NPA METHODOLOGY FOR MANAGEMENT VERIFICATIONS

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Agenda

Background & general principles on management verifications in 2021-2027

Mitigation measures and simplification

Administrative verifications, including SCOs On-the-spot verifications

Scope of management verifications

Risk assessment and sampling







Guide for risk-based management verifications Interreg Northern Periphery and Arctic Programme

Summary:

This guide is targeted at controllers in the programme partner countries. It describes the methodology for risk-based management verifications in the Interreg NPA 2021-2027 programme and contains the essential information needed for the implementation of risk based administrative and on-the-spot verifications. The information is based on the Harmonised Implementation Tools (HIT) methodology for risk-based management verifications.

Background

Same verification process in ALL countries

Verifications include both administrative and on-the-spot verification

Verifications shall be based on risk assessments and be proportionate to risks identified

All documentation shall be in Jems



Northern Periphery and Arctic



General principles

for the establishment of the NPA methodology

- HIT methodology for risk-based management verifications as a basis
- Management verifications at project partner level, for each payment claim
- Historical data on programme level > do not give sufficient input to risk assessments
- Risk assessments are instead carried out by the JS and Controllers on project/partner level



Mitigation measures and simplification

To reduce risks of error

- Electronic monitoring system Jems for information exchange
- Reducing number of options to reimburse staff costs
- Introduction of a number of simplified cost options, SCOs
 - 15% flat rate for office and administration on staff costs (mandatory)
 - 15% flat rate for travel on staff costs (optional)
 - Option to report costs as staff costs + a 40% flat rate for all other costs than staff on a case-by-case basis,
 - For staff cost related to individuals who work on part-time assignments, the costs should be calculated as a fixed percentage of the gross employment cost
 - Lump sums for small-scale projects





Administrative verifications

- Verification of each partner report
- More extensive verification of items which are considered risky
- Random sampling for other non-risky items, based on the risk assessment
- 100% verification of the first report to establish control risk (to be documented with the certification of the first report)
- Risky items (to be fully verified) in all progress reports following the first:
 - Public procurement for contracting amounts above EUR 10 000 (excl. VAT unless the threshold set by national rules is stricter)
 - Suspicious items picked up by the controller due to his/her professional judgement
 - Staff costs of the first two progress reports where staff costs occur should be fully verified, unless the controller feels that he/she has reasonable assurance from the 100% verification of the first partner report. Staff costs of a staff member included for the first time in the partner report should always be verified, as well as if changes occur in the time allocation of staff members.





Verification of Simplified Cost Options

- Verify that conditions for reimbursement have been met and that established rates and amounts for SCOs have been properly applied
- Underlying financial or procurement documents shall not be requested with a view to check the amounts (expenditure) incurred and paid by the beneficiary
- In case of flat rate financing, only the basis cost should be checked (i.e staff costs)
- Management verification of lump sums will cover achievement of outputs/deliverables
 as outlined in the Grant Letter. This is checked by the JS before a payment of the lump
 sum is made by the MA.



On-the-spot verifications

For all lead partners, unless the controller considers that it is not necessary seen from a risk perspective

Timing: when the project is well underway

The level of risk identified during the administrative verifications shall influence the extent and detail of on-the-spot verifications





Scope of management verifications

Risk assessment by the Joint Secretariat

At partner level:

- Type, legal status and ownership structure
- Partner location (ie outside the programme area)
- Number of projects implemented by the same beneficiary
- Beneficiaries' capacity and remit to implement projects
- Past experience with beneficiary

At project level:

- Significant budget (value-for-money, unusual profile)
- Nature and complexity of the project/activities
- Types of expenditure (eligibility issues)
- Legal requirements applicable (state aid, public procurement etc)







Scope of management verifications

Risk assessment by the Controllers

Control risks:

- Previously identified issues and follow-up recommendations
- A high number of clarification rounds, repetitive issues
- Quality of the originally reported expenditure versus verified

Verification according to risk level

 More extensive verifications for partners with higher risk levels



Sampling based on risk assessment

- For items not considered to be risky key elements, random sampling should be conducted in line with the risk level established for the partner.
- Risk level > guiding for the sample size.
- The controllers are free to use different methods of own choice e.g.:
 - check on x% of total costs
 - a certain percentage of costs under a specific cost category
 - control of the x largest invoices based on amount and cost type or
 - control of all invoices above a certain amount





