

SOCIAL ASSISTANCE FOR SOCIAL FLEXSECURITY (Bulgarian Lessons Learned from the Pandemic and Thereafter)²

The article analyses and assesses the flexibility and adequacy of changes in 4 key social assistance programs for vulnerable groups during the COVID-19 pandemic (2020-2022), as well as changes in assistance mechanisms thereafter. The framework of a conceptual vision regarding the parameters of the policy for social support in crisis conditions is presented and specific policy recommendations are suggested. At the basis of the analysis, assessments, conclusions and recommendations is the understanding of the needs for: (i) prior readiness of the state and society to provide crisis social support; (ii) flexibility of social protection system ("social flexsecurity"); (iii) flexible and secure crisis social support through diversity.

Keywords: social flexsecurity; social protection; social support; social assistance; one-off social assistance allowances; monthly social assistance benefits; heating allowances; monthly financial support for people with disabilities

JEL: E61; H55; I30; I38

Introduction

860,000 years!

That is, by some expert estimates, the years of life lost by people who died from the COVID-19 pandemic³. It may be recalled in this connection that:

- The mortality rate among Bulgarians during the COVID-19 pandemic was one of the highest in Europe: according to National Statistical Institute (NSI) data, for example, in the fourth quarter of 2021 the number of deaths was 45,812, the total mortality rate was 26.7‰, and compared to the third quarter of 2021 the deaths increased by 15,099 or by 49%.
- The annual excess mortality rate for the EU in 2020 is 11.9% higher than the 2016-2019 average and 14.4% higher in 2021. Slovakia and Bulgaria, however, report rates close to

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³ <https://bnr.bg/post/101761074/prof-kantardjiev-ot-proizvoditel-na-antibiotici-se-prevarnahme-vav-vnositel>.

40%. Compared to 2020, annual excess mortality rates have increased in 2021 – in Bulgaria (from 14.6% to 37.7%), in Slovakia (from 10.7% to 37.6%), in Latvia (from 1.5% to 21.8%), in Estonia (from 2.2% to 21.2%)⁴.

It would be unreasonable to attribute this colossal loss of life to the healthcare system alone. The education system, the social security system, the social assistance and services system, as well as factors such as European and national policies (central, regional and local authorities), business, the NGO sector, individual health culture, behaviour and responsibility towards public health, are all influential.

Following the beginning of the COVID-19 pandemic and the official declaration of a state of emergency in the country on 8 March 2020 (replaced in mid-May by the introduction of a state of epidemiological emergency), the National Assembly adopted a *Law on Measures and Actions during the State of Emergency declared by the National Assembly Decision of 13 March 2020 and to overcome the consequences* (State Gazette, No 29/24.03.2020). The law, among a number of other (mainly health and economic) measures, provided a temporary (until the end of 2020) reduced access to monthly social benefits. Subsequently, other social assistance measures were introduced, which are discussed below in this paper. Measures have also been introduced in the areas of pensions, health care, unemployment benefits, social services and benefits in kind.

Changes in social protection, however, were usually introduced *ad hoc*, in different periods, at different speeds, which is a sign of a lack of advance preparedness, systematicity and coordination of social policy in a crisis environment. At the same time, social support practices during the COVID-19 restrictions have borne fruit and allowed experience to be gained in policy development and implementation at a national and local level.

In this context, *the aim* of the article is to analyse and assess the flexibility and adequacy of changes in 4 monetary social assistance programmes for vulnerable groups in the context of the COVID-19 pandemic, with a view to suggest specific recommendations and a general conceptual view on the characteristics of social support policy in crisis periods.

Study period: mainly the time of the COVID-19 pandemic – 2020-2022, plus some specific changes in the social assistance policy during 2023.

The research tasks are as follows:

1. Analysis and evaluation of the parameters and changes in 4 programmes for the provision of (i) One-off Social Assistance Allowance, (ii) Monthly Social Assistance Benefits, (iii) Heating Allowances, and (iv) Monthly Financial Support for People with Disabilities.
2. Analysis and evaluation of the content and parameters of newly introduced measures in this area of social protection.
3. Summarizing conclusions and conceptual vision on the implementation of coordinated flexible social support during crisis periods.

⁴ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Excess_mortality_-_statistics#Excess_mortality_in_the_EU_between_January_2020_and_October_2022.

Basis of this study is the conviction of the need for:

- prior readiness of the state and society to provide crisis social support;
- flexibility of social protection – *social flexsecurity*, a term that we borrow from the labour market terminology (namely *flexicurity*, related to flexibility and security in the labour market⁵), but is modified and introduced for the purposes of the present study;
- flexible and secure crisis social support through diversity (security through diversity⁶).

Conceptually, for the purposes of this article, *flexibility (in general terms)* is understood as the ability of a system to respond adequately to external factors by changing its own parameters in a timely manner according to that outside influence. In doing so, the system retains its basic characteristics (e.g. principles and forms of functioning) but can change its structure (understood most generally as the set of elements and the relationships between them) in order to function successfully to achieve its goals and objectives within the societal system and policies.

Flexibility, therefore, is an intrinsic property of the system, not a result of its functioning; however, it is the results and outcomes that make it possible to judge flexibility.

Appropriate *criteria* for assessing flexibility in the face of sudden and/or significant negative change in the external environment are experts' assessments of (i) the effectiveness and efficiency of the social protection system (SPS)⁷; (ii) the adequacy of social transfers; (iii) trends in the development of social protection through the prism of good national and foreign practices and results achieved under similar changes in the external environment.

In this context, *social flexsecurity* can be understood as: ex-ante readiness to change the SPS when the external environment changes; timeliness of changes; redirection/adaptation of existing programmes to reorient aid towards more vulnerable groups; to change their directions of expansion – either vertical (“by temporarily increasing the value or duration of an intervention to meet existing beneficiaries’ additional needs”) or horizontal (by “temporarily inclusion of a new caseload into a social protection program by either extending geographical coverage, enrolling more eligible households... or altering the enrolment criteria”⁸).

Examples of horizontal extension are: the temporary suspension (from March to December 2020) of certain requirements for access to monthly social assistance benefits; the alleviated

⁵ See <https://ec.europa.eu/social/main.jsp?catId=102&langId=en>. In a recently published book, a synthesized characterization of the flexibility of the labour market was made, including of the flexicurity concept – see Loukanova, Houbenova-Delisivkova, 2024, pp. 15-28.

⁶ “Security through diversity” was the name of the pension reform in Poland, which began in early 1997. Security through diversity is an approach in which prepared measures are applied in advance to respond to threats whose occurrence cannot be predicted.

⁷ „Social protection“ and „social support“ are here used as synonyms.

⁸ Citations are from United Nations, Economic and Social Commission for Asia and the Pacific (ESCAP), 2020, p. 8. See also Coudouel, Fuselli, Saidi, 2023, pp. 22-23; Bowen, et al., 2020, p. 14.

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(in July 2023) procedure for the Social Protection Fund to grant social assistance of up to BGN 2 500 to people and families whose housing has been damaged in crisis events.

Examples of vertical extension are: the extended period (until 30 June 2020) for receiving monthly child benefits until the completion of secondary education; the one-off financial support for heating in the amount of BGN 300 (2021) to persons and families from vulnerable groups with incomes that exceed the BGN 30 threshold for granting heating allowances (HA) and for potential HA beneficiaries that missed the deadline for submitting their grant applications.

"The adequacy" is mostly associated with the level of granted benefits, as well as with the amount of public funds planned and spent. Adequacy can also be seen as a *factor* in the security of social support recipients, as well as an *outcome* or *sign* of flexibility.

The flexibility of social assistance and resp. – of SPS, contributing and leading to social flexsecurity, can be interpreted as a specific part of the concept of Adaptive Social Protection (ASP). "ASP has emerged as a flexible and dynamic approach to social protection in the past decade. It combines and exploits synergies between social protection, disaster risk management (DRM), and climate change adaptation, and enables social protection to be leveraged as an effective tool to reduce household vulnerability to covariate shocks, such as economic downturns, natural disasters, conflict and violence, forced displacement, and health emergencies, including the recent COVID-19 pandemic... The ASP approach integrates basic social protection with disaster risk management (DRM) and adaptation to climate change." (Coudouel, A., Fuselli, S., Saidi, M. op. cit., p.21)⁹.

The article is focused on the social assistance as part of the SPS and on its functioning in Bulgaria in health emergency during the COVID-19 pandemic period; DRM and climate changes as components of the synergy leading to an ASP are outside of the scope of the study. The logic of the analyses and evaluations in the present work refers to the following basic parameters of support through social assistance – description of the essence and target groups of the respective program; managing institutions; amount of social assistance and assessment of its adequacy; scope (beneficiaries) and incurred costs with a comparison (when possible) with official target values; regulatory changes made during the studied period; appropriate international comparisons. Thus, the flexibility of the SPS is considered as a part of the social policy (mainly the normative regulations), but also as a status of the system.

1. Analysis and assessment of social assistance flexibility

1.1. One-off Social Assistance Allowances

This is a non-contributory payment that (according to article 16 of the Regulation for Implementation of the Law on Social Assistance – RILSA) is granted once a year to meet health, educational, utility and other vital needs of individuals and families that have arisen

⁹ For more details about ASP concept see Bowen, et al., 2020.

incidentally during various crisis events and situations. Until mid-2023, the amount of this allowance was up to 5 times the amount of the guaranteed minimum income (GMI).

The target group includes people affected by natural disasters, fires, industrial accidents (e.g. explosions), road accidents with severe consequences; people with urgent health needs (incl. in relation to COVID-19) or with education-related needs, or with other sudden vital needs¹⁰.

The managing institution is the Social Assistance Agency (SAA) and its Social Assistance Directorates (SAD) in the municipalities and districts. Assistance is granted on the basis of an order signed by the Director of the local SAD. The deadline for issuing such an order on the basis of an application-declaration, submitted by the applicant and a social survey conducted by social workers is up to 40 days. Obviously, the maximum time limit for granting is quite long for such urgent assistance for covering vital needs in the event of a force majeure event or crisis situation. Within the period under review and until mid-2023, applicants had to submit in person the documents for all types of social assistance – a way that was clearly not appropriate in the context of the health crisis triggered by COVID-19. Only from mid-2023 it was possible to submit documents by post or electronically.

The number of recipients of this allowance maintains a fluctuating upward trend: 7,076 (2019); 14,463 (2020); 11,471 (2021) and 58,481 (2022). The budget expenditure increases proportionally: BGN 2 135 million (2019); BGN 6 486 million (2020); BGN 4 018 million (2021) and BGN 20 662 million (2022)¹¹.

The assessment of effectiveness by the comparison with the target performance indicators shows a significant overrun of the pre-established values – e.g. 7000 allowances were planned in 2020 and twice as many were achieved, with a corresponding increase in the pre-established budget. The situation is similar in 2022, when again (?) 7,000 one-off allowances were planned, while 10,745 orders were issued, plus 47,736 – for granting aid to Ukrainian citizens. The increase in the last of the monitored years is also due to the lump-sum allowance paid to the residents of the settlements of Karlovo municipality affected by the September 2022 flood. However, it highlights the fact that during the COVID-19 pandemic, access to this one-off cash form of social support was not decisively eased (again, a low target of only 7,000 allowances was planned), and coverage was not horizontally enlarged to Bulgarian citizens in need.

Main changes in the mechanism, the magnitude of the transfer and its scope

In April-May 2020, the scope of this one-off allowance was extended in a specific way. In support of working mothers and fathers who look after their children – pupils up to 7th grade, who have reached the age of 14, and who were unable to receive other means, a one-off lump-sum of BGN 375 was granted. According to the data of the MLSP, in 2020, 3 812 orders for granting such benefits were issued and BGN 2942 million were spent.

¹⁰ On this issue see also Vekova, 2022, p. 201.

¹¹ Unless otherwise specified, here and below the source of data is the Ministry of Labor and Social Policy – MLSP (<https://www.mlsp.government.bg/programen-byudzheta-na-mtsp-i-otcheti>).

Subsequently, from September 2020, this one-off payment was transformed into a targeted monthly allowance for families with children up to the age of 14 in case of the introduced state of emergency or announced epidemic emergency situation.

Since 2018 and throughout the analysed period, the amount of this cash support of 375 BGN has remained unchanged. This is due to the freezing of the GMI serving as the basis for its determination.

Based on the above, the following *conclusions and assessments* can be made. The amount of this social assistance one-off aid, which by its design is dedicated to providing immediate financial support to cover emergency needs, remained unchanged from 2018 to June 2023, i.e. throughout the observed crisis period. The mechanism of its granting remains unchanged for about 3 decades. The disbursement of this more than modest emergency cash assistance takes time and is not immediate – e.g. the victims of the September 2022 floods in Karlovo municipality received the aid only after a few weeks. It is obvious that the adequacy of this social transfer was negligible and there was no prior "normative" readiness for changes in case of a sudden deterioration of the external environment (onset of "shock crises" due to health or natural factors).

In other words, in the context of the recent health crisis, the design of this form of social protection according to the "general" order has not been changed and has not allowed flexibility of support. The aid capacity has not been fully used, leading to a limited scope and inadequacy of this social payment.

Main changes after 2022

Since June 2023, the maximum amount of this one-off allowance became three times the amount of the official poverty line (OPL), and its specific amount, when granted, is determined by an order of the director of the local "Social Assistance" Directorate. With an OPL of BGN 504 in 2023, the maximum amount of aid became BGN 1,512, which is an increase of more than 4 times compared to its previous level of BGN 375. For 2024, the aid ceiling is already BGN 1,578. The introduction of a legal annual "anchor" of the one-off allowance is a favourable precondition for greater adequacy and flexibility of social protection along this line. Problematic from a methodological point of view, however, is the question of how to determine OPL¹².

As already pointed out, the possibility of absentee submission (by post or electronically) of the required documents by applicants has also been introduced, which is an administrative facilitation in the context of a pandemic and a factor for greater flexibility of the social assistance system.

Alongside these positive changes, introducing an automatic mechanism for determining the amount of benefit and an easier mode of application, problems remain with the administrative speed of granting to ensure timeliness of support in crisis conditions.

¹² This question is discussed below.

Possible directions for changes are to explicitly state in the legislation that these one-off allowances in their maximum amount are an urgent and unconditional form of support in times of crisis – especially for residents of areas affected by natural disasters, as well as for the population of certain vulnerable groups (e.g. people with disabilities, low-income individuals and families, parents with children) when a state of emergency is introduced. For these vulnerable groups, the one-off benefit could become periodic – from 3 to 6 times a year or until the state of emergency is lifted. Within this period, the recipients who are victims of a disaster or a local accident should start receiving monthly social assistance benefits, at that, "automatically" (i.e. without any means-test). Such a change will introduce currently missing parameters of flexibility in the amount and frequency of receiving these social benefits.

When assessing the changes in social support through one-off allowances, one should note the trend towards their diversification – in addition to these allowances, which are for urgent coverage of current vital needs, the following were introduced: specific one-off grants for parents who look after their children – students up to 7th grade and who are unable to receive other means in the emergency situation; social grants up to BGN 2,500 from the Social Protection Fund for purchase of housing equipment for a dwelling damaged by some disaster; additional one-off financial support for heating, etc. On the one hand, this trend indicates an institutional willingness to provide social support to people affected by a crisis, but on the other hand, it is a sign of an ad hoc and reactive policy.

When assessing the changes in social support through the support of one-time benefits, one should note the trend towards their diversification – in addition to the one-time social benefits discussed here, which are for urgently covering current vital needs, it includes: specific one-time benefits for parents who look after children – students up to the 7th grade and unable to receive other funds in emergency conditions; social assistance up to BGN 2,500 from the Social Protection Fund for the purchase of equipment/furnishings (i.e. of an investment nature) for a disaster-stricken dwelling; additional one-off financial support for heating, etc. This trend, on the one hand, shows an institutional desire to provide relevant social support to people affected by the crisis, but on the other hand, it is a sign of ad hoc and reactive policy.

1.2. Monthly Social Assistance Benefits

They are non-contributory benefits, granted to ensure a minimum income for satisfying basic living needs, according to the age, marital status, health and financial situation, employment and education of the recipients. These are targeted benefits granted on the basis of an income criterion called 'differentiated minimum income' (DMI). They are calculated (until June 2023) on the basis of a GMI and a set of specific percentages for more than 20 groups of beneficiaries (type equivalence scale). In addition to income

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criteria, recipients must meet other eligibility criteria related to their employment status, assets owned, savings, etc. (RILSA, art. 9-12)¹³.

The target group consists of individuals and families who, due to their socio-economic status, are unable to meet their living needs on their own or with the help of relatives who are legally obliged to care for them.

The managing institution, as in the case of the one-off allowances, is the SAA and its structures at the district and municipal levels. In their work, they interact (especially in the exchange of information on the socio-economic status of the assisted persons and families) with the labour offices, the regional education departments, the territorial structures of the National Revenue Agency (NRA), the National Social Security Institute (NSSI), Territorial Expert Medical Commissions (TEMC), the municipal administrations, etc.

The GMI, which serves as the basis for calculating the DNI throughout the 2020-2022 period, is only 75 BGN – a value set by the Government in 2018 under non-transparent rules and mechanisms. The amount of monthly benefit granted to beneficiaries is itself equal to the difference between their own income and the DMI. Under these conditions, the *inadequacy* of this type of social transfer income is quite evident.

The *total number of beneficiaries* (individuals and families assisted) exceeds 4,000 (see Fig. 1), highlighting an unfavourable trend towards a sustained reduction in the coverage of this program for providing financial "last resort" support in conditions of a health crisis.

The effectiveness assessment (by comparing the performance with the target values) shows a significant non-compliance – e.g. in the first Covid-19 year 2020, the underperformance was 25%, in 2021 it is 16% and 32% in 2022 (see Figure 1). These data reflect, on the one hand, inaccuracies in planning and in the programme's readiness to perform its functions, and on the other hand, illustrate the level of its effectiveness.

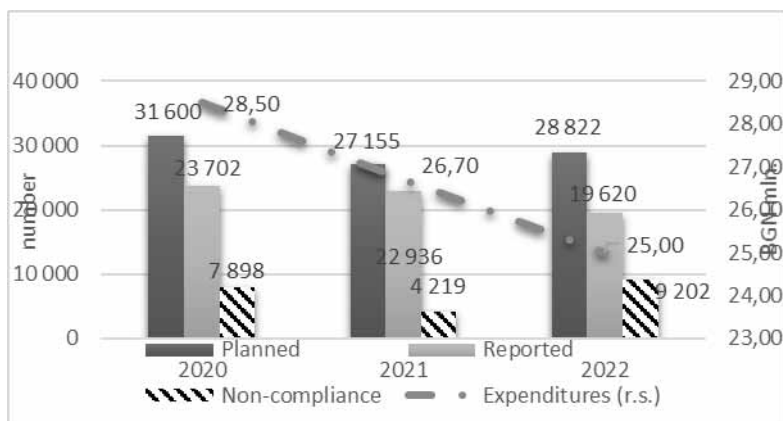
The unfavourable picture is complemented by the logical shrinkage of the respective state expenditures by about 14% (see Figure 1) – from BGN 28.5 million (2020) to BGN 25.0 million (2022).

The *conclusion* is that during the observed period, which included months of emergency situations, restrictions on movement and difficult access to jobs and social services, decline in some sources of income in 2020-2021 (e.g. from pensions, self-employment, unemployment benefits, family allowances for children¹⁴), the program was marginalized as a mechanism for providing timely and adequate in-cash social support to the lowest-income and most vulnerable individuals and families.

¹³ For more details, see Vekova, 2022, pp. 192-197; Tzanov, Shopov, Hristoskov, 2022, pp. 94-99; Tzanov, Shopov, Beleva, Hristoskov, 2017, pp. 201-213.

¹⁴ See Household Budget Survey, NSI – Annual data | National statistical institute (nsi.bg).

Figure 1. Monthly Social Assistance Benefits – number of beneficiaries and expenditures (2020-2022)



Source: Based on data from the annual reports of the MLSP on the implementation of the program budget (<https://www.mlsp.government.bg/programen-byudzheta-na-mtsp-i-otcheti>)

Main changes in the mechanism, the size of the transfer and its scope

During the observed 3-year period, the amount of the GMI (the basis for calculating the individual income threshold) remained at its level of BGN 75, set in 2018. The other main elements for determining this threshold – the percentages for the various vulnerable groups, through which the DMI is calculated, were increased by 10% only at the beginning of 2022, i.e. two years after the start of the COVID pandemic (Decree 257/2021 of the Council of Ministers).

More urgently, in March 2020, the following main changes were introduced with a view to providing easier access to these aids, contributing to a "horizontal" widening in their scope:

- Temporarily (until December 31, 2020) the application of some requirements was ceased, such as¹⁵:
 - the requirement to reduce the amount of "usual" monthly social assistance benefit for families whose children have more than 5 unexcused absences from school;
 - the restrictive requirement that unemployed persons receiving monthly benefits must perform community service in municipal community service programs or must participate in training courses.
- Unemployed persons receiving monthly social assistance benefits were entitled until 30.10.2020 to sign contracts for short-term agricultural work.

¹⁵ See the cited above Law on Measures and Actions during the State of Emergency, art.12 (State Gazette 29/24.03.2020). These changes were for the first time analysed and assessed in our already mentioned publication Tzanov, Shopov, Hristoskov, 2022.

From the second half of 2020, a new type of monthly targeted allowance has been made available to families with children up to the age of 14 for the period when the school is closed due to an epidemic emergency situation and when both or one of the working parents: 1) are unable to telework from home and are unable to take paid leave; 2) are unemployed, have registered with the Labour Office, but are not entitled to unemployment benefit or the amount of benefit received for the previous month is less than or equal to the threshold for access to this benefit – the monthly minimum wage; 3) are self-employed and unable to exercise their occupation due to the restrictions introduced; 4) are not receiving childcare benefit for up to one year.

The amount of assistance for a family with one child is equal to the minimum wage (BGN 610 at that time) and with two or more children – 150% of it, which is relatively good adequacy of this allowance.

In 2020, about BGN 18.6 million were spent on such assistance, in 2021 – over BGN 67 million, and in 2022 – over BGN 11 million. The aid was granted for 35 713, 53 161 and 10 617 children in 2020-2022 respectively.

This scope is indicative that *the program was successfully implemented and fulfilled its functions of providing targeted social support in a crisis environment*. It is also positive that the measure was permanently enshrined in the RILSA and a provision explicitly states that it must be applied in time of crisis. Thus, this part of the system *becomes pre-prepared for implementation*, which is a good (unfortunately rarely applied) regulatory practice.

Notwithstanding these changes, however, social support policy in this area appears conservative compared to measures taken in other European countries in the context of the health crisis, such as: automatic extension of the period of expiring benefits paid to vulnerable people (France); increasing the income threshold to qualify for social assistance (Lithuania); additional support targeted at those already enrolled in social assistance programs (Austria, Finland, France, Slovenia); one-off payments made to recipients of social benefits or people whose income fell below a set threshold (Austria, Finland, Lithuania and Slovenia); one-time solidarity support for recipients of social benefits, older people, students and people whose income fell below the poverty line – in Slovenia (Eurofound, 2021, p.62).

Main changes after 2022

Important modifications in the mechanism for determining and granting monthly social assistance benefits were made in mid-2023 (Decree 74/2023 of the Council of Ministers). Most of them are of a parametric nature; however, there are also amendments that negatively affect important principles of activating social support policy and contain risks concerning the functioning of this part of social assistance. In other words, the changes have both strengths and weaknesses.

As positive elements can be pointed out:

1. The implementation of an automatic mechanism for updating the amount of the base on which the differentiated income (DI) is calculated, as the previous DMI was renamed¹⁶. DI is now calculated by applying the so-called "base for assistance" set at 30% of OPL. The change is in response to: (a) the commitment to reforms in the National Recovery and Resilience Plan (NRRP); (b) the amendments in Article 12 of the Law on Social Assistance, according to which social benefits are determined on the basis of the poverty line for the relevant year, adopted by the Government.

"Base for assistance" is a new term that has replaced GMI. As pointed out in the preliminary impact assessment, "The main focus of this transformation is the shift of social assistance away from linking benefits to GMI towards the poverty line"¹⁷. Such a 'shift' actually exists, as the "base for assistance" is defined as equal to 30% of the OPL. At the same time, however, this change is a kind of formal-terminological one, as virtually nothing in the way of calculating DI would have changed if RILSA had stated that "GMI is set at 30% of the poverty line" – an approach also suggested in our cited publications.

In this sense, it is more logical to use the term "basic income for social assistance" instead of "base for assistance"¹⁸.

2. Another positive change is the simplification of the list of vulnerable groups for which DI is calculated¹⁹: their number has been reduced from more than 20 to 5, which facilitates the administration of the program. Here, however, open questions remain regarding the approach for (a) selecting exactly these groups as "vulnerable"; (b) determining the magnitude of the percentages for the respective groups on the basis of which the DI is calculated.
3. The following can also be described as positive:
 - the enlargement of the groups with the right to social assistance – with the adults who left the residential type of service for the first time, to whom monthly targeted assistance is granted in the amount of the OPL for the relevant year;
 - increasing the amount of DI, which is a prerequisite for opening the system to more individuals and families at risk of poverty and for higher monthly social benefits.

Another positive change is that "When an unemployed person ... receiving a monthly allowance ... starts work, (he or she) is entitled to targeted assistance for 3 consecutive months ..." (art. 11a of RILSA). This is a measure aimed at avoiding the unemployment trap.

¹⁶ This issue is widely discussed in previous our publications – Tzanov, Shopov, Hristoskov, 2022, p.172; Economic Research Institute at BAS. Annual Report 2022, pp. 166-168; Tzanov, Shopov, Beleva, Hristoskov, 2017, pp. 201-213.

¹⁷ <https://www.mlsp.government.bg/uploads/41/test/3-ov-zid-ppzsp.pdf>, p.2.

¹⁸ Such a suggestion exists in the "Opinion of the Economic and Social Council from July 2022 on the Scope and the Adequacy of the Social Support Code", in the preparation of which the author of the present article had the opportunity to participate as an external expert.

¹⁹ This change is also in line with suggestions made in our cited publications.

It is also positive that the sanctions that incentivise children of relevant age to attend kindergarten or school (by reducing the amount of the monthly allowance received by the family) are maintained.

From the point of view of the administration of the program, a positive element is also the possibility for applicants to submit documents electronically as well as by post.

In their totality, the considered changes will increase the scope of the program and the adequacy of the benefits, which will strengthen its role in social protection. However, this, along with the changes made in access conditions, which mostly relate to property status and behaviour in the labour market, contains a risk of worsening the targeting of monthly social benefits and their effectiveness.

The following weaknesses of the changes can be mentioned:

1. The methodology for determining the poverty line. Since the OPL is a basis of the "base for assistance", the shortcomings of the methodology represent a real risk of high significance for the effectiveness and efficiency of social assistance.

In the above-quoted Opinion of the Economic and Social Council (e.g. on p.30), as well as in other publications, the following imperfections of the methodology are pointed out: (a) it is not clear what level of consumption the poverty line affords; (b) the poverty line is calculated in the current year t on the basis of reference incomes in year $t-2$, and applied to the next year ($t+1$); (c) the poverty line does not reflect changes in the income distribution, as it is not allowed to decrease; (d) the method used to calculate a relative poverty line actually measures a distance (equal to 60%) from an equivalent median total disposable net income and sets a threshold for "at risk of poverty" (as Eurostat terms the indicator) rather than measuring the state of poverty; (e) in 2021, indexation with CPI, measured on the basis of the small consumer basket, has been ceased.

These methodological weaknesses for determining the OPL make it a "pitfall" for social assistance modernisation, as it risks putting minimum income social transfer schemes on "shaky ground".

2. The significant liberalisation of a number of criteria and requirements for access to monthly social assistance benefits. This is inconsistent with the principle of subsidiarity in social policy and the objective stated in the LSA to support the social inclusion of beneficiaries and the employment of unemployed persons who qualify for monthly social benefits. For example (art.10 of RILSA):
 - The requirement that the inhabited own home be the only one, without taking into account its size and assessing the possibility of this dwelling to be a source of income.
 - The abolition of the requirement that applicants have no right to refuse to cultivate land allocated to them by the state or municipal land fund.
 - The significant shortening of the waiting period for unemployed persons (from 6 to 3 months and undertaken in a period of low unemployment rate) which is contrary to

the incentives for active behaviour on the labour market and for social inclusion of the poor unemployed.

- The reduction of the length of participation in community labour programs – from 56 hours to 40 hours per month (notwithstanding the doubtful effectiveness and efficiency of such involuntary work participation).
- There is also a significant reduction in the period for not receiving assistance in case of repeated refusal to participate in such labour programs, which is a disincentive for the social inclusion of poor persons.

The general assessment is that these are changes that worsen the targeting of the benefits and contradict the LSA, according to art. 2 of which "Social assistance is implemented by providing social assistance benefits in cash and/or in kind to meet the basic life needs of citizens when this is impossible through their work and the property they own". Such changes in the regulations should, in principle, be made according to changes in the external environment, related to the economic cycle or other factors – in times of crisis the access should be expanded, and in favourable conditions, the eligibility criteria should be tightened in order to encourage labour participation and social inclusion.

The changes implemented in mid-2023 design a program that is expected to function in the same way in any external environment, i.e. the mechanisms for providing monthly social assistance benefits again do not include elements to be triggered "automatically" in case of a crisis change of external (economic, social, health) conditions. In other words, program flexibility was not an objective of the 2023 change.

1.3. Heating allowances

They are non-contributory benefits granted to provide heating for people in difficult social situation. It is provided (like monthly social assistance) after verification of income and assets, health, age, employment and education status. The income threshold was the so-called 'differentiated income for heating' (DIH), calculated (until mid-2023) on the basis of a 'basic income for heating' (BIH) equal to twice the amount of the GMI (i.e. BGN 150) and by applying a system of coefficients for 20 vulnerable groups of the population (Ordinance 5 on the terms and conditions for granting targeted heating allowances).

The target group of this program includes individuals and families who, due to their socio-economic status, do not have the means for minimum heating during the winter season.

The managing institutions are the same as for other types of social assistance – SSA and its directorates in the districts and municipalities. In their work, they interact with the territorial structures of the labour offices, the regional education departments, the territorial structures of the NRA, NSSI, TEMC, the municipal administrations, etc.

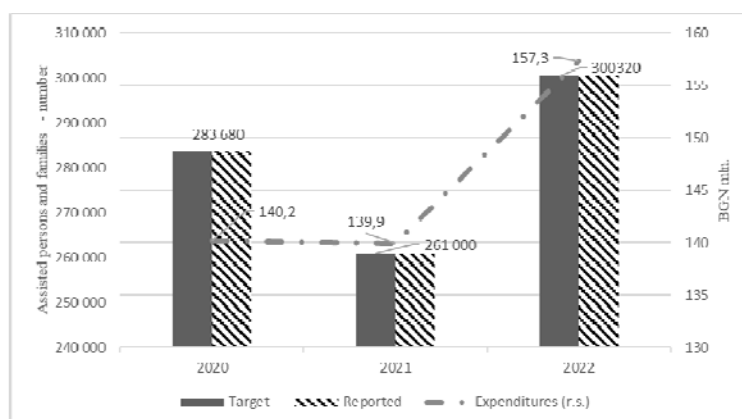
The monthly amount of the heating allowance (HA) during the observed 3-year period is BGN 99.1 (2020); BGN 104.7 (2021); BGN 124.7 (2022). This is a flat-rate amount and is provided for a period of 5 months (November-March). It is determined by an Order of the Minister of Labour and Social Policy based on the average price of electricity for a

household consumer as of October 31 of the current calendar year, with a monthly consumption norm of 500 kWh. The reasons and evidence for this size of the norm are not specified and argued by the MLSP.

The total number of individuals and families receiving such assistance fluctuates, and in 2021 it decreased compared to 2020 by 8%, while in 2020 it marked a growth of 6%, reaching over 300 thousand recipients.

The assessment of effectiveness by comparing performance against target indicators shows full implementation (see Figure 2). It should be pointed out that there is one feature of the operational planning that is very clearly pronounced in this type of aid: at the end of the year, the Ministry of Finance makes adjustments to the target indicators (which in some cases exceed the initial ones) and thus achieves full implementation. A reason for these adjustments is the *ad hoc* provision of necessary additional financial resources. However, this shows that the financial planning in this crisis environment is reactive, *post factum*, and without forecasting and modelling in advance possible costs in the event of a negative change in the external environment.

Figure 1. Heating allowances – number of beneficiaries and expenditures (2020-2022)



Source: Based on data from the annual reports of the MLSP on the implementation of the program budget (<https://www.mlsp.government.bg/programen-byudzheta-na-mtsp-i-otcheti>)

The expenditures generally follow the trend of changes in the number of beneficiaries – a decrease in 2021 and an increase at the end of the period to BGN 157.3 million.

Main changes in the mechanism, the size of the transfer and its scope

The main parametric changes in this social assistance scheme (the increase of the amount of the BIH, the increase of the amount of the DIH through the increased coefficients and the number of vulnerable groups for which the BIH is calculated) were introduced in 2019, i.e. on the eve of the health crisis caused by COVID-19. During the observed period, as a

consequence of the existing automaticity for determining the HA amount, its value was increased by 25%. No other changes were made to the basic parameters of the programme.

This area of social assistance, during the period of the health crisis also resorted to *ad hoc* provision of lump sums. First, in November 2021, the caretaker government of Mr. St. Yanev approved additional budget costs for payment of one-off financial support for heating of BGN 300 to individuals and families from vulnerable groups, including those with incomes that exceed the threshold for granting HA by BGN 30 and for potential HA beneficiaries that missed the deadline for submitting their grant applications. The funds disbursed for this measure amount to almost BGN 48 million for 63,378 cases.

One year later, the caretaker government of G. Donev provided the same additional one-off financial support for the heating season 2022/2023, this time in the amount of BGN 400 and with a higher (by BGN 40) income threshold for access. Again in November 2022, another one-off financial support of BGN 300 was granted to over 47 000 individuals and families and around BGN 14 million was spent. Thus, in 2021-2022, the share of expenditure on these one-off benefits in the total expenditure on this support for heating assistance in the heating season 2022-2023? was around 20%, a significant share but allocated in a "manual mode" by the Government.

This social assistance scheme can be defined as the most flexible among the others: (a) mainly due to the "automatic" mechanism for determining the amount of support based on the electricity consumption norm and according to the changes in electricity prices; (b) its upgrading (albeit *ad hoc* and according to budgetary constraints) during two consecutive heating seasons with additional one-off support for a wider range of vulnerable people, including those affected by fires or natural disasters. These reactive and *ad hoc* measures prove that this program needs optimisation. Its main problems²⁰ consist in its orientation towards winter heating poverty rather than energy poverty; lack of an objective mechanism for determining the size of the electricity consumption norm; unclear rules for determining the size of the coefficients for the different vulnerable groups in the calculation of the DIH; large number of the groups; linkage of the DIH to the GMI, which leads to a low-income threshold; absence of advance readiness to trigger additional support in the event of force majeure. Some of these issues were resolved in 2023.

Main changes after 2022

In the middle of 2023, important changes were introduced. However, they do not affect the essence of the HA program, but modify the following parameters:

1. Change in the basis for calculating the DIH income threshold. Instead of the previous BIH, which was equal to twice the amount of the GMD of BGN 75, the OPL was introduced and, in particular – the "base for assistance" mentioned above in point 1.2,

²⁰ In our above-mentioned publications, attention has been systematically paid to these problems and possible ways to solve them. Some of the recommendations, regarding for example the reduction of the number of vulnerable groups, the optimization of the size of the BIH, became part of the changes in 2023.

the monthly amount of which is 30 per cent of the poverty line for the respective year. At BGN 504 OPL for 2023, the "base for assistance" is BGN 151.20, i.e. – the basis increase is insignificant.

2. The following changes in the way of calculating DIH are essential:

- Firstly, the number of vulnerable groups for which a corresponding DIH is calculated was reduced – from 20, these groups became only 5. They are the same as for the monthly social assistance benefits²¹, which overcomes another shortcoming of the previous design and practice – different vulnerable groups in the two programs.
- Second, a scale of corrective percentages for the 5 groups was introduced, resulting in a higher DIH being set, and allowing access to the program for more individuals and families – e.g. for a person who lives alone, the DIH of BGN 195 became BGN 279.72 or 30% higher.
- Thirdly, based on the practice during the COVID-19 crisis, the possibility was explicitly foreseen for the Minister of Labour and Social Policy to allocate "additional funds to HA for the relevant heating season". This increases the level of support, but (again) on a subjective basis and within the pre-defined budget for targeted HA.
- Fourth, an administrative facilitation was introduced, whereby the HA is paid out all at once. The payment in 2 tranches during the winter season was cancelled.

The following positive sides of the changes in this program can be summarized:

- Linking the income threshold for receiving HA to the OPL, thereby aligning with the approach for calculating monthly social assistance benefits based on the so-called 'base for assistance'.
- Simplification of the application procedure and assessment of the income status of applicants.
- A more favourable formula for calculating a DIH which broadens the scope of the programme.
- Introduction of administrative relief for beneficiaries.
- Regulating the possibility of granting additional heating allowances at the discretion of the Minister of Labour and Social Policy.

The main weaknesses are:

- The program remains focused on alleviating heating-related poverty, but not on alleviating energy poverty.
- The basis for calculating the income eligibility threshold (BIH) is the 'base for assistance', which is set at 30% of the OPL. As already pointed out above, the

²¹ This change is in line with our earlier suggestions – see Tzanov, et al., 2022, pp. 178-179.

methodology for determining the poverty line has serious flaws that make OPL a "slippery" basis for this purpose.

- There are no clear and transparent mechanisms for determining:
 - the 5 vulnerable groups;
 - the values of the respective corrective percentages for calculating the DIH;
 - the electricity consumption norm on the basis of which the HA amount is calculated, which was kept at 500 kWh.

1.4. Monthly financial support for people with permanent disabilities

From the beginning of 2019, people with disabilities are entitled to financial support depending on their needs, determined in their individual comprehensive assessment. The financial support consists of two elements: monthly financial support according to the degree of disability and targeted benefits according to the type of disability. The monthly financial support is a new type of monetary social assistance that replaced the existing until 2018 monthly 'supplement for social integration' whose individual elements were determined as a percentage of the GMI. These changes were intended to extend the scope and improve the adequacy of monetary social support for persons with disabilities.

People with permanent disabilities over the age of 18 are entitled to monthly financial support, and those between 18 and 20 are entitled only if they do not receive monthly support for raising a permanently disabled child. The monthly financial support amounts are set for 5 groups depending on the degree of disability and with a differentiated (but unclear regarding the methodological rules) percentage rate in relation to the OPL (see Table 1). This makes it the first social assistance benefit to be calculated on a basis other than the GMI, which (given the long periods of its freeze) makes it relatively more adequate.

There have not been statutory changes to the regulation of this type of cash social support for people with disabilities since 2022.

Table 1. Differentiation of monthly financial support for people with disabilities (BGN)

Degree of disability and rate in percent of OPL	2020	2021	2022	2023	2024
1. 50 – 70,99 % degree of disability (7 % OPL)	25,41	25,83	28,91	35,28	36,82
2. 71 – 90 % degree of disability (15 % OPL)	54,45	55,35	61,95	75,6	78,9
3. > 90 % degree of disability (25 % OPL)	90,75	92,25	103,25	126	131,5
4. > 90 % degree of disability – for beneficiaries of pension for invalidity due to general illness or due to an accident at work or occupational and assisted by helper (30 % OPL)	108,9	110,7	123,9	151,2	157,8
5. > 90 % degree of disability – for beneficiaries of social invalidity pension and assisted by helper (57 % OPL)	206,91	210,33	235,41	287,28	299,82
<i>Indexes (2020=100)</i>	100	102	114	139	145

Source: author's calculations according to art. 70 of Law on people with disabilities.

Shopov, G. (2024). *Social Assistance for Social Flexsecurity (Bulgarian Lessons Learned from the Pandemic and Thereafter)*.

The analysis of the above data shows that if in general for the period 2020-2024, the increase of this monthly support is by 45%, for the studied pandemic period it is by 14%, and for the first two intensely severe years of the COVID 19-crisis, the increase is minor – only 2%. In other words, here too, the nominal increase during the analysed crisis period is below inflation, which reduces the real amounts of the aid.

The unevenness of the nominal changes is also due to a certain extent to the change in the methodology for determining the OPL. And the adoption of OPL for the calculation of the monthly financial support for people with permanent disabilities has the same shortcomings of this basis, already stressed.

The data show (see Table 2) that the total number of recipients decreased in all years of the period, with a sustained increase registered in the most numerous first group, which also receives the lowest benefits, as well as in the group of people with above 90% degree of disability. The increase in the coverage of the first group stems from changed rules for certification by the Territorial Expert Medical Commissions, directing more people to this group, as well as from the aspiration for early retirement of more people by acquiring the right to a disability pension – 31 695 new personal invalidity pensions were granted in 2022, which is about 3670 more than the previous year.

Table 2. Monthly financial support for people with disabilities – scope and expenses

Number of beneficiaries	2020	2021	2022
Total, incl	757109	750431	745352
1. 50 – 70,99 % degree of disability	235385	249074	260910
2. 71 – 90 % degree of disability	328242	313972	300509
3. > 90 % degree of disability	150099	145323	142614
4. > 90 % degree of disability – for beneficiaries of pension for invalidity due to general illness or due to an accident at work or occupational and assisted by helper	28976	27434	26437
5. > 90 % degree of disability – for beneficiaries of social invalidity pension and assisted by helper	14407	14628	14882
Expenses – BGN mln.	461,9	458,8	500
Indexes (2020=100)			
Total number of beneficiaries	100	99,1	98,4
Expenses	100	99,3	108,2

Source: author's calculations on the basis of data provided by the SAA according to the Law on Access to Public Information.

The *conclusion* is that this part of the social support provided to a particularly vulnerable population group such as people with permanent disabilities, has not been flexible enough.

2. Policy recommendations for optimizing social assistance in crisis

2.1. General principles and approaches

The European Social Policy Network (ESPN), in a report issued by the Publications Office of the EU, recommended that national governments use the COVID crisis response reforms to build or strengthen adequate, comprehensive and sustainable social protection systems

and social inclusion policies that address structural deficiencies, are responsive to external factors and include trigger and recovery measures in response to the crisis (Baptista, I., Marlier, E., Spasova, S., Peña-Casas, R., Fronteddu, B., Ghailani, D., Sabato, S. and Regazzoni, P., 2021). Another study concludes that “post-pandemic recovery policies should focus on rebuilding strong welfare states, directly create jobs and aim at the convergence of the economies through expansionary policies and growth” and “When the health crisis subsides and the focus will turn solely on the economic effects of the pandemic, the orientation of the EU policies should prioritize the rebuilding of a strong welfare state, inclusive and sustainable growth and the creation of quality jobs” (Emmanouil-Kalos, A., & Prokakis, E., 2021, p.70; p.76).

The concept of Adaptive Social Protection (part of which is the promoted here understanding of social flexsecurity) relies on four “building blocks”:

- “Institutional Arrangements and Partnerships. To support government leadership in the coordination of actors, based on the clear articulation of roles and responsibilities.
- Data and Information. To ensure that the design and implementation of ASP programs are informed by information on household vulnerability to shocks and their capacity to cope and recover, including through dynamic social registries.
- Programs and Delivery Systems. To promote programs and delivery systems that are responsive to shocks, in that they have anticipated and planned for shocks.
- Finance. To establish risk financing strategies that promote proactive response planning, enable the availability of funding in case of a shock, and limit delays in response.” (Coudouel, A., Fuselli, S., Saidi, M., op. cit, p.8; 24)²².

As already stated above, after the three-year period of the COVID-19 crisis, positive changes have been made to a number of elements of the Bulgarian social protection system in 2023. However, they have not been undertaken as a result of lessons learnt from official evaluations and to address the weaknesses of specific social protection programs and the system as a whole that emerged during the pandemic, but rather as a result of other factors, most notably the implementation of NRRP commitments.

Regardless of the changes undertaken, from the point of view of the *flexibility of social support in crisis conditions*, some *recommendations considered as a conceptual framework for its optimisation* could be summarised²³:

1. In crises, changes in social support systems should be based on *principles* such as comprehensiveness and complementarity, timeliness, adequacy, wider scope and targeting.²⁴ These principles can be combined with the following *principles and measures* to modify existing programs and use them as a tool for adequate crisis

²² For more details, see Bowen, et al., 2020, pp. 9-26.

²³ The starred suggestions would have the most visible effect on increasing the flexibility of the social assistance system. With abbreviation is marked to which “building box” belongs the respective suggestion – Institutional Arrangements and Partnerships (IAP); Data and information (DI); Programs and Delivery Systems (PDS); Finance (F).

²⁴ For more details, see Tzanov, et al., 2022, pp. 182-183.

response (United Nations, Economic and Social Commission for Asia and the Pacific (ESCAP), 2020, p.8; Coudouel, A., Fuselli, S., Saidi, M., 2023, p.22):

- Piggybacking – using elements of an existing program, such as beneficiaries’ list, staff, registration, or payment mechanism.
 - Vertical expansion – by temporarily increasing the value or duration of an intervention to meet beneficiaries’ additional needs.
 - Horizontal expansion – by temporarily including “a new caseload into a social protection program by either extending geographical coverage, enrolling more eligible households...or altering the enrolment criteria”.
 - Refocusing – adjusting an existing social protection program to refocus assistance on groups within the caseload that are most vulnerable to the shock. (PDS)
2. Introduction of *pre-established* legislative rules and mechanisms for providing social support in a crisis environment caused by various external factors (economic, natural, health). Provision should be made for the well-timed activation of such mechanisms at a national, regional or local level when shocks occur and depending on the scale of the impact of the respective factors*.

With regard to monthly benefits and monthly financial support for people with permanent disabilities, in line with the principle of vertical expansion of the programs, the legislation could, for example, provide for a temporary increase in the amounts of the benefits. (PDS)

Such an approach, e.g. in social protection of unemployed people, has been adopted in some countries:

„Alongside the ad hoc crisis responses, ..., introduced to expand access during the COVID-19 crisis, recent reforms in some OECD countries link unemployment insurance benefits explicitly to the labour market situation such that unemployment support responds automatically to changing macro-economic conditions.

In France, a recent reform links benefit duration to the macro-economic climate in light of the dual findings that (i) job search increases at benefit exhaustion and (ii) job search is more fruitful in a tight labour market where job vacancies are more plentiful” (OECD, 2023a, p.7).

“... in France, the duration of unemployment benefits now depends on the macroeconomic conditions, such as the strength of the labour market” (OECD, 2023b, p.66).

3. Ensuring better adaptability of social programs through:
- greater flexibility by alleviating the conditions for access to the programs and by simplifying the administrative procedures;
 - introduction of mechanisms for redirection to long-term social support programs for people in a crisis environment;
 - adjusting the amount and frequency of social payments (benefits, allowances, supplements) to meet the urgent needs of recipients*. (PDS)

4. In relation to the timely provision of financial resources, it is necessary, through the development of financial models and based on the experience of financing measures in previous exogenous shocks of different nature and magnitude, to carry out preliminary scenarios calculations of future costs for social support in the event of crises. This is a way of anticipating budgetary buffers. (F)

In this context, concrete measures should be developed and implemented to decisively expand market-based financial instruments for the transfer of the risk of disasters and accidents, such as insurance, disaster bonds, promoting the use of insurance by the private sector and the population – as planned in the National Disaster Risk Reduction Program 2021-2025 (p.18-19). (F; PDS)

5. Improving the administration of programs through:
 - implementation of explicit provisions allowing for temporary suspension of the assessment of access conditions in times of crisis; improvement of complaint mechanisms;
 - implementation of the principles of subsidiarity and emancipation from social support by introducing measures such as retraining, psychological assistance, etc.;
 - restoration of the role of the Minister of Labour and Social Policy in the National Disaster Risk Reduction Programs. Unlike the National Program for 2014-2018²⁵, such a role is not included in the Program for the current period 2021-2025*. (PDS)
6. Existing, adapted and new social support programs/measures/operations introduced or modified and implemented during the COVID-19 pandemic should be subject to ex-post evaluation. On this basis, a "National Concept for Social Protection Response to Crisis" could be developed. (PDS)
7. The measures for crisis social protection of the population should be part of the strategic and operational documents for the protection of the population developed at a national, regional and municipal level. Adherence to the maxim "think globally, act locally" implies that the measures in the regional and municipal disaster protection plans should be based on the above-proposed "National Concept for Social Protection Response to Crisis", as well as on the national social protection programs*. (IAP)

These suggestions are in sync with the recommendations of the Bulgarian National Audit Office in this regard (Bulgarian National Audit Office, 2024, p.132):

- In order to ensure effective action in the event of a pandemic situation, take action to assess the impact of the regulations implemented during the COVID-19 pandemic.
- To take action to develop and approve a standard operating procedure for the development of national operational plans, with clear requirements for their structure

²⁵ On p. 58 of the previous Program, it is mentioned that the Minister of Labor and Social Policy "analyses the possible sources of risks and ... organises preventive activities... Creates the necessary organization, coordination and control to ensure the normal functioning of the social assistance system in case of disasters...".

and content, through which to ensure clarity about the specific activities and tasks, responsibilities, deadlines for implementation and allocation of resources for the achievement of the goals and implementation of the National Pandemic Preparedness Plan of the Republic of Bulgaria.

2.2. Specific recommendations for improving the social assistance flexibility in crisis conditions

- To introduce explicit and clear rules for social assistance support in a crisis environment, incl. for well-timed activation of the respective adapted mechanisms – especially for the provision of one-off, monthly and energy social benefits*. (PDS)
- Temporary vertical expansion of the social support – by temporarily increasing the size of monthly, energy and family benefits and the monthly financial support for people with permanent disabilities – or temporarily increasing the duration of energy benefits, as well as a transformation of one-off benefits into periodic (application of vertical expansion). The amount of one-off benefits (as well as the amount and duration of the periodic assistance suggested in the paper) can be differentiated in advance according to the specifics and severity of occurred risks*. (PDS)
- Temporary horizontal expansion of the scope of social assistance programs by alleviating the standard eligibility criteria and the administrative procedures and documents (especially for monthly, energy and family allowances), as well as speeding up the assessment process for all social benefits, but especially for one-off benefits.* (PDS)

Provisions allowing for temporary suspension of the assessment of access conditions in the event of a shock are in place in countries such as the UK, France and the US in this area of social support and are in line with the recommendations of the European Social Protection Network (see Baptista, I., Marlier, E., Spasova, S., Peña-Casas, R., Fronteddu, B., Ghailani, D., Sabato, S. and Regazzoni, P., 2021, p.25).

- To introduce mechanisms for redirecting beneficiaries to longer-term social support programs – for example, from one-off to monthly benefits.* (PDS)
- To introduce possibilities to apply alleviated access conditions in the event of regional and local crises, as well as higher one-off, monthly and energy benefits and monthly financial support for people with permanent disabilities. Furthermore, the specificity that the amounts of and access to family allowances for children can only be adapted and applied in national crises must be taken into account. (PDS)
- Preliminary development of scenario estimates for future social assistance costs in the event of crises; respectively – the state should be ready to allocate the relevant budget funds in a timely manner. (IAP) Conducting ex-ante research on the possible impact of the pandemic crisis on the socio-economic condition of the population as a whole and on its specific groups would justify the necessary parameters of the budget policy in crisis conditions. (F)

- With a National Risk Register in place, developed and maintained under the National Disaster Risk Reduction Program 2021-2025, it is appropriate to prepare and update lists of residents in areas at risk (e.g. flood-prone areas), as well as lists of people from different vulnerable groups therein. Existing information systems of the NSSI, NSI, SAA, Employment Agency, Agency for People with Disabilities, Ministry of Education and Science, NAR, etc., enable this, which is an important prerequisite for providing timely support. Particularly informative are the data sets from the integrated information system of the SAA, built in 2016, which allows to derive an individual electronic profile of each applicant and recipient of social assistance benefits or services (over 4.9 million people). In this way, the information system of the SAA can provide fully up-to-date data on people in need of social support at any time. The use of artificial intelligence (AI) in the development and operation of information systems for social flexsecurity purposes is an undeniable urgent priority. (IAP; DI)

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