, training, social and healthcare services. In parallel with the National Strategy approach, the HRD OP proposes a targeted and integrated approach towards vulnerable citizens of Roma origin, which does not exclude providing support to disadvantaged persons from other ethnic groups. "

OPHRD strategy is based on three main pillars: (1) Higher and better employment; (2) Reducing poverty and promoting social inclusion; (3) Modernization of public policies. Roma integration as a specific investment priority is situated in the second pillar, but the need for intervention in the Roma community are indicated in the other two pillars as well.

In accordance with the described strategy, Section 2.A. "Description of priority axis" contains many texts outlining possible interventions in the Roma community. Priority Axis 1 "Improving access to employment and the quality of working places" includes many indicators / result indicators: in essence, the main indicators in the IP 1.1, 1.2 and 1.3 (measuring outcomes of interventions to secure employment for the unemployed and young people) will be measured in the Roma community as well. Thus, it is guaranteed that the implemented interventions will include enough unemployed Roma

and Roma youth and will increase the capacity of institutions involved in the labor market to work in the Roma community. This is part of the use of the so called "mainstreaming" approach.

Weakness of the texts of Priority Axis 1 is the lack of examples of activities that would have guaranteed effect in the Roma community, i.e. lack of targeted activities: e.g. use of Roma labor mediators, different types of community centers and others. They are included in the justification of individual investment priorities, but not in the model supported activities. This weakness is not significant, since the indicative list of supported activities is not exhaustive and Monitoring Committee may add to it by the criteria for selecting the operations.

A significant weakness is the lack of indicators to measure the effect in the Roma community on investment priority "Self-employment, entrepreneurship and business". It is well known that many of the Roma deal with small business (often - in the informal economy), while to some of the specific Roma groups entrepreneurship is part of ethnic psychology. It is an error that this important part of the Roma remains unnoticed by OPHRD.

As expected, Priority 2 "Reducing poverty and promoting social inclusion" includes the issue of Roma integration in the most profound and multifaceted way. This axis includes the targeted investment priority "Socio-economic integration of marginalized communities such as Roma", in which Roma is one of the main target groups, as well as indicators and indicative budget. This IP, which is important merit of the program, is described in detail below.

Outcome indicator measuring achieved through interventions Roma is included in 2.4 IP. "Promoting social entrepreneurship", which is a strong part of this priority, especially when compared to the IP "Self-employment, entrepreneurship and business" under Priority Axis 1.

The Roma issue is included in the smaller priority axis 3 "Modernization of institutions" and 4 "Transnational cooperation". Axis 3 is a prerequisite for increasing the capacity for monitoring and evaluation of the National Strategy for Integration of Roma, which is a requirement of preliminary conventions. A serious weakness of this axis is that it does not invest resources in joint activities of institutions and NGOs. Although this request was repeatedly placed on all groups of NGOs involved in the preparation of the OP HRD, it was diverted from the Managing Authority on the grounds for differentiation with OP "Good Governance". Thus OPHRD will not support targeted joint initiatives of institutions with non-governmental organization, unless the

the activities supported under Axis 1 and 2. This can be defined as a significant deficiency, since in some areas - e.g. Roma integration and social services - NGOs are key players with an accumulated capacity.

Regulation of the European Social Fund (art. 6, para. 3) provides opportunities for investments in capacity and joint action with NGOs, putting them on equal bases with the social partners: it is a pity that OPHRD do not use this opportunity.

Priority Axis 4 includes the ability to transfer best practices in IP "Socio-economic integration of marginalized communities such as Roma," an indication of result and financial resources. This will provide an opportunity to learn from the experience of other states with large Roma population - e.g. Romania.

Table 24 "Applicable preconditions and evaluation of their implementation" also contains an important component associated with the Roma issue: pre-convention 9.2. "Roma Inclusion" and its definition as "partially implemented", as well as defining the criteria for the implementation of this convention as outstanding. The introduction of ex-ante conditionality is an important innovation for the current programming period, which will enable the European Commission not to approve or to suspend payments to national management authorities. One of the ex - ante conditionalities set by the Partnership Agreement and by OPHRD is 9.2. "A national strategic policy framework for Roma Inclusion is set". Table 24 defines two performance criteria of EX-AC 9.2, the first of which is a compilation of four criteria: "A strategic policy framework for Roma inclusion is set, which:

- sets achievable national goals for Roma integration to bridge the gap with the rest of the population. These goals should address the four goals of the EU for integration of the Roma regarding access to education, employment, healthcare and housing;
- Identifies, where appropriate, disadvantaged micro-regions or segregated neighborhoods, where communities are most deprived, using already available socio-economic and territorial indicators (ie very low educational level, long-term unemployment, etc.);
- includes strong monitoring methods to assess the impact of actions for the integration of Roma and reviewing mechanism to adapt the strategy;
- is designed, implemented and monitored in close cooperation and continuous dialogue with Roma civil society, regional and local authorities';

Failure of the third sub-criterion related to the existence of an appropriate system for monitoring and evaluation of the integration policy is the cause of this entire criterion to be assessed as unfulfilled and pre-convention - as partly implemented. A curious fact is that in previous drafts of OPHRD Bulgarian government submitted EX-AC 9.2. as fully implemented, but at the insistence of the European Commission it is referred to as "partially" completed.

Determination of EXAC 9.2. as partially implemented

is definitely closer to reality. This rather negative assessment gave the chance and the incentive to work not only for the introduction of a comprehensive system for monitoring and evaluation, which is imperative and very serious lack. Operation for development and approbation of such a system will be the first procedure, financed by the new OPHRD. The assessment gives indirectly chance to work and to increase the capacity of NCP (ie the Secretariat of the National Council for Cooperation on Ethnic and Integration Issues), as well as for the overall improvement of the institutional framework for implementation of the integration policy. It is therefore important that the system for monitoring and evaluation should not be limited only to the so-called. administrative monitoring, but should also include forms of civil monitoring and community monitoring, as well as putting interaction between institutions, civil society organizations and local communities in a new way.

OPHRD and Roma integration: strengths

The text of the OP "Human Resources Development" creates an appropriate basis for supporting policies for Roma integration - at national and local level - with funds from the European Social Fund. Among the strengths of the program can be distinguished:

1. The overall inclusion of Roma integration issue in OPHRD: the proposed combination of targeted and mainstreaming approach (i.e. determining the specific investment priority to support integration initiatives and the inclusion of integration activities in other investment priorities), the definition of Roma as a specific target group, the inclusion of indicators and specific goals to be achieved related to Roma integration in all priority axes and availability of indicative budget for targeted investment priority 2.1. create preconditions for supporting policies for Roma integration. Without exaggeration, one can say that the approved version of OPHRD has no need for considerable improvements in the overall inclusion of the subject of Roma integration. The program creates the necessary preconditions, without guaranteeing that they will be used: the latter will depend on the activity of the Monitoring Committee and stakeholders involved in it.

Regarding the inclusion of Roma topic, OPHRD 2014-20 has continued improving and developing the program from the previous programming period. Then it was the only operational program, including explicitly Roma as a target group and supporting targeted procedures for the implementation of policies for Roma integration. The comparison between the way the issue of

Roma integration is included in the new operational program clearly indicates the inclusion of a number of "lessons learned";

2. The inclusion of investment priority "2.1. Socio-economic integration of marginalized communities such as Roma" is important achievement of the program. It should be clarified that the regulation of the ESF for the current programming period offers a list of investment priorities of which national governments should choose which ones to include in their operational programs. I.e. the notion "marginalized communities such as Roma" was preset by the European Commission: Roma are the only ethnic group mentioned in the regulation, which in itself is a clear indication of the importance of Roma integration. The inclusion of IP "Socio-economic integration of marginalized communities such as Roma" is important dignity of Bulgarian OPHRD.

The text of the priority is better scheduled and creates preconditions for the implementation of initiatives that will lead to real progress in the integration process at local level. As a specific purpose was defined "Increasing the number of persons from vulnerable ethnic communities involved in employment, education, training, health and social services with a focus on Roma, migrants, participants from other countries." The target groups of priority are defined in line with the goal: the Roma community; people from other countries; people at risk and / or the victims of discrimination; people living in areas with low population, rural and isolated areas, parts of towns, where there is a concentration of problems, creating a risk of poverty, social exclusion and marginalization (high unemployment, low income, limited access to public services, spatial segregation, spatial isolation, etc.).

The investment priority describes well the main problems and challenges facing Roma integration. It defines the types of activities that will be supported. They are grouped into four areas: improving access to employment, improving access to education, improving access to social and health services, community development and overcoming negative stereotypes. In each direction are set examples of activities that are in line with best practices and models verified in previous years. Particularly highly can be appreciated the inclusion of direction "Development of local communities and overcoming negative stereotypes" and planned activities in it which would create the necessary supportive environment for the implementation of integration activities. The negative experience of Burgas and Varna, where unprepared community environment and the reaction of the ultra-nationalists impede the implementation of integrated interventions in the previous programming period clearly indicates that implementation of the activities of field 4 is a condition for the success of all other activities.

IP 2.1. sets and indicators, grouped in Table 4 and Table 5. They are clearly measurable, although relatively modest, as indicated below.

3. The approach to support targeted projects for Roma integration can be defined as correct: OPHRD will use a decentralized approach to support multi-sectoral interventions, implementing municipal plans and regional strategies for Roma integration. Opportunities for implementation of a community development approach and standardization of certain interventions are also set.

IP 2.1. clearly indicates that the program will support integrated projects which bring together activities from different areas: employment, education, health and social services, development of local communities. Imperative will be the activities on the direction "Improving access to social and health services". It is also stated that this type of integrated projects should "lead to achievement of the objectives laid down in the key strategic documents: the National Strategy for Roma Integration of the Republic of Bulgaria 2012-2020, including the regional strategies and Municipal Roma Integration Plans..".

I.e. by IP 2.1. can be financed the so-called "soft measures" of municipal plans for Roma integration, which are defined as the main instrument for implementing the National Strategy for Roma integration. This possibility and decentralized approach (set from the National Strategy, but unsecured financially) certainly have to be welcomed. The lack of a national institution with management powers in the field of Roma integration and lack of capacity to work in the Roma community among the central institutions can be - if only partially - compensated by active municipal policies. In the first quarter of 2013, 220 municipalities have adopted their Municipal plans for Roma integration 2013-14, and in 2014 began the development of similar plans for 2015-20 period. We expect the municipalities to receive EU funding (or funding from the state budget) for the implementation of these plans. Opportunity provided by the IP 2.1. is currently the only chance municipal plans to be implemented. Open questions remaining unanswered are related to the opportunities for multiple projects - funded by OP HRD, OP "Science and education for smart growth" and OP "Regions in growth." The need for such projects is unmistakable: Municipal plans for Roma integration include both "soft" and "hard" measures, "soft" measures can hardly be conceived without education, etc. At the same time, there is currently no answer how it will secure multi-Fund projects, which is one of the most important challenges described below.

4. There are prerequisites for active involvement of civil society and the Roma community: this is particularly important against the background of

the very limited capacity of local and national institutions for activities in the Roma community. The inclusion of NGOs and local communities is necessary to increase the capacity and efficiency of integration initiatives. OPHRD creates the necessary preconditions for this: in planning (NGOs actively participated in the drafting of the program, as indicated above), in implementation (NGOs are possible beneficiaries on IP 2.1., as well as on other investment priorities; IP 2.1. includes also the partnership principle as a horizontal principle) in monitoring and evaluation.

OPHRD and Roma integration: challenges and weaknesses

Although described strengths, OP "Human Resources Development" contains certain weaknesses and will face important challenges in the implementation. Among them we can emphasize:

1. The capacity for implementation of integration policies at the local level in many municipalities is too low: some municipalities, especially the smaller municipalities in rural areas do not have sufficient human and financial resources nor the experience to implement large-scale multi-sectoral interventions in Roma community. In other municipalities, this is not a political priority. There is a real threat, given the selected decentralized approach, for these municipalities to not take real actions for Roma integration or activities undertaken to lead to no real results.

This problem is systemic and is linked to inequality in the capacity of municipalities. During the previous programming period it has led to very serious imbalances in the absorption of European funds between different municipalities and even different regions, such as the lack of mechanisms to support smaller municipalities led to a further increase of disparities. It is very likely to happen again in terms of the implementation of the IP 2.1. of this OPHRD. Measures are needed for that risk to be minimized;

2. Lack of appropriate institutional and administrative framework at the national level: to assist the municipalities in the preparation and implementation of multi-sectoral integration projects, to plan interventions and procedures, to monitor and evaluate. This problem is systemic and serious. Decentralized implementation of any policy requires a strong institution at national level to assist, coordinate and control participants from the local and regional levels. In essence, there is no such an institution in Bulgaria. Formally, these characteristics correspond to the National Council for Cooperation on Ethnic and Integration Issues, but it is a fact that it has no real power. The need of reform in the structure was declared for years, non-governmental organizations offer various options to strengthen its power, but at present it is not a fact. In 2012 was created an Interagency Working Group for Resources Provision of Roma integration with EU funds, which had the chance to fill the descriptions deficit at least in terms of the use of Euro-

pean funds for the implementation of integration policies. It was chaired by the Minister for management of EU funds and it includes the respective deputy ministers responsible for the Managing Authorities of the key European programs, as well as representatives of Roma NGOs. Unfortunately, in 2013 it was stated more on administrative than on political level and it essentially stopped functioning.

OPHRD (as well as the Partnership Agreement) partially take into account the lack of appropriate institutional and administrative framework at the national level while acknowledging the preliminary convention 9.2. "A national strategic policy framework for Roma inclusion is set" as partially implemented and requires approbation of the national system for monitoring and evaluation. In any event, this is insufficient and will require compensatory mechanisms to replace this lack;

3. The planned budget and indicators to investment priority 2.1. are relatively low, although the IP 2.1. was included among the five investment priorities of the so called "thematic concentration", the indicative budget set for it was about 130 million BGN, about 6% of the program budget. This is not enough taking into account the fact that 220 municipalities prepared their Municipal plans for Roma integration and OPHRD is currently the only option for their funding. Of course, municipalities and other beneficiaries will be eligible on the other investment priorities as well, but it will mean submission and management of several projects that will be a big bureaucratic obstacle.

The indicators to that IP, even after they increase in September 2014 remain relatively low and unambitious: e.g. 17,740 Roma who after leaving the operation began to look for work or have a job or are involved with education / training or have received training or are involved in social and health services. Thus only 5% of people who define themselves as Roma will be reached, which is unlikely to lead to a serious boost in the process of Roma integration.

These weaknesses can be compensated by the fact that at the insistence of the European Commission and Roma organizations in the final version of OPHRD were included indicators related to Roma and in parts of the other investment priorities. I.e. activities for Roma integration shall be supported in the procedures financed by them. Moreover, the budget IP 2.1. (and any other IP) is indicative and in the presence of great interest and quality projects it can be increased. But this remains dependent on the extent to which above mentioned shortcomings will be overcome; 4. Bureaucratic obstacles facing integrated projects: multi-sectoral interventions for the implementa-

ion of municipal plans for Roma integration require integrated projects with at least OP "Science and education for smart growth" (to cover the entire spectrum of "soft measures"), and - at least in some municipalities - with OP "Regions in growth" / Program for rural areas development (to include priority "Housing"). Unfortunately, there is currently no adequate legal basis for integrated projects. This strongly reduces the potential effectiveness of projects to be financed within the priority 2.1. of OPHRD. Indeed, the Council of Ministers Decree 107 / 10.05.2014, provides the opportunity for integrated projects, which are funded by more than one program. Unfortunately, the decree creates many bureaucratic difficulties requiring beneficiaries to sign a contract and, respectively, to report to two or more Managing Authorities. In practice this will mean to manage and report various projects, which will discourage many potential beneficiaries.

Furthermore, OPHRD do not clear the boundary between direction "Improving access to education" of the IP 2.1. of OPHRD and OP "Science and education for smart growth": although this question covers three pages of OPHRD. Surely this will lead to serious problems in the Managing Authority, the Certifying Authority and especially to potential beneficiaries who would want to include activities to improve access to education in their projects. Unfortunately, the possibility of integrated projects between the two programs remains also uncertain as well as in which cases the project could be funded by both programs. The text of the OPHRD in this regard is unclear and requires serious interpretation: "one and the same beneficiary (e.g. municipality) and its partners (e.g. NGOs) that have an idea for activities in diverse areas (labor market, education, social inclusion, etc.), do not have to apply to two contracting authority with two separate projects to ensure sustainable integration of children and families from marginalized communities in an area, district or village. Through mechanisms for coordinated implementation of operations and where applicable - through "integrated operations" OP Science and Education for Smart Growth will complement initiatives in OPHRD, providing support to improve access to education for the target groups." The beneficiaries submitting project that want to finance the implementation of "soft" measures of municipal plans to integrate Roma will face the question: whether this can be done only through a project to OPHRD, through a mechanism for coordinated implementation of operations (such currently missing) or via a mechanism for integrated operations (which is also missing). There is a real danger for beneficiaries to be discouraged and to not apply. It is also a real danger if MAs OPHRD and OPSESG do not create extremely clear mechanisms for coordinated implementation of operations and integrated interventions, many costs to beneficiaries to become unverified.

Possible solutions

Challenges described above are surmountable. The Monitoring Committee and the Managing Authority can take a large part of the solutions. The others are the responsibility of the Deputy Prime Minister on management of EU funds Tomislav Donchev and the Council of Ministers.

1. The lack of capacity to implement large-scale multi-sectoral interventions in the Roma community

In different EU countries there are numerous examples of targeted investments in the less developed regions where they do not compete with other municipalities and the Managing Authorities are working to improve their capacity to implement the necessary interventions. An example is the Hungarian program for the least developed micro-regions in the 2007-2013 period. Advantages of such an approach for equalizing territorial disparities are many. It was recommended by the EU framework for national strategies for Roma integration, which require Member States to "identify, where necessary, those micro-disadvantaged regions or segregated neighborhoods, where communities are the poorest, as using already available socio-economic and territorial indicators." Such a requirement was set in EXAC 9.2. "Roma Inclusion".

This option was not used in planning OPHRD 2014-20, due to many reasons. The main one is related to the lack of an appropriate institutional framework: the actual implementation of such a targeted approach - if only within the theme of Roma integration - would require the creation of units in MAs of OPHRD OPRG, possibly of OPSESG and regulatory changes in connection with the absorption of EU funds at national level. Apart from this, it will require a serious commitment of the Secretariat of NCCEII, which does not have the necessary human resource. Currently, there are several other possible solutions, namely:

1.1. Mandatory use of the partnership principle: funds in IP 2.1. must be spent by procedures for competitive selection of projects. It is announced the opening procedures to require mandatory partnership between the municipality and non-governmental organization that works with the local community. If the procedure is used for direct financing, direct beneficiaries must be certain municipalities with their NGO partners. Partnerships can compensate the lack of sufficient capacity of potential beneficiaries. Especially important is the partnership to be real, i.e. each partner has a clearly defined role. For example, every project on IP 2.1. should contain a component related to the activation of the local Roma community and this component should be

delegated to organizations working on the field;

1.2. Support for the implementation of standardized integration interventions: in 2012-13 Interdepartmental group for Resources provision of Roma integration with EU funds began the process of defining "standardized integration interventions." The idea for them was that they are standardized models that have methodology, describing the basic elements of intervention and financial standard. Standardizing them aims to ensure correct and complete application: with all the essential elements / activities for the intervention. Interdepartmental group identified two interventions - community center and prevention dropout from school. Unfortunately, this process was not extended because the group's activities were practically terminated.

Definition of certain integration interventions (i.e. development of methodology and financial standard) and providing them with funds from OPHRD (through an appropriate mechanism, allowing beneficiaries to obtain resources for their implementation without unnecessary bureaucratic obstacles) will give a chance to these interventions to occur even in communities with low administrative capacity for the implementation of large-scale integration projects;

1.3. Providing opportunities for over-municipal projects involving more than one municipality: a known fact is that some of the municipalities in Bulgaria are too small in territory and population to be able to implement wider policies by themselves. They need over-municipal projects, a requirement which is enshrined in the Program for Rural Area Development, for example, in the development and implementation of strategies for local development.

With regard to Roma integration these findings are even with greater force. In addition, many municipalities do not have the necessary experience in the implementation of integration initiatives and the desirability of promoting their interaction with municipalities that have accumulated successful experience. It is therefore necessary OPHRD to promote the implementation and over-municipal projects for Roma integration. They can be on a regional basis or on the basis of partnership between certain municipalities having similar problems. Main beneficiary could be a non-governmental organization or one of the municipalities. The promotion of such projects will be essential to provide sufficient financial resources, i.e. to set a higher maximum limit per project. Particularly important will be this type of projects to be not a juxtaposition of activities in each municipality, but also to have joint activities and exchange of best practices.

2. Lack of appropriate institutional and administrative framework at national level

Total reform of the administrative and institutional framework for the implementation of the National Strategy for Roma Integration is an important task that currently lack political will, but that cannot be delayed too

long. Recognized fact is that the National Council for Cooperation on Ethnic and Integration Issues is a structure which is no longer performing the functions with which it has been created, and that it needs change. This reform is beyond the powers of OPHRD. What can and should be done within the program is:

2.1. Creating a sub-committee "Roma Integration", responsible for making the selection criteria for operations related to Roma integration. It should also approve the methodology for standardised integration interventions suggested above;

2.2. It is necessary Interdepartmental Group for Resources Provision of Roma integration with EU funds to be restored at political level: chaired by the Deputy Prime Minister of the absorption of EU funds, with the participation of the respective deputy ministers responsible for OPHRD, OPSESG, OPRG and RDP as well as representatives of Roma organizations. A Sub-committee to the Monitoring Committee of the Partnership Agreement is an appropriate form. Among its key powers should be included the development of selection criteria for integrated operations, combining the resources of two or more programs;

3. Lack of an adequate legal framework for integrated / multi-funded projects: It is urgent opportunities for integrated projects between OPHRD, OPSESG and OPRG / RDP to be created to allow potential beneficiaries to implement projects, by applying and reporting in front of a Managing Authority. The following is necessary for this purpose:

3.1. Change in Decree 107 / 05.10.2014, minimum a change is needed in the art. 30 concerning integrated proposals;

3.2. Establishing mechanisms for coordinated implementation of operations and integrated projects for implementation of projects for Roma integration, supported by OPHRD, OPSESG RDOP / RDP

List of abbreviations:

OPHRD - Operational Programme "Human Resources Development"

OPSESG - Operational program "Science and education for smart growth"

OPRG - Operational Programme "Regions in growth"

RDP - Program for Rural Development

NCCEII - National Council for Cooperation on Ethnic and Integration Issues

MA - Managing Authority

IP - investment priority

PA - priority axis

ExAC - ex-ante conditionality

Notes:

1. More information see at: <http://www.amalipe.com/index.php?nav=news&id=1101&lang=2>
2. Framework program for Equal Integration of Roma in Bulgarian Society (April 1999, renewed in May 2010), Strategy for Educational Integration of Children and Students from the Ethnic Minorities (June 2004, renewed in March 2010), Health Strategy for Persons belonging to Vulnerable Ethnic Minorities (September 2005), National Program for Improving the Living Conditions of Roma (March 2006), National Action Plan for the Decade of Roma Inclusion and others
3. http://www.amalipe.com/files/publications/amalipe_statement_ec.pdf
4. *Report on the implementation of the EU Framework for National Roma Integration Strategies*, April 2014. Available at: http://ec.europa.eu/justice/discrimination/files/com_209_2014_en.pdf
5. The Secretariat is National Contact Point for the Strategy
6. *Partnership Contract*
7. Since September 2015 it will turn back to the state budget
8. <http://www.amalipe.com/index.php?nav=news&id=2002&lang=1>
9. The present draft bans segregated classes in ethnically mixed schools but does not outlaw segregated schools in ethnically mixed cities and towns
10. http://ophrd.government.bg/view_doc.php/4446
11. http://ophrd.government.bg/view_doc.php/5062
12. http://ophrd.government.bg/view_doc.php/5091
13. *Годишен доклад за изпълнението на ОП РЧР за 2011 г. (Annual Report for the implementation of HRD OP 2011)*, p. 148

15. HRDOP 2007-2013 contains special chapter "Areas of assistance with regard to Roma community". The chapter contains indicators, among them "Number of Roma included in training for entrepreneurship" and "Number of new entrepreneurs created owing to initiatives for support of the small business". See: *Оперативна програма „Развитие на човешките ресурси“ (Human Resources Development Operational Program)*, p. 146.
16. http://ophrd.government.bg/view_doc.php/4854
17. Interview with expert on ethnic and demographic issues from Roma origin in district administration
18. Interview with Deputy District Governor
19. The practice is included in the Report on the Implementation of the EU Framework for National Roma Integration Strategies, published by European Commission on April 4, 2014. See at: http://ec.europa.eu/justice/discrimination/files/roma_implementation_strategies2014_en.pdf
20. *Годишен доклад за изпълнението на ОПРЧР през 2011 г. (Annual Report for the implementation of HRD OP in 2011)*, p. 42
21. <http://eufunds.bg/en/page/22>
22. <http://www.eeagrants.bg/en/2009-2014/%D0%BD%D0%BE%D0%B2%D0%B8%D0%BD%D0%B8/third-annual-meeting-on-the-implementation-of-the-eea-and-norway-grants.html>
23. <http://eufunds.bg/en/page/20>
24. http://ophrd.government.bg/view_doc.php/5091
25. <http://coiduem.mon.bg/page.php?c=32&d=203>
26. More information see at: <http://www.amalipe.com/index.php?nav=news&id=1275&lang=2>
27. <http://www.amalipe.com/index.php?nav=news&id=1768&lang=2>
28. It is the only Bulgarian OP financed by two funds: ERDF finances Priority Axis 1 while ESF finances Priority Axes 2 and 3
29. See: *Council recommendation on effective Roma integration measures in the member states*, art. 1.9, available at http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/lsa/139979.pdf
30. *Human Resources Development OP 2014-2020*, p. 236. Available at: ophrd.government.bg/view_file.php/21022
31. *Human Resources Development OP 2014-2020*, p. 10. Available at: ophrd.government.bg/view_file.php/21022
32. *Human Resources Development OP 2014-2020*, p. 126. Available at: ophrd.government.bg/view_file.php/21022
33. *Human Resources Development OP 2014-2020*, p. 125. Available at: ophrd.government.bg/view_file.php/21022



Център Амалипе

The project "Civic Society Participation and Roma Integration in the implementation of the National Roma Integration Strategy: Guarantee for Efficiency" (BG05/625) is financed by the Program for Support of NGOs in Bulgaria within the EEA Financial mechanism 2009-2014



The implementation of NRIS

Education

Education is one of the strongest fields in the entire Roma integration process in Bulgaria. Since 1999 Roma NGOs generated successful models for educational integration: desegregation projects, introducing intercultural education (through Roma folklore elective classes and other forms), decreasing the drop-out rate of Roma, etc. The Ministry of Education prepared Strategy for Educational Integration and paid certain level of political attention.

During the reported period the following strengths could be outlined:

- Financial opportunities for Roma educational initiatives were opened: mainly through Human Resources Development OP and the Center for Educational Integration – COIDUEM. They provided tools for implementing the policy for educational integration;
- the cooperation between Ministry of Education and NGOs was remained and extended.

Rural development

Important weakness could be pointed that the Rural Areas Development Program continued to stay aside from the topic of Roma integration and to not contribute for the implementation of the NRIS – although 60 % of Roma in Bulgaria live in rural areas.

Employment

The field of Roma employment is relatively less developed compared to education and health. Only few good practices exist. Except the Roma labor mediators, all other good practices are developed by NGOs.

During the reported period the only big asset was the opportunity for using ESF financing (through HRDOP) for raising the level of employment in Roma community. Nevertheless, even this opportunity was only partly used.

This document is produced with the financial support of the Program for support of NGOs in Bulgaria within the EEA Financial mechanism. Center Amalipe bears the whole responsibility for the content of this document and in no way it could be perceived as an official statement of EEA Financial Mechanism and the Operator of the Program for support of NGOs in Bulgaria

www.amalipe.com