Risk-based management verifications in 2021-2027 SKHU Interreg VI-A

programme

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I. LEGAL BACKGROUND

Management verifications shall be **risk-based** and **proportionate** to the risks identified ex-ante and in writing.

Management verifications shall include:

- administrative verifications in respect of payment claims made by beneficiaries and
- on-the-spot verifications of operations.

Verifications shall be **carried out before submission of the accounts** in accordance with Article 98.



- Instead of a verification of 100% of the reported costs management verifications in the 2021-2027 programming period should be implemented on the basis of a risk-based sampling
- In the new period more cost categories will be involved and a wider range of SCOs will be introduced.
- Time required for the verifications will significantly be reduced for some cost categories.
- It still will be necessary to check items containing public procurement and procurement







 National Control has to focus more on the high risk expenditures and less on the low risk expenditures

Low risk expenditure

High risk expenditure

II. FACTORS DECREASING THE RISK OF ERRORS

How to reduce the risk of errors:

- reducing the number of options that a programme offers to reimburse certain costs categories (e.g. Staff Costs);
- extensive use of SCOs;



HUSK Interreg VI-A Programme plans to significantly emphasise the use of SCOs, namely in the following cost categories:

- lump sum for Preparation Costs 1 300EUR/Partner
- flat rate for Staff Costs 20% (10% 1 000 000 EUR)
- flat rate for Office and Administration Costs 15%
- flat rate for Travel and Accommodation Costs 15%
- unit cost for Interpretation/Translation/Project events





III. METHODOLOGY FOR RISK-BASED VERIFICATIONS

- Risk of errors in these cases (especially in Staff Costs) will already be minimised
- Implementation of procurement and public procurement procedures represent a high risk detailed check is necessary
- Project partner level risk identification in Phase 1.



<u>Phase 1</u>

Wide range of SCOs, is to be considered a significant mitigation measure



Recommended to check 100% of all other (direct) costs, reported as real costs



Revision of this method is proposed after the first year(s) of project implementation

The methodology may be **modified**

- In case the first two reports do not contain deficiencies which result in cost deductions, simplifications described in section *Phase 2* may be introduced
 - The decision on the introduction of Phase 2 type checks will be made in case of each partner by the Head of the control unit

 In case if it is well justified a sample-based verification of items reported as real cost might be introduced

Risky elements (to be checked in full):

- all items concerned with public procurement are to be fully checked
- all procurements above 10 000 euros (excl. VAT) are to be checked

Random sampling:

- elements, that are not identified as risky ones (items below 10 000 euros) shall be verified based on a random sample of a minimum of 10%, but at least 2 items per cost category.
- In case deficiencies are detected, the verification can be extended to 100% of the reported direct costs

IV. Small Project Fund

Organising crossborder events:

- Cultural, Sport, Conferences etc.
- Minimum 50% of the participants from partner country

PARTICIPANT	ERDF EUR	TOTAL EUR
25-50	13 215	16 518,75
- /		
51-75	15 855	19 818,75
76-100	18 500	23 125,00
101-125	21 145	26 431,25

IV. METHODOLOGY FOR SAMPLE-BASED CHECK OF FINAL RECIPIENTS WITHIN SPF

no real-cost based cost category is foreseen



verification of project partner reports will be significantly simplified

if reports do not contain substantial mistakes and the supporting documents are fully available

In case of errors or missing supporting documents



every 5th following report will have to be checked by the Control



the control bodies will continue to check the subsequent five reports

V. IMPLEMENTATION OF ON-THE-SPOT CHECKS

- In the 2014-2020 programming period soft type projects, small projects the on-the-spot verification does not represent much added value compared to the desk-based check
- The next programming period would be the introduction of sample-based on-the-spot checks, with the following preconditions:

- At least one on-the-spot check is obligatory in case of each project part containing an investment element or a procurement of equipment. Necessity of further on-the-spot checks will be decided by controllers via filling the Risk assessment file for on-the-spot verifications.

- On-the-spot check is **sample-based** in case of "soft" project parts
- As a general rule, on-the-spot verifications **are performed at the premises** of the partner receiving financial support as well as in any other place **where the project part is being implemented**
- In case Audit Authority performs on-the-spot check of a project part, the next on-the-spot check of the respective project part (to be implemented by the Control Body) will be subject to professional judgement of the controller.

Thank you for your attention!