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# **Training for beneficiaries 2<sup>nd</sup> Call for proposals (14 June 2021, Online) Questions & Answers**

**ENI CBC Black Sea Basin Programme 2014-2020**



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### *Q&A on Narrative reporting*

QUESTION	ANSWER
<p>1. Please provide instructions regarding the procurement plan and procedures.</p>	<p>The procurement rules you have to apply should comply with the provisions described by Regulation (EU) 897/2014 and Grant Contract and more information you can find in the Projects Implementation Manual - Chapter 4 - Procuring services, supplies and works.</p> <p>For guidance, you can also check the summary available on the programme website: <a href="https://blacksea-cbc.net/news/archive-news/procurement-rules-national-legislation-or-prag/">https://blacksea-cbc.net/news/archive-news/procurement-rules-national-legislation-or-prag/</a>.</p> <p>In any case, please consider all the legal provisions mentioned above.</p> <p>For support, you may contact the Joint Technical Secretariat and, in case of specific national legislation, the National Authority in your country.</p>
<p>2. What is the role of the project assistant in the interim report?</p>	<p>The role of each team member must be defined within the partnership and must correspond with the roles and responsibilities of each partner, in order to ensure the coverage of the expertise necessary for the implementation of project activities.</p>
<p>3. Can we buy services or goods from university trade organizations?</p>	<p>All services, supplies or works that must be purchased in the project must follow the procurements rules.</p>
<p>4. What is the real possibility that the progress reports will return to the initial format of eMS?</p>	<p>Until now the Programme structures did not take into consideration this option.</p>
<p>5. In case if the term of implementation of the project changes (extends by 6 months) does the term of preparation and submission of the interim report change? Thank you in advance.</p>	<p>If a duly justified project's extension is approved by the Managing Authority, then the deadline for submission of the interim report will be updated in accordance with the new project duration.</p>
<p>6. Please provide details about single tender procedures (both for services and supplies).</p>	<p>In case PRAG 2020 is used, the specific information about the single tender procedure can be found in sections 2.6.8, 3.3.3, 4.2.4, 4.6 and 5.2.4.</p>
<p>7. Please provide more information on the Lead Beneficiary's obligations in this report.</p>	<p>The Lead Beneficiary will ensure the coordination between partners in order to make sure that the deadline for submission of the consolidated report is met; LB is responsible for consolidating information at project level and uploading all FLC Certificates; LB will receive the potential</p>



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QUESTION	ANSWER
	<p>clarifications from JTS and must share the information with partners; in order to respond to clarifications, the LB might need to revert the reports to partners (action made in eMS); LB has to communicate to JTS any issues that might delay the submission of the report</p>
<p>8. How is the quality of deliverables assessed?</p>	<p>The JTS verifies if the evidences provided are sufficient to prove the deliverables obtained, if the content of deliverables correspond with the application form; e.g. for events organised - it is verified if the agenda of the events contain all topics described in the application form, if the target group corresponds and is relevant for the event, if number of participants corresponds with the number indicated in AF, if the submitted photos demonstrate that the event was organised</p>
<p>9. How detailed should be the interim report?</p>	<p>The level of details must be sufficient in order to clearly demonstrate the progress for each deliverable and the results achieved</p>
<p>10. How can be defined the Project Output Indicator and Targets Level of Achievement?</p>	<p>The description of the progress of Project Output Indicators must correspond with the information in the application form and with their contribution to the already preselected Programme Output Indicator. In order to better understand how to quantify and report the target value reached, please see the following example: if a project plans to deliver 5 products to promote tourism (i.e. project output = Products promoting tourism / target value = 5) and 2 such products are completed by the time a certain Progress Report is submitted, then the beneficiary will indicate “2” under “Achieved in this report”. If, by the time the next Progress Report is submitted, the remaining 3 products are also completed then the beneficiary will indicate “2” under “Achieved so far” and “3” under “Achieved in this report”. Under the “level of achievement” the appropriate status shall be indicated (e.g., proceeding according to workplan - if under preparation; behind schedule - if delayed as compared to the due date, etc.)</p>
<p>11. How can we proceed when the size of the deliverable are exceeding the maximum size accepted by the eMS system?</p>	<p>In case the evidence exceeds the limit of 20 Mb, the partners should create .rar or .zip packages of no more than 20 Mb of each and upload them in more parts.</p>
<p>12. Should all partners upload on eMS the deliverables that are involved in</p>	<p>The partners will describe their contribution in each GA and will upload the documents for which</p>



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(along with submitting the description of their contribution), or the WP leader only to avoid duplications?	they were responsible; the LB will consolidate the information, describing the progress at project level, but with references to the partners involved
13. Who will sign the report?	The interim report is prepared in electronic version and is submitted via eMS; therefore, the report cannot be technically signed; all other supporting documents to be uploaded should be signed by the legal representative of the LB/beneficiaries
14. It is possible to access the eMS platform for initialization?	Yes, you can start writing reports, but please be aware that no request for notification/addendum are submitted during this process; the report will be linked to the version of the application form valid at the moment of creation of the report
15. The Lead Beneficiary will have to submit an Interim report as Lead partner and as project partner as well?	The Lead Beneficiary will submit its interim partner report and the consolidated project report

### *Q&A on Financial reporting*

QUESTION	ANSWER
1. Is there any specificity in the selection of audit firms to conduct an audit before submitting an interim report? /Information about interim report and FLC/ Audit.	Please check the provisions of Instruction no. 15 of 20 November 2018. <b>The second revision of Instruction 15</b> is available <a href="#">here</a> and the Annexes can be downloaded from <a href="#">here</a> . The partner, depending on the country that s/he belongs to, will choose the relevant path to follow. Pay attention that if the controller is selected from a long list of auditors, the partner should follow the applicable procurement procedure for selection.
2. In the process of preparing the consolidated interim report, can the partners upload financial documents which weren't on eMS when the FLC control was carried out? Documents in connection to the expenditures made, not verified and not asked by FLC, but which could bring more explanation for the control of the expenditure development over the whole project by JTS and department of the payment authorization?	No, in the consolidated interim report the partners cannot upload financial documents which weren't on eMS when the FLC control was carried out.  The financial part is compiled automatically by the system based on available FLC certificates included in the project report by the lead partner. Other documents may be attached only at the request of the program structures that perform the expenditure verification (FLC, JTS, Managing Authority).
3. Eligibility of declared costs	Regarding the criteria for the eligibility of



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QUESTION	ANSWER
	<p>declared cost please take into account the provisions of article 8 from the Grant Contract and section 5.1 and 5.2 from Project Implementation Manual. Also, in the reporting process, in order to ensure that the controllers/Managing Authority have all the necessary information in order to perform the expenditure verification, we kindly remind you of the obligation to provide/ upload in the eMS all the supporting documents and annexes requested in the Project Implementation Manual.</p>
<p>4. Are we supposed to upload tender documents to eMS platform (supply contract, invoice etc.) related to administrative spending?</p>	<p>According to article 8.3 of the Grant contract, this flat-rate for office and administration costs does not need to be supported by accounting documents. This means that no justifying documents proving the expenditures incurred under this category have to be provided during the interim report and final report.</p>
<p>5. Who to contact in case of technical aspects during reporting in the eMS/technical issues related to the financial report?</p>	<p>If during the reporting process you encounter technical problems that may delay or stop your reporting process, contact JTS officers in order to ask for support.</p>
<p>6. Is there a preferred template for internal appointment of the staff to work for the project or is the template of the organization enough?</p>	<p>No, there is no preferred template for internal appointment of the staff to work on the project. In this respect, please check the supporting documents requested for expenditure verification for costs declared under budget line "Staff" (section 6.5.3 PIM)</p>
<p>7. What will be the format of interim reporting and how will the expenditure report be done - using eMS or another new format? Is there a financial report template in the eMS to fill it in?</p>	<p>The interim reporting process is done through the eMS / the interim partner and project reports being filled in and submitted in eMS. There is not a template for the financial report in eMS. The financial report is filled in, in the eMS, by filling in the List of Expenditures. Please check, in this respect the Project Implementation Manual, revision 3 and Annex 5 Guide on reporting in the eMS.</p>
<p>8. What happens in case the project reaches the half of the implementation period but has not spent the requested 70% of the pre-financing (even though the activities are implemented according to the time plan)?</p>	<p>According to article 5.5 of the Grant Contract "if half of the implementation period has elapsed and the part of the expenditure actually incurred and paid which is financed by the MA is less than 70 % of the previous payment, the Lead Beneficiary shall present an interim report within 90 days following this period; the interim payment shall be reduced by the amount corresponding to the difference between the 70 % of the previous</p>



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	payment and the part of the expenditure actually incurred and paid which is financed by the MA.”
<p>9. Are there any differences regarding the preparation of the interim report, between the 1st and the 2nd Call for proposals?</p>	<p>For the financial part of the interim report there are no major differences. Please be informed that the Instruction 15 laying down specific provisions for the expenditure and revenue verification of a Grant Contract funded under the JOP BSB 2014-2020 and its Annexes were revised, as to:</p> <ul style="list-style-type: none"> <li>- simplify the control work and remove the identified overlaps. In this respect, the former Annex 6 - Template of report on expenditure and revenue verification and Annex 7 - list of factual findings to the instruction have been removed;</li> <li>- respond to the Beneficiaries’ needs and bring a solution to mitigate the potential losses due to exchange rate variations. Consequently, the Instruction includes (see section 2.7) the option for Beneficiaries to submit financial reports in the eMS, prior to the submission of the Interim/Final Reports.</li> <li>- clarify, or detail some of its provisions.</li> </ul> <p>Also, in Project Implementation Manual revision 3 some aspects related to the reporting process were clarified or described in a more detailed way and Annex 9 and 10 (Checklist for narrative and financial interim/final report) were introduced in order to support the beneficiaries.</p>
<p>10. Should project documents be translated into English?</p>	<p>The original financial documents do not need to be translated in English. They have to be uploaded in eMS in scan version of the original documents and <b>named in English</b>.</p> <p>In case during the verification process of the interim/final report the Managing Authority, will need clarification regarding certain documents, a translation in English of the respective documents or parts of them may be asked.</p>
<p>11. What is the deadline for uploading all the documents to eMS for the interim report? When should we submit the report to the FLC, and when the LP should consolidate the report and submit to JTS? What are the deadlines for those steps?</p>	<p>After the end date of the interim reporting period, the partners have 90 days to prepare the report and submit it to the JTS. To meet this 90-days deadline, partners are advised to prepare in advance a schedule of the reporting process. Please be aware that the expenditure verification process by the controllers takes up to 30 days, excluding the periods dedicated to providing the answers to clarifications, if the case.</p>
<p>12. How should we send the invoices?</p>	<p>The invoices are going to be uploaded in eMS. All</p>





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<p>The originals should be sent via the post office? How long should we keep the invoices?</p>	<p>the supporting documents are uploaded in a scanned version in eMS. The originals are not sent by post, they are kept at the partner premises for the verifications of the programmes' structures.</p> <p>According to the Grant Contract, art.11.8, the Lead Beneficiary and the Beneficiaries shall keep all records, accounting and supporting documents related to the Contract for five years following the payment of the balance of the Programme, and in any case until any on-going audit, verification, appeal, litigation or pursuit of claim has been disposed of.</p> <p>The documents shall be easily accessible and filed so as to facilitate their examination and the Lead Beneficiary and the Beneficiaries shall inform the MA of their precise location upon request.</p> <p>Please also note that, according to instruction 15, the controller will carry out an on-the-spot check at least once during the life of the projects.</p>
<p>13. Are the working hours of the project taken into account when you are on paid leave under the main employment contract? How to fill in the timesheet?</p>	<p>The paid leave is eligible, proportionally with the number of hours worked in the project, therefore it must be mentioned in the timesheet.</p>
<p>14. We would like to combine budget line "Project Management &amp; Coordination / Financial Expert" and "Project Management &amp; Coordination / Technical Expert" as one budget line. In this way we want to hire one Project Management &amp; Coordination/Project Expert for 2days/ per month. Is it possible?</p>	<p>These situations have to be analyzed on a case-by-case basis, taking into account the information in the Application Form and the justification provided by the beneficiary.</p> <p>Regarding the modification of the Application Form please check Instruction no. 16 of 20 February 2019 to Beneficiaries regarding Addendum and Notification.</p>
<p>15. How can we increase the amount of money for a budgetary line if it is absolutely necessary?</p>	<p>These situations have to be analyzed on a case-by-case basis, taking into account the information from the Application Form and the justification provided by the beneficiary.</p> <p>Regarding the modification of the Application Form please check Instruction no 16 from 20 February 2019 to Beneficiaries regarding Addendum and Notification.</p>
<p>16. Due to the pandemic COVID-19 situation, there are restrictions for travelling abroad. We need to make</p>	<p>PCR tests for staff members or guests, target groups and/or final beneficiaries for whom travel and accommodation costs are covered from</p>



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<p>PCR tests. The question is if these costs of tests are eligible? If yes, from which budget line?</p>	<p>“Travel and accommodation” costs budget line, shall be covered from this budget line.</p> <p>For guests, target groups and/or final beneficiaries for whom travel and accommodation costs are foreseen and covered from budget line “External Expertise and services” shall be covered from this budget line.</p> <p>For the reimbursement process the beneficiaries shall present supporting documents (invoices/receipts, etc) and upload them in the eMS when the expenditure will be declared (at interim or final report).</p> <p>If savings are not registered under these budget lines, the tests may be reimbursed from “Office and administration” costs.</p>
<p>17. The main questions relate to exchange rate fluctuations</p>	<p>In order to help the beneficiaries and to reduce the risk of losses due to the exchange rate differences, the Managing Authority has introduced the option to submit <b>more frequent financial reports</b>, using the approach described in the Project Implementation Manual (revision 3)/ Annex 5, section 4.3.2.</p> <p>Our recommendation is to elaborate such financial report every 4 months, in order to correlate them with the usual 4-month reporting process.</p> <p>If you decide to use this option of multiple financial reports before the interim report:</p> <ol style="list-style-type: none"> <li>1. A precondition is that the partner needs to have assigned the controller in the eMS. For this procedure, please take into consideration Instruction no 15/Feb 2021 (<b>the second revision of Instruction 15 is available <a href="#">here</a> and the Annexes <a href="#">here</a></b>) and also the <b>eMS Manual for CCPs and controllers (available <a href="#">here</a>)</b>, which contains step by step instructions on how to assign a controller in eMS.</li> <li>2. The LB should send an official request to the JTS indicating the partners who would like to submit such reports and the timeframes for which they would like to report costs in eMS before the Interim / Final reports. We strongly advise to carefully analyze the frequency of these reports, taking into account the time required to complete them. Please note that these reports need to have continuity and overlaps in the reporting periods</li> </ol>





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	<p>should be prevented, that is why a consultation at the partnership level should be consider in order to avoid delaying the overall interim reporting process.</p> <p>3. The partner will have to open the first report in the eMS (period 1), the following reports being generated by the JTS officer at the Beneficiary request. For step by step instructions, please refer to the Project Implementation Manual (revision 3)/ Annex 5-“Guide on reporting in eMS”.</p>
<p>18. Could we write more than first phase cost for the co-finance? How to indicate the partner contribution and where?</p>	<p>The co-financing will be established by the MA when authorizing the report by applying the percentages from the Grant Contract art. 3.2. In eMS for partner interim report, you will fill in “Contribution section”</p> <p>In this section you have to specify the source(s) of partner contribution matching the ENI of the current report. The eMS give the partner target amount (i.e., the total contribution calculated by deducting the fund co-financing from total eligible expenditure introduced in the List of Expenditures). The system proposes the same sources of contribution as specified in the application form.</p> <p>The total value of contribution from all sources needs to correspond to the total amount of match-funding. Please check provisions of Annex 5 section 4.3.3.</p>
<p>19. May we change the hour rate of staff members only with a notification?</p>	<p>These situations have to be analyzed on a case-by-case basis, taking into account the information in the Application Form and the justification provided by the beneficiary.</p> <p>Please note, that the acceptance of such a proposal is subject to the rules of eligibility for staff costs, among which, the new proposed hourly rate must correspond to those normally borne at institution level for similar positions.</p>
<p>20. Provided that there are unspent amounts from the "pre-financing" period of the project (1st period, months 1-n); is it possible to move them to the 2nd period (months (n+1) - last month) of the project implementation AFTER the Interim report (over an addendum)?</p>	<p>The savings from the first part of the implementation period, up to the interim report, may be used also, after the interim report, following the regular procedures of project’s modification which are described in Project Implementation Manual (revision 3) and Instruction no 16 from 20 February 2019 to Beneficiaries regarding Addendum and Notification.</p> <p>In this respect, please check section 5.4 from</p>



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QUESTION	ANSWER
	Project Implementation Manual
<p>21. What is the most efficient way to combine the submission of the interim report and a request for an addendum? (i.e., would it help to have a common date reference, so as not to provide twice some paperwork that may refer to slightly different time periods?)</p>	<p>Please take into consideration the provisions of the Project Implementation Manual which specifies that “throughout the process of expenditure verification of the Interim Report until the approval by the controllers/MA of the report, Beneficiaries shall not make or request budgetary modifications to the sub-budget lines included in the report for which verification is ongoing”.</p>
<p>22. For the procurement of notebooks, do we indicate in the Procurement section all the docs regarding the procurement and in the Expenditures all docs regarding the payments? Where do we attach the photos of the notebooks procured?</p>	<p>Regarding the documents that you need to upload in the Procurement section please check section 2.5 from Annex 5 - Guide on reporting in the eMS. Photos of the notebooks procured may be attached in the Attachment section of the interim partner report.</p>
<p>23. Must the contract with the audit company (for partners from the Republic of Moldova) be registered on the platform of the Ministry of Finance amp.gov.md?</p>	<p>The contracts with the audit company for partners from the Republic of Moldova do NOT have to be registered on the platform of the Ministry of Finance amp.gov.md.</p>
<p>24. When should the partners contract the FLC? How many months / weeks before submitting the Interim Report?</p>	<p>There is no reference to the number of months /weeks before submitting the Interim Report when the partner should contract the FLC. The partner should take into account the time necessary for the procurement process. The recommendation is to be sure that, at the moment of the partner interim report submission, the partner has signed the contract with the controller and the controller is already assigned in the eMS by the respective CCP.</p>
<p>25. If a procurement invoice was received within the interim period report but the payment was made 5 days after that period, can we include in the expenditure report these payments?</p>	<p>Please check in this respect the provisions of Annex 5 where is specified that “ Always include in the partner report generated for interim reporting period expenditure paid within the respective period.”. <b>The respective costs will be introduced in the final report.</b></p>
<p>26. Do we need to submit a notification if instead of 2 items foreseen in the budget, we want to buy 3 items within the same budget limits?</p>	<p>In principle, when the beneficiaries request the increase of the number of equipment (same type of equipment), which require only the rephrasing of the comment box in the budget, a notification is enough.  But if the modification requires the change of the unit rate and/or of the values in the budget, then</p>



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QUESTION	ANSWER
	an addendum is necessary.
<p>27. The photos of the procured equipment must be uploaded in the Supplementary section with the procurement procedures documents?</p>	<p>Regarding the documents that you need to upload in the Procurement section please check section 2.5 from Annex 5 - Guide on reporting in the eMS. Photos of the equipment procured may be attached in the Attachment section of the interim partner report.</p>
<p>28. Should we have a separate bank account for the program from where we have to pay the expenditures? Is it necessary to make our payments (even staff and social charges) through this account?</p>	<p>According to Project Implementation Manual provisions “ The Lead Beneficiary and Beneficiaries have to have dedicated bank accounts in Euro for the implementation of the Project, in order to identify the funds paid by the MA. Also, the Lead Beneficiary and Beneficiaries may have a different bank account opened in their national currency (not applicable for Greek beneficiaries) for transfers representing co-financing and for other operations related exclusively to project implementation, if necessary.” The Lead Beneficiary and Beneficiaries must ensure that expenditure for the project is easily identified and traced to and within their accounting and bookkeeping systems.</p>
<p>29. Should we stamp our invoices with the program stamp?</p>	<p>Please note that clear reference to the Programme and project (e.g Programme and project eMS Code) has to be seen in relevant documents (e.g invoices, contract, reports, agendas, lists of participants, materials published, documents elaborated for events, etc).</p>
<p>30. Can we subcontract the same audit company for 2 projects carried out on different programs?</p>	<p>There is no restriction in Black Sea Basin Program. Please check in this respect Instruction 15 from 20 November 2018 to the Beneficiaries laying down specific provisions for the expenditure and revenue verification of a grant contract funded under the ENI CBC Black Sea Basin Joint Operational Programme 2014-2020, second revision, Project Implementation Manual and if the case, your national legislation. Also, when conducting the procurement, please ensure that the controller is listed on the most recent lists of controllers selected for carrying out the expenditure verification performed within the projects funded by Joint Operational Programme Black Sea Basin 2014-2020. The lists are available at the following link <a href="https://blacksea-">https://blacksea-</a></p>



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QUESTION	ANSWER
	<a href="http://cbc.net/projects-implementation/">cbc.net/projects-implementation/</a> .
<p>31. Where we can start to fill in the financial information/report? In list of expenditure or add real cost?</p>	<p>For the interim reporting, each partner will create in eMS, a partner report consisting of a narrative part, and also a financial part. The financial part is in fact the “List of expenditure” (LoE) section of the eMS partner report.</p> <p>After clicking on ‘Add real cost’ a LoE appears, where the system asks you to give basic information on the cost item.</p> <p>For step-by-step instruction on how to generate and fill in a partner report, please refer to the Project Implementation Manual (revision 3), Annex 5 - Guide on reporting in the eMS.</p> <p>When generating a partner report, please check in the application form in eMS, the reporting period for the interim report. Please also note that since reports are automatically generated to cover the defined reporting periods set out in the version of the application form to which the report is linked, any future changes to the estimated reporting periods will require deleting the old report and generate a new one that corresponds to the revised reporting periods.</p>
<p>32. When an organization has a technical contract with one expert, and there is a need to hire such expert in EU project, shall we hire him/her without any procurement procedure or procurement rules (tender or any other) are applied for the expert who is currently in contractual relations with the company?</p>	<p>Please check very carefully the situations of conflict of interest described in the section 5.2.4. of the Project Implementation Manual in order to avoid the cost being declared ineligible.</p> <p>Also, please consider in this respect the provisions of Project Implementation Manual section 5.2.4. “ The external experts and service providers are sub-contracted to carry out certain tasks or activities which are strictly linked to the project and are essential for its effective implementation (e.g., studies and surveys, translation, promotion and communication, services related to meetings and events, etc). Do not forget that in order to conclude service contracts you have to follow the requested relevant procurement rules!” So, for every cost budgeted under “External expertise and services” a service contract signed is needed, following the applicable procurement procedure.</p>
<p>33. Can we conclude a service contract with the person who is already an employee of our project? So, we will have two contracts with this person: one employment contract, second service contract. Does any conflict of</p>	<p>No, there is a conflict of interest and the respective costs will be declared ineligible by the program’s structures. Please check very carefully the situations of conflict of interest described in the section 5.2.4 of the Project Implementation Manual in order to avoid the cost being declared</p>



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QUESTION	ANSWER
interest exist?	ineligible.
34. When we are underbudget for some specific budget line, and overbudget in another line, can we offset these two if there are located in the same budget group (for example travel part)?	No, you may not offset. According to the provisions of Instruction 16 and Project Implementation Manual, art.3.8 “ minor changes of amounts between items within the same main budget heading not having a major impact on the latest approved eMS version of the Budget” are subject of a Notification.
35. If the project implementation period is until 30.06 for example and we receive a service invoice later (04.07) but dated on 30.06, is it eligible to pay this invoice after the implementation period?	<p>According to art.8.1 from the Grant Contract “ <b>Costs incurred should be paid before the submission of the final reports</b>” to the controller.</p> <p>In this respect please be aware that for final report, beneficiaries may include, expenditure(s) <b>incurred</b> between the first day after the interim reporting period and end of implementation period, and <b>paid</b> before the submission of the final report to the controller.</p> <p>Expenditure is considered <b>incurred</b> when the activity that has generated the expenditure (for example the works executed in accordance with the conditions of the contract) has been completed or the services foreseen in a contract have been provided.</p> <p>Supporting documents to the expenditure(s) declared (e.g invoice, contract, take over certificates or confirmation of service delivery - documents indicating the completion of the operation, or any other accounting documents of equivalent probative value, etc) must be issued during the implementation period and demonstrate that the costs have been incurred during the reporting period</p>
36. Is it possible to have a user manual explaining step by step how to upload the information?	Please check, in this respect, sections 2.5, 4.3.2 and 4.3.4 from Annex 5 - Guide on reporting in the eMS.
37. Regarding the timesheets, if the main employment place is 30 hours and for the project itself is 5 hours per month, do we have to indicate all the worked hours or only those regarding the project?	Please note that the template proposed in Annex 3 to PIM, should be followed. The hours worked each day on tasks not related to the BSB Project should be indicated in the timesheet, in order to allow the verification bodies to check that the number of hours in a working day do not exceed the limit specified in relevant national legislation.
38. Are we supposed to provide	Supporting documents (as they are detailed in





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<p>supporting documents for the co-financing part in the interim report?</p>	<p>section 6.5.3 Supporting documents for expenditure verification, from Project Implementation Manual), will be provided and uploaded in the eMS for all the costs paid irrespective of the source of financing, EU funds or co-financing.</p>
<p>39. Is it acceptable to carry out two procurement procedures, while the procurement plan envisaged only one procedure?</p>	<p>In relation to the procurement as separate procedures, please make sure that artificial split of the estimated value of the contract is avoided, as it is one of the most common breaches related to procurements.</p> <p>Also, you should take into account whether there is a need for a modification of the Contract through an addendum or notification.</p> <p>For other information about carrying out several procurement procedures instead of a single one, please check the FAQ on the programme website, section for the beneficiaries of the second call for proposals, subsection public procurement, first question.</p>
<p>40. Regarding the exchange rate fluctuations, would it not be easier to change the exchange rate system in eMS, rather than submitting so many reports and having different approaches to different partners. Beneficiaries from first call are left even without any solution for their losses. Most EC projects are using average exchange rate for the reporting period, which still has difference, but the exchange rate for the day of reporting period is never even close to the real exchange rate used in the project. This is the biggest loss and problem in the program for now.</p>	<p>In order to help the beneficiaries regarding the losses due to the exchange rate differences, Managing Authority has introduced an option as described in the Project Implementation Manual (revision 3) and also in Annex 5 Guide on reporting in the eMS: “as an exception from the normal practice used for reporting expenditure, those beneficiaries who anticipate big losses because of the exchange rate, may consider using the approach described in Annex 5 Guide on Reporting in eMS, section 4.3.2 'List of Expenditures (LoE)' tab - Currencies other than Euro.”</p> <p>This method of reporting at the Inforeuro exchange rate of the month during which the expenditure was submitted for examination is provided by the Grant Contract, by the Programmes’ provisions and also by the EC Regulation no. 897/ 2014.</p> <p>Also, the Decision of using the euro exchange rate of the month during which the expenditure was submitted for examination (option b) of article 67 of the aforementioned Regulation) was jointly taken by all participating countries in BSB JOP.</p> <p>The draft of the Grant Contract was annexed to the Guidelines for Applicants, therefore, all</p>





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QUESTION	ANSWER
	potential beneficiaries have been informed accordingly and the approved requirements of the programme were made available to the large public and the launching of calls, evaluation and selection of application, as well as contracting and implementation processes have been organized in line with these provisions.
41. Can you please guide us on the dates of the reporting steps, if August 2021 is the last month of first interim period for our project for a Project Partner?	For guidance regarding the reporting procedure, we advise you to address the question to your project/financial officer from JTS.
42. In Annex 3 to Instruction 15/ PIM-Annex 5 and Guide on Reporting chap. 4.3.2 there are different lists for attachments. Which one should we follow?	The Indicative list of supporting documents required for expenditure verification included in Annex 3 of PIM is the same with section 6.5.3 Supporting documents for expenditure verification from Project Implementation Manual. In sections 4.3.2., 2.5 and 4.3.4 from Annex 5 Guide on reporting in the eMS are described and mentioned the sections where the respective documents should be uploaded. We recommend to check all the sections mentioned above.
43. In Expenditure Verification section, there is a section for "Internal ref. number". It's an internal number for the Partner or something else?	The "Internal ref. number" from the List of expenditures is the number that the respective document has received in the partner organization (internal number) and is used to make easier the identification of the document.
44. In case we modify (after proper justification) the staff cost per hour in the addendum, the total hours dedicated to the project may be decreased. Is it acceptable?	These situations have to be analyzed on a case-by-case basis, taking into account the information in the Application Form and the justification provided by the beneficiary. Please note, that the acceptance of such a proposal is subject to the rules of eligibility for staff costs and the fact that the number of hours have to be correlated with the activities from the project.
45. We want to clarify some issues on the Addendum on the procurement plan and the following budget line construction. The question is the following, we need to provide changes to the equipment list. The new items (equipment) need consumables. Should it be the single budget line for both the equipment and consumables for it or separate one (subline) with the	Considering the provisions of the Guidelines for Applicants call 2, in the budget line Equipment may be included equipment and "Consumables necessary for the functioning of the equipment". How you structure your budget lines for equipment and consumables depends on how you envisage that the procurement procedure will be organized, are there suppliers that can offer both the equipment and the consumables, does the equipment require to use consumables



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required amount?	manufactured by the same equipment manufacturer, etc
46. In case of a contract with long implementation period (6-7 months, for example), the contractor needed an advance payment to buy required tools or systems to prepare the service. An advance payment assures that no part will renege on a contract. If we don't make an advance payment, we could not motivate the contractors to participate in high amount and long period projects. Is the advance payment allowed?	As long as the advance payment is foreseen in the procurement documents and in the contract and also accepted by the national legislation provisions the advance payment may be declared and introduced in the interim report.

### *Q&A general aspects*

QUESTION	ANSWER
1. Are we supposed to prepare a 3 <sup>rd</sup> Progress Report apart from Interim Report?	For those projects for which the reporting period coincides you will submit only interim report within 3 months after end date of reporting period. The 3 <sup>rd</sup> progress report will be related to the period that will include also the preparation period for the interim report (the 3 months to which we make reference). For example: if the end date of the reporting period for interim report is March, 30, you will submit interim report until June, 29 and the 3 <sup>rd</sup> progress report (for period March, 30 - July, 29 <sup>st</sup> ) will be submitted until August, 30 <sup>th</sup> .
2. Following an approved addendum, should the partner and consolidated reports be re-created (in case some of them had been already created previously), so as all reports are linked to the same (latest) approved version of the AF?	Depends on the changes requested through Notification or addendum. If they include changes related to the reporting period of the interim report, you will have to delete the reports created prior to these changes. If not, then is not necessary to delete the reports. Still, please remember that all changes requested through addendum don't have to be retroactively applied. We also do not recommend submission of addendum during preparation of interim report. Please coordinate all activities (analysis of the necessity to change activities/budget and reporting tasks) in order to ensure an efficient and smooth project implementation. Being involved in making changes in the application form and in drafting the interim



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QUESTION	ANSWER
	report will be challenging. Also, deleting the reports already created will take time for saving first the information already filled in and then recreating the reports. Please be aware of your obligation to follow programme deadlines. Any delay will lead to delays in receiving the second installment and this might affect the financial resources of some partners. Please see also the clarifications provided at Q38 from financial aspects.
3. Is there any online chat system, we all have access, pertaining to admin but also on project technical and strategic issues, we can all use to interact as modern community?	We encourage you to send any technical or strategic issue to JTS officer. We will use this information for improving the programme documents (such as PIM). JTS is periodically updating the section FAQ from the programme website: <a href="https://blacksea-cbc.net/news/archive-news/faq-section-has-been-updated/faq/">https://blacksea-cbc.net/news/archive-news/faq-section-has-been-updated/faq/</a> .