Evaluation of Local Energy Agencies Performance

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ABSTRACT

About four hundred local energy agencies (or similar organisations) are active in EU, most of them created with support from the EC SAVE programme (now EIE). Two investigations on their performance have been funded by DG TREN, based on statistical elaboration of questionnaires and sample interviews. Another inquiry was performed at single nation level for information and advice services. The open problem is how to assess if a local energy agency is globally successful, with regard to the expectations of the funding partners and other local stakeholders. There is no consensus on which parameters should be used to quantify the rate of success of these organisations, which couple sustainable energy objectives with communication targets. The paper will discuss this problem and formulate a possible evaluation format, adapted to various models of local energy agencies. The results will be the basis i) for proposing an innovative tool for a self assessment of local organisations active in the area of sustainable energy, ii) for allowing local administrations to monitor the performance of the agencies operating in their territory, iii) for regional or national agencies to better assess the available skills and rate of success of the local organisations submitted to their co-ordination.

Introduction.

The European Commission (EC), General Directorate Energy and Transport (DG TREN), has been running for several years a programme, called "Intelligent Energy for Europe" (IEE), which included a specific action for supporting the creation of local or regional energy agencies, promoted by Local Administrations LA) with a manifold objective[1]:

- To contribute to implementation and future development of EU, national, local and regional policies, strategies and legislation for promoting action by householders, businesses (especially SMEs) and the public sector to improve energy efficiency and increase use of renewables, especially in buildings and transport (including biofuels).
- To create a critical mass of local activity and achieve local economies of scale in order to reduce the costs of energy efficiency and renewable energy systems.
- To change citizens' behaviour and improve the quality of local/regional decision-making on implementation of energy efficiency and renewable energy systems.
- To increase levels of investment in energy efficiency and renewable energy services at local and regional levels.
- To promote establishment, public financing and use of local energy agencies by public authorities as a vital tool for achieving these objectives.

More than 350 agencies of this type have been created in the European 27 Member States (EU27), with the support of this programme, and many others have been originated by independent initiative of LA, or as Non-Governmental Organisations (NGO), no-profit private initiatives, or even private companies with a mission for developing a sustainable energy model in their local area of interest. A comprehensive map and database of these bodies is accessible through the

[1] IEE Call for proposal 2007, Info Day**,** Applying for IEE II funding: the nuts and bolts (continuation) William Gillett, Head of Unit, IEEA, at
http://www.managenergy.tv/metv/portal/_vi_real_300_en/player/index_player.html?id=2593&pId=2587.

"Managenergy" website[2], a very rich source of information on local clean energy actions throughout EU27.

A group of EAs met in Cork in 1998 and agreed the so-called "Charter of Cork", stating that European regional or local EAs should have the following features:

- its principal aim is to promote energy efficiency and renewable energy sources;
- its area of operations corresponds to a sub-national administrative and policy level;
- it has political support from the regional and/or local authority or authorities within its area of operations;
- its constitution confers upon it genuine autonomy in relation to existing bodies. In particular it has its own budget and administrative board;
- its administrative board includes representatives of a variety of players involved in energy management, and in particular local elected representatives and representatives of consumers and local companies;
- it has an operations team with at least two permanent members, together with the necessary logistical facilities (headquarters, premises, etc. ...) needed for its tasks and for maintaining its image as an impartial body in terms of energy options.
- its strategy is first and foremost directed towards energy demand from consumers, meaning households, public authorities and SMEs.
- its activities are diverse and concern, in particular, energy planning, consumer information and advice, assistance with setting up, funding, monitoring and evaluating energy management projects, and disseminating the results obtained.
- it has sufficient will and means for forging cooperation with other European agencies.

In September 2004, Energy Agencies (EA) were invited to contribute to an independent study of outputs, performance and future perspective of SAVE Agencies, being carried out by a team of experts for the European Commission Energy & Transport DG. The team was composed of Catrin Maby (Severn-Wye Energy Agency, UK), Reinhard Six (Rhônalpénergie-Environnement, Lyon, FR), Jiri Zeman (Seven, Prague, CZ) and coordinated by Marcello Antinucci (Ecuba srl, Bologna, IT)[3].

The report of this overview, commonly referred to as the "ECUBA Study", stated that *"the quantity and range of activities globally developed by the EA at local level is impressive, going far beyond what might be expected by an unaware observer. The overall impression of local and regional energy agencies (EA) perceived by the four experts is of highly committed, knowledgeable, skilled individuals, struggling for resources and recognition, against apathy, competition, and institutional barriers at all levels. Some find a way to make a success of things whatever is thrown at them, but others fall by the wayside, and there is a real need to ensure that avoidable burdens are not added to the formidable task that they face."*

The study makes a number of recommendations relating to: i) Identity and role: definition of EA; ii) Top-down support; iii) EC support to EAs; iv) Financial support for EAs after the SAVE-Agency contract; v) Evaluation of the local impact of EAs; vi) Staff training; vii) Associations and networks (including ManagEnergy).

The most frequently occurring specific areas of interest were found to be: Energy efficiency in buildings, industry or commerce; Combined Heat and Power; Renewable Energy Sources; Transport and mobility; Information and advice; Education and training; Energy planning and strategic development; EU policy support.

A new inquiry on EA aggregate performance was commissioned in 2009 by the European Agency for Competitiveness and Innovation (EACI), acting under powers delegated by the European

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[2] http://www.managenergy.net/emap/maphome.html

[3] Study of outputs, performance and future perspectives of SAVE energy agencies - Consolidation Report, available with all annexes at http://www.managenergy.net/products/R1077.htm.

Commission, to obtain an "Evaluation of the relevance of Community funding of local and regional energy agencies"[4], more directly addressed to analysing the evolving role of local and regional energy agencies in view of the much higher levels of public knowledge and interest in energy efficiency and renewable energies in recent years; exploring the European added value of the agencies which have been set up with EU support, and providing recommendations concerning the future needs of local and regional communities in relation to such support and the most appropriate mechanisms for providing it. The results of this service contract are not yet available.

The objective of this paper is to contribute to this debate on the impact and role of EAs, focusing on the possible methods for assessing their performance and obtained results at local level, under the assumption that the best way to evaluate EA is to verify what they have done.

Is it worth classifying by type of agency?

The first evidence of any survey on EA is the wide variety of organisational modes, ranging from EA being actually a branch of a LA (an office, a department, a special unit), to fully independent NGOs where the participation of the LA elected in the management board is at personal level only. Intermediate situations are the most common, where the LA (a single county or city, or in many cases a multiplicity of small-medium size Municipalities) which funded the initial development of the EA, still makes a minor 'contribution' (funding to support the organisation in general, rather than for delivery of specific projects or services), and also assigns working contracts to their EA according to occurring needs, leaving it to the initiative of the LA director to apply for external contributions /regional, national or European), to extend the range of possible contract suppliers to other geographical areas or other fields of interest.

This situation is becoming more and more complex, as the LAs tend to have less financial resources, due to the governmental limitations to public expenditure and debt at local level. The EA in some cases find new opportunities, engage new partners, evolve to different models, and even change their objectives and statutes. This, together with an uneven geographical spread in terms of creation of new agencies, creates a patchy situation, where it is more and more difficult to detect a common model.

This is another strong reason for addressing the evaluation towards the results and impacts of EAs, rather than getting lost in analysing a multiplicity of organisational schemes.

Connection with the local administration.

Whatever the institutional connection between the LA and the EA, the essential role of a local agency is to meet the policy objectives of the LA. In some cases this is accomplished by a direct assumption by the EA of official roles, assigned by the LA, for example the management of funding programmes addressed to the final users, or to become an information desk for citizens. Typically, the EA senior manager will have a general mandate from the management board (where LAs are represented) to develop the programme of work, and organise activities and projects, taking up opportunities presented by external funding, or offering technical / organisational services to interested bodies, with any assessment of the performance of the EA effectively carried out ex-post by the management board in their regular formal meetings or at the annual balance approval.

If the EA connection with the LA is based on the degree of practical realisation of the LA objectives achieved through the actions of the EA, the method for assessing outputs and impacts should be flexible enough to adapt to the different features of the local energy policies, and objective enough to avoid subjective interpretations of the results.

[4] Tender documents are available at http://ec.europa.eu/energy/intelligent/tender/archive_en.htm.

Competition with private companies.

A most sensitive issue is how to avoid a situation where an EA, created to address public objectives, competes with private consulting companies in supplying services to LA, enterprises or citizens, within the local policies defined by the LA. Making rigid barriers to avoid this risk may create useless limitations: for example, a feasibility study prepared by an EA in an independent manner might be more effective than a study provided by a private consultant, and produce then, if approved, much more work for engineers, technology suppliers and installers. Advice to citizens can be committed also to private companies, but an EA is in many ways more suitable due to its independence, its horizontal approach to technologies and its connection with all the local actors.

A more convincing approach to the problem of competition with the private sector is to avoid duplication. When a suitable supplier of a service already exists there is no reason for the EA to engage, but conversely when an area is not covered by any convenient provider, then it may be useful and appropriate for the EA to either offer this service themselves, or support the development of a separate service provider - provided that the area falls within the objectives of the EA itself. We call this aspect *additionality* of the EA.

Where an LA is offering a contract to an EA, as with any other service provider, they will require evidence of efficiency and cost effectiveness. The only way for the LA to verify this aspect is to compare offers, so the EA has to demonstrate its ability to provide a more economically advantageous offer than the competitors. This may elicit negative reactions from these competitors, if they deem that the EA benefits from privileges due to any 'core' financial support from the LA, which would effectively subsidise the EA and create an unfair situation. A possible solution is to identify clearly in the EA's accounts the direct funding received from the LA, and what it is used for, showing that these funds do not alter the prices offered for the requested project.

The additionality and efficiency aspects, and not the institutional organisation type, should be added to the items to be evaluated, and the proposed method should include an analysis of it.

Networking capacity.

The capacity to network, that is to involve local partners and resources in projects, is one of the most evident advantages of an EA in the realisation of local actions. A consultant usually performs its task under a bilateral agreement with the client, while an EA is asked to contact the various stakeholders (professional or entrepreneurial associations, consumer or environmental associations, other Municipalities, groups of citizens) using its semi-official role of an organisation with a public objective.

Or better classifying by output/impact?

From the previous discussion, the need for an evaluation based on objective outputs and foreseen impacts appears to be an effective way to assess the success of an EA in satisfying the expectations of their LA partner(s). The aim of this paper is to identify which elements this evaluation should concentrate on.

Sustainable energy quantitative realisations.

An EA can facilitate the realisation of concrete energy efficiency (EE) projects or the application of renewable energy (RES) in many ways. A typical example is the drafting of a feasibility study, as previously mentioned, but many other options exist: preparing a funding application, obtaining directly a contribution from an EC programme, assisting the LA in drafting a programme and assisting its realisation, developing energy audits for public buildings, assisting in preparing a call for tender and the corresponding specifications for energy services (heating,

ventilation and air conditioning, street lighting, artificial lighting and management of other electricity use in buildings, …), preparing Energy Performance Contracts, and so on; in all these cases the EA is not actually investing money, but facilitating the realisation of investments.

The author's proposal is to quantify all investments that have actually been implemented, with a contribution of the EA at some key phase. The essential conditions are the actual implementation and the relevance of the EA role. Actions which have not led to concrete realisations have not to be ignored, just evaluated in a separate list.

Reaching the communication targets.

A significant part of the EA activity concerns influencing user's behaviour or promoting the take-up of individual EE or RES measures, at home, or in the workplace, place of study or leisure facility. These activities can be regrouped as *communication* actions and have to be assessed in a way that evaluates not only the quality of the message as it is launched but also how it is received.

Quantitative evaluations typically cover at least the number of communication actions taken (materials produced, enquiries received, people receiving different levels of communication such as a single conversation, a site survey and report, longer term support with multiple contact opportunities).

A more sophisticated approach that needs to be taken in the longer term is to evaluate the actions taken (measures installed, behaviour changed) by consumers as a result of the communication activities, and the outcomes of these actions (energy, money and carbon saved, comfort levels improved).

An interesting example at national level of this approach is presented in Métreau and Tillerson, 2007, reporting the results of an assessment of the activity performed by 161 publicly-funded information & advice centres in France, by interviewing a sample of 500 beneficiaries.

Another useful reference on advice centres in Europe is the final report of the EIE project "SERENADE", where the following indicators of achievement are proposed: number of clients, range of type of client compared to characteristics of target group, data collected by provider or funder as to results of actions, customer satisfaction surveys carried out, in-depth evaluation studies carried out.

Multiplying the results.

Another key aspect of EAs is the capacity to multiply the results obtained in one location and getting other actors involved in replication. Emulation is a great driver to action, particularly for small and medium sized LAs, who are not spontaneously attracted by the risk of being a pilot implementer of new, untested projects. When the project has been successful in a nearby site, the willingness to replicate it immediately is very strong. Therefore, the capacity of an EA to produce materials suitable for multiplying the concept/project in other sites is another important element to be assessed, together with the actual number of concrete projects/realisations which can be connected to a dissemination activity.

Why a common assessment tool?

In principle any local EA could develop its own methodology for performance assessment, as the target for it is local, i.e. the LA responsible for EA existence. But in this case an essential aspect would be lost, the possibility of benchmarking with other similar organisations. It is clearly understandable that benchmarking very different organisations, in different countries, contexts, economic environment, experience, is a difficult task and can be unfair to the ones that are weaker due to less favourable external conditions. However, one of the most powerful success factors for an EA, as mentioned in the ECUBA study referred to above, is belonging to an EU-wide network. If

this is considered to be true, EAs should also be prepared to accept the value of common tools, particularly with regard to performance evaluation, and to be willing to share openly what they have achieved so far.

Recording the right indicators.

There are two steps to this: firstly identifying the relevant variables that relate to achievement of success as an EA, and secondly the indicators that might be monitored in practice, as the S.M.A.R.T. acronym reminds us. Therefore good indicators should be:

- **Specific** enough to avoid any risk of double-counting, or lack of clarity as to what 'counts'.
- **Measurable,** for example in terms of energy quantities (saved fossil fuel) and avoided greenhouse gases (tons of equivalent CO_2), but also in terms of communication impact, networking activity and replicability. Another aspect of measurability is that the time, skills and resources to carry out the implied monitoring are within the capacity of the EA, and not too costly. It may not be possible, for example, for an EA to carry out detailed customer follow-up in all cases, and they may need to rely on sampling to indicate quality and outcomes, together with full numerical details only of activities carried out (such as advice contacts or feasibility studies).
- **Achievable** indicators means that they do relate to success factors that are feasible in relation to the capacity of an EA, challenging but not unrealistic.
- To be **Realistic** the indicators have to be correctly calculated by a reasonable number of EAs. The suggested activities must be in the range commonly covered by n EA with the typical available human resources and by the normally available facilities and equipment.
- To be **Time-bound** the indicator has to consider the number of years of activity of the involved EA, as the creation of a successful agency is a process requiring several years, not simply the 3-years start-up funded by the IEE programme. The indicators should be calculated at least after a number of years sufficient for getting a stable configuration. For a mature agency, it may be most practical to relate evaluation to the phasing of a business strategy (if one exists) – this may for example be annual, 3 yearly or five yearly.

Benchmarking

Comparing performance between agencies throughout the EU is a challenging task because of their diversity. However, the aim of this approach is not to make comparisons between agencies, but to provide a suitable tool by which an agency can evaluate and monitor progress. It is envisaged that agencies will adapt and amend the approach to suit their own particular situation and aspirations, as well as the specific aims of their sponsors. It is also envisaged that this will change over time in this rapidly evolving field of activity – one of the strong and positive features of an EA being that they are 'situational', designed to facilitate change, and to be dynamic and responsive to changes in the market. An initial set of indicators has been drafted by the authors as a starting point.

A possible evaluation framework

A first attempt to draft an outline EA performance evaluation format, taking into account most of the aspects discussed above, is set out below. The format is broken down in separate sections diversified by type of result, and does not distinguish by project or by funding source.

Table 1: Direct sustainable energy installations (programmes totally managed by EA, or in which EA has active role – such as managing installers, advice or finance)

Sustainable energy installations.	**number**	**Total capacity**	**Saved fossil energy [1] (KWh)**	**Avoided CO_2 [1] (tonnes)**
Roof insulation				
Wall insulation				
Floor insulation				
Draught-proofing				
Hot water tank insulation				
Window replacements (energy efficient)				
Boiler replacements (energy efficient)				
Heating controls				
Biomass boilers		xx (kW)		
PV systems		xx (kWp)		
Solar thermal systems		xx (m^2)		
Heat pumps				
Wind generators				
Hydro power generators				
CHP systems		xx / yy (kWe/kWth)		
District heating		xx (m)		
Etc….				

1. Approximated on basis of modelled savings over anticipated lifetime of measure

Table 2: Communication activities

Communication action	**Nr. of initiatives**	**Nr. of published copies**	**Nr. distributed /website hits**
Events run or attended			
Advice surgeries held			
Handbooks			
Leaflets			
Wall thermometers with info.			
Educational tools			
website			
competitions			
Media events/mentions			

Table 3: Advice and behavioural change activities

Activities	Number	Results [2]	Anticipated outcomes[2]
Households advised			
Home energy surveys /reports			
SMEs /community/public sector buildings			
Community buildings advised			
Feasibility studies for RES			
Schools engaged in energy management programmes			
Individuals engaged in behavioural change programmes			
Businesses engaged in behavioural change programmes			

2. Based on approximate anticipated results and modelled outcomes

Table 4: Strategic achievements

Achievement	details
Strategic partnerships formed/joined	
Inclusion/prioritisation of sustainable energy or energy poverty objectives in strategic objectives of relevant bodies:	
Local strategic partnership	
Local/regional authority or municipality	
Business or industry	
School or further education body	
Other public sector body	
Funding for sustainable energy brought into territory from external sources	

Table 5: Organisational achievements

indicator	Number or detail
Turnover	
Number of personnel (full time equivalent)	
Performance standards achieved:	
Personnel	
Environmental	
other	

Testing of the format on a local energy agency: AESS

The following results have been achieved applying the presented format to a typical Italian energy agency (AESS). The figures above show the diversity of aspects that can be covered by

agency's activity, even if only part of the suggested items fitted with the actual results. The results are referred to a period of 5 years (2006-2010), typical of the planning period of the agency. The evolution with time of these performances can be a useful tool to assess the agency activity trends and successes. The total estimated amount of avoided t of CO_2 equivalent emissions is about 3000 t/year, which in terms of average lifetime of each measure can yield a value of about 75.000 t.

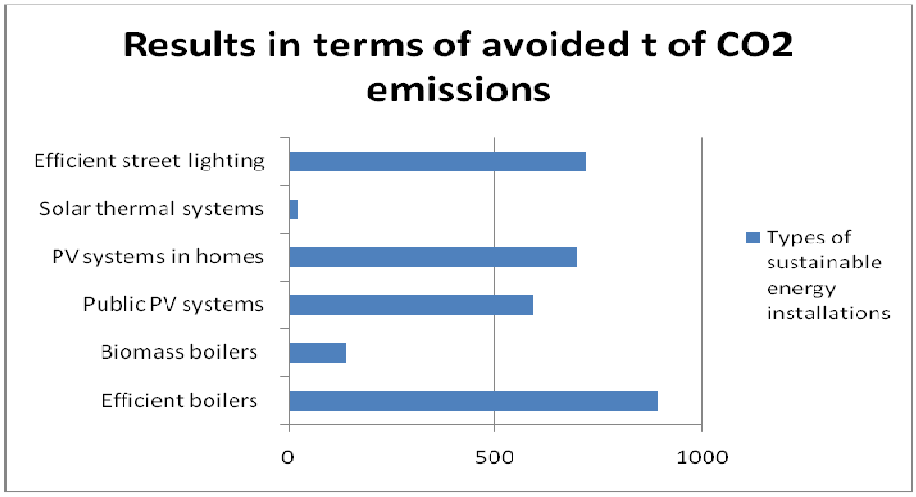

Figure 1: Distributions of results originated by investments in sustainable energy.

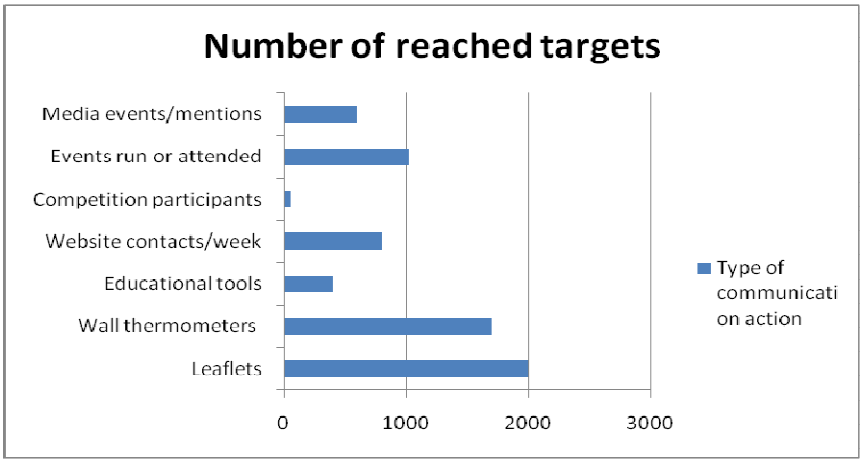

Figure 2: Targets of various types of communication actions.

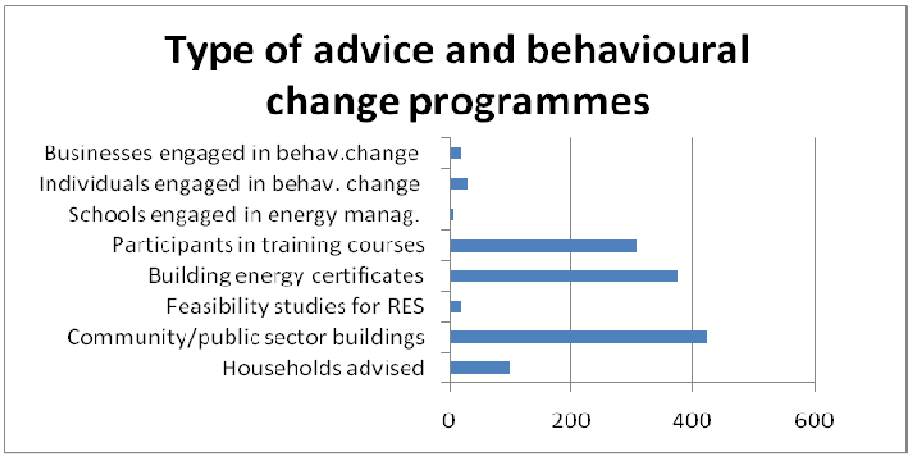

Figure 3: Achieved results in terms of supplied advice and behavioural change initiatives.

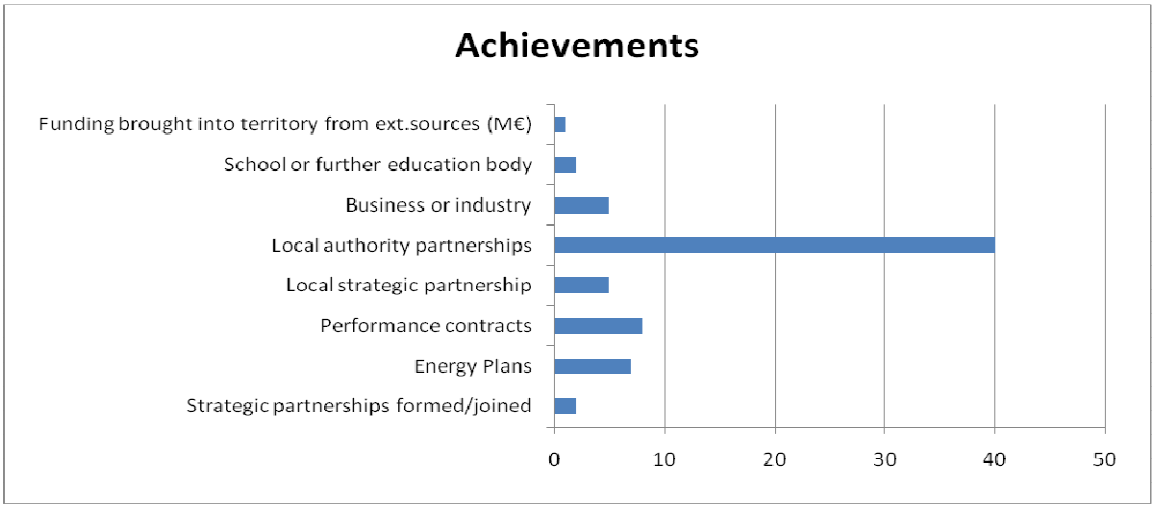

Figure 4: Achievements in terms of established partnerships and other targets.

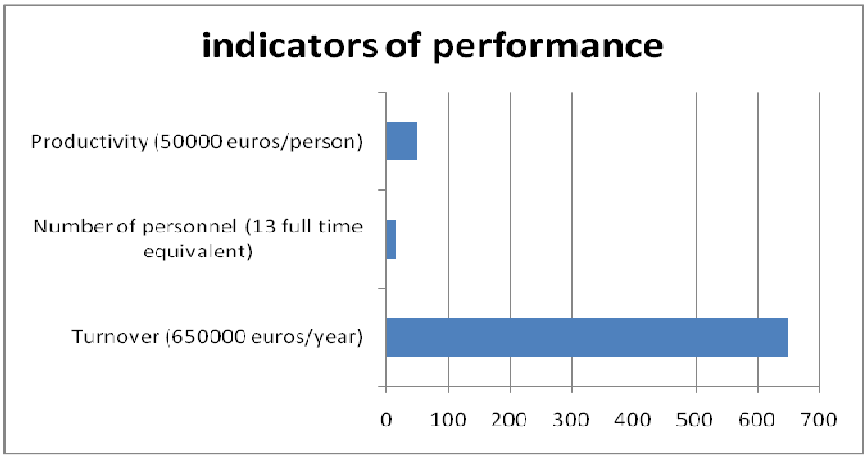

Figure 5: Indicators of economic and organisational performance.

Testing of the evaluation approach on SWEA

An attempt has been made to approximate the results from when the agency became fully independent in 2000, at the end of the pilot phase until the end of 2010. The results should be understood within the context of the fact that during this period the agency grew from 2 to 39 full time equivalent staff.

The presentation of results is here in terms of tables instead of graphs, to show how specific information can fit in the proposed format.

Table 6: Direct sustainable energy installations (programmes totally managed by EA, or in which EA has active role – such as managing installers, advice or finance)

Sustainable energy installations.	**number**	**Total capacity**	**Saved fossil energy [1] (MWh)**	**Avoided CO_2 [1] (tonnes)**
Roof insulation	15863	n/r	2,658,730	156,987
Wall insulation	11513	n/r	1,649,270	97,383
Floor insulation	-	n/r		
Draught-proofing	1067	n/r	4,750	281
Hot water tank insulation	1553	n/r	8,400	496
Boiler replacements (energy efficient)	1257		38,140	2,252
Heating controls	2435	n/r	107,980	6,376
Biomass boilers	23	2600 (kW)	74,000	19,240
PV systems	40	190 (kWp)	4,150	1,784.5
Solar thermal systems	200	580 (kW)	10,160	2,641.6
Heat pumps	68	642 kW	11,100	2,886
Wind generators	6	26 kW	500	215
Hydro power generators	1	5 kW	950	408.5

1 Approximated on basis of modelled savings over anticipated lifetime of measure

Table 7: Communication activities

Communication action	**Nr. of initiatives**	**Nr. of published copies**	**Nr. distributed /website hits**
Events run or attended	260	-	
Advice surgeries held	420	-	
Leaflets	7	50,000	
Wall thermometers with info.	3	20,000	
Educational tools	5		
Website	6		
Competitions	20		
Media events/mentions	70		

Table 8: Advice and behavioural change activities

Activities	Number	Results [1]	Anticipated outcomes[1]
Households advised	58,000	-	Financial Savings £1,885,000
Home energy surveys /reports	85,000	-	Savings of 178,500 MWh 39,695 tonnes CO2 [2]
Businesses advised	132	Action plans agreed	Savings of 22 MWh, 8,800 tonnes CO_2
Public sector buildings advised	9 prisons 35 schools		
Community buildings advised	150		
Feasibility studies for RES	150		
Schools engaged in energy management programmes	35		
Individuals engaged in behavioural change programmes	203		
Businesses /public sector organisations engaged in behavioural change programmes	5		

1. Based on approximate anticipated results and modelled outcomes
2. Based on Energy Saving Trust 2001/02 figs: financial savings from all actions taken on advice given to homeowners £32.50; average financial savings for customers who have received a **written** report are estimated to be £38.08 per annum with energy savings of 2.1 MWh and CO_2 savings of 467 kg per household per annum.

Table 9: Strategic achievements

Achievement	Details
Strategic partnerships formed/joined	Leading role in development of: Gloucestershire Affordable Warmth Partnership, Gloucestershire Environment Partnership and Gloucestershire Environmental Education Partnership. Joined Regional Centre of Excellence Severn
Local strategic partnership	Gloucestershire Local Area Agreement: inclusion of 3 and 10 year targets for carbon and fuel poverty reduction
Local/regional authority or municipality	Climate change or energy policies for 6 Gloucestershire Districts
School or further education body	City and Guilds (National accreditation body whom we are affiliated to through 6176 and 6177 courses

Table 10: Organisational achievements

indicator	Number or detail
Turnover	£2.6m
Number of personnel (full time equivalent)	39
Performance standards achieved:	
Personnel	Working towards 'Investors in People'
Environmental	Working towards 'ISO14001' Established method for monitoring of carbon emissions from own operations
other	Ashden Foundation Award 2006

Comparison

Some initial conclusions can be derived from the limited test of the proposed evaluation format on two EAs:

1. A standardisation of the saved energy and avoided emissions is necessary, in terms of conversion coefficients, lifetime of technologies, and the precise nature of the active role of the agency in achieving these results .
2. For communication actions involving publications, data is available only for the number published, and not those which have actually reached the target, nor the impact that these materials might have had as regards actions taken, and energy or carbon savings that result from these actions. There is an evident difficulty in verifying such outcomes without expensive inquiries.
3. A compromise is offered by the use of standardised figures for outcomes, as for example the SWEA's use of Energy Saving Trust figures for energy impact of advice to households, based on evaluation of relatively large scale advice programmes.
4. An alternative approach, used by SWEA to evaluate the impact of advice to businesses, is to assume savings on the basis of modelled savings that would result for implementation of agreed action plans. This approach is a simple one, applied to a relatively small programme of work , but on a larger scale could be fine-tuned by application of a percentage take-up rate following programme evaluation.
5. Strategic achievements are a very significant indicator, as they express the capability of local networking and of collaboration with Institutions.
6. The comparison of agencies using indicators such as turnover or number of employees is a limited indicator of success, for example it does not take into account different levels of salary, of expertise of staff, or of service specialisation (for ex. engineering v/s advice).
7. The application of environmental standards to the organisation itself, in particular to monitor carbon emissions form the EA operations, and assess these against the outcomes of the activities, is an important step for the developing organisation to take, and might beneficially be incorporated into future agency creation and support requirements. This would help the EA to be a role model in its own performance for those it advises.

The sample application, even if applied to two agencies only, but considering their wide difference in size, field of action and local environment, provides useful hints for a further development of a EU-wide tool to be proposed by EC. ManagEnergy[5] could help the dissemination and implementation of the tool. Benchmarking indicators should also be developed in terms of relative indexes; expressing for example results per year of activity, would help comparing the

[5] ManagEnergy a service created by DG ENERGY to support EAs.

achievements of young and old structures in the same timeframe.

Conclusions

Energy agencies are a unique type of organisation with challenging aims and objectives, and would benefit from guidance on evaluation of their performance beyond the programme of work directly monitored by the European Commission during the directly supported start up phase. It is possible, based on knowledge and experience of the activities of energy agencies to date, to develop an outline framework for a self-assessment tool, which energy agencies might use to evaluate their own performance. The approach might be improved and fine-tuned after testing with a sample of agencies.

The use of such a tool as a method for comparison between agencies should be treated with caution, due to the diversity of their situations and resources, but the cumulative results and outcomes could be interesting to review, should the tool be widely used in practice.

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