The European University Association (EUA) welcomes the European Commission Joint Research Centre’s report on “A Regional Innovation Impact: Assessment Framework for universities”. The report opens the debate on the impact that universities can have on regional innovation. It also recognises the importance of assessment frameworks and shows the strategic role of universities in their innovation ecosystems. EUA would like to make the following points regarding the assessment framework system proposed by the Joint Research Centre:

**On the overall purpose of the assessment system**

The report provides initial input to the discussion on EU-level regional innovation performance-based funding of universities and a related assessment framework. It outlines an assessment system in which performance indicators are supported by university narratives providing qualitative evidence of their contribution to regional innovation ecosystems (the so-called “narrative with numbers” approach).

The regional context must be, however, considered when designing such a system. The regional innovation performance of a university heavily depends on many factors that need to be captured by the assessment system. These include various external determinants typical for innovation ecosystems, such as geographical location, intra-regional collaboration, the mix of companies in the region (multinationals, SMEs, spin-offs, start-ups), the regulatory framework, the availability of funding instruments or infrastructure. The innovation performance of a university depends also on its individual profile (local or international), size, type, specialisation and governance system.

The proposed assessment framework could be of great value to an individual university in its self-assessment and progress tracking over time. However, contrary to the intended use of the assessment system, it should not serve to rank performance nor determine funding allocations for universities as they operate in different regional contexts.

**On the “narrative with numbers” approach and the performance indicators**

Universities contribute to the development of regional innovation ecosystems in various ways, such as enhancing regional innovation performance through their research activities, playing a crucial role in developing, attracting and retaining human talent, promoting business, and improving social equity. Their direct and indirect contributions go far beyond marketable products, including innovation in education, culture, and social welfare.
Therefore, the entire spectrum of activities performed by universities, including those linked to the activities of other regional stakeholders, should be taken into account when designing the assessment framework. A system in which universities can describe their positive impact on regional innovation by presenting a narrative can demonstrate their innovation performance in a comprehensive manner and contextualise supporting quantitative indicators. Other ways of assessing the impact beyond purely quantitative metrics will capture the whole picture of assets that universities bring to their regional innovation ecosystems, including, for example, their contribution to social innovation.

Hence, to build an optimal system, the narratives should be put at the centre of the assessment framework. Due to the reductive character of the quantitative indicators, they should be solely considered as complementary to the narratives, which will allow to better reflect the impact of universities on their innovation ecosystems.

Finally, it is likely that such an assessment framework would require universities to invest in the measurement, collection of data and development of narratives. The assessment framework should therefore aim at keeping the administrative effort for universities at a low level.

In summary, the framework assessment presented in the Joint Research Centre’s report is a good initial input to the discussion on how to assess the impact of universities on their regional innovation ecosystems. However, it requires further refinement in the next phase of the analysis. EUA calls on the European Commission to establish a dialogue with universities in order to design an assessment system that fully reflects their impact on regional innovation. EUA is currently involved in the development of other approaches that capture the value of universities in the regional context. The outcomes of this work could provide valuable input to the assessment framework demonstrating the strategic role of universities in their innovation ecosystems.

This response builds on EUA position on maximising the effectiveness of smart specialisation strategies, the Association’s reaction to the Renewed EU Agenda for Higher Education, its response to the “LAB – FAB – APP” report, its position on FP9, and EUA’s ongoing work on regional innovation. EUA has prepared this response in consultation with its Expert Group on Research and Innovation Strategies for Smart Specialisation (RIS3).