

Policy Note on Social Consensus - AMCOR Perspective on the Policy Proposals

AMCOR (The Romanian Management Consultancies Association) welcomes the opportunity to contribute to the policy discussions on the future of cohesion, social and territorial development policies beyond 2027.

As the professional association representing management consulting firms and professionals in Romania, AMCOR brings practical experience from consultants working across the public, private and non-governmental sectors. This experience provides a useful perspective on the design, implementation and evaluation of development policies and investment programmes, as well as on the institutional and administrative factors that influence their effectiveness.

AMCOR considers that the success of the post-2027 policy framework will depend not only on strategic priorities and available funding, but also on the ability to turn these priorities into effective interventions that respond to real needs and deliver sustainable results. Differences in territorial development, institutional capacity, access to services, labour-market conditions and economic potential require policies that combine strategic coherence with enough flexibility to respond to local and regional needs.

From this perspective, AMCOR supports a stronger focus on implementation capacity, integrated interventions, evidence-based decision-making, partnership, administrative simplification and the long-term sustainability of publicly funded investments. It is important that projects are well prepared, beneficiaries have the necessary institutional and operational capacity, and infrastructure investments are supported by the resources, services, skills and organisational arrangements needed for their effective use.

The proposals of AMCOR complement the structural challenges and policy recommendations identified in the draft by highlighting practical issues arising from implementation experience. They cover areas such as human capital and lifelong learning, access to health and social services, social inclusion, territorial cohesion, mobility, green and digital transformation, administrative capacity, project preparation, technical assistance, governance and integrated funding.

AMCOR also sees the post-2027 framework as an opportunity to strengthen the link between policy objectives and implementation realities. Greater use of evidence, territorial data, professional expertise and stakeholder involvement can help ensure that funding instruments respond better to actual needs and that administrative requirements are proportionate to the capacity of beneficiaries.

The additional proposals presented below aim to contribute to a more effective, accessible and results-oriented policy framework. They are based on the principle that sustainable development requires not only adequate financial resources, but also sound policy design, strong implementation capacity, well-prepared projects, effective governance and appropriate mechanisms to ensure the long-term use and sustainability of investments.

Critical Problems and Structural Challenges	Critical Problems and Structural Challenges - Proposal	Policy Recommendations	Policy Recommendations - Proposal
IV. Key dimensions			
IV.1 Education and Skills			
43. Digital skill deficits affect both learners and educators. Fewer than one-third of adults possess basic digital skills, and digital competence among students and teachers remains below EU averages (fewer than half of the youth possessing basic digital competencies). While equipment investments have increased, many schools still lack connectivity or effective integration of technology in teaching. Digital content remains underdeveloped and continuous teacher support in digital pedagogy is limited.	<u>Additional proposal 1 - proposed structural challenge:</u> 43. Digital skill deficits affect both learners and educators. Fewer than one-third of adults possess basic digital skills, and digital competence among students and teachers remains below EU averages (fewer than half of the youth possessing basic digital competencies). While equipment investments have increased, many schools still lack connectivity or effective integration of technology in teaching. Digital content remains underdeveloped and continuous teacher support in digital pedagogy is limited. <u>Although education is among the few sectors that benefit from subsidies for continuous training, there is a lack of a distinct, trackable budget allocated for it within the standard cost per infant/preschooler/student.</u>	59. Accelerate digital transformation in teaching and learning. Digital equipment must be matched with continuous teacher training, peer mentoring, and quality digital content. The DigCompEdu and DigCompRo frameworks should guide teacher development and curriculum updates, including more digital skills in the core and specific curriculum. Schools with advanced digital readiness can act as resource hubs for surrounding rural schools. Moreover, the digital skills training program already developed for the public libraries under NRRP could be expanded for a wider reach, in employment offices, and rural centres, as well as schools.	<u>Additional proposal 1 - proposed policy recommendation:</u> 59. Accelerate digital transformation in teaching and learning. Digital equipment must be matched with continuous teacher training, peer mentoring, and quality digital content. The DigCompEdu and DigCompRo frameworks should guide teacher development and curriculum updates, including more digital skills in the core and specific curriculum. Schools with advanced digital readiness can act as resource hubs for surrounding rural schools. Moreover, the digital skills training program already developed for the public libraries under NRRP could be expanded for a wider reach, in employment offices, and rural centres, as well as schools, <u>or through accredited courses provided by private operators. Breakdown of continuous training expenditures within the standard cost per infant/preschooler/student, alongside the monitoring of continuous training expenses.</u>
41. Adult learning participation is minimal and not demand-driven. Romania remains the EU country with one of the lowest shares of adults engaged in lifelong learning (under 20%). Opportunities for reskilling and upskilling are scarce, fragmented, and often poorly connected to local labour-	<u>Additional proposal 2 - proposed structural challenge:</u> 41. Adult learning participation is minimal and not demand-driven. Romania remains the EU country with one of the lowest shares of adults engaged in lifelong learning (under 20%). Opportunities for reskilling and	62. Expand lifelong learning and adult upskilling through measurable participation targets. Lifelong learning actions should form a network of community learning centres , prioritizing the lowest-income regions and targeting low-skilled adults. Success should be measured by participation and	<u>Additional proposal 2 - proposed policy recommendation:</u> 62. Expanding Lifelong Learning and Adult Upskilling through Measurable Targets and Private Sector Partnerships Lifelong learning actions should form a network of community learning centers

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market demand. Second-chance education and flexible learning pathways are only emerging and lack sustainable funding.	upskilling are scarce, fragmented, and often poorly connected to local labour-market demand. <u>The rigidity and lack of flexibility of the County Employment Agencies (AJOFM) in delivering reskilling and upskilling programs, as well as in the "Second Chance" Program, lead to a significant lack of attractiveness. Furthermore, the absence of funding for the private sector restricts the expansion of reskilling and upskilling opportunities. Second-chance education and flexible learning pathways are only emerging and lack sustainable funding.</u>	certification rates, not only by enrolment. Participation incentives—micro-credentials, childcare support, and employer co-financing—can help reach women and NEETs.	and flexible training providers, prioritizing low-income regions and low-skilled adults. Success must be measured by participation and certification rates, not just enrollments. <u>Participation incentives—such as micro-credentials, childcare support, and employer co-financing—will help engage women and NEET youth.</u> <u>To maximize impact, direct funding mechanisms (e.g., competitive grant schemes, training vouchers, and co-financing models) should be established to support lifelong learning initiatives delivered by private sector actors, including companies, professional associations, and NGOs. Funding allocation should prioritize industry-aligned, work-based learning, upskilling within enterprises, and community-led inclusion programs.</u>
		63. Use lifelong learning to activate underused labour reserves in the context of demographic decline. Adult-learning programmes should prioritize groups whose participation is currently low but whose activation is essential for mitigating labour shortages: low-skilled adults, women outside the labour market, young NEETs, older workers, Roma, persons with disabilities, and adults in rural and declining areas. Training packages should combine foundational skills, digital literacy, socio-emotional skills, vocational modules, career counselling, childcare or care support where relevant, and links to employment	<u>Additional proposal 3 - proposed policy recommendation:</u> 63. Use lifelong learning to activate underused labour reserves in the context of demographic decline. Adult training programs must prioritize underrepresented groups crucial for mitigating labor shortages in the context of demographic decline: low-skilled adults, inactive women, NEET youth, older workers, Roma, persons with disabilities, and adults in rural or economically declining areas. <u>To achieve this, dedicated public funding and subsidies should be channeled to private companies,</u>

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		services. For these groups, participation incentives and completion support are as important as training content, because the main barriers are often cumulative and include poverty, distance, care responsibilities, low confidence, weak digital access, and limited information about available opportunities. Moreover, complementary support for labor mobility and housing should be planned to ensure that leaning participation is translated in concrete employment opportunities.	<u>professional associations, and NGOs to design and deliver tailored training packages. These packages should combine foundational skills, digital literacy, socio-emotional competencies, vocational modules, career guidance, and care support. For these target groups, participation incentives, workplace mentoring, and completion support are as critical as the training content, addressing cumulative barriers such as poverty, distance, and low confidence. Additionally, complementary support for labor mobility and housing should be planned to ensure training translates into concrete employment opportunities.</u>
<i>Long-Term (Post-2027): Build a skills-first, productivity-driven development model</i>			
	<u>Additional proposal 3 - proposed structural challenge:</u> Poor educational infrastructure and basic utilities in rural areas: Many school buildings, particularly in rural communities, remain non-compliant with standard educational requirements and safety regulations. These facilities often suffer from a severe lack of basic utilities (such as adequate heating, indoor sanitation, and running water), directly impairing the quality and safety of the learning environment.		<u>Additional proposal 4 - proposed policy recommendation:</u> Mapping educational infrastructure and assessing disparities: A comprehensive mapping of educational infrastructure and a rigorous assessment of the current state of school units regarding facilities and utilities are required. This measure should be implemented through close collaboration between the Ministry of Investments and European Projects (MIPE), the Ministry of Education, and Regional Development Agencies (RDAs), in order to identify and address infrastructure disparities across regions.

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IV.3 Healthcare and Social Services			
	<u>Additional proposal 4 - proposed structural challenge:</u> Critical shortage of town hospitals, outpatient clinics (ambulatories), and context-specific medical specialties. There is a severe lack of town hospitals and outpatient care facilities in small urban areas capable of serving wide regional patient catchments for prevention, screening, and basic treatments. This deficit is further compounded by the absence of essential medical specialties aligned with local needs and territory profiles. <i>(For instance, in Vatra Dornei (a major tourist resort town with significant seasonal activities), the local hospital lacks an orthopedics specialty, forcing all winter sports injuries to be transferred over 100 km away to the Suceava County Emergency Hospital.)</i> Consequently, the lack of full or context-adapted specialty coverage in small and medium-sized hospitals directly causes the overcrowding of county and tertiary hospitals, diverting critical emergency resources away from complex cases.		<u>Additional proposal 5 - proposed policy recommendation:</u> Target funding for town hospitals and outpatient facilities, especially in demographic growth zones. Post-2027 and mid-term funding frameworks must allocate dedicated resources for the development, modernization, and operational financing of town hospitals and outpatient clinics (ambulatories). Priority should be given to rapidly expanding suburban areas and secondary towns experiencing demographic growth, ensuring that primary and secondary healthcare infrastructure keeps pace with local population expansion and prevents acute care bottlenecks.
113. Social and environmental determinants of health exacerbate systemic vulnerabilities. Poor housing conditions, energy poverty, and limited access to safe water and sanitation continue to affect millions of citizens - especially in rural settlements and informal areas. These deficits translate	<u>Additional proposal 5 - proposed structural challenge:</u> 113. Social and environmental determinants of health exacerbate systemic vulnerabilities. Poor housing conditions, energy poverty, and limited access to safe water and sanitation continue to affect millions of citizens -	125. Expand preventive and community healthcare as the foundation of the system. Scaling up the ongoing screening programmes must go hand in hand with stronger primary care and referral mechanisms. Family doctors and community nurses should become the first point of contact for all citizens,	<u>Additional proposal 6 - proposed policy recommendation:</u> 125. Expand preventive and community healthcare as the foundation of the system. Scaling up the ongoing screening programmes must go hand in hand with stronger primary care and referral mechanisms. Family doctors

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directly into higher prevalence of respiratory, waterborne, and chronic diseases. Climate risks and air pollution also compound existing health inequities, underscoring the need to integrate environmental, energy, and health policies at local level. Moreover, unhealthy behavior and addictions increase health risks and underline the need for preventive and integrated approaches, linking health care with social assistance and, in some cases, law enforcement.	especially in rural settlements and informal areas. These deficits translate directly into higher prevalence of respiratory, waterborne, and chronic diseases. Climate risks and air pollution also compound existing health inequities, underscoring the need to integrate environmental, energy, and health policies at local level. Moreover, unhealthy behavior and addictions increase health risks and underline the need for preventive and integrated approaches, linking health care with social assistance and, in some cases, law enforcement. <u>Mental-health and psychosocial-support services remain insufficiently integrated into community-based health and social-care delivery, particularly for children and adolescents, vulnerable adults, and populations living in rural or underserved areas. Limited community capacity, long referral pathways, and uneven territorial access may result in late intervention and unnecessary pressure on hospital-based services.</u>	supported by mobile units in isolated areas. Outcome-based financing can incentivize prevention and chronic-disease management. Complementary public-awareness campaigns can reinforce demand for these services; outcome-based financing should reward verified health improvements rather than output measures such as the number of screenings alone.	and community nurses should become the first point of contact for all citizens, supported by mobile units in isolated areas. Outcome-based financing can incentivize prevention and chronic-disease management. Complementary public-awareness campaigns can reinforce demand for these services; outcome-based financing should reward verified health improvements rather than output measures such as the number of screenings alone. <u>Develop a dedicated community-based mental-health and psychosocial-support pillar. Post-2027 funding should support multidisciplinary community mental-health teams, child and adolescent services, school-linked psychosocial support, tele-mental-health in underserved areas, addiction prevention and treatment pathways, and coordinated crisis and referral mechanisms. Results should be monitored through territorial coverage, waiting times, continuity of care, and reintegration into education or employment.</u>
110. Fragmentation between health, social, and community services limits the effectiveness of inclusion measures. Despite recent progress with integrated community teams, coordination between county directorates, social assistance services, and primary healthcare providers remains weak. Vulnerable groups - such as older people, persons	<u>Additional proposal 6 - proposed structural challenge:</u> 110. Fragmentation between health, social, and community services limits the effectiveness of inclusion measures. Despite recent progress with integrated community teams, coordination between county directorates, social assistance services, and primary healthcare	126. Advance deinstitutionalization and community-based long-term care. The deinstitutionalization process should prioritize the creation of small-scale residential centres, home-care teams, and respite services. EU funds should continue supporting local authorities to integrate health, social, and rehabilitation services under one coordination model,	<u>Additional proposal 7 - proposed policy recommendation:</u> 126. Advance deinstitutionalization and community-based long-term care. The deinstitutionalization process should prioritize the creation of small-scale residential centres, home-care teams, and respite services. EU funds should continue supporting local authorities to

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with disabilities, Roma, and low-income households - often navigate separate systems without clear referral or case-management pathways. Institutional care still dominates for elderly and disabled persons, while community- and home-based alternatives remain underdeveloped.	providers remains weak. Vulnerable groups - such as older people, persons with disabilities, Roma, and low-income households - often navigate separate systems without clear referral or case-management pathways. Institutional care still dominates for elderly and disabled persons, while community- and home-based alternatives remain underdeveloped. <u>The current service architecture does not sufficiently recognize the role and burden of informal carers, especially family members supporting older people and persons with disabilities. Without structured respite, counselling, training, assistive technologies, and temporary replacement services, informal care can generate burnout, labour-market withdrawal, and avoidable institutionalisation.</u>	ensuring continuity of care for the elderly and people with disabilities.	integrate health, social, and rehabilitation services under one coordination model, ensuring continuity of care for the elderly and people with disabilities. <u>Strengthen ageing-in-place policies and formal support for informal carers. Future programmes should finance home adaptation, respite-care services, day-care facilities, training and counselling for informal carers, assistive technologies, and temporary replacement services. Performance indicators should include continuity of independent living, avoided or delayed institutionalisation, and reduction of excessive informal-care burden.</u>
IV.4 Social Inclusion and Poverty Reduction			
136. Territorial and community disparities deepen the risk of exclusion. The gap between Bucharest-Ilfov and lagging regions such as the North-East or South-Muntenia is now one of the widest in the EU. Rural areas concentrate 45 percent of Romania's population but over two-thirds of its poor. Thousands of small towns and villages still lack adequate transport links, childcare, and basic utilities, perpetuating isolation. In rural areas, 42% of children live in poverty and	<u>Additional proposal 7 - proposed structural challenge:</u> 136. Territorial and community disparities deepen the risk of exclusion. The gap between Bucharest-Ilfov and lagging regions such as the North-East or South-Muntenia is now one of the widest in the EU. Rural areas concentrate 45 percent of Romania's population but over two-thirds of its poor. Thousands of small towns and villages still lack adequate transport links, childcare, and basic	154. Expand and institutionalize integrated community services across all counties. The integrated community-team members now active should be consolidated into permanent local structures financed through regular budgets. Each county should operate at least one multidisciplinary coordination hub connecting family doctors, social workers, employment counsellors, and education mediators. Priority should go to counties with low service density,	<u>Additional proposal 8 - proposed policy recommendation:</u> 154. Expand and institutionalize integrated community services across all counties. The integrated community-team members now active should be consolidated into permanent local structures financed through regular budgets. Each county should operate at least one multidisciplinary coordination hub connecting family doctors, social workers, employment counsellors, and

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access to quality social services remains limited. Informal settlements on urban peripheries are expanding, often without legal property rights, water, or sanitation. These territorial inequalities directly affect access to education, employment, and social services, making place-based inclusion strategies essential.	utilities, perpetuating isolation. In rural areas, 42% of children live in poverty and access to quality social services remains limited. Informal settlements on urban peripheries are expanding, often without legal property rights, water, or sanitation. These territorial inequalities directly affect access to education, employment, and social services, making place-based inclusion strategies essential. <u>Child poverty should be treated as a multidimensional and territorially concentrated challenge, requiring coordinated access to early education and care, school participation, nutrition, health, housing, basic utilities, mobility, and family support rather than isolated sectoral measures. Particular attention is needed for vulnerable children and young people during the transition from child to adult services.</u>	ensuring that every vulnerable settlement is covered by a community team. Where individual local authorities lack the financial or administrative capacity to sustain such hubs on their own, micro-regional or inter-communal arrangements serving several administrative-territorial units offer a more sustainable delivery model.	education mediators. Priority should go to counties with low service density, ensuring that every vulnerable settlement is covered by a community team. Where individual local authorities lack the financial or administrative capacity to sustain such hubs on their own, micro-regional or inter-communal arrangements serving several administrative-territorial units offer a more sustainable delivery model. <u>Create integrated territorial Child Guarantee packages in areas with high child-poverty rates. Interventions should combine early-childhood education and care, school meals, remedial and after-school support, primary and mental-health services, transport, adequate housing and basic utilities, and family case management. The packages should include continuity-of-support arrangements for vulnerable young people aged 16-24 and use shared territorial outcome indicators.</u>
IV.5 Territorial and Community Cohesion			
170. Deep regional and urban-rural divides continue to fragment opportunities and public-service access. Romania's growth remains concentrated in Bucharest-Ilfov and a few dynamic cities, while lagging areas in the North-East, South-West and South-Muntenia face low productivity, thin labour markets, and weaker access to services. Peripheral communes and small	<u>Additional proposal 8 - proposed structural challenge:</u> 170. Deep regional and urban-rural divides continue to fragment opportunities and public-service access. Romania's growth remains concentrated in Bucharest-Ilfov and a few dynamic cities, while lagging areas in the North-East, South-West and South-Muntenia face low productivity, thin	189. Turn integrated development strategies into "territorial compacts" with clear service outcomes. Each functional urban area should commit to a compact that bundles clean public transport, active-mobility networks, green-blue corridors, neighborhood services (schools, health, social), and social housing pilots. Compacts should set simple outcome targets - public-	<u>Additional proposal 9 - proposed policy recommendation:</u> 189. Turn integrated development strategies into "territorial compacts" with clear service outcomes. Each functional urban area should commit to a compact that bundles clean public transport, active-mobility networks, green-blue corridors, neighborhood services (schools, health, social), and

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towns struggle with depopulation, out-migration of youth, and underuse of assets. Localities with the lowest level of development are often those that are not well connected to a dynamic urban centre, while fast-growing peri-urban localities face significant infrastructure and service gaps. Urban-rural disparities vary significantly by region, including between dynamic cities and their adjacent territories.	labour markets, and weaker access to services. Peripheral communes and small towns struggle with depopulation, out-migration of youth, and underuse of assets. Localities with the lowest level of development are often those that are not well connected to a dynamic urban centre, while fast-growing peri-urban localities face significant infrastructure and service gaps. Urban-rural disparities vary significantly by region, including between dynamic cities and their adjacent territories. <u>In rural and small-town areas, the existence of a school, clinic, employment office, or social service does not guarantee effective access when regular transport is absent or poorly matched to service schedules. The lack of flexible last-mile mobility can therefore reproduce exclusion even where physical service infrastructure exists.</u>	transport ridership, minutes to key services, hectares of cooling canopy, and residents benefiting from upgraded neighborhoods - and report every six months. Investment appraisal should explicitly assess territorial-integration impact, including urban-rural linkages, and encourage interventions extending beyond the boundaries of a single administrative-territorial unit.	social housing pilots. Compacts should set simple outcome targets - public-transport ridership, minutes to key services, hectares of cooling canopy, and residents benefiting from upgraded neighborhoods - and report every six months. Investment appraisal should explicitly assess territorial-integration impact, including urban-rural linkages, and encourage interventions extending beyond the boundaries of a single administrative-territorial unit. <u>Introduce demand-responsive and assisted-mobility solutions for access to essential services in rural and small-town areas. Eligible interventions should include on-demand minibuses, mobility vouchers, coordinated inter-municipal transport, and assisted transport for persons with reduced mobility, enabling residents to reach schools, healthcare facilities, social services, training, and employment. These services should be integrated with county and metropolitan public-transport planning and monitored through actual access-time improvements.</u>
170. Deep regional and urban-rural divides continue to fragment opportunities and public-service access. Romania's growth remains concentrated in Bucharest-Ilfov and a few dynamic cities, while lagging areas in the North-East, South-West and South-Muntenia face low productivity, thin	<u>Additional proposal 9 - proposed structural challenge:</u> 170. Deep regional and urban-rural divides continue to fragment opportunities and public-service access. Romania's growth remains concentrated in Bucharest-Ilfov and a few dynamic cities, while lagging areas in the	204. Add demographic, labour-market, and skills layers to the national territorial data platform. The platform should include interoperable datasets on population change, ageing, migration, commuting flows, vacancies, education and training provision, public-service staffing, school capacity, childcare	<u>Additional proposal 10 - proposed policy recommendation:</u> 204. Add demographic, labour-market, and skills layers to the national territorial data platform. The platform should include interoperable datasets on population change, ageing, migration, commuting flows, vacancies, education

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labour markets, and weaker access to services. Peripheral communes and small towns struggle with depopulation, out-migration of youth, and underuse of assets. Localities with the lowest level of development are often those that are not well connected to a dynamic urban centre, while fast-growing peri-urban localities face significant infrastructure and service gaps. Urban-rural disparities vary significantly by region, including between dynamic cities and their adjacent territories.	North-East, South-West and South-Muntenia face low productivity, thin labour markets, and weaker access to services. Peripheral communes and small towns struggle with depopulation, out-migration of youth, and underuse of assets. Localities with the lowest level of development are often those that are not well connected to a dynamic urban centre, while fast-growing peri-urban localities face significant infrastructure and service gaps. Urban-rural disparities vary significantly by region, including between dynamic cities and their adjacent territories. <u>Territorial prioritisation is supported by multiple datasets, but the framework does not yet provide a single transparent composite measure that captures the combined effect of deprivation, demographic pressure, service accessibility, fiscal capacity, and workforce shortages at locality and functional-area level.</u>	availability, health and social-service access, and local labour-market outcomes. These data should be usable by MIPE, regional development agencies, county councils, metropolitan associations, local authorities, PES offices, and line ministries when designing calls and selecting territorial packages. This would help identify where demographic decline, service gaps, and labour shortages intersect and make EU funds more responsive to territorial realities.	and training provision, public-service staffing, school capacity, childcare availability, health and social-service access, and local labour-market outcomes. These data should be usable by MIPE, regional development agencies, county councils, metropolitan associations, local authorities, PES offices, and line ministries when designing calls and selecting territorial packages. This would help identify where demographic decline, service gaps, and labour shortages intersect and make EU funds more responsive to territorial realities. <u>Develop and operationalize a transparent Territorial Vulnerability and Service Accessibility Index to guide the targeting and prioritisation of post-2027 investments. The index should combine poverty and deprivation, demographic decline and ageing, travel time to essential services, labour-market inactivity, local fiscal capacity, infrastructure deficits, and shortages of essential-service personnel. Results should be publicly available at locality and functional-area level and used as an evidence layer, together with sector-specific criteria, when designing calls and selecting territorial packages.</u>
215. Procurement and maintenance planning are underdeveloped. Project preparation and contracting remain complex, often prioritizing lowest cost rather than lifecycle value. Many local	<u>Additional proposal 10 - proposed structural challenge:</u> 215. Procurement and maintenance planning are underdeveloped. Project preparation and contracting remain	202. Professionalize local asset management and maintenance. Require life-cycle costing and funded maintenance plans for all territorial assets; expand municipal access to standard	<u>Additional proposal 11 - proposed policy recommendation:</u> 202. Professionalize local asset management and maintenance. Require life-cycle costing and funded

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administrations lack standard tools for procurement, supervision, or asset management. This affects sustainability: facilities built with EU funds - such as community centres or digital hubs - risk degradation without clear operational budgets and maintenance protocols.	complex, often prioritizing lowest cost rather than lifecycle value. Many local administrations lack standard tools for procurement, supervision, or asset management. This affects sustainability: facilities built with EU funds - such as community centres or digital hubs - risk degradation without clear operational budgets and maintenance protocols. <u>Infrastructure investments can be physically completed without full operational readiness if staffing, referral pathways, service models, maintenance responsibilities, and multiannual operating budgets are not secured before commissioning. This creates a risk of underused or unsustainable social infrastructure despite successful construction and absorption.</u>	contracts for operations and energy-performance partnerships to protect value for money.	maintenance plans for all territorial assets; expand municipal access to standard contracts for operations and energy-performance partnerships to protect value for money. <u>Introduce a mandatory Service Activation and Sustainability Plan as an eligibility and contracting condition for social and community infrastructure investments. Before approval, each project should demonstrate a multiannual operating budget, staffing and recruitment plan, service and referral model, maintenance arrangements, realistic occupancy or utilisation assumptions, and measurable service outcomes for at least five years after completion. Operational readiness should be verified before final project closure.</u>
<i>176. Green-blue infrastructure, brownfield rehabilitation, and environmental quality lag behind needs. Many cities have limited tree cover, few continuous parks or riverfronts, and insufficient storm-water management. Brownfields, contaminated sites, and derelict industrial areas are common near dense neighborhoods but remain difficult to redevelop due to ownership, cleanup costs, or regulatory hurdles. These deficits reduce resilience to heat waves and floods and constrain city livability.</i>	<u>Additional proposal 11 - proposed structural challenge:</u> <i>176. Green-blue infrastructure, brownfield rehabilitation, and environmental quality lag behind needs. Many cities have limited tree cover, few continuous parks or riverfronts, and insufficient storm-water management. Brownfields, contaminated sites, and derelict industrial areas are common near dense neighborhoods but remain difficult to redevelop due to ownership, cleanup costs, or regulatory hurdles. These deficits reduce resilience to heat waves and floods and constrain city livability.</i>		

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	<u>The absence of a legal framework facilitating partnerships between local administrations and the Administrația Națională „Apele Române”/ Administrațiile Bazinale results in cumbersome collaboration protocols, making project implementation along riverbanks difficult for UATs. Additionally, there is a lack of technical norms or regulations enforcing stormwater collection investments and cable underpasses integrated into urban mobility infrastructure.</u>		
<i>175. Public transport, active mobility, and intermodality remain underdeveloped. Outside the largest cities, bus fleets are old, tram infrastructure is outdated, cycling networks are fragmented, and interchanges are scarce. Clean urban fleets and charging networks expand slowly, so car dependence remains high, congestion persists, and emissions rise—undermining both accessibility and environmental targets.</i>	<u>Additional proposal 12 - proposed structural challenge:</u> 175. Public transport, active mobility, and intermodality remain underdeveloped. Outside the largest cities, bus fleets are old, tram infrastructure is outdated, cycling networks are fragmented, and interchanges are scarce. Clean urban fleets and charging networks expand slowly, so car dependence remains high, congestion persists, and emissions rise—undermining both accessibility and environmental targets. <u>This situation is exacerbated by the lack of an approved technical guide or regulation for bicycle lane construction, where the reliance on an unapproved draft leads to fragmented networks. Furthermore, many completed cycle lanes end up being</u>		<u>Additional proposal 12 - proposed policy recommendation:</u> Integrating utility networks and mandating complete green transport infrastructure. Urban mobility infrastructure projects must mandatorily incorporate stormwater collection systems and underground cable duct conduits. Furthermore, project design must enforce the delivery of complete green transport infrastructure—comprehensively combining accessible sidewalks, dedicated cycling tracks, and priority bus lanes—rather than funding or executing these interventions in isolation (e.g., standalone cycle paths or isolated priority lanes).

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	<u>used as sidewalks due to the lack of dedicated pedestrian infrastructure.</u>		
			<u>Additional proposal 13 - proposed policy recommendation:</u> Developing a national guideline for territorial strategies and establishing strategy verification mechanisms. A national guideline for Local Development Strategies and Territorial Strategies must be drafted, with a strong focus on investment prioritization and implementation tracking. To ensure strategy quality and enforceability, a dedicated verification and endorsement body/mechanism should be created, drawing on the best-practice model developed by the North-East Regional Development Agency (ADR NE) through its review and approval framework for Integrated Urban Development (DUI) strategies.
IV.6 Institutional Strengthening for Social Policy Delivery			
210. Digitalisation of public services is advancing, yet citizen-centered use is still limited. The country has designed multiple e-government platforms and initiated interoperability frameworks, but local adoption is uneven. In many areas, citizens and frontline workers cannot complete an entire service journey online - from registration to referral, payment, and outcome confirmation - forcing paper detours. Without end-to-end integration	<u>Additional proposal 13 - proposed structural challenge:</u> 210. Digitalisation of public services is advancing, yet citizen-centered use is still limited. The country has designed multiple e-government platforms and initiated interoperability frameworks, but local adoption is uneven. In many areas, citizens and frontline workers cannot complete an entire service journey online - from registration to referral, payment,	224. Accelerate an integrated digital transformation across ANOFM and the wider social policy delivery chain - combining operational case-management tools with strong data governance. This requires strengthening IT capacity in ANOFM and partner social-assistance and social-service institutions and adopting a sector-wide Digital Transformation Strategy and Data Governance Framework that shifts	<u>Additional proposal 14 - proposed policy recommendation:</u> 224. Accelerate an integrated digital transformation across ANOFM and the wider social policy delivery chain - combining operational case-management tools with strong data governance. This requires strengthening IT capacity in ANOFM and partner social-assistance and social-service institutions and adopting a sector-wide

across employment, social, and health services, digitalisation remains a back-office improvement rather than a genuine inclusion lever.	and outcome confirmation - forcing paper detours. Without end-to-end integration across employment, social, and health services, digitalisation remains a back-office improvement rather than a genuine inclusion lever. <u>As interoperability expands across employment, social, health, and education systems, cybersecurity, personal-data protection, service continuity, and resilience become structural delivery requirements. Uneven local capabilities and the concentration of sensitive data can create operational and trust risks if security is treated as a technical afterthought.</u>	delivery towards citizen-centered services and simplifies processes rather than merely digitizing paper workflows. Interoperability between ANOFM operational systems, local social services and key government databases should be supported by shared case management, secure data exchange, strengthened analytical capabilities and assisted-digital support, especially in rural and peri-urban areas.	Digital Transformation Strategy and Data Governance Framework that shifts delivery towards citizen-centered services and simplifies processes rather than merely digitizing paper workflows. Interoperability between ANOFM operational systems, local social services and key government databases should be supported by shared case management, secure data exchange, strengthened analytical capabilities and assisted-digital support, especially in rural and peri-urban areas. <u>Make cybersecurity, privacy-by-design, and service continuity integral components of digital social, health, education, and employment investments. Projects involving interoperable or sensitive data should include proportionate identity and access management, encryption and secure data exchange, backup and disaster-recovery capabilities, security testing, logging and auditability, incident-response procedures, business-continuity arrangements, and recurring staff awareness and training. Requirements should be risk-based and aligned with applicable EU and national cybersecurity and data-protection rules.</u>
209. Capacity disparities between central and local administrations remain a systemic bottleneck. Romania's large cities and a handful of counties have professional teams for planning, procurement, and monitoring, but most small municipalities operate	<u>Additional proposal 14 - proposed structural challenge:</u> 209. Capacity disparities between central and local administrations remain a systemic bottleneck. Romania's large cities and a handful of counties have professional teams for	228. Simplify and standardize administrative processes across programmes. Beneficiaries and providers face multiple, overlapping rules for reporting, procurement, and verification. Programmes should converge around unified operating	<u>Additional proposal 15 - proposed policy recommendation:</u> 228. Simplify and standardize administrative processes across programmes. Beneficiaries and providers face multiple, overlapping rules for reporting, procurement, and

with minimal staff and high turnover. Technical assistance is available but fragmented, and project management capacity is weakest where needs are highest. These asymmetries lead to uneven quality of social service delivery, thin project pipelines, and frequent delays in contracting or asset maintenance.	planning, procurement, and monitoring, but most small municipalities operate with minimal staff and high turnover. Technical assistance is available but fragmented, and project management capacity is weakest where needs are highest. These asymmetries lead to uneven quality of social service delivery, thin project pipelines, and frequent delays in contracting or asset maintenance. <u>Complex reimbursement and verification requirements can create a disproportionate administrative burden for small municipalities, NGOs, social-service providers, and training providers, reducing participation and diverting scarce staff capacity from service delivery to document processing.</u>	models: one set of templates, one reporting cadence, and one outcomes protocol. Service bundles that integrate employment, training, and social inclusion should replace fragmented projects to ensure continuity and reduce bureaucracy.	verification. Programmes should converge around unified operating models: one set of templates, one reporting cadence, and one outcomes protocol. Service bundles that integrate employment, training, and social inclusion should replace fragmented projects to ensure continuity and reduce bureaucracy. <u>Subject to the final post-2027 EU regulatory framework, establish a national catalogue of simplified cost options for recurrent social and human-capital interventions. Standard unit costs and lump sums could be developed for training, counselling, mediation, community outreach, home-care services, integrated case management, and other standardised service bundles. Verification should focus on eligible delivery and results rather than exhaustive invoice-based control, while preserving audit trails and anti-fraud safeguards.</u>
209. Capacity disparities between central and local administrations remain a systemic bottleneck. Romania's large cities and a handful of counties have professional teams for planning, procurement, and monitoring, but most small municipalities operate with minimal staff and high turnover. Technical assistance is available but fragmented, and project management capacity is weakest where needs are highest. These asymmetries lead to uneven quality of social service delivery, thin project pipelines, and frequent delays in contracting or asset maintenance.	<u>Additional proposal 15 - proposed structural challenge:</u> 209. Capacity disparities between central and local administrations remain a systemic bottleneck. Romania's large cities and a handful of counties have professional teams for planning, procurement, and monitoring, but most small municipalities operate with minimal staff and high turnover. Technical assistance is available but fragmented, and project management capacity is weakest where needs are highest. These asymmetries lead to uneven quality of social service delivery,	225. Turn Technical Assistance into a delivery engine focused on problem-solving while avoiding capacity substitution. TA resources should prioritize actions that remove bottlenecks in implementation - standard procurement templates, model Terms of Reference, unified reporting frameworks, and embedded coaches who strengthen internal teams during contracting and start-up rather than replacing them. Counties and municipalities below the national median on administrative capacity or territorial delivery should receive dedicated TA packages linked to	<u>Additional proposal 16 - proposed policy recommendation:</u> 225. Turn Technical Assistance into a delivery engine focused on problem-solving while avoiding capacity substitution. TA resources should prioritize actions that remove bottlenecks in implementation - standard procurement templates, model Terms of Reference, unified reporting frameworks, and embedded coaches who strengthen internal teams during contracting and start-up rather than replacing them. Counties and municipalities below the national median on administrative

	thin project pipelines, and frequent delays in contracting or asset maintenance. <u>Weak project pipelines often originate before calls are launched: smaller beneficiaries may lack resources for feasibility studies, technical design, surveys, permitting, land and ownership clarification, cost estimates, and procurement preparation. Technical assistance focused only on contracting and implementation therefore arrives too late to solve upstream project-readiness gaps.</u>	clear capability milestones and performance incentives tied to verified outcomes.	capacity or territorial delivery should receive dedicated TA packages linked to clear capability milestones and performance incentives tied to verified outcomes. Establish Regional Project Preparation Support Mechanisms Establish regional project preparation support mechanisms, without creating new permanent public design bodies, to help build technically mature investment pipelines before funding calls are launched. The mechanisms should provide or finance technical assistance for feasibility studies, technical surveys, permitting, land and ownership clarification, environmental documentation, cost and option analysis, procurement preparation and, where appropriate, technical design. Specialised technical documentation should continue to be prepared by qualified external professionals and firms selected through transparent and competitive procedures. The role of the regional mechanism should be to finance, coordinate and quality-assure project preparation rather than replace the professional engineering, architecture and consultancy market. Support could be delivered through dedicated technical-assistance calls, project-preparation grants or vouchers, framework contracts with qualified providers, or expert advisory services. Priority should be given to small municipalities, inter-municipal partnerships and territories with limited administrative capacity, and support
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			should be linked to a clearly defined pipeline of investments intended for future national or regional calls. To avoid financing studies that subsequently become unusable, project preparation should be based on forward-looking technical requirements and indicative conditions agreed in advance with the relevant Managing Authorities, with mechanisms for updating documentation when future calls introduce material changes.
208. Fragmented governance and overlapping mandates weaken delivery coherence. Social, employment, health, and territorial policies are managed by separate ministries, agencies, and county or municipal structures, often with insufficient coordination or shared accountability. Cross-sector platforms exist but remain procedural, focusing on compliance and spending rather than integrated problem-solving. As a result, beneficiaries face discontinuous support pathways - moving from education to employment, or from health to social assistance - without consistent follow-up or shared data systems.	<u>Additional proposal 16 - proposed structural challenge:</u> 208. Fragmented governance and overlapping mandates weaken delivery coherence. Social, employment, health, and territorial policies are managed by separate ministries, agencies, and county or municipal structures, often with insufficient coordination or shared accountability. Cross-sector platforms exist but remain procedural, focusing on compliance and spending rather than integrated problem-solving. As a result, beneficiaries face discontinuous support pathways - moving from education to employment, or from health to social assistance - without consistent follow-up or shared data systems. <u>Fragmentation is reinforced when one policy objective requires beneficiaries to prepare separate applications, contracts, calendars, procurement processes, and reporting systems for infrastructure, staffing, training, activation, and community support. Even when interventions are conceptually integrated,</u>	228. Simplify and standardize administrative processes across programmes. Beneficiaries and providers face multiple, overlapping rules for reporting, procurement, and verification. Programmes should converge around unified operating models: one set of templates, one reporting cadence, and one outcomes protocol. Service bundles that integrate employment, training, and social inclusion should replace fragmented projects to ensure continuity and reduce bureaucracy.	<u>Additional proposal 17 - proposed policy recommendation:</u> 228. Simplify and standardize administrative processes across programmes. Beneficiaries and providers face multiple, overlapping rules for reporting, procurement, and verification. Programmes should converge around unified operating models: one set of templates, one reporting cadence, and one outcomes protocol. Service bundles that integrate employment, training, and social inclusion should replace fragmented projects to ensure continuity and reduce bureaucracy. <u>Where permitted by the final post-2027 EU regulatory framework, enable integrated multi-component interventions to be financed through a single application and coordinated funding decision. Projects combining infrastructure, service delivery, staffing and skills development, activation, mobility, and community support should operate under one results framework, one</u>

	<u>administrative fragmentation can break the service pathway at implementation stage.</u>		<u>implementation calendar, and one coordinated reporting architecture, even where several funding sources contribute. The objective should be to preserve integrated delivery while reducing administrative fragmentation for beneficiaries.</u>
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We remain at your disposal for any further clarifications or consultations regarding the topics addressed above.

Yours sincerely,

Ciprian MORCAN
 President, AMCOR



Reviewed by the AMCOR Professional Committee for European Funds (CPFE)

Lucian NAUM
 Coordinator, AMCOR CPFE

