

INTERREG IPA CBC PROGRAMME
“GREECE - ALBANIA 2014-2020”
INFODAY
2021 JULY
Common mistakes
during the implementation

Ministry for Europe and Foreign Affairs
First Level Control Office

Common mistakes during implementation in

- **Most of the mistakes comes from:**

- A slow Collaboration with JS/MA and the lead beneficiaries
- Management and financial capability of beneficiaries
- Undertaking too many projects without calculating budgets, pre-financing and reimbursement dates
- Not paying enough attention to the manuals that are easily accessible online
- Not well analyzed AP
- Not being aware of the FLCO and Reimbursement process

Procurement

All contracts financed in whole or in part by the budget shall respect the principles of: - Transparency; - Proportionality; - Equal treatment, and - Non-discrimination;

- Splitting of tenders or grouping tender procedures under one procedures without the adequate justification is an issue with a high risk.
- Inviting potential suppliers that are not interested in the procurement could end up in procedures with not enough candidates that could bring a more detailed tender document analysis.
- Time Management miscalculation from beneficiaries could bring a situation of not letting enough days to beneficiaries to apply for tenders as in the PRAG
<https://ec.europa.eu/europeaid/prag/>

Procurement

- Lack of publication in the adequate is a mistake of a high risk because potential tenderers cannot get access to the documents of the tender and could bring a tender cancelation.
- Similarity between methodologies under the same tender procedure is considered a high risk from the FLCO and could bring a more detailed tender document analysis.
- Land Permits and other permits from other national institutions should be planned before tendering procedures starts.

Other Mistakes

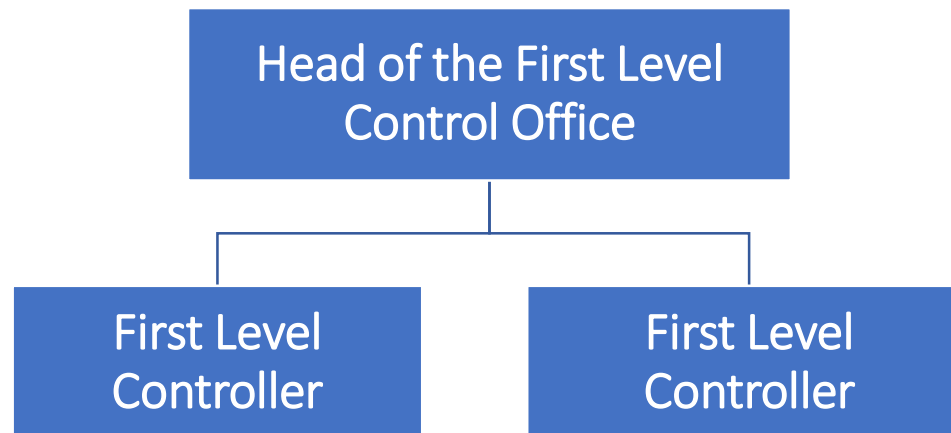
- Timesheets of a different format of that in the IPA Greece – Albania Programme is an issue, beneficiaries should stay strict to the official documents of the programme as in the link below <https://greece-albania.eu/library>
- Wage calculation and also lek/euro exchange is a very common mistake
- MIS error “*Making 0 Error claim for reimbursement of the expenditures*” leads to a return from the FLCO
- Beneficiaries should be warned regularly that *Missing documents* have a 10 days waiting rule from the FLCO.

Other Mistakes

- Publicity rules are sometimes forgotten or not checked regularly after being implemented (in case of posters or billboards)
- Uploading documents that are not scanned in a high quality could bring the further delays in the control from the FLCO
- Ineligible VAT is not an issue that depends by the FLCO
- Expenditures (travel, events, etc...) not related to the actual project are ineligible
- Forgotten or irregular stamps could bring further delay in the process by the FLCO
- Missing supporting documents, is a mistake that could bring to an ineligible procedure
- Submitting for verification without documents at all is a mistake that can lead to further delays

FLC Office in Tirana

The FLC Office is composed by the Head and two First Level Controllers,
Coordinated by the Ministry for Europe and Foreign Affairs.



The verification process includes:

Administrative verifications

Administrative verification are carried out at the FLC Office, once the documentation has been submitted by the Albanian beneficiaries for verification

Management verifications of 100% of the applications for reimbursement

- ***It is recommended that an official verification submission to the FLCO in Albania should not be lower than 5000 Euro of expenditures***

On the spot verifications

On-the-spot checks - control checks undertaken by First Level Controllers on the premises of a Beneficiary or any other project-related site

At least *one check* should be carried out for each partner during the lifetime of a project

The FLCO has a maximum of 90 days to carry out the control and issue a CVE for each report submitted in the system

Administrative Checks

Intensity	Administrative Checks
Management verifications of 100% of the applications for reimbursement	Approved application form Partnership agreements Procurements Procedure Documents Contracts Invoices Bank Statements Payment Orders Travel authorization Time-sheets Proof of participation Agenda of meetings Proof of existence (photos, etc.) Reports, Minutes etc.

Timing of the “On the Spot Checks”

Timing/Intensity	On the Spot Checks
<p>At least one on-the-spot check to be carried out for each partner during the lifetime of the project</p> <p>It is highly recommended, that the checks are carried out when the project is in progress</p> <p>Follow-up verifications through risk-based approach according to findings during previous desk-based checks</p>	<p>Control of the services works and supplies rendered during the project implementation</p> <p>Compliance of the expenditure with the project - realization of the expenditure</p> <p>Conformity of the original documents with the documents submitted to the FLC Office</p> <p>Financial and Physical progress of the project</p>

Procurement Thresholds

PRAG (EC) 1 August 2020

SERVICE CONTRACTS	<p>≥ EUR 300 000</p> <ul style="list-style-type: none"> - International restricted or open tender procedure 	<p>< EUR 999 999</p> <ul style="list-style-type: none"> - Framework contract SIEA 2018 Or < EUR 300 000 - Framework contracts (SIEA 2018, Audit, Commission, ...) - Simplified procedure 		<p>≤ EUR 20 000</p> <ul style="list-style-type: none"> - Single tender <p>A payment may be made against invoice without prior acceptance of a tender if the expenditure is ≤ EUR 2 500</p>
SUPPLY CONTRACTS	<p>≥ EUR 300 000</p> <ul style="list-style-type: none"> - International restricted or open tender procedure 	<p>< EUR 300 000 but ≥ EUR 100 000</p> <ul style="list-style-type: none"> - Local open tender procedure 	<p>< EUR 100 000 but > EUR 20 000</p> <ul style="list-style-type: none"> - Simplified procedure 	
WORKS CONTRACTS	<p>≥ EUR 5 000 000</p> <ul style="list-style-type: none"> - International open tender procedure or - International restricted tender 	<p>< EUR 5 000 000 but ≥ EUR 300 000</p> <ul style="list-style-type: none"> - Local open tender procedure 	<p>< EUR 300 000 but > EUR 20 000</p> <ul style="list-style-type: none"> - Simplified procedure 	

<https://ec.europa.eu/europeaid/prag/>

It is recommended that three candidates should take part in procedures of values of less than 20 000 Euros

Value on Added Tax (refund procedures)

Beneficiaries should submit the following documents to the local Treasury branch:

- Certified copy of the subsidy contract and/or partnership Agreement between the EU beneficiaries (*including NGO's*) and Managing Authority, in Albanian and English language;
- Title of the project in Albanian and English;
- Contract amount and duration of the project;
- Name of the non-profit organization responsible of the project;
- Documents proving the non-profit nature status of the organization.
- Copy of original receipts of goods supplied and services rendered under the project implementation

Co-financing

Beneficiaries from Albania will provide 15% of the national counterpart.

Double financing

- Verifications shall include procedures to ensure that no expenditure shall be financed under more than one operation and thus to avoid double-financing of expenditure with other Community funds and with other reporting periods.
- It has been required that each original invoice and accounting documents of probative value is voided by means of a stamp (or writing by pen even if the use of a stamp is strongly suggested).
- **2 stamps are required**
- The concerned expenditure has been co-funded by the IPA Greece-Albania CBC Programme
- The code and the name (acronym) of the project
- The amount reported or declared as eligible
- In order to avoid double declaration of cost, the controller may also check that the reported expenditure is actually accounted with an appropriate project accounting code . For electronic invoices, it's recommended to verify the presence of a text identifying project and the programme in the title of the invoice.

Expenditure incurred under Interreg IPA GREECE-ALBANIA 2014-2020 CBC Programme, Project "<Acronym> - Code <Code>", for a sum of ALL, equal to €, date.....

Corresponding to the Original

Thank you for your attention.

First Level Control Office Contacts:

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