



Partner Training, the most common **Questions and Answers**

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## A. Reimbursement Process

### a. Partner Report

#### Q1. Who signs the partner report?

The Partner Report must be signed in order to certify that all expenditure has been incurred in the implementation of the project's activities. The signatory of the Partner Report must be a person who has the authority to certify that the expenditure is solely related to the project. Ideally, the signatory should be the person listed as "legal representative" in the Application Form. Please refer to Section II of [the Guidance Note 6a of the Programme Manual](#)

#### Q2. Does the Partner report need to be bilingual?

No, the Partner Report can be written in the language of the Partner. However, the Project Report, provided by the Lead Partner (LP), has to be bilingual.

#### Q3: How long does it take to receive the money once the Progress Report and the Payment Claim have been submitted?

The corresponding amount of ERDF will be paid to the LP by the Certifying Authority (CA), within 90 calendar days of receipt of complete and correct project reports by the JS. However, if the JS requires clarification or further information to assess the claim, this will trigger a "stop the clock" procedure, extending the payment deadline. The JS may ask the Project Coordinator or the Finance Manager for clarifications or additional information. Once the documents have been accepted as complete, the corresponding amount of ERDF will be paid to the LP by the CA. Please note, any issue, even with just one partner, will trigger the "stop the clock" on the payment of the whole claim. [Please refer to Guidance Note 6a of the Programme Manual.](#)

#### Q4: On eMS - can a partner upload files at any point during a reporting period or only at the end of it? When would the documents be visible to the JS?

Project Partners (PPs) can and are encouraged to enter their expenditure (including uploading evidence) on a monthly basis. It is possible for the JS to view any information uploaded, but the JS cannot edit this information and will not take any action based on what has or has not been uploaded until after the formal submission of the project report by the LP.

### b. First Level Control (FLC)

#### Q5: How do we select the FLC institution?

Please refer to section III of [Guidance Note 6 of the Programme Manual](#).

Please make sure you follow the programme procurement rules which are defined in the section VI of the same Guidance Note.

#### Q6. What happens if the FLC is not appointed in time to receive the Partner's first Partner Report?

If the FLC is not appointed in time, it is not possible for the partner in question to submit any expenditure. Partners with no FLC will have to wait until the next reporting period to claim their expenditure. The JS can support you with issues regarding the FLCs selection and will work with you to find solutions.

Q7: If an organisation has already selected a FLC institution for another FCE project, does the selected FLC have to attend a second FLC training?

No, the selected FLC does not need to attend a second FLC training. However the FLC would have to be designated by DCLG, or chosen from a pool of suppliers which have been previously selected and appointed by Préfecture de Normandie for the second project as well.

DCLG designates FLCs for partner organisation on a project per project basis.

For UK Partners, please contact Arni Narain [Arni.Narain@communities.gsi.gov.uk](mailto:Arni.Narain@communities.gsi.gov.uk) to obtain the Application form for Approval of Controller of a UK Beneficiary.

For French partners, please contact Aude Vonthron-Diatta [aude.vonthron@normandie.gouv.fr](mailto:aude.vonthron@normandie.gouv.fr) to obtain more information on the FLC selection process in France.

Q8. When does FLC training take place?

As soon as possible once all the FLC have been procured and designated. The FLCs procured will have to attend a training session provided by the JS on the work they will be required to carry out, this includes the checklists they will need to use and the standards they must adhere to. It is only after this training that the FLC can access the Partner Report on eMS. The training session is delivered by the JS and DCLG in the UK, and by the JS and Préfecture de Normandie in France. Please contact your JS contact point for further information about FLC training dates. Please refer to section III of [the Guidance Note 6 of the Programme Manual](#).

Q9: During the previous Interreg IV Programme, only one FLC for the whole Partnership was necessary. Is this still the case now under the new Interreg V programme?

No, the rules concerning FLC have changed for the current Programme. Each Partner now has to select its own FLC following relevant procurement rules.

Q10: When the Partner is a small organisation (SME, association...) using an independent accountant, can this accountant also be the FLC of the Partner?

No. The accountant of the organisation and the FLC fulfil two different functions. The accountant is responsible for producing and signing off the accounts of the organisation whereas the FLC will certify that the activities and related expenditures are in line with the application, including that the accounting system is appropriate. In other words, as the FLC must be able to demonstrate that it is independent, the accountant of a partner cannot also be its FLC. Once the FLC has been selected, the Partner must send an FLC appointment application to the Department for Communities and Local Government (DCLG) (for UK partners), who will determine if the selected Controller is suitable. If deemed the appointed FLC will be designated as the Controller of a specific PP.

Q11: Can the UK Partners use internal FLC?

In the UK the process of recruiting FLC is overseen by the DCLG, who have set a common standard for recruiting controllers across all ETC programmes in which the UK is taking part.

If the partner is in the Public Sector or a University, it is permitted for the Controller to be Internal, provided that they are independent and have no role in any part of the accounting, management or delivery of the project. There must be a clearly defined code of practice in the organisation that guarantees their independence. For example, an internal audit department of a Local Authority could meet this requirement.

Q12: How do you pay the FLC at the end of the project?

See GN13 on Closure (under development)

### c. Claims

Q13: How can we claim the money at the end of the project?

By the closure period, the main activities should be completed and all outputs delivered. The partnership takes care of the final administrative requirements before the funded project is over.

Regarding the end date- it is a requirement that Partners complete the main project activities 3 months before the official project end date in order to ensure that they can claim the costs linked to project closure. Eligible costs claimed during the closing 3 month period will be limited to BL1-Staff costs and BL2-Office and administration and BL4 cost relating to payment of FLC for final claim only.

Q14: Is it possible to have one claim for one year [regarding the first claim?](#)

Yes, this approach has been taken by the JS for several projects in order to facilitate the first claim.

Q15: For small organisations, is it possible to claim only once per year?

No if a partner leads on activities during the planned period, they must submit their Payment Claim as well as their partner report, in accordance with the timeline set out in the GOL.

Q16: What happens if my organisation, as a PP, spends less than expected?

Each Partners is strongly encouraged to closely monitor its forecast and spend progress on a regular basis and to liaise with the LP to enable them to build up an accurate picture of the project's overall financial progress. The JS will also closely monitor the project's financial progress, and should be informed as soon as possible of any major issue met throughout the project implementation. High underspend is considered as a sign that the project may not successfully deliver its outputs as planned, and it is therefore expected that the partners and the LP take the necessary steps to rectify the issues, with the support of the JS.

Underspend is monitored at project level by the JS. Following the programme rules, underspend above 10% may lead to a reduction of the grant allocated. In case of a grant reduction, the LP will need to confirm to the JS how this should be impacted on the project budget (which WP & which PP). Please refer to [Guidance Note 6a of the Programme Manual](#).

Q17: What is the retention period for documents?

After the end of the project, the LP and the PP must retain and keep accessible all supporting documents for a project (including evidence of payments to beneficiaries) after the project is completed. This period will be for 4 years from the 31<sup>st</sup> of December of the years the project received the last ERDF payment. The Lead Beneficiary will be informed in writing or by email of the start date and of the end date of the retention period when the final ERDF payment is made.

If a project is receiving State Aid, specific rules apply and all supporting documents have to be retained and kept accessible by the LP and the PP for a period of 10 years from the date on which the aid was granted. Please refer to [Guidance Note 6a of the Programme Manual](#) on "Project implementation".

## B. Eligibility of expenditure

Q18: When can we claim in £ and when can we claim in €?

The claim should be made in the currency of defrayal. So if an employee is reimbursed in £ for a € cost, the Partner organisation will claim in £. In this case the Partner would need to provide evidence that conversion rate used is justifiable e.g. EU conversion rate. Similarly, for a corporate credit card, if the credit card statement is paid in £s, all items of expenditure should be claimed in £ even if original items were €.

Q19: What exchange rate should we use to reimburse staff?

In the case of staff expense claim reimbursement, it is advisable to use the EU exchange rate available [here](#). However another exchange rate can be used depending on the organisation's rules.

#### Q.20: What is the project end date for the LP and for all the Partners?

For all Partners: it is a requirement that Partners complete the main project activities 3 months before the official project end date (i.e. end of project activities 31.01.17, end of project: 30.04.17) in order to ensure that they can claim the costs linked to project closure. Eligible costs claimed during the 3 months closing period will be limited to BL1-Staff costs and BL2-Office and administration and BL4 for the cost of FLC related to the last partner report. Please refer to [Guidance Note 13 on Project Closure](#)

#### Q21: Do the costs incurred during a reporting period have to be claimed during the same reporting period?

The Programme Manual states that expenditure should be claimed during the corresponding reporting period. In case of expenditure claimed later than the relevant corresponding reporting period, eligibility decision will be made by the FLC / JS on the basis of the justification provided by the Partner. Please refer to [Guidance Note 6a of the Programme Manual](#).

##### a. Staff costs

#### Q22: What supporting documents have to be provided in relation to staff costs?

This depends on the staff costs calculation methodology chosen by the Partner. Please refer to the section II.A of [Guidance Note 8 of the Programme Manual](#).

#### Q23: Staff costs – do the project officer contracts have to be provided with each partner report?

No, it only has to be provided in the first applicable partner report. However if the staff contract expires before the end of a later reporting period, the new contract or an extension must be submitted. In general, for supporting documents that provide evidence of several costs throughout different claims, it is advised to clearly mention where those documents are saved in the relevant comment box in eMS, to enable the FLC, the JS and auditors to locate these documents more quickly and to keep clear and complete audit trails.

#### Q24: What documentation can be provided for students who will take part in the project, when they are not under contract?

A PhD student working on the project should normally be identified in the application form. In addition, a letter attesting that the student works on the project and a copy of the agreement with or about the PhD candidate working on the project could be considered as sufficient.

#### Q25: If someone dedicates 20% of their time to the project, how can we proceed to justify that they have worked on the project?

Please refer to the section II.A of [Guidance Note 8 of the Programme Manual](#).

The following documents have to be provided to the FLC to demonstrate the eligibility of the costs:

- Working contract or any other equivalent legal agreement that allows for the identification of the employment relationship between the employee and the Partner's organisation;
- A document clearly showing that the employee works a fixed percentage of the time on the project (this could be the working contract and/or any other document issued by the employer like a 'mission letter');
- Document identifying the real salary costs (gross salary and employer's social charges) for the employee such as pay slips or other accounting documents where the employment costs are clearly detectable;
- Proof of payment (for example, bank statements, BACS reports, or outputs from accounting system).

#### Q26. What happens when you don't have a payslip?

In this case an extract from the accounting system, signed by the legal representative would be accepted. Your FLC may feel it is necessary to then make an inspection of this process during an on-the-spot visit.

#### Q27: Are salary employment taxes eligible?

Yes, provided the costs are not recoverable by the employer. It includes for example NI contributions. Similarly, other costs linked to salary such as employer pension contributions are also eligible, provided they are required by the contract of employment.

#### Q28. When do secondment letters indicating the % of time dedicated to a project need to be signed?

The letter needs to be signed before the person starts working on the project.

#### Q29. When a person is working part-time for a project on a fixed percentage, is it possible to change this fixed percentage to adapt it to the employee's workload?

During the project it may happen that there is a variation of workload. If an employee is working on the project with a fixed percentage, it may not reflect its actual workload. Therefore, it is possible to revise the fixed percentage. However, it cannot be revised more than once a year. If the PP feels that the percentage of working time of their employee should be revised more often, they should consider using the variable working time methodology calculating an hourly rate based on 1720 hours and reporting time spent on the project in timesheets (method c) of staff costs calculations as described in the [Guidance Note 8 of the Programme Manual](#)).

#### Q30: How to demonstrate the rationale for the calculation of the fixed percentage of time worked on the project?

The percentage of time allocation should be determined on the basis of the anticipated workload. This would form a part of the FLC / JS checks as well as whether the project deliverable / outputs match the staff time claimed. The fixed percentage should appear reasonable in light of the role of that person within the project and his/her contribution to the project delivery, as well as in light of his/her other activities not related to the project. Evidence could consist of the contract and the job description specific to that person.

#### Q31: If you claim at an hourly rate based on last year's salary, but this has increased because of inflation, does it mean this is a loss for the partner's organisation?

Potentially, this could happen. Nevertheless, the purpose of the Simplified Cost Options is to help human resources and administrative effort involved in the management of the project to be more focused on the achievement of the outputs and results instead of being concentrated on collecting and verifying financial documents. Therefore, although in some occasions the simplified cost option can be seen as a financial loss it is compensated by the time and effort saved by the employees in compiling the claim.

#### Q32: In the case of a project officer reporting his staff cost via timesheets, can the project officer claim more daily working time than stated in his contract?

##### a) For instance, for an employee normally working 7h24 a day, is it possible to claim 10h?

The maximum number of hours claimed per day must be in line with the employment's terms and conditions of the organisation and national regulations on working time. It may happen that an employee normally working 7.24 hours a day reports 10 hours on a specific day. This is possible as long as the employee does not exceed his/her weekly/monthly or annual working hours limitation (where applicable) and that the additional working hours are compensated by time off in lieu

Please note that a proposal to amend the current regulation is being discussed, including the setting of annual working time limit of 1720h. In this case the FLC /JS would have to verify that project officers do not exceed the working time limit. This should be voted on early 2018. It is possible that this amendment to the regulation may be applied retrospectively, however there is currently no guarantee in relation to this.

Q33: What happens if hours worked are outside normal working hours e.g. travelling on a Sunday for a Monday morning meeting - is that eligible?

It is eligible as long as it is reasonable, justified and paid for. For example, it would be easily justifiable for officers working in France to justify a trip to England on a Sunday for a meeting in England on a Monday morning.

## b. Travel and accommodation

Q34: Is it possible to organise trips outside the Programme Area?

Please refer to the section II.C of [the Guidance Note 8 of the Programme Manual](#).

There are restrictions on Travel and Accommodation costs that relate to trips outside the Programme Area. Unless one of the three following requirements are met, they will not be considered eligible:

- Trips to places outside the Programme Area are eligible if they are explicitly mentioned and justified in the Application Form.
- If trips outside the Programme Area that are not foreseen in the Application Form are required, a specific request needs to be submitted by the LP to the JS for validation in advance.
- Travel for Partnership meetings in Paris or London do not require JS validation to be eligible.

Q35: What is the procedure for obtaining permission to travel outside the area?

If specific travel outside the Programme Area is already planned for in the Application Form, then in the approval of the Application Form the partner has already received permission. If the specific travel is not clearly stated in the Application Form, the partner must request authorisation from the JS. The partner requesting authorisation should ask its LP to fill in the form “Request for trip outside the Programme area” that can be found on the [Programme website](#) with the information requested (forecasted costs, staff travelling, location, link to the project, etc.).

Q36: If a payment is made in cash, for example for a taxi, is the receipt sufficient evidence?

Yes. However, in the Payment Claim what the Partner organisation has actually reimbursed will be checked. If members of staff pay with their own money, they will have to claim it to their organisation which will then have to demonstrate that they have been reimbursed for the expense. Therefore, the Partner will have to provide evidence that members of staff have been reimbursed by their organisation e.g. expense claim + proof of defrayal.

Q37: What is the rule for mileage reimbursement?

For project staff who are using their vehicles for travelling to an event/meeting/any activities related to the project, the mileage is eligible. Each organisation will have to follow their own organisation’s rules e.g. claim being compliant with mileage allowance established by each organisation. The mileage allowance cannot exceed the amounts defined by national and European rules. The organisation’s rules will need to be uploaded as evidence of the cost claimed and you will have to provide proof that the staff have been reimbursed by their organisation e.g. expense claim + proof of defrayal.

### Q38: Are transport fees (commuting to work) eligible for short-term contract employment (French partners only)?

It is eligible provided that the cost is related to the salary payment and it is in line with the employment policy of the beneficiary organisation. 100% of the cost can be claimed if the individual works full time on the project. A pro-rata should be applied if working part time on the project.

### Q39. Is alcohol eligible?

The eligibility depends on your internal rules. You will need to provide your FLC with your internal rules.

## c. External expertise and services

### Q40: Would the cost for an English training provider located in Jersey be eligible?

The Channel Islands are not considered to be a part of the Programme Area. Therefore any travel to the Channel Islands for the purposes of the project would have to follow the rules set out above (Approved as part of the application or by the JS in advance). Assuming that the travel has been approved, procurement of a training provider in the Channel Islands for training related to the project would be deemed eligible provided that standard procurement rules and principles are followed.

### Q41: Are import taxes for a purchase made outside the Programme Area an eligible cost?

These are eligible. It is comparable to irrecoverable VAT, which is an eligible cost. It is also comparable to payment of National Insurance or other employment taxes, which are eligible costs of the Programme. We advise that you request the import taxes to be included in the prices that are quoted by suppliers in quotes or tender submissions.

## d. Depreciation

### Q42: What is the procedure for depreciation?

Depreciation is calculated on the basis on the organisation's internal accounting rules, and this calculation should be provided as a part of the claim. Please refer to section II.E of [Guidance Note 8 of the Programme Manual](#).

### Q43: Can we claim the depreciation if the project continues after the closure of the project?

Where equipment will be used for the purpose of project activities after the formal closure of the project, and when the Partners have decided to claim the depreciation costs of an item, they cannot claim depreciation after the end of the project. For example if something depreciates over 5 years and is used in the project for only 3 years, then the partners can only claim 3 years depreciation costs but they cannot claim for the following two years of depreciation.

In the case that the item is solely used for the project, only during the project's duration and for the purposes of sustaining the project results post implementation, the Partners can decide to claim the full cost, but this must be set out in the Application Form. For this option the PPs will need to establish an asset management plan to ensure that the equipment will remain the property of the Partner Organisation and will be used for activities in line with the project activities. More detailed information on asset management plans can be found in the Guidance Note 13 on "Project Closure" (under development).

## e. VAT

Q44: If my organisation can partially recover VAT, how to do we demonstrate to the FLC what we can and can't recover?

The Partner should provide a supporting document evidencing your status regarding VAT. This could be a letter from you tax accountant or a signed letter from a legal representative.

Q45: If an organisation is recovering VAT, does this organisation have to report VAT when entering the expenditure on eMS?

Yes, there is a specific cell for entering VAT when claiming expenditure on eMS.

## C. Communication

Q46: Do we need the Interreg logo on our partner websites?

Yes, the reference to the Interreg Programme is compulsory. In general, all partners (who have a website) are required to have the following information displayed on their websites:

- A short description about the project
- Aims and results of the project
- The amount of financial support towards the project from the European Union
- Reference to the European Union (this is covered by using the Interreg FCE Programme logo)

Q47: On the partner website - how large should the Interreg logo be compared to other logos on the website?

The size of the Interreg logo does not matter as such. It is important that the European emblem (the flag part of the Interreg logo) be bigger or equal in size to the other logos. Please refer to [Guidance Note 7 of the Programme Manual](#)

Q48: Does the logo have to be on the equipment used/purchased during the project?

The Communication Rules ([Guidance Note 7 of the Programme Manual](#)) refers to Materials used for project communication (therefore, not usually for equipment). If equipment is being showcased at an event, then the equipment itself would not need to display a reference to ERDF so as long as this is visible through other means (a poster, a banner etc.). At each partners premises it is compulsory to display a poster in a place easily visible to the public.

We have created a poster for each specific objective that can be downloaded from the [Programme website](#) and edited for each PP. Please contact the Joint Secretariat if you have any problems editing the poster

Q49: Who will check if the partners and the project comply with the communication rules?

The LP and the FLC have to check the compliance of communication tools with the Programme rules. The JS may also check the communication tools, as well as higher level auditors (such as 2<sup>nd</sup> Level auditors, EC, European Court of Auditors).

If you have any doubts regarding the websites or the posters, you can send the link or the PDF document to the JS who will advise you on whether it complies with the rules.

Q50: Is it one poster per project or one poster per partner?

All PPs must display a poster with information about the project in a public area.

Q51: Do we need to translate into French and English on the same poster?

Communication material needs to be produced in both French and English. You can either include both languages on the same document (e.g poster, leaflet, etc) or you can create two separate versions - one in French and one in English.

Q52: Do all the documents need to be bilingual? If not, how do we decide “what is relevant” for bilingual communication?

This will be on a case by case basis. If you are uncertain, please contact your FAO. It will depend on the target group and the aims of the communication. For example, an article only needs to be in English if the readers will all read it in English or in French if all the readers are French.

Q53: Regarding to plaque/ billboard on investment site –are there any special requirements?

If the project has received over 500,000 euros of ERDF and includes the financing of infrastructure or construction operations then the project should erect, in a location visible to the public, a temporary billboard of significant size. This should display the financial support from the European Union, the total budget spend and the programme priority the project is contributing to. This should remain visible until the completion of the work. For more information concerning the requirements please refer to the [Guidance Note 7 of the Programme Manual](#).

Q54: Are there any rules for social networks - Facebook and Twitter?

The list of social media platforms is growing by the day so it’s important you choose the ones that are most relevant to your project. There are a few tips and things to be aware of when using social media. You will find more information about the main social media platforms Twitter and Facebook in [Guidance Note 7 of the Programme Manual](#). For you information, the programme Twitter account is [@Channel\\_Manche](#)

## D. Procurement

### Q55: What are the main risks of procurement?

In the past, Public Procurement failures have been a common failure detected in Audits of Interreg programmes. Common errors include;

- Failure to **consider repeat purchases as a single procurement**, meaning the procurement thresholds are exceeded and incorrect procedures are used.
- Partners **artificially splitting procurements** in order to avoid procurement thresholds
- **Insufficient Publicity** for Procurements
- Amendments to contracts **without considering whether an extension/addition is permissible** under the original procurement or whether a new procurement process is required
- Award of contracts made **using different criteria to those published** in the Tender, meaning the competition is not fair

### Q56: In the case of a procurement which has already been carried out and the contract has already been awarded before the start of the project, do we have to re-do it?

No, you don't have to re-do it (unless you know there was an issue with the initial procurement process). You have to respect the terms of the contract that was awarded and upload the procurement evidence on eMS for any costs claimed that are related to it. The same eligibility rules apply to existing contracts, so the original procurement may be checked to ensure that it is valid according to the organisations rules.

### Q57: How do I select a quote?

You will have to define your selection criteria and be transparent about the way you evaluate a quote. You can decide to select the cheapest, but you don't have to. For instance, you can decide to evaluate the quotes the following way: 50% on the price, 30% on the quality, and 20% on experience. The defined selection criteria should appear in the request for quotes.

The selection of a quote depends on the value of item to be procured. Please refer to [Guidance Note 6a of the Programme Manual](#), and to your organisation's internal rules as well as national and European rules applicable.

### Q58: How do I get 3 quotes if only one supplier can supply the product?

It is the number of invitations to quotation sent that matters, not the number of quotes received. However the Partners should demonstrate that the invitation to quotation was sent to relevant organisations. For instance if you want to purchase a van, it will be deemed irrelevant to send invitation to supermarkets.

### Q59: Do we have to justify even in the case of a contract value below €25,000?

Yes. The selection criteria must be clear and an evaluation of the quotes should be carried out.

### Q60: In the past we had a procurement that was cancelled because the specification was too specific, it was considered that it was targeting a specific product.

#### a. How should we proceed if we know that only one company can provide a piece of equipment necessary for the project?

This is not easily proven. We cannot rely on a partner's declaration with regards to procurement. In any case, if there is only one supplier able to provide the equipment that matches the specification, then it is likely that you will award them the contract. Please refer to the Ford Transit example which appears on the presentation handout of the PP training provided by the JS.

#### b. Do we have to ask other companies even though we know they don't have the relevant skills?

Yes the relevant procurement process (depending of the contract value) still needs to be carried out. Please refer to Q41. The shortlisting process should focus on finding companies that are able to answer the procurement, if possible.

Q61: If we did not correctly anticipate the amount of equipment needed and need to buy more, do we need to do another procurement?

Not necessarily. There are European rules on contract extension limits. Depending on these rules and/or your organisation's rules you could potentially increase the contract value without having to procure again. If the total value of the additional equipment needed is higher than the contract extension limit, you would have to procure again. In this case, you would also have to demonstrate that you did not artificially split the procurement in two to avoid the procurement threshold. It is good practice to foresee any potential extensions and to indicate in the procurement documents that an extension is possible.

Q62: Do we have to only ask European suppliers or is it possible to open it outside the EU, because we have got a supplier in India?

The general principles of public procurement are non-discrimination, equal treatment, and transparency. In simple terms, this means that all suppliers capable of providing the products or services should have equal opportunity to carry out the work. The transparency of the process refers to the need for it to be clear how the decision will be made, and what the rules are for bidding for the contract, and records to be kept showing how the decision was made. Regarding the suppliers from outside the EU, the only rule is that the contracts must be accessible across the EU.

Q63: On the budget we have a budget of 30,000 for the equipment, we will buy from different suppliers, regarding the procurement do we need to ask for 3 quotes?

The partners have to follow the applicable rules (internal, national, EU). They should pay particular attention in not artificially splitting contracts (see Q.39), by justifying that there is a clear business case for separate procurements.

Q64: If we have a total procurement cost of € 300,000 but because of technical requirements some pieces are less than 5,000 euros, do we need to procure each piece individually or should we procure for the total amount?

Subject to each partner's applicable internal rules, individual items below 5000 do not need to be procured. However, the partners need to be certain that there is a genuine reason for the separation (see Q.39 on avoiding artificial splitting).

Q65: What role does the JS play in providing legal advice for procurement?

The Programme Manual and/or JS advises should not be treated as a definitive guide to Procurement, as the rules can vary depending on the item being procured and the organisation procuring it. For higher value procurements where the organisation does not have its own procurement department with experience of handling public procurements it may be advisable to for PPs to seek legal advice.

Q66: Does tender or 3 quotes have to be published in both languages or is a partner free to publish in the language of their choice? Does it mean we have to publish procurement in both language for the project website?

For any procurement, the contracting authority can publicise the procurement in the language in which they operate. Therefore, partners do not have to publish multilingual invitation to quotations to potential suppliers. However, in some cases publishing a tender or 3 quotes in both languages can be interesting as it may attract relevant suppliers.

## E. eMS

Q67: Would it be possible to have several users access per partner organisation?

Yes. It is possible to assign several project officers to one partner organisation. Please refer to section 2.1 of the eMS technical guidance in order to get guidance on how to register on eMS. The LP should then refer to section 5.1 in order to assign project officers to their partner organisation. Re- the LP access though, although there might be several LP user accesses created, only one user with LP access will be able to submit the project report.

Q68: eMS - is there a maximum size for file upload? Number of file uploaded? And what kind of format is supported?

As indicated in the [eMS technical guidance](#), only the following type of files can be upload on eMS: PDF, JPEG, JPG, ZIP, DOC, DOCX, XLS, and XLSX. The maximum size per document uploaded is 8MB and there is no limit in the number of documents which can be uploaded.

Q69: Would eMS allow a Partner to overspend on a budget line?

There is no actual blocking on eMS, but FLC / JS will spot this and reject the amount above the WP or BL maximum amount. If a Partner realises he is going to overspend, a project modification would need to done.

## F. Reporting

Q70: How do I get the invoice number?

The invoice number is not compulsory information when entering an expense on eMS. The information only needs to be provided if it is relevant. For instance, for staff costs, you don't need to provide an invoice number. For a cost under BL4 you will need to enter the invoice number on eMS when reporting this expenditure (unless it is an external travel expense claim for an external speaker). It will help the FLC to check the link between the cost and the uploaded evidence.

Q71: Does the term "paid" need to appear on the invoices?

No. However, proof of defrayal for each expenditure item has to be provided.

## G. Modification

Q72: We changed the workplan/timeline therefore is there an official way to submit this modification and what procedure should we follow?

We have created a modification form template, which is available on the [Programme website](#) under the section “Funded project management documents”. The completed modification form has to be signed by the LP and sent to the JS. You can also refer to [Guidance note 6a of the Programme Manual](#). It is good practice to consult with your FAO before submitting a modification.

Q73: Is it possible to move budget between Work Packages (WP)?

It is possible but we don't encourage this. As long as you have sufficient budget in the correct budget line and the partner's total budget is not exceeded, there is no issue to claim a cost, even if the total budget for that WP has been exceeded. This means that modifications are needed only if a budget line might be exceeded.

Please contact your JS contact point if you would like to change the budget between WP.

Q74: Does the 20% total eligible budget threshold apply at WP level or project level?

For a project modification to be considered as technical, changes in the budget should not represent more than 20% of total eligible budget. For more information concerning technical modifications please refer to the [Guidance Note 6 of the programme manual](#).

Q75: Is there a need for a modification request if partners are only moving funds from one WP or budget line to another?

Yes. Any change to the budget has to be done through a project modification, because of the impact of changes to eMS. Please refer to Q34 of this Q&A.

Q76: We have to recruit a PhD student, but we have delayed the recruitment so he/she will start later than expected. It is a three year contract but we already know that we will have to extend the duration of the project. How can we extend the duration of the project?

You can request a modification of the project duration before the GOL is signed. It is better to do it at this stage so that there will be no need to amend the dates of the GOL later. If the total time extension requested in the project exceeds 6 months, it will require the approval of the PMC, which adds time to the process. In any case, a project extension will need to be clearly explained and justified, and the impact on activities and outputs will need to be clearly presented in the request for modification.

Q77: In case of issues with one partner, will the financial penalties impact the concerned partner or all of the partnership?

It will be a case by case judgment, but if a target or an output cannot be delivered, it is the whole project and therefore partnership that is impacted. This is the reason why it is important to anticipate any issues and to launch a process of modification as soon as possible.

## H. Other

Q78: Who do we have to ask questions to regarding the project, do we have to address our questions to the JS or the LP?

The LP is the first contact point for the partnership. If your LP is unable to answer your question, he/she should contact the JS.