



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

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### 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 procedures – timeframe for reporting

 Reporting periods set by call subject to the monitoring committee (MC)'s approval

### **EXAMPLE** for 3rd call projects:

	Rep	orting period	Deadline for submission		
Phase 1 (e.g.36 months)	six-monthly	01 June – 30 Nov. 01 Dec. – 31 May	01 March 01 September		
Phase 2 (24 months)	annual*	01 June – 31 May	01 September (1st year) 31 May (2nd year)		

<sup>\*</sup> six-monthly reporting under certain conditions



### 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
- ✓ Ministerio de Hacienda 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

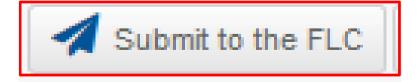
 The lead partner consolidates and submits the joint progress report to the JS

3





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







### The partner report includes:

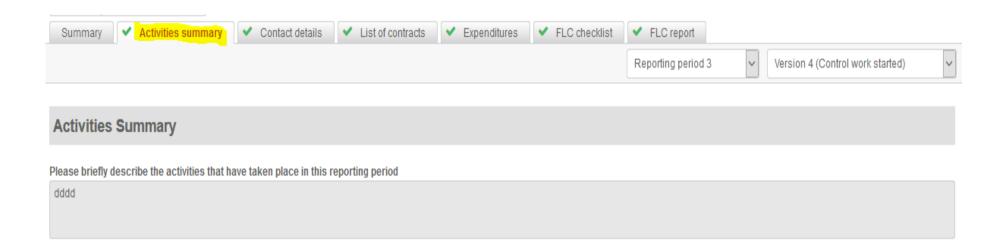
- PP's activity report
- The list of expenditure
- The list of contracts



### 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)



#### 4. List of Expenditure 🚹

Do any corrections linked to previous PRs have to be implemented in the current PR? (1)

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



### The list of expenditure



- Costs incurred and paid by the partner in the reporting period
- Costs eligible from 13 March 2018 until 30
   November 2018 (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

#### 3. List of contracts Contracted Contracted Contract Above EU amount Supplier name amount Procedure applied Contract type Partner comments FLC comments threshold number (excluding (including VAT) VAT) Travel and accomodation for 2 stakeholder representatives Negotiated P06-01 1,600.00 1,600.00 procedure without Services prior publication Add Contract Only contracts above EU thresholds should be transferred to the joint progress report. To transfer a contract into the joint PR, just tick the box 'above EU threshold'





Above EU threshold?

Current EU thresholds\* (contracts signed since January 2018, excluding VAT):

- 1. 221,000€ for all public law bodies
- 2. 144,000€ for all central government authorities (this is a limited list of authorities, if you are on it you usually know it!)

\*Commission Delegated Regulation (EU) No 2017/2365

Thresholds applicable during 2 years



### 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 March 2019

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

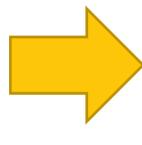
How to make sure to have a **sound financial reporting** in place and to be able to report costs in full and in time **by 1 March 2019**?





### 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



### 2. THE IOLF REPORTING SYSTEM



### Two interlinked systems

## Interreg Europe data base

#### **iDB**

Joint secretariat
Managing authority
Certifying authority

Partner states\*
Approbation bodies\*

\*statistics







## Interreg Europe online forms

#### **iOLF**

### **Lead partners**

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



### Reporting fully online

### Reporting fully online in the iOLF system!

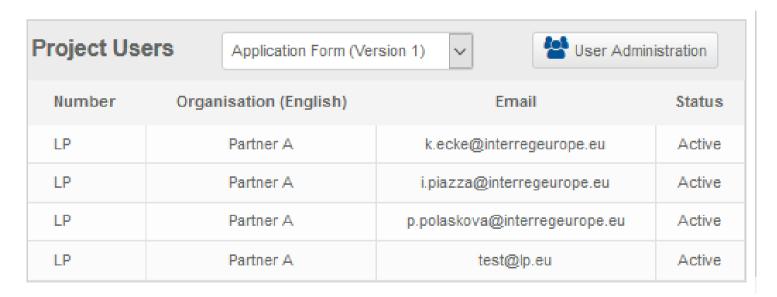
- Partner reports
  - (incl. list of expenditure and list of contracts)
- FLC designation
- FLC certification
  - (incl. the first level control certificate, the control report incl. checklist, and the financial correction sheet, if applicable)
- Joint progress report



# 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 Administraciones Públicas:

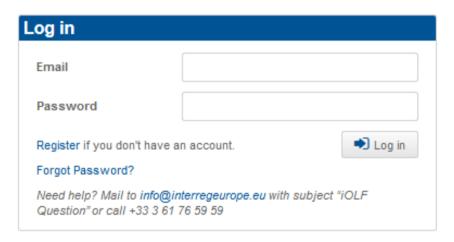
- creates FLC accounts in iOLF  $\Rightarrow$  activation of accounts by FLCs

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

#### Reporting system - iOLF



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



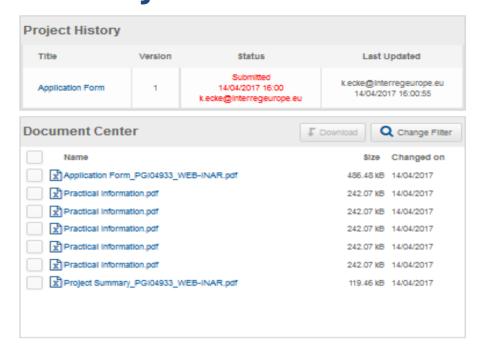
The use of iOLF signifies unconditional acceptance to the terms and conditions.

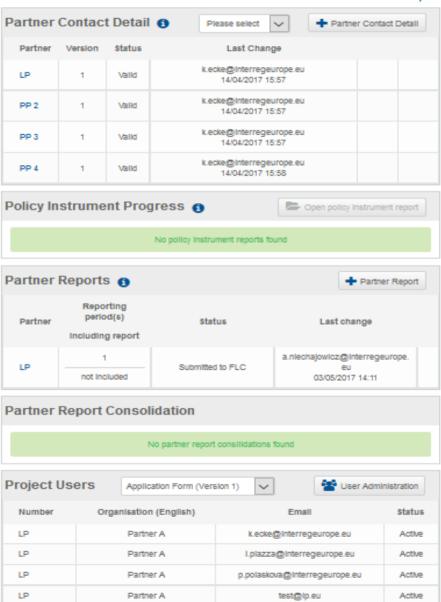


# PROJECT PARTNERS DASHBOARD

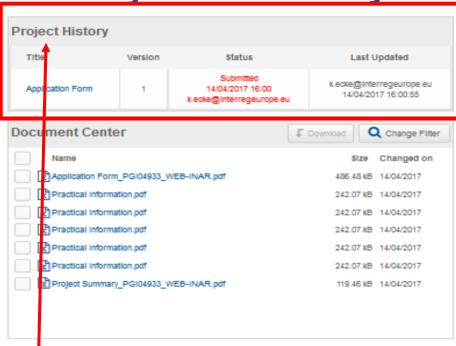
#### Project dashboard for PPs





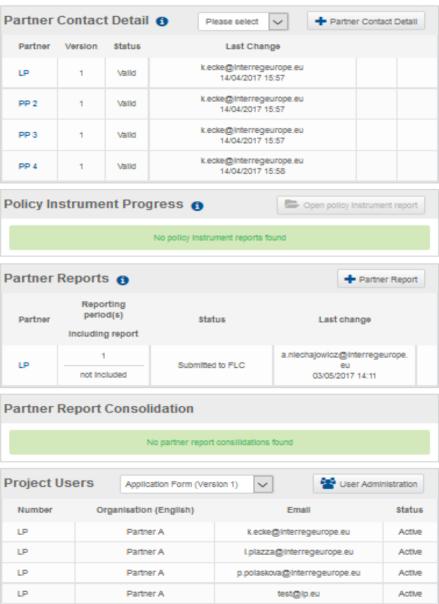


#### **Project History**



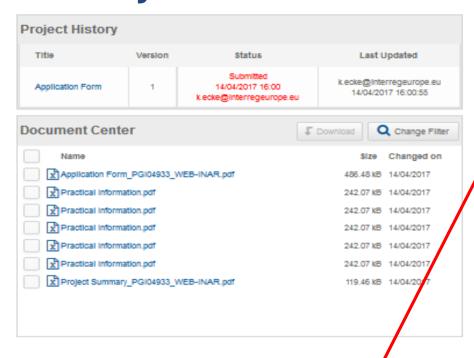
Application form
Joint progress reports
PR clarifications



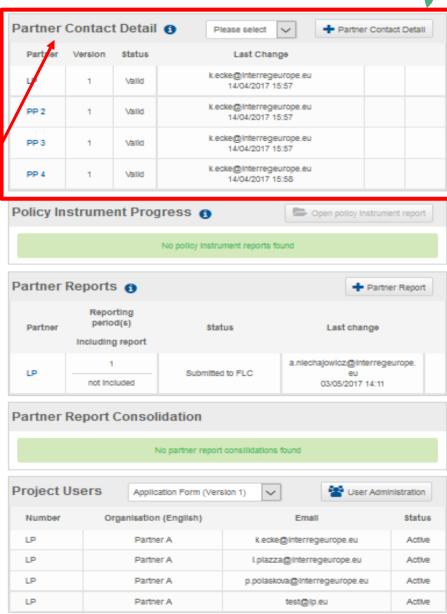


#### Project contact details





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 C	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

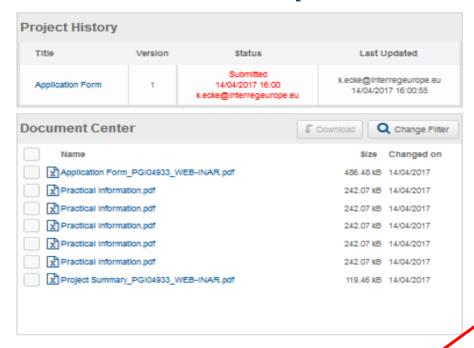
# Updating partner contact details



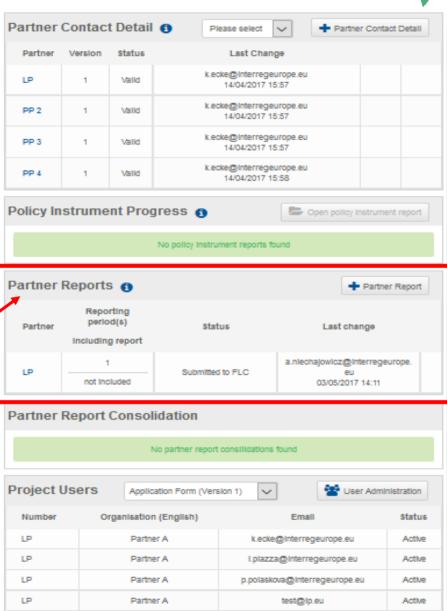
Partner Manager Bank			
☐ Save	Check for errors New Version Submit	Remember to submit!	
Contact Details - Version	1		
Name of organisation in original language	Partner A		
		9	/ 200 characters
Name of organisation in English	Partner A		
		9	/ 200 characters
Department/unit/division (if	±		
applicable)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

#### Partner reports





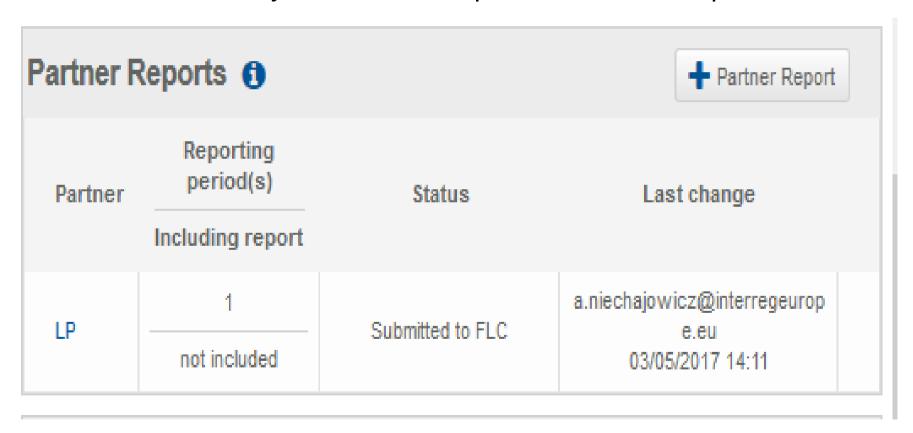
All your partner reports are visible here



#### Partner reports

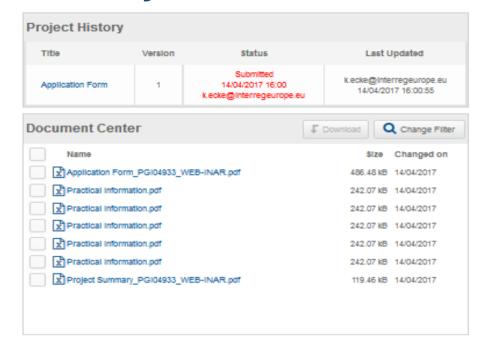


- Each partner can see only their own reports
- LP notified by email when a partner submits report to FLC



#### Project users





Partner Contact Detail 6 Please select Partner Contact Detail Version Last Change k.ecke@Interregeurope.eu LP Valld 14/04/2017 15:57 k.ecke@interregeurope.eu PP 2 1 Valld 14/04/2017 15:57 k.ecke@interregeurope.eu PP 3 1 Valid 14/04/2017 15:57 k.ecke@interregeurope.eu PP 4 1 Valld 14/04/2017 15:58 Policy Instrument Progress 6 Copen policy Instrument report No policy instrument reports found Partner Reports 6 Partner Report Reporting period(s) Partner Status Last change including report a.nlechajowicz@interregeurope. IP. Submitted to FLC not included 03/05/2017 14:11 Partner Report Consolidation No partner report consilidations found Project Users User Administration Application Form (Version 1) Number Organisation (English) Emall Status Partner A k.ecke@Interregeurope.eu Active LP Partner A I.plazza@Interregeurope.eu Active LP p.polaskova@Interregeurope.eu Partner A Active LP Partner A test@lp.eu Active

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	ers Application Form (Ver	rsion 1) V User Admin	istration
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)
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**

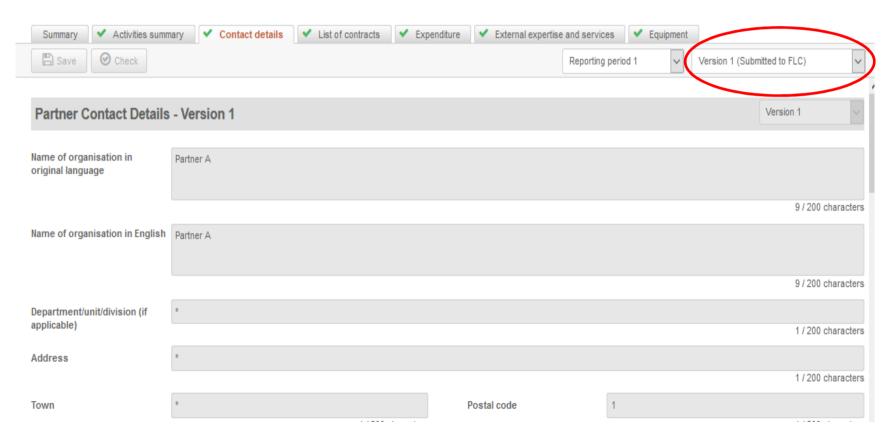
Please briefly describe the activities that have taken place in this reporting period

- 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



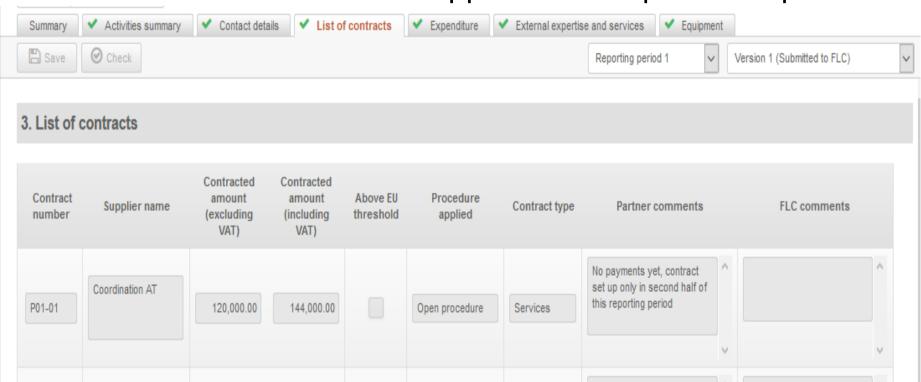
- Select the current version of contact details
- New version of contact details can be created in the dashboard from the 'Partner contact details' section



#### 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

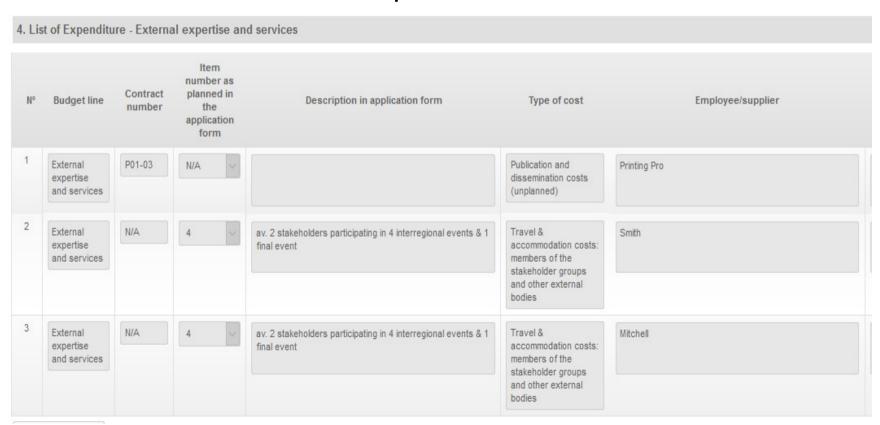


#### Expenditure



#### 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)

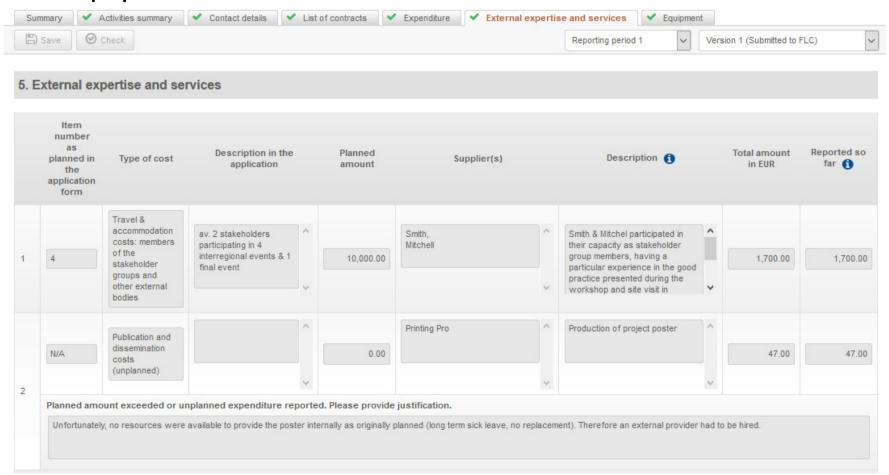
 In the certified report, the "Total amount certified by FLC" will be visible

*************	C VISIBIC				
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.

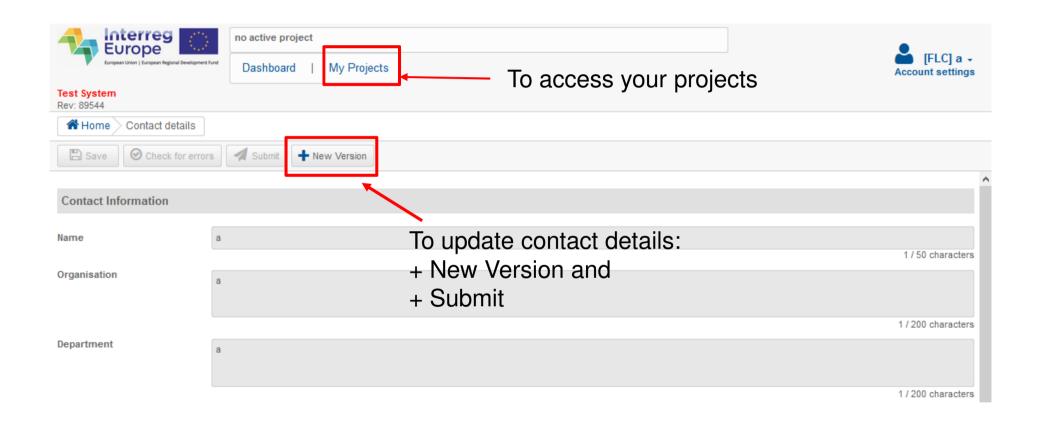
Project title	Successful Reporting in Interreg Europe
Project index number	PGI04933
Partner name	Partner A
Partner number	LP (PP1)
Reporting period start date	Reporting period 1 (begins on 01/01/2018)
Reporting period end date	Reporting period 1 (ends on 30/06/2018)
Included in progress report	Not yet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



#### **FLC DASHBOARD**

# Log in

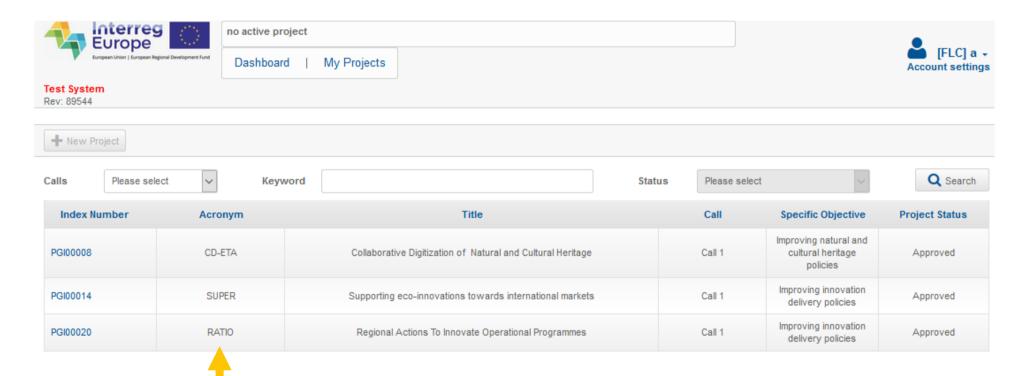




## My projects



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

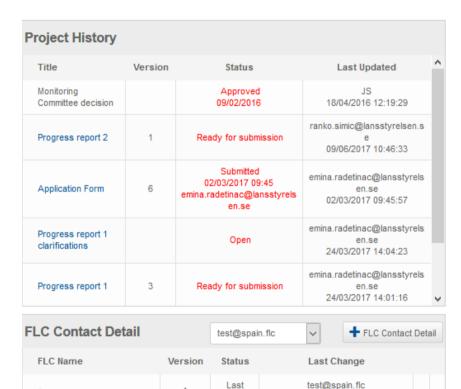


Click on a row to access the project

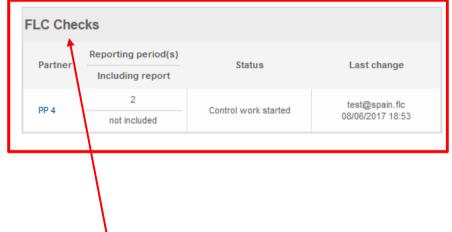
#### Project dashboard for FLCs

04/04/2017 15:47





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

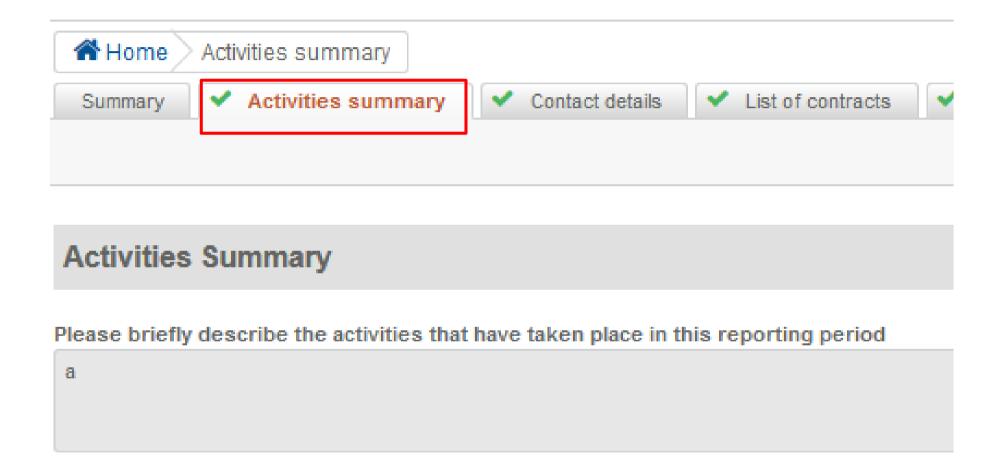
In the table below please select the reporting period(s) that you wish to include in this partner report.

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	✓ Activities sumr	nary	Conta	ct details	~	ist of contrac	ets 🗸	Expenditure	✓ FLC ch	necklist	✓ FLC report				
🖺 Save	<b>⊘</b> Check										Reporting period 2	~	Version 5 (C	ontrol work started)	· ·
						12 / 2	200 charac	ters				_		22 / 200	0 characters
Flc Conta	ıct Details - Ve	rsion	1											Version 1	~
Name		а													
Organisation														1 / 50	0 characters
		а													
														1 / 200	) characters
Department		a													
														1/200	0 characters
Position		a													
														1/200	0 characters
Address		a													
														1/200	0 characters

#### List of contracts

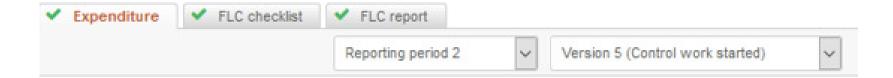


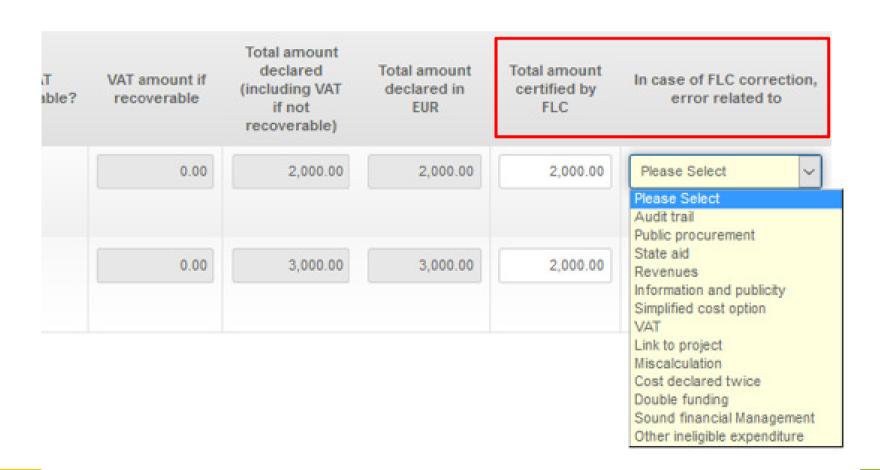
#### 3. List of contracts

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	^	
P04-03	Small contract	15,000.00	18,000.00		Request for several offers	Services	^	

## List of expenditure

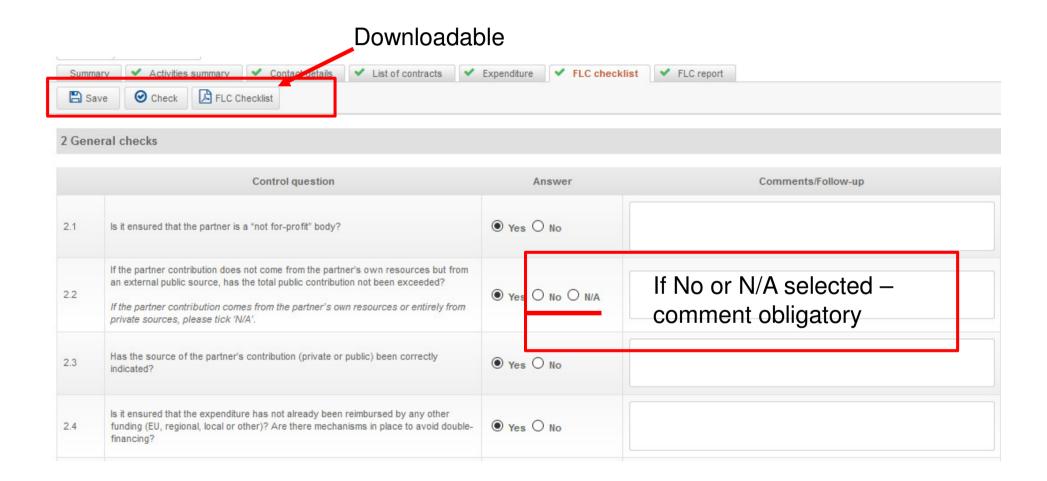






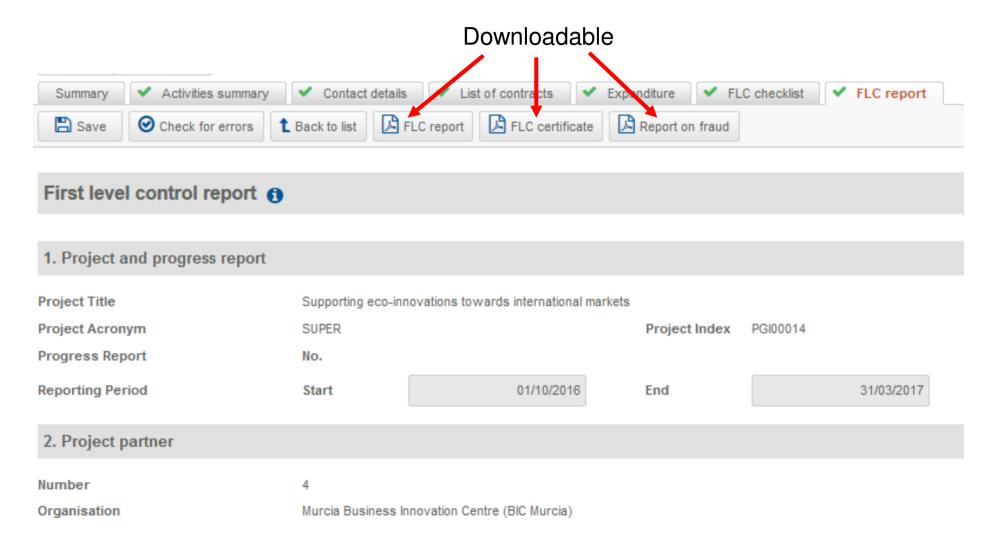
#### **FLC** checklist





#### 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.

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	

# Certify report – step 2



#### Click the link received in the email

Dear Sven Controller,

Please confirm that you certified the partner report of in reporting period(s) 2.

To do so, follow the link below:

http://iolf.interreg.gecko.de/FLCC/Summary/ConfirmCertify/4821/12992/137/a0f76d35-ab94-4062-9b57-d15cef953007

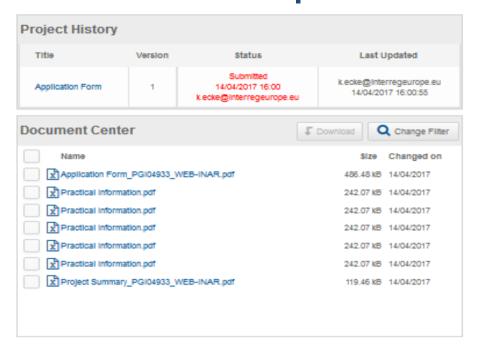
Kind regards, Interreg Europe

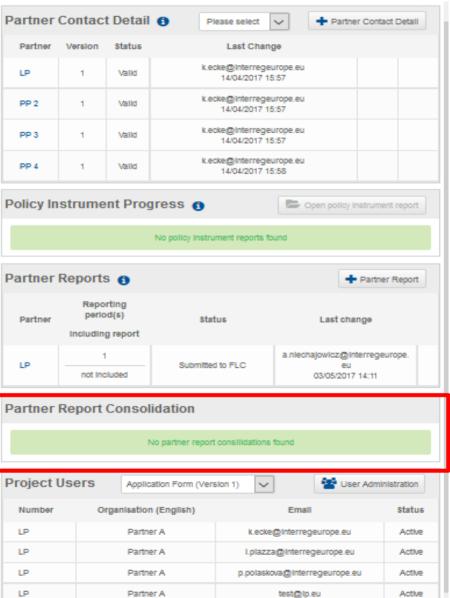
This is an automatic email - please do not reply.



## **JOINT PROGRESS REPORT**



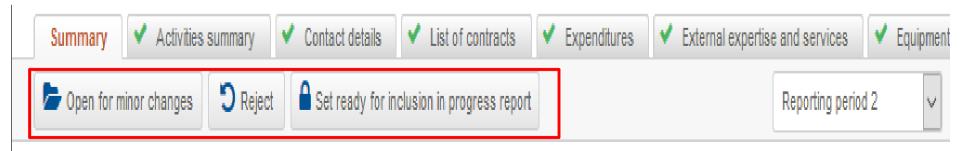






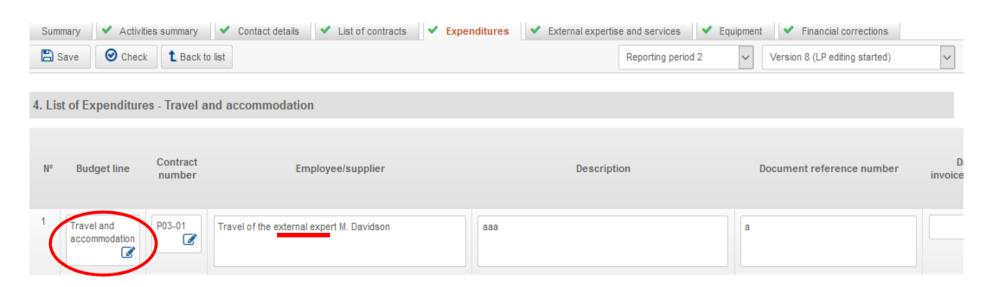
What can the LP do in the partner report consolidation module?

- 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





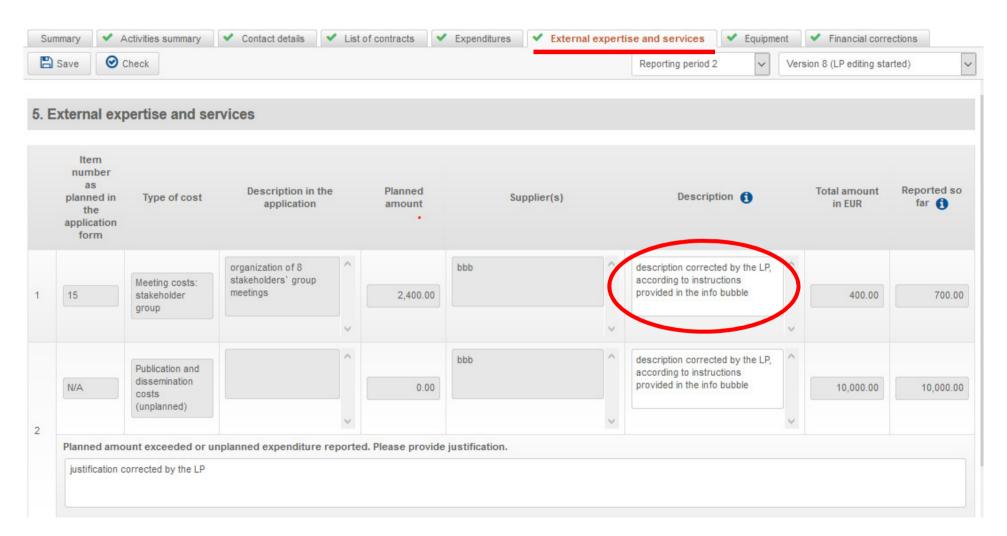
• Minor changes = the amount does not change, for instance: wrong budget line (except staff), incomplete item description, justification not sufficient, old contact details...



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







Online in the iOLF: all reporting

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







Info bubbles



Check button



Error messages

. Exchange rates need to be refreshed.

Video tutorials:

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



## 3. ELIGIBILITY RULES



## 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



## 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

# Eligibility period





Eligibility period from project approval by monitoring committee (e.g. 13 March 2018 for 3rd call) to project end date

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



Administrative closure: last three months before project end date!



## Preparation costs

# Lump sum of EUR 15,000 per project attributed to <u>lead partner</u>

- Covers costs linked to the <u>preparation of the application</u>
- 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)

#### Calculation methods:

- 1. full-time on project
  - > Real cost charged
- 2. fixed % on project
  - > % of real cost charged



- 3. flexible involvement
  - > a) monthly salary / contractual hours or
  - > b) annual salary / 1,720 hours
- 4. hours + hourly rate fixed in contract



## 1 + 2 Full time / fixed %

- 1. Full-time on project > Real cost charged
- 2. Fixed % on project > % of real costs charged
- NO timesheet mission letter





HIGHLY recommended even for limited involvement



## 1 + 2 Full-time / fixed %

Calculation:



**Employment cost \* %** 

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



## 1+2 Full-time / fixed % - Mission letter



- Name of employee
- Role in the project
- % allocated to the project
- Description of project related role, responsibilities and monthly tasks (see application form)
- Dated and signed by employee + line manager
- Regularly reviewed (e.g. staff appraisal) and adjusted if needed
- Programme template available

## 1+2 Full-time / fixed %



#### Is the % plausible?

- in relation to the employee's role in the project?
- in relation to other costs declared (e.g. travel)?
- in relation to the FLC's knowledge from controlling other projects?



## 1+2 Full-time / fixed %



#### Is the person involved in another project?

- No double-financing?
- Coherence supporting documents

The budget is the (natural) limit!



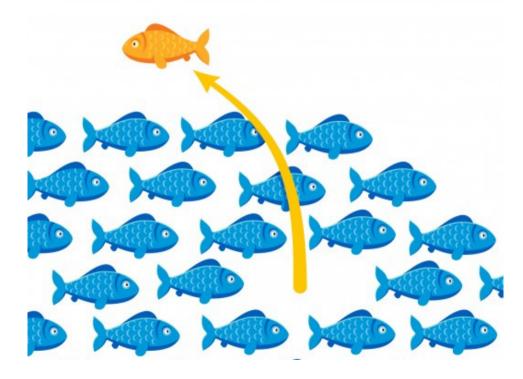
## 2 Fixed %



Method 2 can be used even when the staff member's involvement in the project is **limited** 



Set a fixed percentage even if small



## 2 Fixed %





Easier



More secure for staff costs reporting >possible impact also on office and administration flat rate

Simplification is also what YOU make of it!

### 3 + 4 Flexible involvement



#### 3. flexible % on project

- > a) monthly salary / contractual hours or
- > b) annual salary / 1,720 hours
- Timesheet required

#### 4. hours + hourly rate fixed in contract

- hourly rate fixed in employment contract
- used in specific partner states
- timesheet required

NOT recommended – risk of errors in calculation

#### 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 4

#### Travel and accommodation



BUDAPEST

THE88ALONIKI

LJUBLJANA

LILLE

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
- ⚠ boarding passes + proofs of participation

Programme manual section 7.2.3 & Delegated Regulation (EU) 481/2014, Article 5



# Travel & accommodation – Audit









Compliance with national / institutional rules

## External expertise



 Services needed outside the partner organisation, incl. travel & accommodation for stakeholder groups

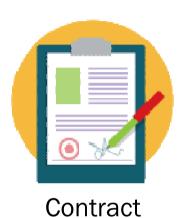


Compliance with public procurement rules

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



# External expertise – Audit trail









Paid invoices



Service deliverables



Proof of payment



# External expertise

#### **Payment**

- on basis of contracts or written agreements
- against invoices or requests for reimbursement





## External expertise

#### For stakeholder travel:



- formalize their involvement in writing (e.g. invitation email, contract or written agreement)
- relevance / link with the policy instrument addressed
- terms for travel reimbursements



## 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



# Equipment – Audit trail



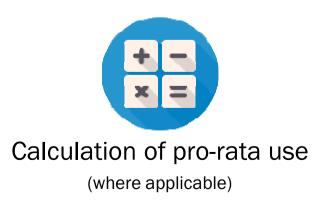
with procurement rules





Paid invoices

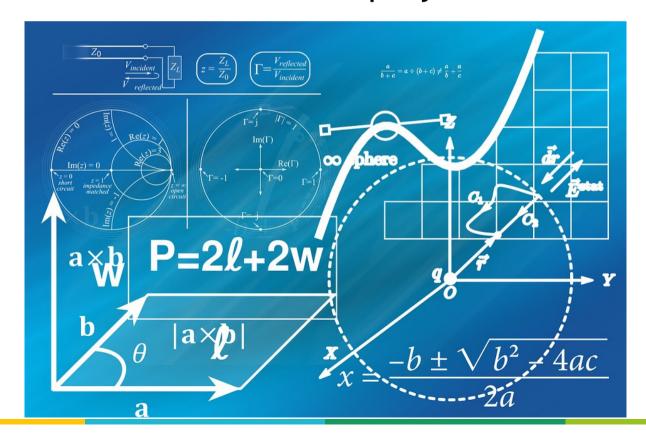






## Equipment – Point of attention

If equipment item only partially used for the project (or bought at late stage), only share related to the use in the project can be reported!





# Items requiring pre-approval

Prior approval from JS necessary for

- Activities/travel outside the programme area
- Unplanned equipment
- Gifts and promotional items (strict approach by programme)



#### 4. POINTS OF ATTENTION

#### Points of attention



- Financing of joint activities
- Public procurement
- Financial corrections
- Fraud detection and reporting
- State aid
- 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



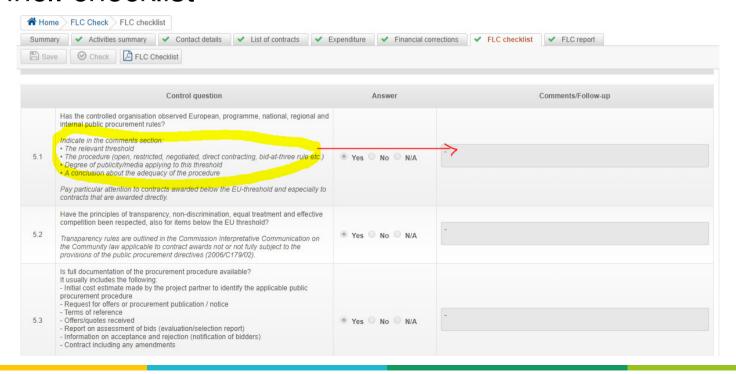
# Procurement and reporting

- 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

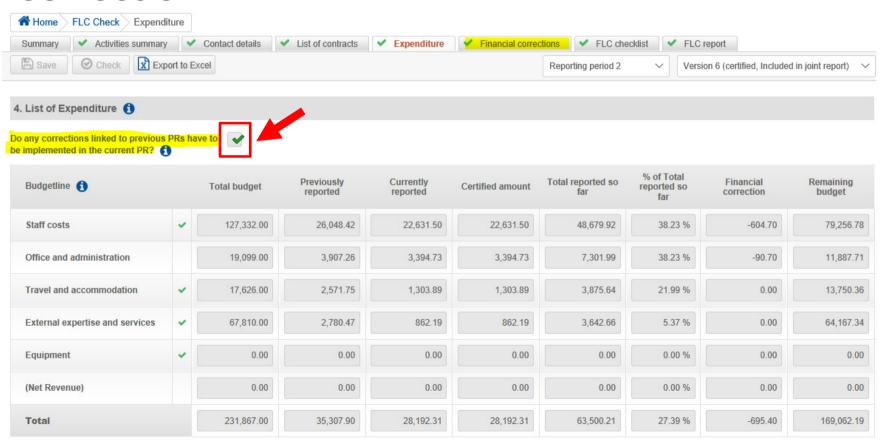
- FLC checks compliance with public procurement rules
  - ➤ Documented in section 5 of the first level control report incl. checklist





#### Financial corrections

# Following quality checks/audit, irregularities may be detected and corrected through a financial correction:





### Definition of fraud

#### **Fraud**

Intentional

#### **Irregularity**

error /bad management

#### Consequences:

financial correction

financial correction

investigation & sanctions



## Fraud risks identified

Irregularity	Fraud
Added hours on the timesheet wrongly so claimed excess hours than worked.	Intentionally added more hours on the timesheet then actually worked. Repeated on a number of occasions.
Used same invoice twice. The amount relates to goods and services received.	Charged invoice for goods not related to project for personal gain or for goods not received.
Travelled on project related activities but unable to provide the key supporting evidence.	Travelled for personal reason and charged the costs to the project.
Followed the tendering process correctly but did not fully comply with all the requirements.	Followed the tendering process but internally manipulated the bids to favour a particular tenderer.



#### 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 risks - origin

Fraud risks may be at the level of:

- the beneficiary staff
- the external contractors

- collusion between the two
- JS / FLC staff (conflict of interest, corruption...)



# 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 7.9
- recommendations for public procurement in section 7.5.6



## Fraud prevention and detection

 FLC should check the beneficiaries' reports and supporting documents with "appropriate skepticism" (in particular for staff costs and public procurement)



<u>appropriate skepticism</u> = "an attitude that includes a questioning mind and a critical assessment of audit evidence"

# Reporting suspected or established fraud

How can the MA/JS be informed?

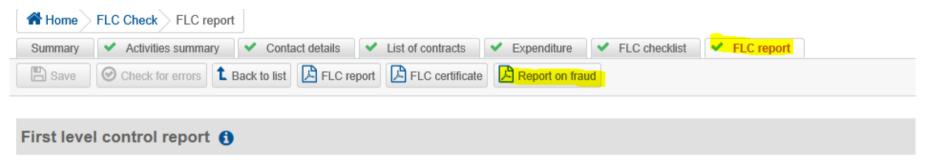


- whistleblowing procedure for general public/beneficiaries (adress available at https://www.interregeurope.eu/aboutus/anti-fraud-policy/)
- specific reporting template for FLC



# FLC reporting template on suspected or established fraud

Available for download in iOLF from FLC report tab of the partner report:



 To be sent by the FLC to the JS financial control and audit officer by email



# State aid in Interreg Europe

#### Phase 1

No state aid activities

- JS checks AF during assessment
- FLC to check during implementation that no state aid activities are carried out (= in line with AF)

#### Phase 2

State aid only if pilot actions are approved with state aid relevance (de minimis)

FLC to check de minimis declaration (= ceiling not exceeded)



Limited relevance due to the type of activities carried out by Interreg Europe projects!



### Quality checks/audits

Several bodies to carry out quality checks/audits

To detect errors and ensure proper use of funds







Second Level Auditors







#### Second level audit campaign 2017-2018

Main reason for irregularities:

- VAT
- Miscalculation in staff costs

No systemic irregularities, only individual irregularities with very limited financial impact



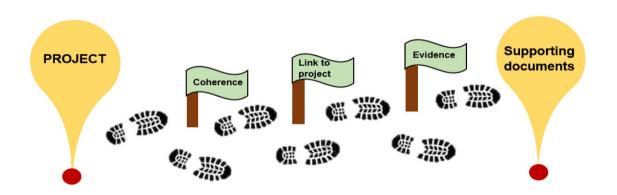




### Second level audit campaign 2017-2018

#### **Main lessons learnt:**

Pay attention to the audit trail



Make it simple for staff costs





- Video tutorials on our website
   <a href="https://www.interregeurope.eu/projects/implement-a-project/">https://www.interregeurope.eu/projects/implement-a-project/</a>
- Contact your LP in case of questions, the LP will contact the responsible policy and finance officers at the JS – LP principle ☺



