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EU Cohesion Policy Implementation and Administrative Capacities: Insights from Italian Regions

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ABSTRACT

In this article we explain Italy's partial persisting difficulties in EU cohesion policy implementation by focusing on one specific variable: regional administrative capacity. In line with research findings based on the national level (Tosun, 2014), our working hypothesis is that administrative capacity is the most important explanatory factor of EU cohesion policy implementation also at the regional level. In the article, by adopting a 'most similar research cases' design approach, we test the hypothesis with reference to two Italian regions: Campania and Puglia. In addition, we seek to adequately define the concept of 'administrative capacity' and operationalize it properly. In the concluding section, we consider the competitive advantage of our definition and operationalization of the notion of administrative capacity also with reference to other policy sectors beyond cohesion policy.

KEYWORDS EU cohesion policy; administrative capacity; Southern Italy; policy implementation; multi-level governance

1. Introduction

As is well known, EU cohesion policy has become one of the most important redistributive policies: the 2014–20 EU budget allocated almost €352 billion for the financing of the growth goals (under which cohesion policy is located). The figure corresponds to roughly 33% of the entire EU budget. In addition, from an academic perspective, cohesion policy has become increasingly interesting (just to mention some of the most prolific scholars on the subject: Hooghe and Marks, 2001, 2003, 2004; for a recent overview Piattoni and Polverari, 2016).

More specifically, the most interesting aspect in terms of scholarly research is that the adoption of EU cohesion policy has progressively limited the discretion of national and subnational actors (Graziano, 2013; Polverari, 2013), but at

the same time the policy is implemented through a network of actors located at different institutional levels (European, national, regional, local but also including representatives from civil society). And implementation results have been quite diverse in the various European regions (Dabrowski and Graziano, 2016). Therefore, researchers have primarily focused on a very specific research question: What are the drivers for effective implementation?

In terms of indicators, a common approach adopted in current literature uses financial absorption and execution as proxies for describing different regional implementation performances of member states. In terms of explanation, low levels of financial execution are often associated with administrative failures (such as inadequate planning) or practical implementation obstacles (Milio, 2007; Bubbico and De Michelis, 2011). But political and more specific procedural explanations have also been used in the literature —as we will show in the following section.

The article is organized as follows: in the next section we will present the research strategy; in section 3 we will present the regional administrative capacity matrix, which will be used for the empirical analysis carried out in sections 4 and 5; sections 6 and 7 cover a comparative discussion and concluding remarks.

2. Research Design and Methods

Cohesion policy has been a long-standing subject of enquiry in European policy studies (for an overview, see Piattoni and Polverari, 2016), but limited attention has been paid to administrative capacity as a key determinant of policy implementation. This study focuses on the Italian case as one of the countries that has continuously obtained a large share of EU funds and has witnessed the most significant problems in policy implementation (Graziano, 2013).

More generally, together with 'internal' administrative capacity, the existing literature has identified three major explanatory factors: some authors (Barca, 2006, 2011; Milio, 2007, 2008; Viesti, 2015) have identified at least three other aspects—aside from mere administrative issues—that may account for cohesion policy implementation:

Political stability: in explaining the historical delay in cohesion policy implementation in Italy, especially at the regional level, the existing literature attributes great significance to the political framework (Viesti, 2015). The lack of strong 'ordinary' public policies and the difficulty of national policy makers in defining clear and specific measures to be implemented have been considered as key reasons for poor implementation records. Furthermore, and even more relevant, at the regional level political instability has been considered as a key determinant for poor effective funds allocation (Milio, 2008).

- Implementation procedural variables: between policy adoption and implementation there is a significant delay, most notably in Italy, Such delay is related to the slow procedures for activation of call for proposals/tenders, frequent administrative complaints, in itinere and ex post controls. The delays are significant in the case of public works: for example, the average time required for the completion of public works amounting to more than €100 million is approximately 11 years in Italy.
- Resource availability variables: many regional governments are subject to the constraints on cash payments established by the ever-changing and increasingly restrictive rules of the 'patto di stabilità interno'. The 'patto di stabilità interno' implies that even when there are no anomalies on the reporting side, the government cannot deliver the sum due: this results in delays in both the implementation of interventions and in expenditure reporting. In other words, financial constraints, mainly related to the ever-changing financial framework and the problematic state of public finances, strongly impact on the capacity of regional governments to spend Structural Funds and ultimately to implement the interventions outlined in their regional Operative Programmes.

While Bubbico and De Michelis (2011) and Barca (2011) emphasize the relevance of cash flow issues related to the implementation of Structural Funds (such as financial reporting and the limitations represented by the 'patto di stabilità interno'), Viesti considers all three of the above-mentioned issues as elements that hinder Structural Funds' implementation in Southern Italy.

Our contribution starts from the acknowledgement that these elements are common to all the regions of Southern Italy. But a puzzle remains: within one country—Italy—, regional implementation may differ significantly. Therefore, we consider that administrative capacity—since we 'control' for the other variables which do not vary in Southern Italy—may be the key explanation of differential EU cohesion policy implementation. Therefore, our study is aimed at answering the following research guestion: Can cohesion policy implementation differences be explained by different degrees of regional administrative capacities? And our research hypothesis is the following: Controlling for the other above-mentioned factors, higher administrative capacities will lead to more effective EU cohesion policy implementation measured in terms of expenditure capacity.

Using Milio's administrative capacity loop and the regional performance matrix as an empirical framework (with due adjustments—see below), the analysis, which is based partly on a policy document analysis and partly on interviews, will assess and compare the administrative capacity of Campania and Puglia, between the third (2000–06) and the fourth programming period (2007–13). To be sure, administrative capacities are not given once and for all: we will seek to argue that under specific political conditions administrative capacity building may occur. We shall seek to prove our argument using the example of Puglia, and contrast it with Campania where regional administrative capacities have not increased over the past 10 years.

A 'most similar cases' research design has been followed. The cases (both Italian regions, in order to control for the domestic politico-institutional national setting, which would not have been controlled for with a study of regions of different EU member states) have been selected on the grounds of three criteria which echo the other explanatory variables illustrated above:

- Political stability: both regions have benefited from relatively stable governments during the considered time frame (Tronconi, 2015).
- Implementation procedures: both regional administrations had to cope with the same European policies and previously had similar compliance problems (Graziano, 2010).
- Resource availability: since the overall size of the allocated funds does have
 a considerable impact on the implementation process, we considered only
 regions that had similar overall allocations. In terms of regional operational
 programmes (ROPs) 2007–13, Puglia received an allocation of €1293 per
 capita, whereas Campania received an allocation of €1190 per capita—
 data which make the two regions very similar in this respect.

The financial execution analysis reveals, interestingly, that expenditure rates concerning EU cohesion policy were quite similar until 2002 (which is not surprising since both regions were at the beginning of the new cohesion policy programme): as will be further illustrated in the following sections, from 2002 onwards there appears to be a fork between the financial execution of the two programmes. The data represented in Figure 1 shows that the Puglia region systematically managed to spend a higher percentage of the ERDF budget. For instance: already by December 2002, Puglia had managed to spend 13.3% of the ERDF budget, while Campania had managed to spend only 8.2%.

The gap between the two regions has remained to some extent throughout the entire programming cycle: by the end of the programming cycle, Puglia had managed to spend 93.7% of the ERDF budget, while Campania had managed to spend only 84.4% Figure 2.

With regards to the European Social Fund, the two regions had similar patterns during the programming cycle. It should be noted that the European Social Fund is much smaller compared to the European Regional Fund (see Figure 3). One explanatory variable that has been mentioned by the interviewees concerning the diverging patterns between the ESF and the ERDF (which concerns both regions) is size: Bigger budgets are more complicated to manage and therefore potentially require greater administrative capacities Table 1.

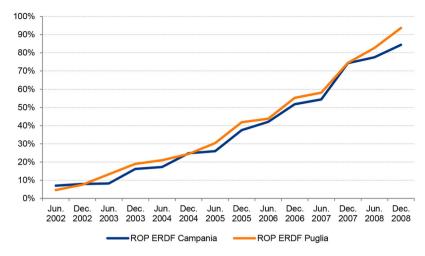


Figure 1. Certified expenditure of the ROPs of Puglia and Campania regions under the European Regional Development Fund (% of expenditure over final budget allocation), 2000–06. Source: Own calculations on IGRUE data, 2016.

Furthermore, the ESF typically funds training programmes, while the ERDF usually finances infrastructure projects. What clearly emerged from the interviews is that projects financed by the ERDF posed significant regulatory challenges (more compliance requirements, comprehensive audit processes and controls) and more comprehensive programming capacity.

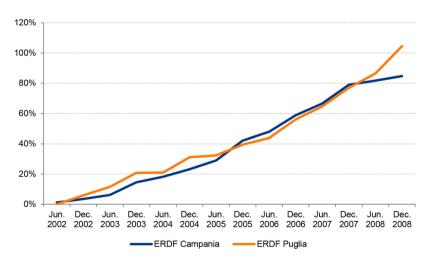


Figure 2. Certified expenditure of the ROPs of Puglia and Campania regions under the European Social Fund (% of expenditure over final budget allocation), 2000–06. Source: Own calculations on IGRUE data, 2016.

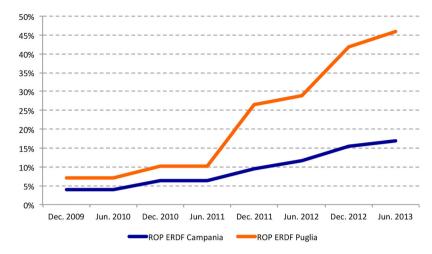


Figure 3. Certified expenditure of the ROPs of Puglia and Campania regions under the European Regional Development Fund (% of expenditure over final budget allocation). 2009-13. Source: Own calculations on IGRUE data, 2013.

Regardless, by the end of the programming cycle it became evident that the Puglia region managed—also in this case—to spend a higher percentage of the available ESF budget (104.5% vs. 84.7%).

The fork between the two regions was even more evident during the 2007– 13 programming cycle (see Figure 4): starting from 2009 the Puglia region has been reporting a higher capacity of expenditure both under the ESF and the ERDF.

Interestingly, the fork is limited before 2009. As it emerged from the interviews and relevant literature, this phenomenon is mainly explained by two causes that have been cited at the beginning of this article: the time lag between project implementation and actual payment and the overlapping between two programming cycles.

Once again, while looking at financial execution rates we suggest caution. From a theoretical point of view, the financial execution curve should follow up with the implementation process (and thus the learning curve), however, as explained at the beginning of the article, payments are not made in real time, they do not reflect entirely the process of implementation of the

Table 1. Resource allocation for the Campania and Puglia regions during the 2000–06 programming cycle (€).

€	Campania	Puglia
ERDF	5,551,407,320	3,443,654,000
ESF	1,003,482,527	877,460,285
Total	6,554,889,847	4,321,114,285

Source: Own calculations on IGRUE data, 2016.

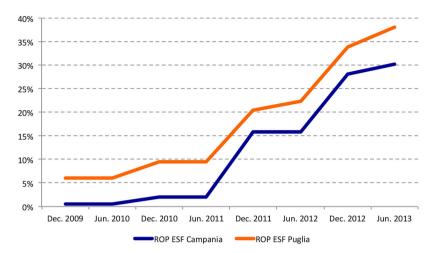


Figure 4. Certified expenditure of the ROPs of Puglia and Campania regions under the European Social Fund (% of expenditure over final budget allocation), 2009–13. *Source*: Own calculations on IGRUE data. 2013.

ROPs, but they may be delayed depending on the availability of the budget allocated to the relevant Directorates. In these cases, we should take more into consideration the actual stock of payments at the end of the programming cycle rather than the flow.

We have already noted that between the end of one programming cycle and the beginning of the new one there is a significant overlap. Programming cycles provide different regulatory requirements that cause confusion and delay at the beginning of the programmes. National and regional managing authorities face various difficulties in the simultaneous management of two different programming cycles, since new administrative structures and rules need to be adopted.

Furthermore, the n+2 rule implied that the funds made available during the 2000–06 programming period could be spent until the end of 2008. During the interviews it clearly emerged that between 2006 and 2008, measure delegates of both regions were much more concerned with spending the funds of the 2000–06 programming period than those of the 2007–13.

The most recent data show that significant differences have emerged (Figures 3 and 4). By June 2013, the Puglia region managed to spend 25.6% while the Campania region spent 14.7%. In the following sections we will describe the process of capacity building that took place in the two regional structures. We will identify and underline the variables that have been critical for success as well as the main obstacles to cohesion policy implementation. We will argue that the capacity building started in Puglia during the 2000–06 programming cycle had a positive impact on the following programming

period. The autonomy from the regional government introduced accountability and empowered the management structure while the limited use of external technical assistance promoted the growth of internal competences.

3. Measuring Administrative Capacities: The Regional **Administrative Capacity Matrix**

As mentioned above, the sources are of three types: literature review, policy document analysis and semi-directive interviews with the most relevant administrative actors. In order to systematize the collected information, a regional administrative capacity matrix (RACM) was used in order to analyse the material collected throughout the first two moments.

We started from Milio's matrix since we considered it to be particularly useful in the context of our analysis: Milio's proposal summarizes the main activities related to administrative capacity and it defines some key indicators. Nevertheless, we revised it in order to be more coherent with the score allocation and the identification of the main dimensions of analysis. Table 2 and Figure 5 summarize Milio's model.

Since programming implies foreseeing contextual needs in a time frame of six to ten years, it might very well be that not all future scenarios may be initially considered; some new elements may emerge, while others may be reconsidered. Consequently, it is logical to assume that regional goals may be subject to changes over the programming period, especially following mid-term reviews. Furthermore, an unstable project framework undoubtedly hinders programme implementation. Therefore, in order to assess the framework's effectiveness, a new indicator has been introduced within the regional administrative capacity matrix: the number of supplementary programming documents—Complementi di Programmazione (CdPs)—drafted throughout the programming period and whether they introduced changes in the financial allocations.

Another relevant indicator that has not been considered in Milio's analysis is the relevance of external actors for technical assistance. The impact of external technical assistance on Structural Funds management is often seen as a sign of administrative capacity and, most of the time, it is indeed; when interpreted correctly, the role of external technical assistance is pivotal in guaranteeing support to internal personnel and providing regular and satisfying financial performances of the ROPs. However, in some cases, especially

Table 2. Potential scores of overall administrative capacity. Source: Milio (2007).

Stage		Absent		Nascent E		Emerging		Consolidated	
Score	0	2.4	2.5	4.9	5.0	7.4	7.5	10.0	

Source: Milio (2007).

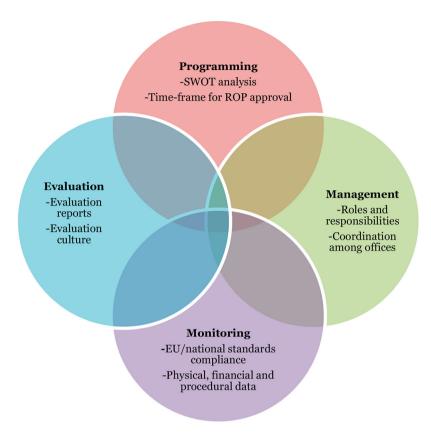


Figure 5. Key performance indicators and indexes identified by Milio.

when internal administrative structures are unable to implement the ROPs efficiently, technical assistance assumes an excessive role and replaces internal personnel in their responsibilities. This process not only triggers irresponsible behaviours in the internal staff but also hinders the pivotal process of capacity building.

Capacity building requires the development of conditions that allow building and improving existing knowledge and skills within public administration: when the role of external technical assistance becomes too pervasive and substitutes the administrative role, capacity building is hindered. For the above-mentioned reasons, we decided to introduce a new indicator related to the ratio between internal and external competences.

The third innovative aspect that has been introduced by this analysis is the use of monitoring systems for managing purposes. This aspect is quite relevant as suggested by OIR (2003); the majority of administrations still perceive monitoring more as a compliance exercise rather than an opportunity.

Therefore, the analysis decided to introduce an innovative indicator referred to the use of monitoring data for management purposes. Indeed, this analysis stresses the point that when the regional structure is capable of tracking real-time, at any given moment, the status of each individual project, the overall implementation of the programme is facilitated. If issues do emerge, an effective monitoring system is capable of identifying the problem and find a solution.

Lastly, a new indicator has also been introduced under the key dimension of evaluation: in recent times, the role of evaluation units (especially since the previous programming period) has become increasingly relevant within cohesion policy implementation. The *Nuclei di Valutazione e Verifica degli Investimenti Pubblici* (evaluation units), once considered passive observers of regional policy, are now taking actively part in the policy's implementation. Therefore, this analysis decided also to consider the institutional role of evaluation units, which have covered different functions in the two case studies.

A score from 0 to 3.3 has been attributed to each indicator on the basis of specific requirements, which will be detailed in the empirical section of this article (with the exception of the evaluation index, which had a score that ranged from 0 to 5). The score of each index (programming, management, monitoring and evaluation) is the sum of each indicator: the final score is the average of each index. In order to avoid any kind of selection bias, the indexes have been attributed with the same weights in order to determine the final score. Table 3 summarizes the RAC matrix.

4. The Italian Case: The Evolution of the Multi-Level Bottleneck

The misalignment between the Italian approach and EU cohesion policy as envisaged in the 1988 Structural Funds reform was so evident that an authoritative observer like Barca (2009) referred to it as a problem which required a paradigm shift. The adoption of new local development models was intended to emphasize the role of endogenous resources through joint programming.

Furthermore, the decentralization of administrative responsibility clashed heavily with the lack of experience of the regional administrations to programme and manage such interventions. Regional administrations were barely acquainted with the territory in which they operated, while horizontal and vertical cooperation were scarcely taken into consideration. Overall, Italian regions became more familiar with EU planning tools during the 2000–06 programming period. Managing Authorities started to design and implement accurate monitoring tools (such as Puglia's MIRWEB which will be discussed later), and projects were scrupulously examined by the new 'Nuclei di valutazione e verifica degli investimenti pubblici'.

However, the 2007–13 programming period reported a series of relevant bottlenecks that seriously affected the capacity building process. Structural

Table 3. Regional administrative capacity matrix

SCORES		Absent	Nascent	Developing	Consolidated
PROGRAMMING					
1.A Programme design: SWOT analysis and partnership	RATIO	No SWOT	Introduction of SWOT analysis that does not take into consideration relevant territorial needs due to poor partnership involvement in the programming.	Introduction of SWOT analysis that takes into consideration relevant territorial needs. The involvement of socio-economic partnerships is limited to the programming phase.	Introduction of an accurate SWOT analysis that takes into consideration relevant territorial needs and budget availability. Strong involvement of socioeconomic and institutional stakeholders in the programming.
	POINTS	0.0	1.1	2.2	3.3
1.B Number of CdPs and resource scheduling	RATIO	No CdP is drafted	The CdP is produced but it remains vague and indeterminate on the means to achieve the proposed objectives, no resource scheduling or allocation. Missing link between targets, indicators and necessary interventions. More than five CdPs are drafted throughout time with various and substantial changes.	The CdP provides a stable framework for programme implementation: limited resource scheduling and definition of the means to achieve proposed objectives. Fewer than five CdPs are drafted during the programming period. However CdPs may be subject to substantial changes following reviews (mid-term review). Consequently the link between targets, indicators and necessary interventions requires further specification	The CdP provides thorough resource scheduling and explicitly describes the means through which obtain the proposed objectives. Management limits as much as possible changes to the CdP in order to guarantee a stable framework for the programme (no more than three CdPs are drafted). The link between target, indicators and the necessary interventions is present and logically explicated.
	POINTS	0.0	1.1	2.2	3.3

(Continued)



Table 3. Continued.

SCORES		Absent	Nascent	Developing	Consolidated
1.C Time lapse between the beginning of the negotiations for the CSF and the ROP approval	RATIO	ROP approval is consistently delayed (more than 2 years). 0.0	ROP approval is delayed by two years. 1.1	ROP approval is delayed by only one year. 2.2	The ROP is fully operative within six months. 3.3
MANAGEMENT 2.A Clarity in the definition of roles among offices, authorities and personnel	RATIO	Roles and responsibilities are poorly defined and interchangeable.	Staff roles and responsibilities while formally defined remain, in practical terms, vague and undetermined. Management is strictly centralized and management choices are influenced by the political context. Civil servants carry out prescribed operations with no idea of the bigger picture.	Staff roles and responsibilities are formally and practically defined. Management is independent but still involves civil servants to a limited extent. Civil servants do not always actively participate in the management process and have a limited understanding of their contribution.	Staff roles and responsibilities are formally and practically codified into protocols. Staff is fully aware of its position and is encourage by the management to actively participate in the management process.
2.B Coordination and cooperation among departments	POINTS RATIO	Low levels of communication between staff and departments. Lack of formal / informal communication channels.	I.I Initial creation of formal (or informal) communication and decision-making channels. Communication between internal staff is modest and interaction with different offices is limited.	Formal and informal channels are both effectively used. Good communication between staff and offices. Internal staff generally communicates with each other. Problems may occur when assessing communication flows between different offices.	3.3 The organization carries out periodic assessments of communication flows in order to guarantee the best information standards (independently from the formal and informal character of the channel). Satisfying levels of communication at all levels, both within each office and between offices.
	POINTS	0.0	1.1	2.2	3.3

13

2.C Ratio between internal and external resources	RATIO	Scarce knowledge of Structural Funds in the overall regional structure, poor computer skills of personnel. No external technical assistance.	Modest knowledge of Structural Funds procedures in the overall regional structure. Technical Assistance is required to actively take part into management decisions due to scarce autonomy of the overall structure.	Overall understanding of Structural Funds. The complexity of the procedures, which tends to slow down expenditure, induces regional administration to rely significantly on external technical assistance towards the end of the programming cycle in order to accelerate financial expenditure. 2.2	Good organizational memory of the overall structure and knowledge of Structural Funds procedures and rules. Internal personnel are capable of managing autonomously the ROP. TA is present but does not substitute management in decision-making.
MONITORING					
MONITORING 3.A Introduction of a system of indicators and of monitoring procedures compliant with national or EU standards and assessed by evaluators	RATIO	No monitoring system or procedures.	The evaluation unit judges the monitoring system as unsatisfactory. The system is formally compliant, but indicators and data collection procedures are not well developed.	The evaluation unit judges the monitoring system generally satisfying but underlines issues that should be addressed. The system is coherent with national/European standards. Some problems with practical application of indicators and procedure may arise.	The evaluation unit is comprehensively satisfied by the system. Indicators and procedures are entirely coherent with European/national guidelines and are specifically conceived for the regional context.
3.B Availability of physical, financial and procedural data	POINTS RATIO	0.0 No available data	1.1 Partial availability of data. The provided data is mainly financial and is usually provided towards EU deadlines.	Data is available within a reasonable time-span and not only towards EU deadlines. The provided data is more financial than physical. Some problems with reporting on procedural data concerning the status of the projects.	3.3 Continuous flow of monitoring data. Data is available in any moment and is used to support the policy process in every step. The kind of data provided is physical, financial and procedural: the regional administration is capable of framing at any time the status of the selected projects.
	POINTS	0.0	1.1	2.2	3.3

Table 3. Continued.

SCORES		Absent	Nascent	Developing	Consolidated
3.C Use of monitoring data for managing purposes	RATIO	Management is unable to use the provided data.	Management uses the monitoring system exclusively as a financial reporting tool and not for managing purposes. Management and personnel perceive monitoring as a time-consuming and costly operation of little relevance.	Management uses the monitoring system both as reporting and management tools. In some policy areas, management tends to use the monitoring system more as a financial reporting tool than for management purposes.	Management uses extensively the monitoring system, both as a reporting tool and as a management tool with no discrimination among policy areas. Management and personnel fully understand the relevance, the mechanisms and the implementation of the entire monitoring system and actively use it to monitor the status of the projects.
		0.0	1.1	2.2	3.3
EVALUATION 4.A Production of the evaluation reports	RATIO	No reports are produced.	Only the <i>ex ante</i> report is produced. (Only one report)	The ex ante and in itinere reports are produced. (Two reports)	The ex ante, in itinere and ex post reports are produced. (Three reports)
отаналитерия	POINTS	0	1.67	3.33	5.00
4.B Institutional role of the evaluation unit.	RATIO	No evaluation unit is institutionalized.	The evaluation unit has a limited role within the structure and its recommendations are poorly valued.	The evaluation unit plays a pivotal role in the programming but is not actively involved in the implementation.	The evaluation unit has a strongly relevant institutional role within the structure and takes actively part in the implementation of the programme.
	POINTS	0	1.7	3.3	5.0

Funds implementation showed problematic aspects in all member states during the 2007–13 programming period especially in the start-up phase, due in part to new, complex planning and management rules, but also because the 2008 financial crisis had a significant impact on liquidity and investments. Italy however continued throughout 2010 to demonstrate relevant and persistent problems especially, but not exclusively, in the regional programmes of the so-called 'Convergence Objective'.

To provide evidence of the lag that developed between 2007 and 2013, it is sufficient to consider the first three years of the present and previous programming periods. At the end of 2010, only 7.4% of the EU allocated resources had been spent by Italy (the lowest figure in the entire EU) against an EU average of twice that much (14.4%). In 2003 Italy managed to spend 16.6% of its resources. accumulating a far more modest backlog with the EU (4.7 percentage points).

With the new 'Piano di Azione Coesione', initiated towards the end of 2011, Italian cohesion policy has been subject to substantial changes which have radically revised its objectives and principles. The major new feature in the 'Piano di Azione Coesione' was the programming of the financed interventions on a six-month basis. The goal of this realignment was to accelerate the implementation of the 2007–13 programming.

Even though many other EU countries made significant improvements in terms of financial execution between 2011 and 2013 in order to spend the available resources by the end of the programming cycle, the strategic realignment of programming produced impressive results in Italy between 2011 and 2012. Certified expenditure in Italy has risen from 7.4% in 2011 to 23.2% in 2013. According to the European Commission data (see Figure 6), in the 14 months between November 2011 and December 2012, Italy

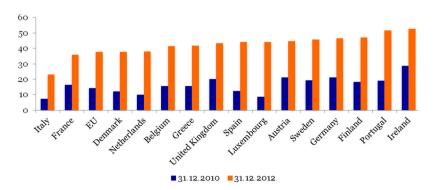


Figure 6. Financial execution of Structural Funds of the 2007–13 programming period between 2011 and 2013 (% of expenditure on total allocated funds). Source: Own elaboration on European Commission data, 2013.

managed to employ more EU funds than in all the previous years of the programming period.

However, not all Italian regions produced similar performances in terms of financial execution of Structural Funds. There have been consistent differences, which we are going to explore in the following sections of this article.

5. Campania and Puglia: A Comparative Analysis

5.1. Campania

5.1.1. Programming

During the previous programming period, the regional administration carried out an accurate SWOT analysis, considering strengths, weaknesses, threats and opportunities of each intervention area (axis). The initial programming was oriented towards a few specific objectives (mainly valorization of cultural resources, requalification of metropolitan areas and development of infrastructural networks), which ultimately privileged big strategic projects. The *ex post* evaluation, however, underlined how the ROP had assigned a series of tasks requiring efforts and resources that went far beyond the competences of the regional administration. Furthermore, the programmatic documents remained vague and indeterminate on the time frame of the programme, the only constraint being the n+2 rule.

Consequently, during the implementation of the programme, the limited series of objectives outlined in the ROP was translated into a resource distribution logic that privileged a multitude number of small projects³ (and thus of beneficiaries). The need to concentrate and simplify interventions clashed with the marked dispersion of financial resources, and this ultimately affected overall implementation of the programme.

Since socio-economic actors were involved to a limited extent in the programming, the regional administration had doubts as to whether some projects were sustainable and could be carried out in the foreseen time frame. In this context, the n+2 became a critical factor in choosing the financed projects.

The ROP 2000–06 was approved by the European Commission on 8 October 2000, the 'Complemento di Programmazione' later. The financial perspectives of the 2000–06 period as well as the main regulations concerning the Structural Funds had been officially outlined in March 1999. Thus, a considerable delay was reported, which was particularly noticeable in the setting out of the management structure of the ROP: in the formal constitution of the projected organizational structures, in the institution of the staff units that were ultimately responsible for the implementation of the measures and in the assignment of tasks to the various delegates.

5.1.2. Management

The organizational chart specifically provided by the 'Complemento di Programmazione' institutionalized a management structure divided into seven macro-areas which comprised (Figure 7): The technical secretariat for the management and surveillance committee, the unit for partnership support, the monitoring unit, the financial management unit, the integrated projects unit, the dissemination, information and data system unit and, lastly, a cross-sectional expert in law and security.

Formal roles and responsibilities were clearly specified in this complex and specific chart. Initially the regional government acted as the managing authority, nominating a delegate within the 'Dipartimento dell'Economia' (Economic Department). In principle, roles and responsibilities were clearly specified, but in practice these were constantly changed. The strong link between management and the regional government was particularly evident in moments of political uncertainty. Consequently, even in a context of political continuity, the changes registered at government level were felt at management level as well. During the entire programming period there have been four different managing authorities. Changes in the managing authorities implied a considerable turnover of the measure delegates (responsabili di misura). The first managing authority nominated the responsabili di misura, selecting principally among external managers

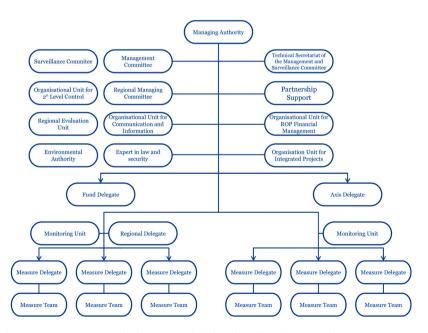


Figure 7. Organizational chart provided by the 'Complemento di Programmazione'. Source: Complemento di Programmazione POR Campania 2000–06.

(60 managers out of 64); from 2002 the new managing authority tried to involve more civil servants: their number increased from 4 to 21. Almost every year the balance between managers and civil servants was changed, with considerable shifts in tasks and key responsibilities. Instead of assuming the role of policy advisor, the management often awaited the government's decision in order to be politically compliant: consequently, technicians searched more for political consensus rather than effective support and consideration of their own competences. In such a context, personnel at all levels found it very difficult to feel responsible for the delivery of results.

Undoubtedly, another problematic aspect presented itself in the lack of communication flow between departments. As the *ex post* evaluation of the programme confirmed, in some cases staff were not even able to identify the measure delegates of certain areas. Another critical aspect was the role of the external technical assistance. Since the overall regional structure had only been involved to a limited extent in the implementation of the POP 94–99, EU procedures and regulations were something new to the majority of the personnel. The regional administration set up an experienced technical assistance team (TA), i.e. two external consultancy firms and some experts, in order to support the programming and implementation of the ROP 2000–06.

In the context of the ROP, the need to demonstrate good financial performance induced the technical assistance staff, rather than merely to provide support, to start taking over the ordinary activity of the regional administration. The consequences of an excessive use of technical assistance were twofold: on the one hand, it fundamentally compromised the process of capacity building of the entire regional structure; on the other hand, it prevented the internal staff from assuming responsibilities.

5.1.3. Monitoring

The ROP formally envisioned the creation of a monitoring system named SMILE, responsible for backing up the national monitoring system (MONIT). In principle, the system was capable of providing real-time data; in practice, the measure delegates were responsible for the updating of the system, which was provided with mainly financial data and exclusively towards the EU deadlines.

A critical issue was that only financial indicators had to be legally disclosed. Indicators of outcomes and impacts were not regulated by strong mandatory requirements established at national or European level; hence they were perceived as a bureaucratic burden. Overall, the evaluation unit judged the monitoring system as unsatisfactory for the objectives proposed. In the final analysis, despite various efforts, the administration failed to introduce an integrated monitoring system that would allow managers to assess the status of the interventions and eventually introduce corrective measures *in itinere* (so as to improve the overall implementation of the programme).

5.1.4. Evaluation

Even though all three evaluation reports (ex ante, in itinere and ex post) were carried out and published, the serious shortcomings of the monitoring system had strong repercussions on the evaluation process. The provided data largely concerned financial transfers, which were ultimately inadequate to frame the status of the financed projects and intervene in itinere. The management did not use the provided data to frame the status of projects, but simply to certify expenditure. Despite the above-mentioned shortcomings, over time there has been a substantial improvement in evaluation culture and accountability. However, the learning processes have not been very widespread: some internal resources did develop consistent competences within the programming cycle, but many staff members of the previous programming cycle were left out in the following.

The regional evaluation unit (NVVIP) deserves particular mention; created in 1999, it has always covered a very relevant institutional role within the structure. The office team is composed of high-profile personnel who enjoy complete autonomy. The NVVIP approved the ex ante evaluations of the progetti integrati territoriali (PITs) and was primarily responsible for overseeing their management. The office also drafted the mid-term (2005) and ex post evaluations (2011), and prescribed various adjustments aimed at management, implementation procedures and monitoring system.

The low political interest in evaluation in Campania resulted in a strongly conflictual relationship between the presidency and the evaluation unit: all the interviews confirmed that many of the (binding) recommendations provided by the NVVIP were not taken into consideration (especially within the context of the PITs) by the regional administration.

Overall, evaluation was not entirely perceived as a useful tool for assessing the effectiveness of interventions: where regarded as such, the lack of data did not offer an opportunity for a well-designed evaluation process to be established.

5.2. Puglia

5.2.1. Programming

The regional administration carried out an accurate SWOT analysis, considering each measure and intervention axis coherently with the scope requested at European the level. However, the regional administration had difficulty in identifying a few, clear, strategically relevant priorities. Consequently, the regional administration proposed a wide selection of interventions (58 measures and various overlapping interventions) that did not always correspond to territorial needs and that ultimately had marginal impact. The episodic involvement of socio-economic actors interested in the priorities of the ROP also limited the capacity of the administrative structure to assess

whether the projects were actually sustainable, could be carried out in the foreseen time frame and with the projected impact. On an overall basis it should be specified that the integration of interventions had made a consistent leap forward when compared with the 1994–99 programming period thanks to the PITs. The PITs implied a new, highly integrated, bottom-up approach that actively involved lower governance levels in the implementation of the ROP. However, the PITs formally started only in 2005, and allocation of resources thereto was questioned by the n+2 rule. The regional administration answered by resorting to the financing of side projects. This did not affect the strategy of the ROP (since all released financial resources⁴ were then reinvested in the ROP priorities), but simply allowed for the 'overriding' of the n+2 rule and consequently expanded the timeframe for the financed interventions.

Ultimately, the CdPs provided a stable framework for programme implementation. They included limited resource scheduling and definition of the means to achieve proposed objectives from the beginning. The only major changes to the programme were applied following the mid-term review.

Regarding the approval date for the ROP 2000–06, the Puglia region did not succeed in sanctioning its document until October 2000; the CdP was authorized two months later in December. Thus, a delay of almost two years was reported in this case as well.

5.2.2. Management

In order to discipline the procedures for the implementation of the ROP, the Puglia region approved the *Legge Regionale* 8/2000. The Law divided the coordination for the management of the programme into four macro-areas: unit for programme implementation, monitoring unit, the budget and financial management unit and technical secretariat of the surveillance committee (Figure 8). The managing authority was responsible for the coordination of EU policies c/o the regional presidency.

For the first half of the programme, the managing authority was the manager responsible for coordinating EU policies at the regional presidency. Hence, the latter exerted, for the first four years of the programme (which lasted from 2000 to 2010), a strong influence on the managing authority: not only did it play a substantial role during the programming phase, but it also followed closely the first four years of the implementation. The interviewees generally agreed on the fact that politics played a significant role in setting the ROP's objectives and in following the first half of the programme. However, with the regional elections the situation changed: after Fitto, the previous regional president, the policy style markedly shifted. The new regional administration moved the managing authority from the presidency to the programming president's delegate (Assessorato alla Programmazione):

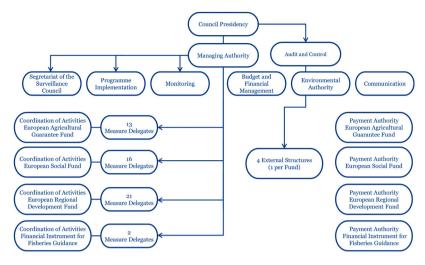


Figure 8. Organizational chart provided by the 'Complemento di Programmazione'. Source: Complemento di Programmazione POR Puglia 2000–06.

the managing authority was much more autonomous from political pressures starting from 2005.

From 2005, management became progressively more autonomous in its choices concerning the implementation of the programme and the entire structure benefited from a relatively stable organizational framework. The new managing authority promoted the autonomy of the entire bureaucratic structure: the interviews confirmed that the structure was granted much greater autonomy than before.

The biggest change was constituted by the new managing authority, formerly the environmental authority (which also had a relevant role under the environment axis), which had worked very closely with the other civil servants and lower organizational levels. During this new phase, the managing authority promoted a style that called for more participation within the regional structure: the professionals could at last appreciate their overall contribution to the programme. Tasks and responsibilities were far more diluted within the overall structure, yet each operator had a clear grasp of his work.

As for the ratio between internal and external competences, the interviews confirmed that by the closure of POP 94–99, internal personnel were capable of understanding the functioning of EU cohesion policy and Structural Funds. Tasks and responsibilities, in contrast with the Campanian case, were shared, hence the legacy of the programme had an administrative capacity building impact on the entire structure. However, the 'new programming' implied a remarkable quantity of modifications to regulations, procedures and

standards. Since the articulation of the ROP 2000–06 was much more complex, it initially required consistent external contributions. In this context, internal personnel did not receive adequate training and had to develop their own competences in the field.

Technical assistance was also used to foster communication flows. In order to gather required information for the annual implementation report (*rapporto annuale di esecuzione*), the managing authority would systematically send technical assistance throughout the various departments (indicatively between November and December of every year).

In order to provide the requested data, the managing authority activated horizontal and vertical communication flows between the general coordination unit and the authorities responsible for managing the funds. Furthermore, methodologies were homogeneously applied in all the departments, and personnel shared the same conceptual and administrative tools. In order to ensure an adequate communication flow for the overall coordination, the managing authority and the sectors responsible for the coordination of the funds periodically reported to each other.

5.2.3. Monitoring

In the 2000–06 period Puglia adopted stringent monitoring procedures. In the 1994-99 programming period, the lack of a coherent and adequate monitoring system⁵ impeded the development of a further level of analysis and, more importantly, it did not allow the regional administration to answer to the requests formulated by the European Commission and national authorities. The Commission became more demanding (due to previous experiences), but also more specific with monitoring and communication system requirements. The internal and external pressures, the necessity of a more integrated database of the various funds involved and especially the need to conduct a more detailed analysis and evaluation persuaded the regional administration to take a step further. In fact, Puglia decided to develop its own monitoring tool: 'monitoraggio degli interventi regionali' (monitoring of regional interventions). The tool had the specific purpose of strengthening regional capacity to monitor interventions and respond coherently to EU requirements. The system consistently supported the management of the programme in database provision, reporting and certification of expenditures, surveillance activities and evaluations. The data was provided by the final beneficiaries (local authorities) who uploaded the required information as financial transfers occurred. If financial data was not transmitted, the financial flows were usually suspended. This induced local administrations to be more accountable: the financial incentive to report more frequently was relevant and data was not provided just towards EU deadlines.

5.2.4. Evaluation

Thanks to the monitoring of regional interventions system, the relevance of monitoring and evaluation procedures is generally appreciated and no longer perceived as a compliance exercise but as a tool for management support. This approach was further supported by the creation of a monitoring of regional interventions website (MIRweb), guaranteeing a constant interaction between measure delegates and final beneficiaries.

Undeniably there were some initial difficulties: the managing authority made a consistent effort not only to standardize databases, but to share and make them more reliable. Changing the evaluation culture became a prime objective throughout the territory. In the final analysis, the adoption of MIR proved pivotal especially for the measure delegates, who could, through a detailed and complex database, piece together thousands of activities reported at various levels. MIRweb succeeded because it compelled personnel to go beyond judging monitoring as a mere compliance exercise. This undoubtedly remains the most path-breaking legacy of the 2000–06 programming period.

Lastly, with regard to the relationship between monitoring and evaluation, a high uniformity is seen to prevail in the use of monitoring data for evaluation purposes: evaluators work on data directly from the MIRweb for evaluation purposes.

6. Discussion

The following paragraph will summarize the basic findings outlined by the comparative analysis (Table 4).

Table 4. Applying the RAC matrix: comparative scores

	Campania	Puglia
1) PROGRAMMING		
1.A) Programme Design: SWOT analysis	2.2	2.2
1.B) CdP drafting	1.1	2.2
1.C) ROP approval	1.1	1.1
Index Score	4.4	5.5
2) MANAGEMENT		
2.A) Clarity in the definition of roles and responsibilities	2.2	3.3
2.B) Coordination and Cooperation between offices	1.1	2.2
2.C) Ratio between internal and external competences	1.1	2.2
Index Score	4.4	7.7
3) MONITORING		
3.A) Introduction of monitoring procedures	1.1	3.3
3.B) Availability of physical, financial and procedural data	1.1	2.2
3.C) Use of monitoring data for managing purposes	1.1	2.2
Index Score	3.3	7.7
4) EVALUATION		
4.A) Production of evaluation reports	5	5
4.B) Institutional role of the NVVIP	1.67	1.67
Index Score	6.7	6.7
FINAL SCORE (Average)	4.7	6.9

As for programming, both regions presented a series of issues. Both regions carried out a SWOT analysis of the territory according to EU standards, underlining the main strengths, weaknesses, opportunities and threats. However, in both cases a wide variety of interventions were proposed (58 in Puglia and 66 in the Campania). Both administrations reported problems in identifying a few, clear and strategically relevant priorities and thus presented a wide variety of interventions that often had marginal impact on the territory. Indeed, it comes as no surprise that during the 2007-13 period, both Puglia and Campania financed an extraordinary number of fragmented projects. In the case of Puglia, Structural Funds financed more than 30 000 projects which, indeed, were rather small by size. Resources in Campania were concentrated on a smaller, but still impressive, number of projects (almost 10 500). Management was particularly concerned to guarantee a stable implementation framework with a set of priorities that remained constant throughout the programming period. The situation was quite different in Campania, where the programmatic document remained vague and undetermined both on the time frame (no resource scheduling in the first CdP) of the programme as well as on the means for implementation. Programming was done in itinere in order to follow expenditure rather than to schedule it. Both regions reported a considerable delay in the approval of the programme, which caused both regions to spend very little of their resources by the beginning of 2001 (by 31 December, Puglia had spent 0.30% of its resources, while Campania had spent 0%).

As for management, both regions presented some initial problems in the definition of roles and responsibilities within the structure. The main problems regarded the hierarchy of the organization which presented some overlapping activities and attributed responsibilities to civil servants which did not have any real decisional power. However, the differentiating factor between the two regions is indeed the influence of the regional government on the managing authority. Despite being able to lead the Campania region for more than 10 years (from 2000 to 2010), the regional government chaired by Bassolino was affected by strong internal conflict: between 2000 and 2010 the regional government, albeit in a context of political continuity, changed four times. The strong link between management and the regional government was particularly evident. Consequently, even in a context of political continuity, the changes registered at government level were perceptible at management level. The changes in the managing authority implied considerable turnover rates in the measure delegates: the various management authorities that succeeded involved civil servants to different levels and with different management styles. In the Apulian context, on the other hand, the regional government exerted a strong influence over the managing authority only until 2005: as already mentioned, with the administration change (from Fitto to Vendola, who remained governor until 2015) the

managing authority was transferred from the presidency to the programming delegate (*Assessorato alla Programmazione*) and the managing authority was much more autonomous from political pressures. This new governance design was a precise choice of the new administration, which benefited from strong political stability and wide consensus. Furthermore, in Puglia the experience of the POP 94–99 (with all of its limitations) involved the entire structure, in Campania the heritage of the programme was of a single manager (who retired shortly after the beginning of the programme).

Lastly, technical assistance also needs to be mentioned, since it played different roles in the two regional structures: as already mentioned, in Campania the external technical assistance often substituted the ordinary activity of the measure delegates, especially in those policy areas where capacities were somewhat lacking. This had enormous repercussions, not only in terms of capacity building but also in the implementation process. A particularly relevant aspect that should be kept in consideration is what the two regional administrations did in order to guarantee administrative continuity among the two overlapping programming periods: in Puglia the management authority invested a considerable amount of resources on intensive training of personnel.

In terms of monitoring, the first relevant difference between the two systems was structural: MIR (Puglia) was created as a system for the monitoring of each project, while SMILE (Campania) was created in order to comply with the information requests of the national monitoring system; furthermore, MIR was created to provide a vast quantity of data at various aggregation levels (programme, axis, measure, single project). This conceptual difference allowed MIR to constantly review the status of each financed project. The new protocols outlined by IGRUE have undoubtedly become more demanding and pushed regional administrations to timely provision of data concerning the projects. As a result, the MIRweb introduced a wide range of new indicators (which have become mandatory) that are constantly updated over time: along with a plurality of incentives and utilities, this allowed the MIRweb to become a management tool, particularly useful in framing in itinere the status of the financed projects. In the context of the Campania region, the interviews confirmed that the only indicators seriously considered were still financial indicators, since all the others were not constantly updated. Even financial indicators tend to be provided towards EU/national deadlines.

In terms of evaluation, both regions published all three evaluation reports, confirming the general idea that, at least formally, evaluation is considered particularly relevant in the policy process. The institutional role of the NVVIP in both cases became quite relevant. In Campania, however, the low political interest in evaluation resulted in a very conflictual relationship between the presidency and the evaluation unit and low compliance with the recommendations provided. On the other hand, in Puglia, the regional structure proved



to be extremely responsive to the recommendations provided both by the independent evaluator (mid-term reviews) and the NVVIP (*ex ante* evaluations of the PITs).

7. Conclusion

The article has sought to test the administrative capacity hypothesis with reference to two Italian regions—Campania and Puglia—which during the period 2000–13 have been implementing EU cohesion policy. The scores summarized in the previous section show that, after controlling in the case selection for other relevant variables (political stability, implementation procedures and financial constraints), a higher degree of regional administrative capacity determined greater expenditure capacities, i.e. more effective cohesion policy implementation. Clearly administrative capacities do not come out of nowhere, and therefore there have been some political mechanisms triggering the administrative trajectory capacities. This, for example, may imply that there are differential political characteristics supporting administrative capacities, or—to put it in Piattoni's terms (Piattoni 2001)—different forms of clientelism may produce different administrative results. This may be the case, but such further empirical analysis goes beyond the scope of this article, which was to isolate in the research design as much as possible the administrative capacity variable, considering it to be an independent variable, and to study its impact on Structural Funds expenditure—a common proxy for EU cohesion policy implementation.

More specifically, we believe that our findings advance existing scientific knowledge on cohesion policy implementation in three ways. Firstly, by focusing on the Italian case, it shows that the administrative capacity variable can be usefully considered a key explanatory factor of differential regional policy implementation. Unlike other studies that considered all Italian regions (which may be different in terms of political stability and/or implementation procedures and/or financial allocations), this study—by following a 'most similar cases' research design—tests in an original way the administrative capacity hypothesis with respect to two Italian regions. Secondly, it provides a new measurement tool—the regional administrative capacity matrix—which could also be used for other regions that are involved in the implementation of EU cohesion policy. A further step in this research direction could be to use the matrix and apply it cross-nationally in order to test its more general heuristic validity. Thirdly, the matrix could also be used in other multi-level policies for national and international comparison purposes. For example, it could profitably be applied to policies that are different from EU cohesion policy and far from the European context by providing an original and accurate measurement tool that could advance analyses of other types of policies.

Notes

- To be sure, much more has been researched in terms of 'external administrative capacity', i.e. the capacities to obtain funds allocation (see, among others, Dellmuth, 2011; Chalmers, 2013, Tosun, 2014). This article focuses on 'internal administrative capacity', i.e. the local capacity to administer or implement the funds once allocated.
- 2. Twelve semi-structured interviews at the regional level Campania and Puglia were conducted between May 2011 and January 2012. The interviewees, selected following the 'snow ball' technique (Denzin and Lincoln, 2005), are regional officials who at the time were dealing with EU cohesion funds implementation. Due to space limitations, the interviewees will not be cited verbatim.
- 3. The average value of the financed projects under the ERDF was €600 000.
- The released financial resources are those resources that derive from the certification of the expenditure related to side projects.
- 5. In the 1994–99 programming period, the monitoring system was a paper database.

Disclosure statement

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