



# Financial rules and procedures in Interreg Europe - second call projects

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Finance Officer
Interreg Europe joint secretariat

Madrid, 14 June 2017



#### CONTENT

- 1. Financial reporting and first level control
- 2. The iOLF reporting system
- 3. Eligibility rules
- 4. Points of attention



# 1. FINANCIAL REPORTING AND FIRST LEVEL CONTROL

### Reporting deadlines and procedures

- Reporting periods are set by call subject to the monitoring committee (MC)'s approval
- 2nd call MC's approval 5 October 2016

	Repo	orting period	Deadline for submission		
Phase 1 (e.g.36 months)	six-monthly	01 Jan – 30 June 01 July – 31 Dec	01 October 01 April		
Phase 2 (24 months)	annual*	01 Jan – 31 Dec	01 April (first year) 31 Dec (second year)		

<sup>\*</sup> six-monthly reporting under certain conditions (eg. decommitment risk, high amounts due to pilots)



#### Preliminary steps

- During the first reporting period project partners:
- ✓ have signed the project partnership agreement

ONLY partners who signed the project partnership agreement can report costs!



#### Preliminary steps

During the first reporting period :

✓ Spanish project partners propose their FLCs to Ministerio de Hacienda y Función Pública

✓ Ministerio de Hacienda y Función Pública designates the FLCs through iOLF

Ready for the reporting procedures!



 Project partners send their reports incl. list of expenditure and list of contracts to their FLCs through iOLF

 The FLCs verify and confirm the eligibility of the expenditure reported by the respective project partners in iOLF

 The lead partner consolidates and submits the joint progress report to the JS

3





PPs fill the partner reports and submit them to their FLCs through iOLF







#### The partner report includes:

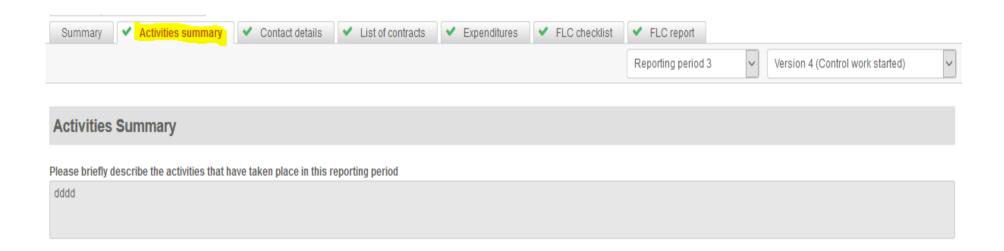
- PP's activity report
- The list of expenditure
- The list of contracts



#### The partner's activity report



'Activities summary' tab of the partner report not included in the joint progress report





### The partner's activity report



- Goal = to provide information to the FLC on the activities carried out
- Can be filled in Spanish
- Not compulsory to use = information can be provided outside the system



#### The list of expenditure (LoE)



VM15

4. List of Expenditure 🚹

Do any corrections linked to previous PRs have to be implemented in the current PR? 🚹

Budgetline (1)		Total budget	Previously reported	Currently reported	Certified amount	Total reported so far	% of Total reported so far	Remaining budget
Preparation		15,000.00	15,000.00	0.00	0.00	15,000.00	100.00%	0.00
Staff costs	*	199,300.00	34,333.25	40,999.86	0.00	75,333.11	37.80%	123,966.89
Office and administration		29,895.00	5,149.99	6,149.97	0.00	11,299.96	37.80%	18,595.04
Travel and accommodation	•	33,055.00	1,946.76	3,964.76	0.00	5,911.52	17.88%	27,143.48
External expertise and services	•	33,600.00	1,275.38	7,652.85	0.00	8,928.23	26.57%	24,671.77
Equipment	•	0.00	0.00	0.00	0.00	0.00	0.00%	0.00
(Net Revenue)		0.00	0.00	0.00	0.00	0.00	0.00 %	0.00
Total		310,850.00	57,705.38	58,767.44	0.00	116,472.82	37.47 %	194,377.18

#### Diapositiva 12

VM15 New screenshot of loe without the financial correction shhet

Virginia Moscadelli; 06/06/2017



#### The list of expenditure



- Costs incurred and paid by the partner in the reporting period
- For PR1: eligible from 5 October 2016 until 30
   June 2017 (no costs paid out after!)







Descriptions in the list of expenditure:

self-explanatory

 clear link with reported activities/outputs planned in AF



#### The list of expenditure



#### Why so important?

- Finances have to match the activities
- Costs in PR reported against expenditure planned in AF



Expenditure in list of expenditure coherent with reported activities + costs planned in AF!



#### The list of contracts (LoC)



 Listing all contracts used for the implementation of the project (above & below EU thresholds)

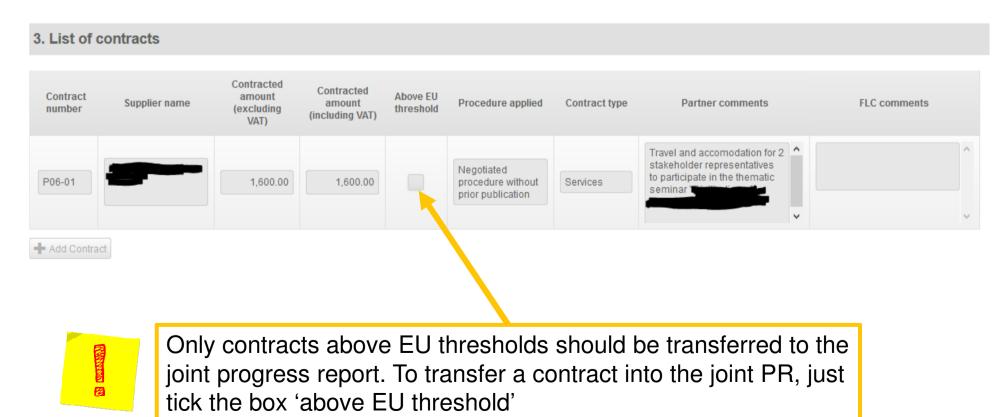
#### 3. List of contracts Contracted Contracted Contract amount Above EU Supplier name amount Procedure applied Contract type Partner comments FLC comments (excluding threshold number (including VAT) VAT) Travel and accomodation for 2 \_\_\_\_\_\_ stakeholder representatives Negotiated to participate in the thematic P06-01 1.600.00 1,600.00 procedure without Services prior publication Add Contract



#### The list of contracts (LoC)



 For costs related to travel and accommodation, external expertise and equipment





#### What to include in the LoC?





'Classical' contracts



Any written contractual agreement e.g. confirmation emails or purchase orders.



#### What you should not include in the LoC?



- One-off purchases
- Oral agreements since not documented









FLCs check the expenditure and fill the control report including checklist in iOLF

Partner reports certified!





2 B

# The Validation Body validates the FLC certificate in iOLF

Partner reports certified!







PPs send their certified partner reports to the LP through iOLF.



The partner report includes:

- First level control certificate
- Control report including checklist
- Certified list of expenditure including the list of contracts
- PP's activity report





The LP consolidates the partner reports in the joint progress report (PR) in iOLF

No longer special role for the lead partner's controller!





The LP consolidates the partner reports in the joint progress report, checking that the reporting complies with the minimum requirements:

- the expenditure is related to the project and corresponds to the activities in the application form
- the partner expenditure certified by a controller is in line with national control requirements (first level control certificate)





## BUT in case of doubts $\rightarrow$ LP asks for clarifications from PPs and can:

- undertake minor changes (eg. no change in amount)
- send back the partner report (new FLC certification)

PP + FLC always informed!



5

LP submits the joint PR to the JS within three months after the end of reporting period



1 October 2017

for the first reporting period



6

Clarification and/or approval of the joint PR

The LP answers to JS's clarification requests PPs should be cooperative and provide input if needed





7

# Execution of payment by the certifying authority





8

The LP transfers the programme funding to PPs in compliance with the amounts stated in the PR



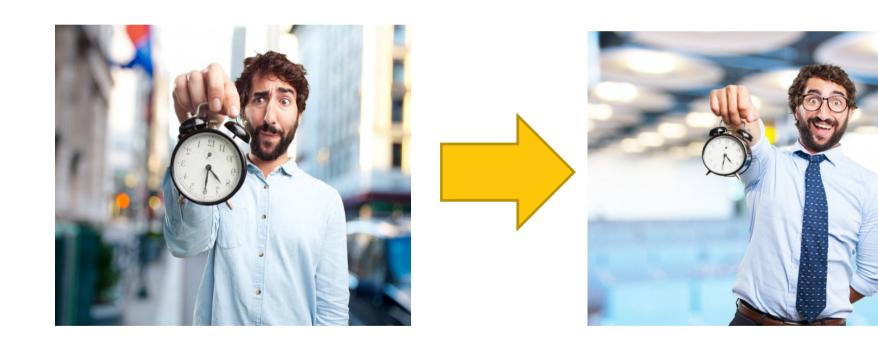
### Reporting deadlines and procedures

How to make sure to have a **sound financial reporting** in place and to be able to report costs in full and in time **by 1 October 2017**?





#### Work with internal deadlines



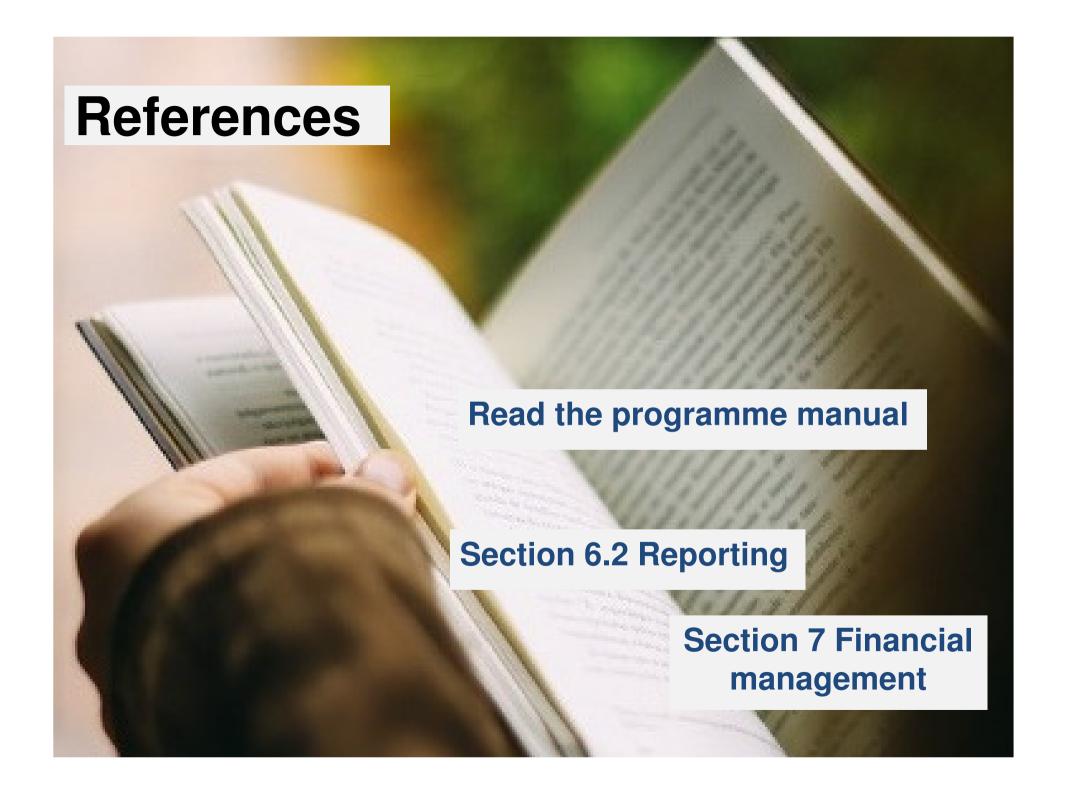


#### PPs reporting to their FLC

✓ PPs submit their partner report to the FLC shortly after the end of a reporting period

#### PPs reporting to lead partner

✓ Ensure LP has sufficient time to compile the PR and submit it on time





#### Time for questions...





#### 2. THE IOLF REPORTING SYSTEM



### Two interlinked systems

# Interreg Europe data base

#### **iDB**

Joint secretariat
Managing authority
Certifying authority

Partner states\*
Approbation bodies\*

\*statistics



#### **iOLF**

#### **Lead partners**

Project partners
First level controllers
Validation bodies (ES & PT)
Approbation bodies





### Reporting fully online

## Reporting fully online in the iOLF system! (no more paper documents)

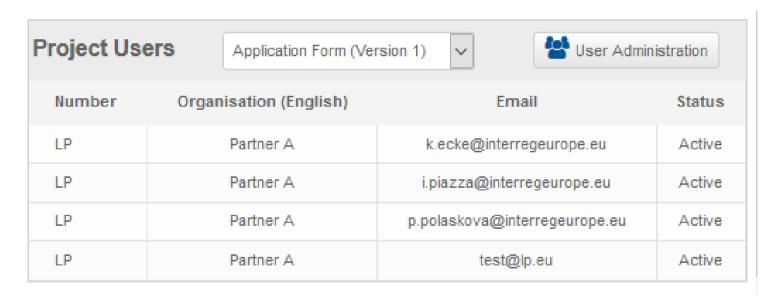
- Partner reports
  - (incl. list of expenditure and list of contracts)
- FLC designation (no longer paper designation certificates)
- FLC certification
  - (incl. the first level control certificate, the control report incl. checklist, and the financial correction sheet, if applicable)
- Joint progress report



### Reporting fully online

#### PPs need access to iOLF

LP creates only the access for PPs





### Reporting fully online

#### FLCs need access to iOLF

Ministerio de Hacienda y Función Pública:

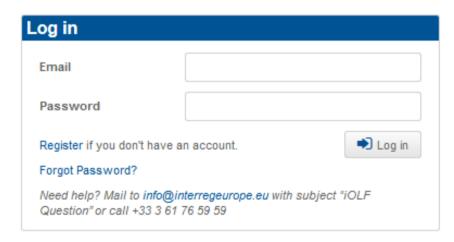
- creates FLC accounts in iOLF activation of accounts by FLCs

- assigns FLCs to their PPs in iOLF activation of assignments by FLCs

### Reporting system - iOLF



http://iolf.eu/Account/Login?ReturnUrl=%2f



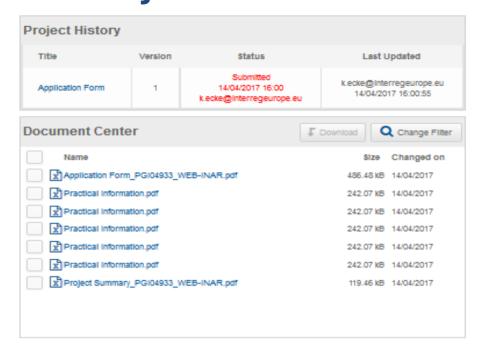
The use of iOLF signifies unconditional acceptance to the terms and conditions.

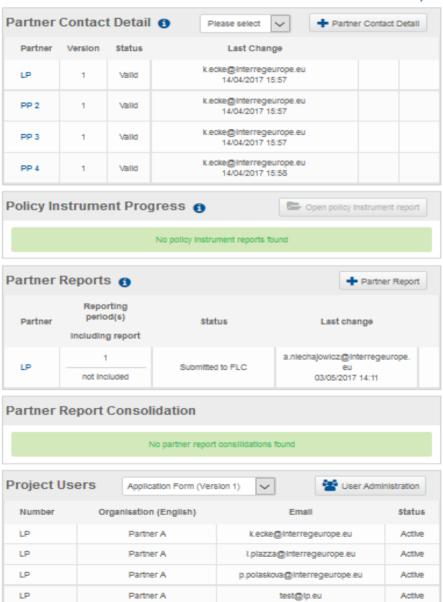


# PROJECT PARTNERS DASHBOARD

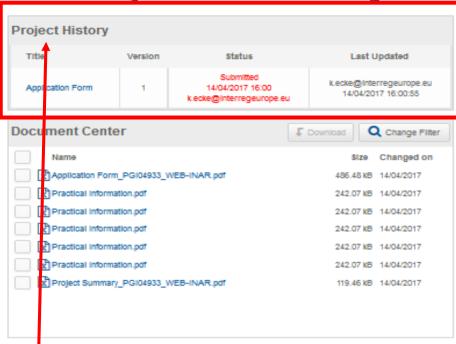
### Project dashboard for PPs





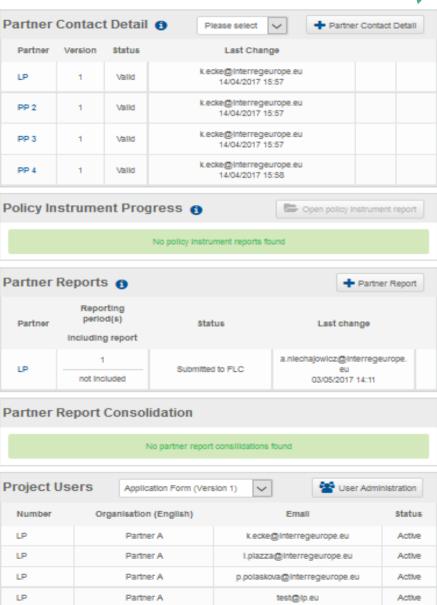


### **Project History**



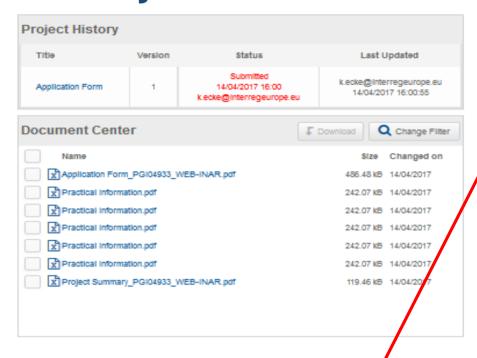
Application form
Joint progress reports
PR clarifications



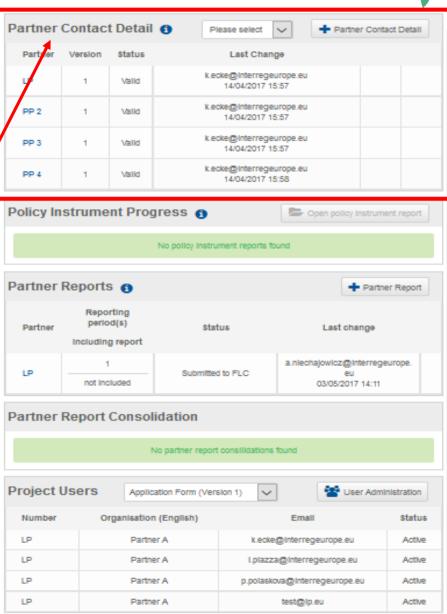


### Project contact details





The **only** place where you edit the contact details



### Partner contact details



- The only place where contact details are edited
- Contact details can be changed by PPs & LP

Partner 0	Contact I	Detail 📵	Please select Partner Contact Detail
Partner	Version	Status	Last Change
LP	1	Valid	k.ecke@interregeurope.eu 14/04/2017 15:57
PP 2	1	Valid	k.ecke@interregeurope.eu 14/04/2017 15:57
PP 3	1	Valid	k.ecke@interregeurope.eu 14/04/2017 15:57
PP 4	1	Valid	k.ecke@interregeurope.eu 14/04/2017 15:58

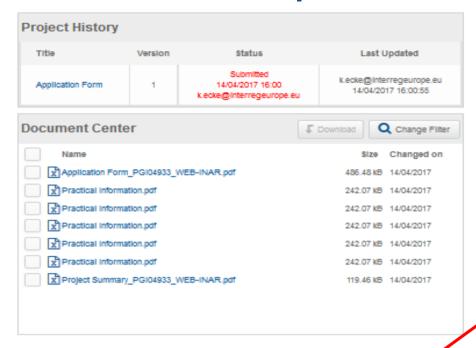
### Updating partner contact details



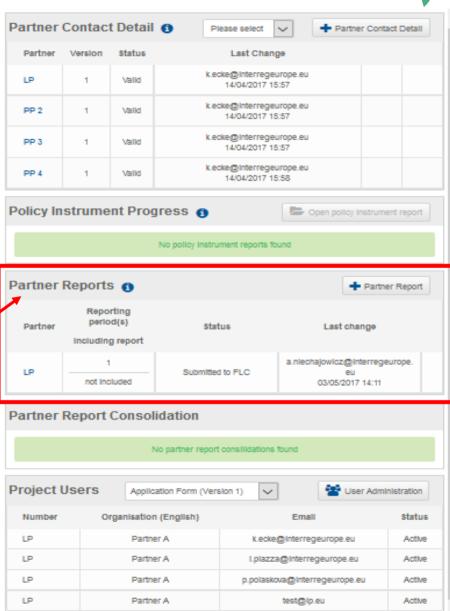
Partner Manager Bank			
☐ Save	Check for errors	Remember to submit!	
Contact Details - Version	1		
Name of organisation in original language	Partner A		
			9 / 200 characters
Name of organisation in English	Partner A		
			9 / 200 characters
Department/unit/division (if applicable)	±		
			1 / 200 characters
Address	±		4,000
			1 / 200 characters

### Partner reports





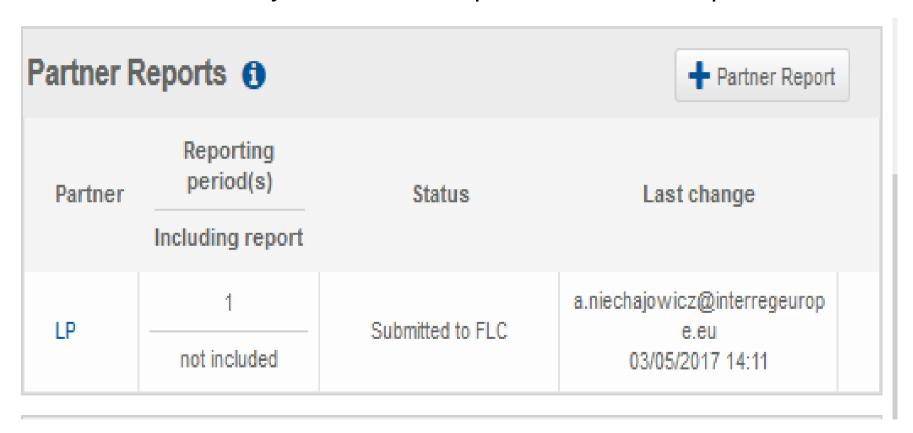
All your partner reports are visible here



### Partner reports

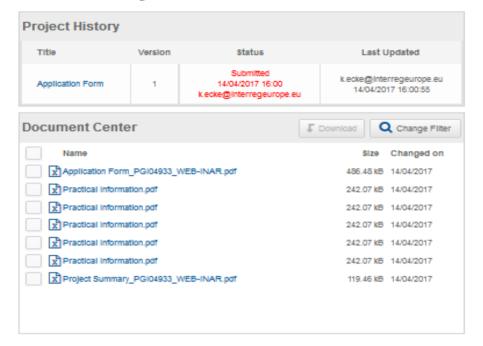


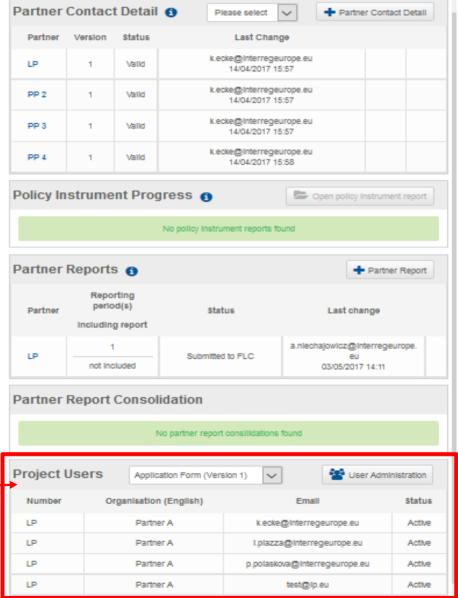
- Each partner can see only their own reports
- LP notified by email when a partner submits report to FLC



### Project users







Only the LP can add — new users to the project

### Project users



- All partners can see all users (no FLCs listed here)
- Only the LP can add or remove users

Project Use	Application Form (Ve	Application Form (Version 1)					
Number	Organisation (English)	Email	Status				
LP	Partner A	k.ecke@interregeurope.eu	Active				
LP	Partner A	i.piazza@interregeurope.eu	Active				
LP	Partner A	p.polaskova@interregeurope.eu	Active				
LP	Partner A	test@lp.eu	Active				



### PARTNER REPORT

### Summary



## Indicate the correct reporting period – impossible to change it later on



#### Summary

In the table below please select the reporting period(s) that you wish to include in this partner report.

Please note that if you include a specific reporting period in this report, it will be impossible to select it again in any other partner report. Please also note that it is possible to add another reporting period to an existing, open partner report. However, for technical reasons, moving the end date to an earlier point in time is not possible. If you accidentally choose a wrong end date, please delete the entire partner report from the Dashboard and recreate a new report with the corrected dates.

Project title	Successful Reporting in Interreg Europe				
Project index number	PGI04933				
Partner name	Partner A				
Partner number	LP (PP1)				
Reporting period start date	Reporting period 1 (begins on 01/01/2018)	V			
Reporting period end date	Reporting period 1 (ends on 30/06/2018)	~			
Included in progress report	Not yet included in a progress report.				
Certified by					

### **Activities summary**



- Information for FLC
- It can be filled in Spanish



#### **Activities Summary**

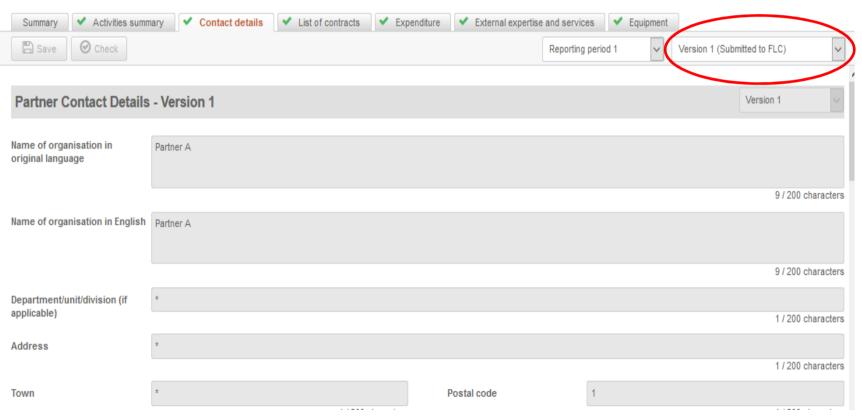
Please briefly describe the activities that have taken place in this reporting period

- Participation in 2 project meetings: 1 in Norway for the interregional workshop and site visit, 3 day round trip with the staff members ECKE, PIAZZA, NIECHAJOWICZ and stakeholders SMITH & MITCHEL, 1 steering group meeting in Brussels, participating staff member PIAZZA
- Continued work on the action plan development, update of the baseline study (included in supporting documents); several intermediate meetings with external service provider
- Production of the programme poster, put in the foyer of the department (visible to the general public, see picture included in supporting documents)
- 1 stakeholder group meeting: a total of 15 participants (see participants list included in supporting documents)
- Preparation of upcoming interregional workshop at the beginning of semester 2, at LP premises (agenda, public procurement for catering & transport etc., included in supporting documents)

### Contact details



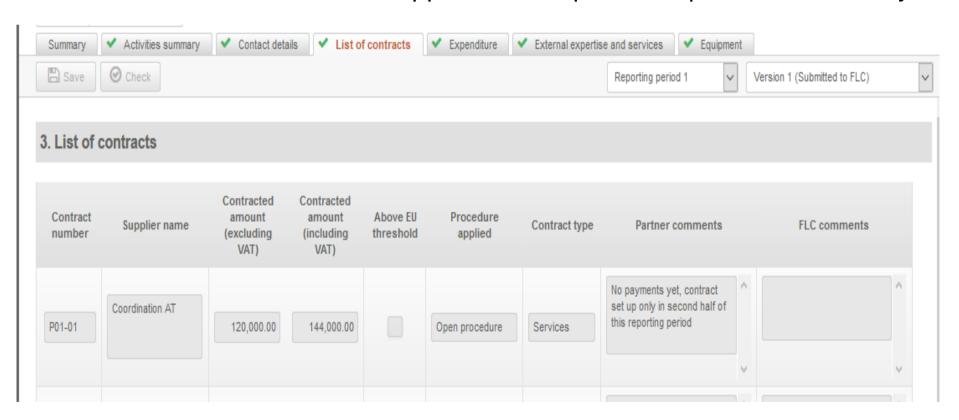
- Select the current version of contact details
- New version of contact details can be created in the dashboard from the 'Partner contact details' section



### List of contracts



- Listing all contracts used for the implementation of the project (above & below EU thresholds)
- Listed contracts will reappear in next partner reports automatically

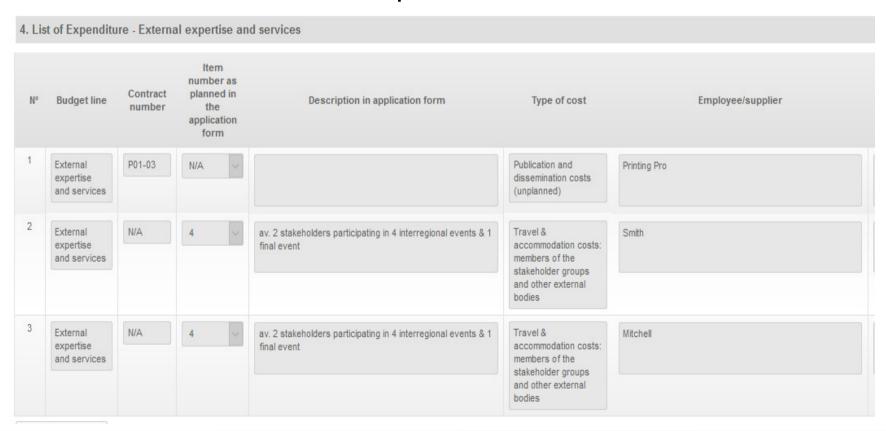


### Expenditure



#### Example budget line (1/3)

- Link the T&A, external expertise and equipment expenditure with contracts listed in the list of contracts
- Link the external expertise and equipment expenditure with the relevant item planned in AF, section E.2



### Expenditure



#### Example budget line (2/3)

 Exchange rate automatically calculated by the system (= exchange rate valid on the date of submission to the FLC)

Description	Document reference number	Date of invoice/document	Date of payment	Currency	Exchange rate	Gross amount declared (including VAT)
Printing project poster	4582 - DG	06/02/2018	09/02/2016	EUR	1.0000	56.00
Stakeholder participating in the interregional workshop & site visit in Norway	4689 - EX	17/05/2018	22/05/2018	EUR	1.0000	850.00
Stakeholder participating in the interregional workshop & site visit in Norway	4692 - EX	18/05/2018	21/05/2018	EUR	1.0000	850.00

### Expenditure



#### Example budget line (3/3)

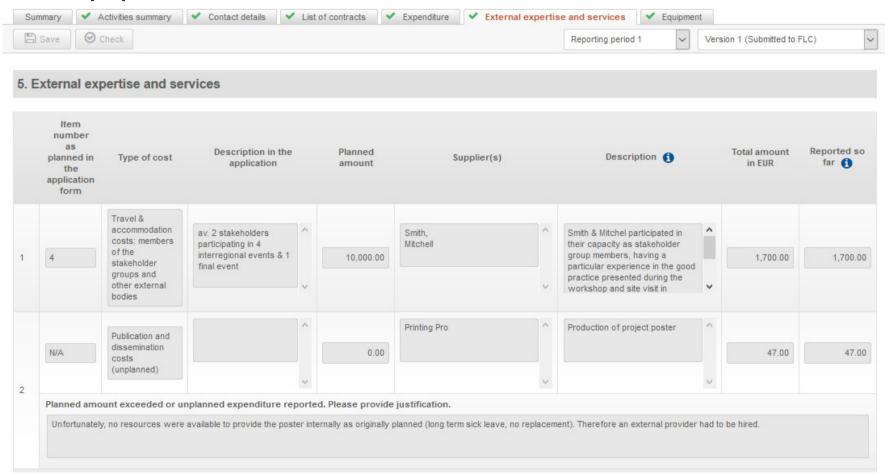
 In the certified report, the "Total amount certified by FLC" will be visible

Check if VAT recoverable	VAT amount if recoverable	Total amound declared (including VAT if not recoverable)	Total amount declared in EUR	Total amount certified by FLC	In case of FLC correction, error related to
<b>✓</b>	9.00	47.00	47.00	0.00	~
	0.00	850.00	850.00	0.00	~
	0.00	850.00	850.00	0.00	

### External expertise and services



• Individual items from the List of expenditure, listed in the External expertise budget line, are here merged into one item per indicated AF item. Same for equipment.



### Submit partner report





In the table below please select the reporting period(s) that you wish to include in this partner report.

Please note that if you include a specific reporting period in this report, it will be impossible to select it again in any other partner report. Please also note that it is possible to add another reporting period to an existing, open partner report. However, for technical reasons, moving the end date to an earlier point in time is not possible. If you accidentally choose a wrong end date, please delete the entire partner report from the Dashboard and recreate a new report with the corrected dates.

Project title	Successful Reporting in Interreg Europe					
Project index number	PGI04933					
Partner name	Partner A					
Partner number	LP (PP1)					
Reporting period start date	Reporting period 1 (begins on 01/01/2018)					
Reporting period end date	Reporting period 1 (ends on 30/06/2018)					
Included in progress report	Not yet included in a progress report.					
Certified by						





Info bubbles



Check button



Error messages

. Exchange rates need to be refreshed.

Video tutorials:

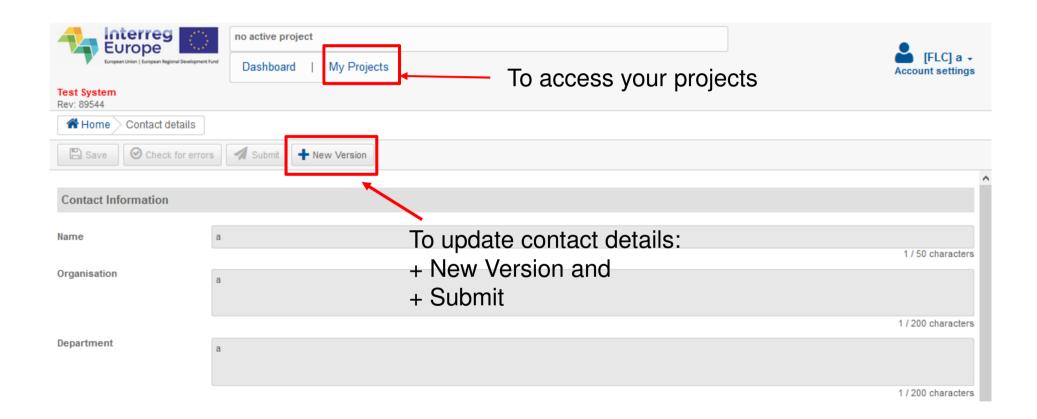
https://www.interregeurope.eu/projects/guidance/#reporting https://www.interregeurope.eu/projects/guidance/#flc-guidance



### **FLC DASHBOARD**

### Log in

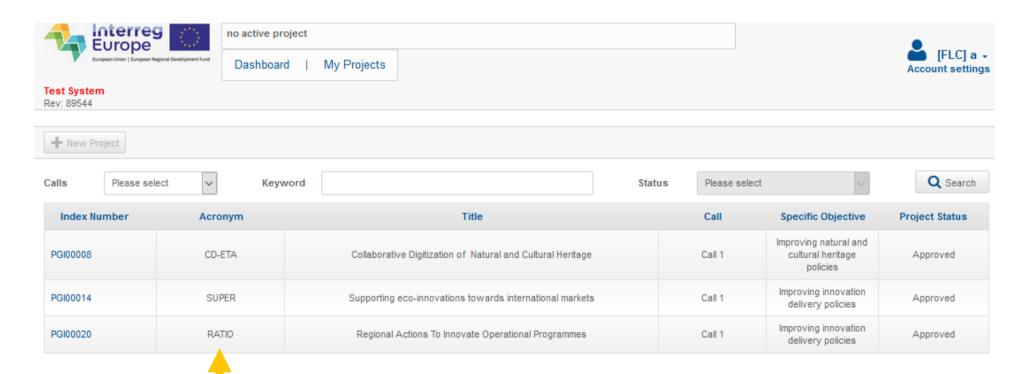




### My projects



#### List of projects the FLC is assigned to



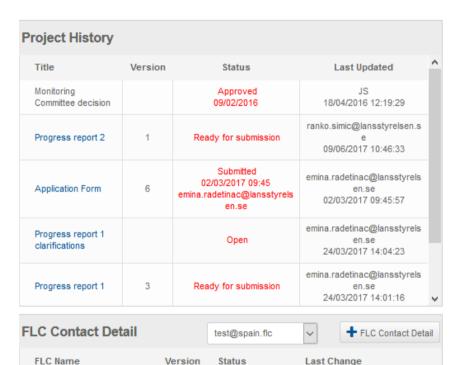
Click on a row to access the project

### Project dashboard for FLCs

test@spain.flc

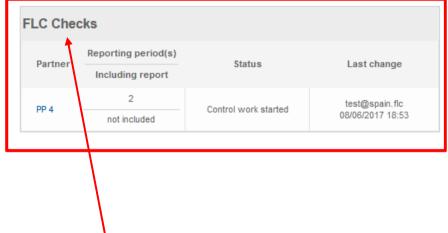
04/04/2017 15:47





Last

submitted



All reports of the partner that have been submitted to the FLC will be visible here



# PARTNER REPORT – FLC VIEW

### Partner report – FLC view



Summary	Activities summary	<ul> <li>Contact details</li> </ul>	✓ List of contracts	Expenditure	✓ FLC checklist	✓ FLC report			
Certify report	<b>5</b> Request changes					Reporting period 2	~	Version 5 (Control work started)	~
Summary									

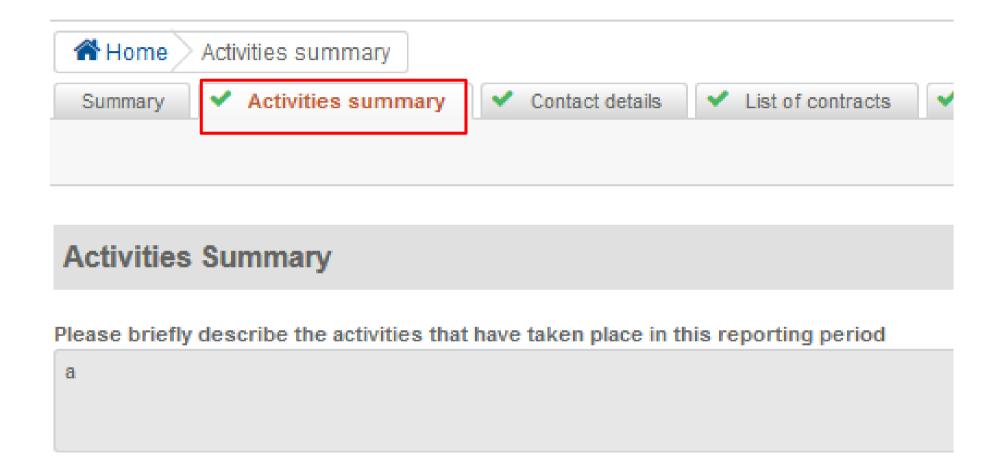
In the table below please select the reporting period(s) that you wish to include in this partner report.

Please note that if you include a specific reporting period in this report, it will be impossible to select it again in any other partner report. Please also note that it is possible to add another reporting period to an existing, open partner report. However, for technical reasons, moving the end date to an earlier point in time is not possible. If you accidentally choose a wrong end date, please delete the entire partner report from the Dashboard and recreate a new report with the corrected dates.

Project title	Supporting eco-innovations towards international markets					
Project index number	PGI00014					
Partner name	Murcia Business Innovation Centre (BIC Murcia)					
Partner number	PP4					
Reporting period start date	Reporting period 2 (begins on 01/10/2016)					
Reporting period end date	Reporting period 2 (ends on 31/03/2017)					
Included in progress report number	Not yet included in a progress report.					
Date of submission to first level control	08/06/2017					
Certified by						
Validated by						

### **Activities summary**





### Contact details



Summary	<ul> <li>Activities summar</li> </ul>	y Contact deta	ails 💙	ist of contracts	Expenditure	✓ FLC checklist	✓ FLC report				
🖺 Save	<b>⊘</b> Check			J			Reporting period 2	~	Version 5 (Co	ntrol work started)	~
				12 / 200 c	characters			-		22 / 200	characters
Flc Conta	ct Details - Vers	ion 1								Version 1	~
Name	а	ı									
Organisation										1 / 50	characters
	8										
										1/200	characters
Department	а										
										1 / 200	characters
Position	а										
										1/200	characters
Address	а										
										1 / 200	characters

### List of contracts

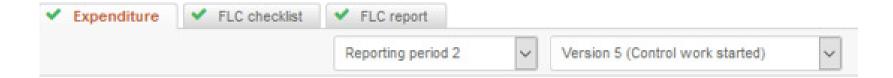


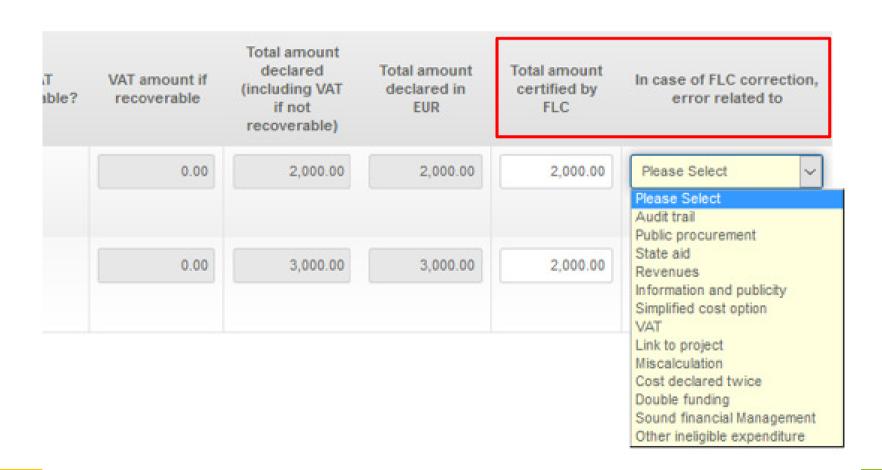
#### 3. List of contracts

Contract number	Supplier name	Contracted amount (excluding VAT)	Contracted amount (including VAT)	Above EU threshold	Procedure applied	Contract type	Partner comments	FLC comments
P04-02	Big contract	250,000.00	300,000.00	<b>✓</b>	Open procedure	Services	^	<b>^</b>
P04-03	Small contract	15,000.00	18,000.00		Request for several offers	Services	^	\ \ \

### List of expenditure

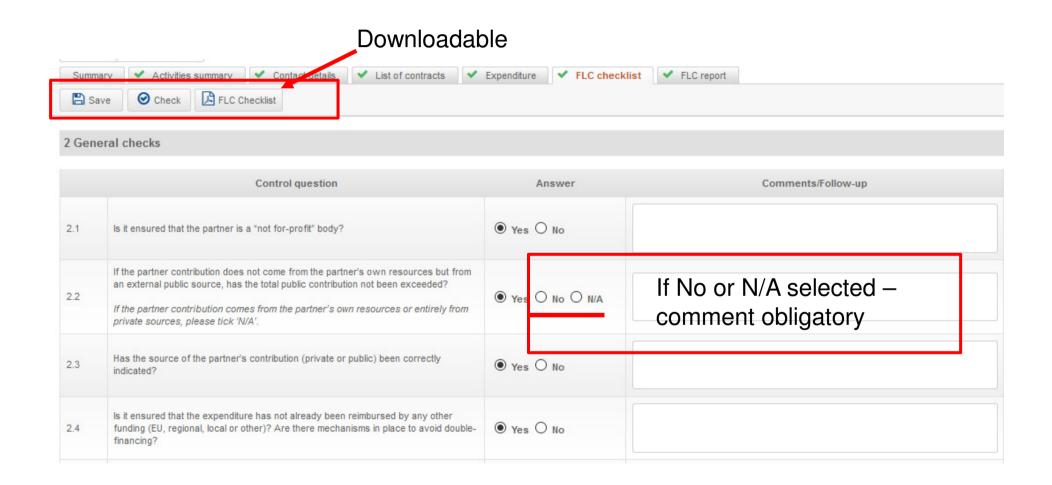






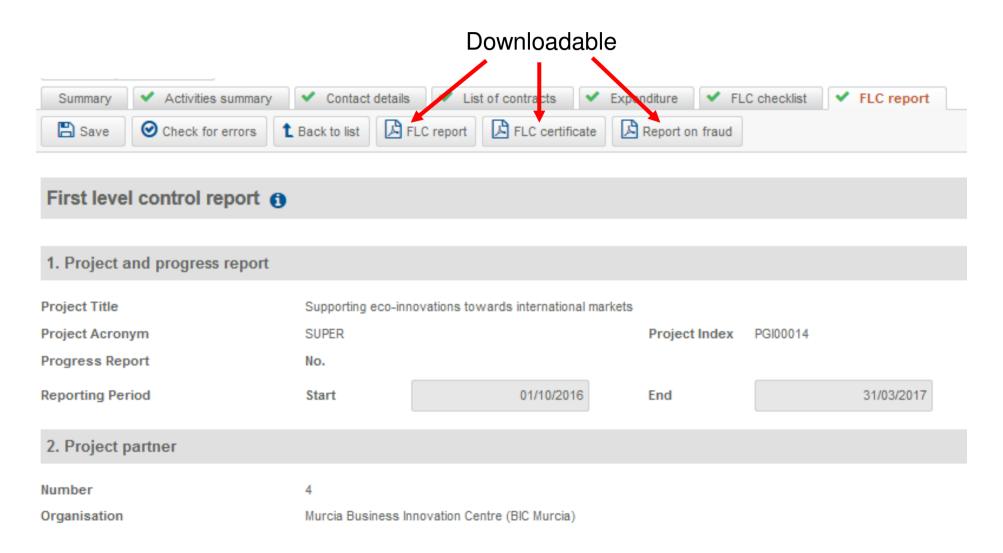
#### **FLC** checklist





## FLC report





## Certify report – step 1



#### **Click "Certify report"**



In the table below please select the reporting period(s) that you wish to include in this partner report.

Please note that if you include a specific reporting period in this report, it will be impossible to select it again in any other partner report. Please also note that it is possible to add another reporting period to an existing, open partner report. However, for technical reasons, moving the end date to an earlier point in time is not possible. If you accidentally choose a wrong end date, please delete the entire partner report from the Dashboard and recreate a new report with the corrected dates.

Supporting eco-innovations towards international markets
PGI00014
Murcia Business Innovation Centre (BIC Murcia)
PP4
Reporting period 2 (begins on 01/10/2016)
Reporting period 2 (ends on 31/03/2017)
Not yet included in a progress report.
08/06/2017

# Certify report – step 2



#### Click the link received in the email

Dear Sven Controller,

Please confirm that you certified the partner report of [Partner name] [Project acronym] in reporting period(s) 2.

To do so, follow the link below:

http://iolf.interreg.gecko.de/FLCC/Summary/ConfirmCertify/4821/12992/137/a0f76d35ab94-4062-9b57-d15cef953007

Kind regards, Interreg Europe

This is an automatic email - please do not reply.





Info bubbles



Check button



Error messages

. Exchange rates need to be refreshed.

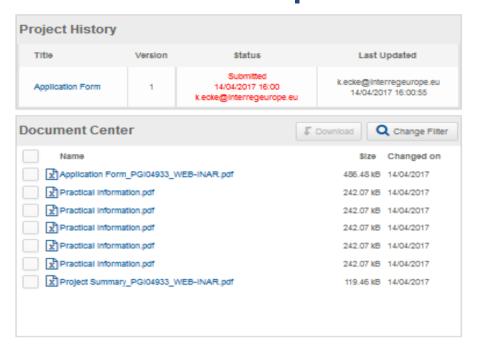
Video tutorials:

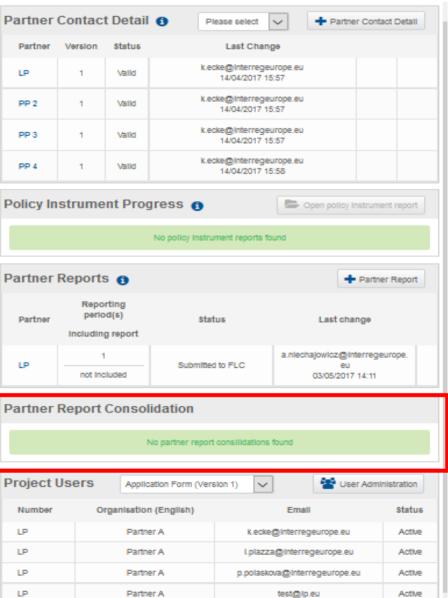
https://www.interregeurope.eu/projects/guidance/#reporting https://www.interregeurope.eu/projects/guidance/#flc-guidance



#### **JOINT PROGRESS REPORT**









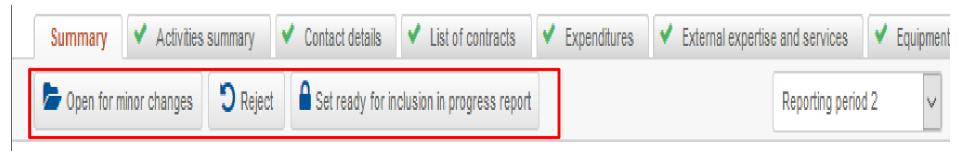
- LP can see all reports submitted by PPs after certification
- All editing of partner reports is done in this section

Partner Report Consolidation			
Partner	Reporting period(s)	Status	Last change
	Including report		
PP 3	2	Included in joint report	
	2	iliciaded ili jollit report	24/05/2017 09:52
PP 4	2	Deady for inclusion	
	not included	Ready for inclusion	24/05/2017 09:57



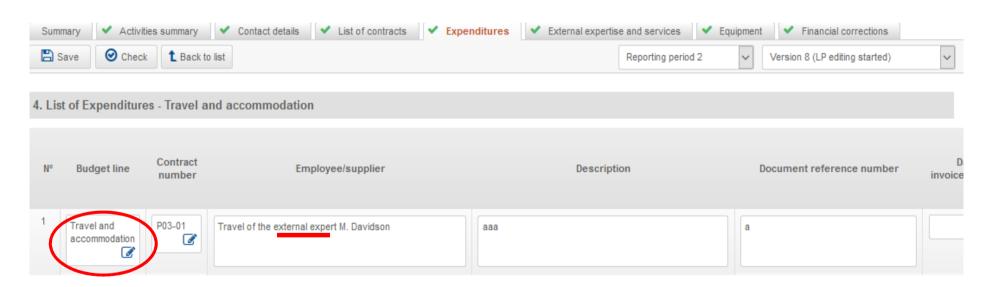
What can the LP do in the partner report consolidation module?

- 1. Minor changes = the amount does not change
- 2. Reject = sends report back to partner new certification
- 3. Set ready for inclusion = blocks for editing before including in PR





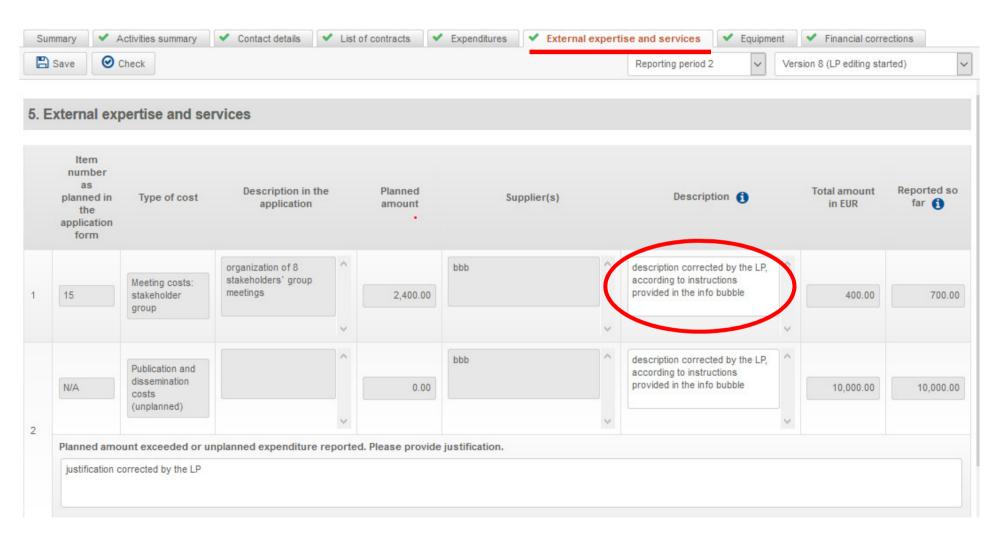
• Minor changes = the amount does not change, for instance: wrong budget line (except staff), incomplete item description, justification not sufficient, old contact details...



LP can correct the budget line, as long as it doesn't have impact on the amount certified by the FLC



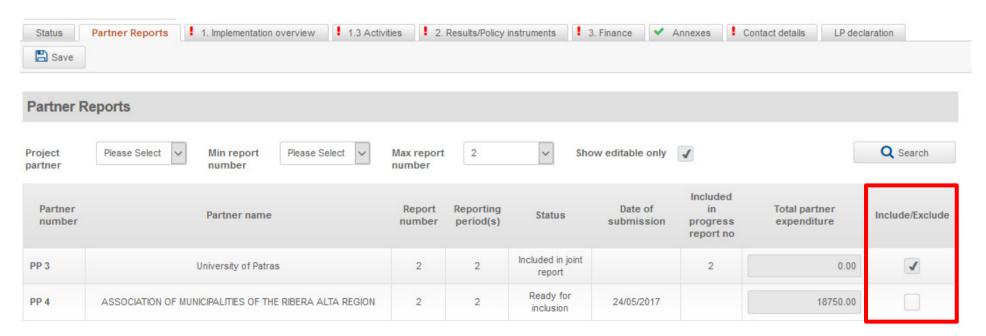
Prepare description of EE and equipment items for the joint PR



#### Joint PR – Partner reports



- List of partner reports
- Include = partner report data transferred to the joint PR
- Exclude = partner report data taken out from the joint PR
- Notifications sent to partner each time





# Conclusions looking at PARTNER REPORTS & PR1

Online in the iOLF: all reporting

Offline: Sending of supporting documents (invoice, payment proofs, procurement documents) to FLC





# Time for questions...





#### 3. ELIGIBILITY RULES



# General principles

#### Different levels of rules

- European: EU regulations
- Programme
- National
- Partner/institutional



## General principles

Eligibility of costs is determined by the relevance of the activities!

Costs necessary to



- Carry out the project activities
- Achieve the project objectives



## General principles

#### CONSISTENT

allocate the expenditure to the right budget line

#### **JUSTIFIED**

 unforeseen expenditure items or over/underspend needs to be justified

#### COHERENT

reported activities and finances have to match



# Eligibility period

Eligibility period from 5/10/2016 (approval by monitoring committee) to project end date

Submission date of last report = project end date = end date of eligibility of costs

Expenditure can be reported only if paid before the end of the reporting period Paid = debited from partner's institution bank account



## Preparation costs

# lump sum of EUR 15,000 per project attributed to the lead partner

- Covers costs linked to the preparation of the application
- Added only to the reported lead partner's expenditure in PR1
- Distribution among partners regulated internally by project partnership agreement – only lead partner reports to the programme!
- No supporting evidence required!



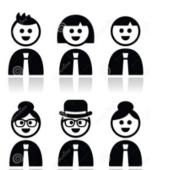
## Budget lines

- Staff
- Administration costs
- Travel and accommodation
- Equipment

External expertise and services

Only for staff directly employed by the partner organisations

# Staff costs (principles)



- For partner staff only (employment contract)
- Not for staff employed by other bodies even if
  - 100% owned by partner
  - seconded to partner
  - they are members (of association, umbrella organisation)
  - if seated in partner organisation

Programme manual section 7.2.1 & Delegated Regulation (EU) 481/2014, Article 3



## Staff costs (calculation)

#### What does your contract say?

- A. full-time on project?
  - > Real cost charged
- B. fixed % on project?
  - > % of real cost charged



- C. flexible hours on project?
  - > C.1 monthly salary / contractual hours or
  - > C.2 annual salary / 1,720 hours
- D. hours + hourly rate fixed in contract?



#### A. + B. Full-time / fixed %

#### Calculation:

Employment cost \* %

- Points of attention:
  - ✓ Regular review (e.g. annual staff appraisal)
  - √ % adjusted if necessary





#### A. + B. Full-time / fixed %

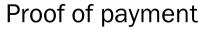
#### Supporting documents:















# C. 1 Flexible hours - monthly calculation

#### Calculation:

- hourly rate: Monthly gross employment costs / nb of hours per month per employment contract
- ✓ attention to holiday allocation
- ✓ record 100% working time
- ✓ timesheet example on website



Recalculation potentially each month!

# C.2 Flexible hours - 1720h method

#### Calculation:

- ✓ latest annual employment cost / 1720h
- ✓ Example timesheet on website (<a href="http://www.interregeurope.eu/about-us/programmedocuments/">http://www.interregeurope.eu/about-us/programmedocuments/</a>)



Regular updates necessary? Potentially one time calculation hourly rate!



#### C. Flexible hours

#### Supporting documents







Proof of payment



Document showing calculation of hourly rate



#### Administration costs





- Flat rate of 15% of staff costs
- Includes: office rent, utilities, office supplies, general accounting etc.
- No administration costs under any other budget line
- No supporting evidence required!

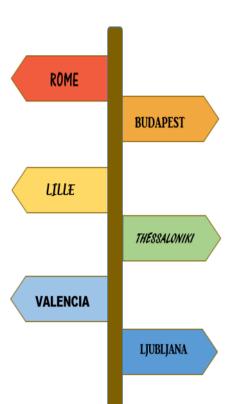
Programme manual section 7.2.2 & Delegated Regulation (EU) 481/2014, Article 5



#### Travel and accommodation

- Only for staff employed by a project partner
- Non-staff travel costs: external expertise budget line!
- Includes items such as travel, meals, accommodation, visa, daily allowances
- Compliance with national and/or institutional rules

Programme manual section 7.2.3 & Delegated Regulation (EU) 481/2014, Article 6



## External expertise



- Services needed outside the partner organisation, incl. travel & accommodation for stakeholder groups
- Public procurement!

Programme manual section 7.2.4 & Delegated Regulation (EU) 481/2014, Article 6

## Equipment



- Purchased, rented or leased by a partner, to achieve the objectives of the project
- Mainly 'office equipment' for project management, not exceeding EUR 5,000-7,000 per project
- Only planned/pre-approved equipment eligible!
- Compliance with public procurement rules

Programme manual section 7.2.5 & Delegated Regulation (EU) 481/2014, Article 7



## Not eligible costs

- VAT if recoverable by whatever means
- In-kind contributions
- Fines, financial penalties, expenditure on legal disputes and litigation, exchange rate fluctuation and interests on debt,
- Expenditure already supported by other subsidies
- Gadgets and gifts



## Gifts and promotional items

Gifts and promotional items (gadgets) are **not eligible** unless

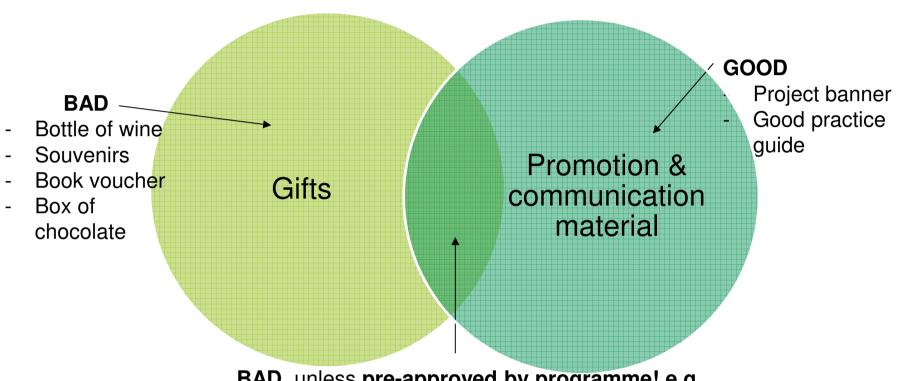
- approved ex-ante by the programme (application form & during project implementation)
- needed for a specific communication activity (EU logo/project logo does not automatically make a gift a promotional material)



Programme manual sections 7.4.9 and 8.2.1 & Delegated Regulation (EU) 481/2014, Article 2



# Gifts and promotional items



BAD, unless pre-approved by programme! e.g.

- **USB** sticks
- Pens
- Notebooks
- Bags



# Items requiring pre-approval

Prior approval from JS necessary for items not already specified and approved in the application form, e.g.

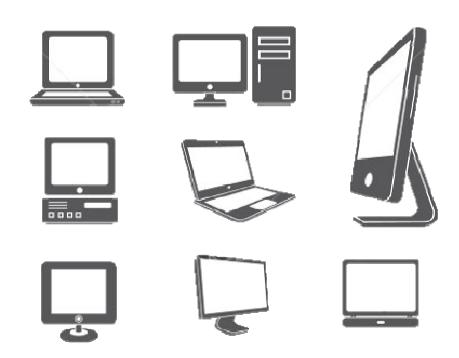
Activities/travel outside the programme area





# Items requiring pre-approval

Equipment if not planned at application stage





### 4. POINTS OF ATTENTION

## Points of attention



- Financing of joint activities
- Public procurement
- Financial corrections
- Fraud detection and reporting
- Quality checks/ audits
- Lessons learnt



# Financing of joint activities

#### No shared costs!



Contracting partner principle applies



Contracting partner = the only one reporting and receiving the ERDF!



## Public procurement

- Public procurement applicable rules\*
  - the EU public procurement directives (Directive 2014/24/EU)
  - national rules
  - internal rules of the partner organization
- No programme-specific rules
  - Section 7.4.6 Public procurement of the programme manual



\* The strictest rules must always be applied in case of doubts, check with your procurement department



## Public procurement

- The private non-profit bodies
  - should respect national rules and internal partner rules (if they exist),
  - should be able to demonstrate good use of public funds,
  - in some countries need to comply with national public procurement rules.



If not sure, contact your national point of contact!



## Procurement and reporting

- List of contracts to be filled in by each partner (contracts below and above EU threshold)
  - ➤ list of contracts in the partner report
- List of contracts subject to EU procurement directives (only above EU threshold)
  - ➤ list of contracts in the joint PR (contracts automatically transferred from the partner reports)



## Procurement and reporting

 FLC checks compliance with public procurement rules

Documented in section 5 of the first level control report incl. checklist



# Common procurement findings

- Inadequate procedure chosen (e.g. direct award of contract not justified)
- Insufficient publicity
- Value of the contract not estimated at institutional level
- Splitting the contracts to fit below thresholds
- Insufficient audit trail (e.g. missing documents)



### Direct award of contract

Common non-justified reasons:

"urgency"

"the only one"

"more economic

– no cost for
training new
person"

"good value (based on old comparison)"

- Direct award for these reasons is rarely justified
- Objective reasons needed (the market should prove)



## Financial corrections

 Correction of an irregularity included in a previous progress report paid by the programme

#### detected following:

- FLC checks (e.g. on-the-spot check)
- National checks
- Second level audits
- EC/ECA audits
- CA quality checks



## Financial corrections

Documented in a financial correction sheet

 Context of the corrections to be selected in the pre-defined list (e.g. following second level audit, on-the-spot check, national check, etc.)

Correction done in the expenditure list

AN11

#### Diapositiva 119

#### What is meant by that? Aleksandra Niechajowicz; 09/06/2017 AN11



## Definition of fraud

#### **Fraud**

Intentional

#### **Irregularity**

error /bad management

#### Consequences:

correction investigation & sanctions

correction



## Fraud detection and reporting

#### **Anti-fraud strategy**

- Regulatory requirement for MAs to
   "put in place effective and proportionate anti-fraud measures taking into account the risks identified"
   (Article 125(4)(c) of Regulation (EU) No 1303/2013)
- implemented notably through:
  - information of project and FLC on the main risks identified
  - recommendations included in the programme manual
  - FLC checklist taking into account risks identified
  - procedures for the reporting of suspected fraud



### Fraud risks identified

Main risks identified for Interreg Europe programme:

- Staff costs reported do not correspond to the reality
- Public procurement (conflict of interests, favouritism, corruption)
- Double financing



## Fraud prevention and detection

To prevent and detect fraud, partners should:

- be aware of the potential risks of fraud
- have internal procedures in place to prevent and detect fraud
- See revised programme manual
- general info in section 7.8
- recommendations for public procurement in section 7.4.6



## Fraud prevention and detection

To prevent and detect fraud, FLC should:

- be aware of the potential risks of fraud
- check the beneficiaries' reports and supporting documents with "appropriate skepticism" (in particular when checking staff costs and public procurement)

# Reporting suspected or established fraud

How can the MA/JS be informed?

 whistleblowing procedure for general public/beneficiaries (dedicated email)

https://www.interregeurope.eu/about-us/anti-fraud-policy/

specific reporting template for FLC –
 Annex 4 of the programme manual



## Quality checks/audits

Several bodies to carry out quality checks/audits

To detect errors and ensure proper use of funds







Second Level Auditors







# Time for questions...





## To conclude...

Don't be scared!



Be prepared!









#### **Video tutorials**



#### **Finances**

- Partner report: 13 video tutorials + 1 webinar recording
- FLC section: 8 video tutorials + 1 webinar recording

#### **Activities**

Reporting activities in joint PR: 4 video tutorials

https://www.interregeurope.eu/projects/implement-a-project/





# Contact your LP in case of questions, the LP will contact the responsible policy and finance officers at the JS



#### What's next?

Online Q&A sessions on reporting for all project partners information on our website





# Thank you!



