

# Levelling up SCOs

13 June 2022 I Online, Zoom

#### Welcome!



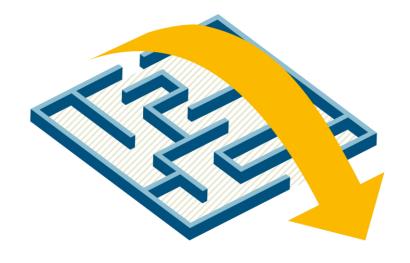
Bernhard



Grzegorz



Iuliia





### **Expectations management**





#### **Format**

12.00 - 16.00 CET - 4 hours

Interaction is a must!

Workshop-style sessions.



### **Draft budget method**

#### Article 53(3)(b) CPR & Article 25(6) Interreg Regulation



Dedicated workshop – Zoom in on the draft budget method

17 June, 09.15 - 12.45

Registration open



#### **Code of conduct**

- Stay 'muted' unless talking
- Interactivity contribute & share (all ideas are welcome!)
- Be open (no recording, no notes of who-said-what)
- Be patient with others
- Questions/contributions in plenary: use Slido,
  - breakout rooms use e-hand/ speak up





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# **Updates in the SCOs community**

What has happened since our last meeting?



# Embedding SCOs in programme documents and procedures

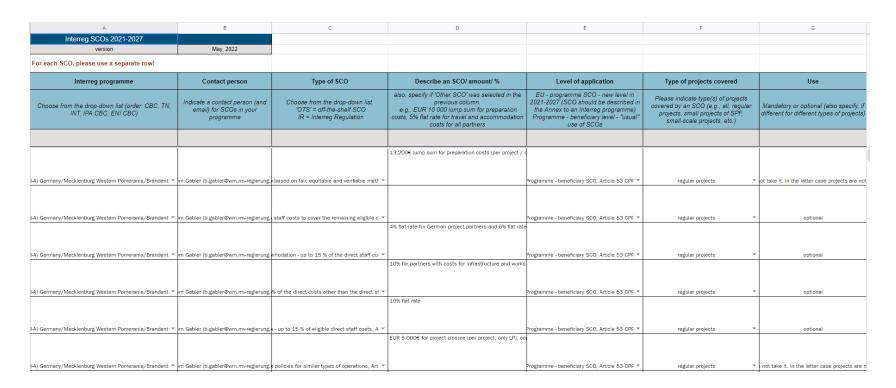
2022/02/23

Procedures/ documents	Summary
Management and control system description	Procedures for verification of SCOs – part of system audit (key requirement 3 & 4, risk-based management verifications)  Proper documentation of the programme-specific SCOs methodologies – in a dedicated document, proposed template (joint slides).
Subsidy Contract, project partnership agreement	HIT working group approach: reference to Programme Manual; if the draft budget method was used – SCOs amounts are part of the SC. For programme-specific SCOs (e.g., a lump sum for preparation/ closure costs) – where an SCO is applied at the project(!) level, it is recommended to include division of a lump sum between partners (incl. shared responsibilities, tasks, amount) as a dedicated annex to the partnership agreement.
Programme manual/ handbook	Take-aways from <u>CB experience</u> : be clear on which SCOs are mandatory; clarity; general principles and information; illustration and separate chapters if one cost category includes both real costs and SCOs; clearly describe what is in/ out/ what the payment trigger is
Guide for controllers	Controllers check only the application of the SCOs! (not the establishment of the method – audit work). Define what controllers should check and what not – different mindset when SCOs are used. <a href="mailto:Tailor-madechecklist">Tailor-madechecklist</a> (part 2) on the application of SCOs.
CP: Appendix 1	<u>Slovenia – Hungary</u> tips on filling in Appendix 1. <u>SFC Manual</u> . <u>SCOs community</u> (mock-up example + guidance).



### **Updates from Interreg community**

# Mapping SCOs for 2021-2027 – Interreg Collection Please provide your input - <u>link to the document</u>





### **Programme-specific SCOs**



- Preparation costs lump sum (programme historical data, expert judgement, survey among lead partners, indexed amounts from 2014-2020, objective/ statistical data)
- Closure lump sum (programme historical data)
- Face-to-face unit cost (programme historical data)
- Project management equipment unit cost (programme historical data)
- Unit cost hourly rates for staff (objective/ statistical data)
- Flat rate for control costs (programme historical data)
- Lump sum for joint models/ processes, strategic plans, feasibility studies (programme historical data)
- Unit cost for targeted training



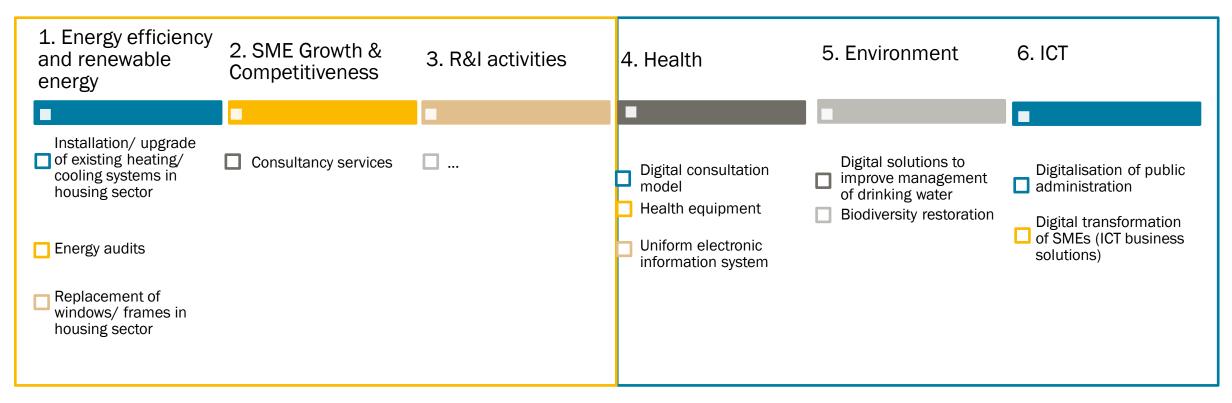


#### **Updates from TN SCOs network**



**EU-level SCOs (Article 94(4) CPR)** 





#### End of 2023 – Delegated Acts ready

These SCOs can be used by all Interreg programmes (Article 53(3)(c) CPR – SCOs from Union policies (similarly to off-the-shelf SCOs – no need to develop a methodology).





SCOs schemes submitted in Appendix 1 – overview per MS (for information) [1/3]

MS	Types of operation	Indicator triggering reimbursement	SCO
BE	<ul> <li>Reinforcement of sustainable attractiveness of defined priority areas</li> <li>Development of research projects and support for acquisition of state of the art equipment</li> </ul>	Hours worked (staff costs)	SSUC
BE	Support to SMEs	further streamlining needed	SSUC
FR	<ul> <li>Energy renovation in social housing</li> <li>Energy renovation in public buildings</li> </ul>	<ul> <li>Social housing supported (number)</li> <li>m<sup>2</sup> renovated surface</li> </ul>	SSUC
FR	Staff costs for several specific objectives & types of operation	Hours worked	SSUC
FR	Energy renovation in social housing	Social housing supported (number)	SSUC
ESP ON	Single ESPON operation – staff costs	total amount of eligible expenditure declared	FLAT RATE
ESP ON	Single ESPON operation- calculation of the costs of an activity of the operation	total amount of     eligible expenditure     declared	FLAT RATE





SCOs schemes submitted in Appendix 1 – overview per MS (for information) [2/3]

MS	Types of operation	Indicator triggering reimbursement	sco
CZ	Energy efficiency measures in building envelope	<ul><li>Wall, roof,floor insulation</li><li>Replacement of fillings in windows/doors</li></ul>	• SSUC
CZ	Improve quality of indoor environment	<ul> <li>External shield installation</li> <li>Modernisation of LED lighting</li> <li>Spatial accoustic solutions</li> </ul>	• SSUC
CZ	Installation of recharging points for electropowered vehicles	Number of charging points	• SSUC
CZ	<ul> <li>Implementation of measures to accumulate and reuse rainwater, infiltration or evaporation of rainwater, treatment of waste water and use of grey water as non- drinking water</li> </ul>	<ul> <li>Storage tank capacity</li> <li>Retention facility capacity</li> <li>Capacity of water treatment plant</li> </ul>	• SSUC
CZ	Administration of aid applications in several fields (water protection, nature conservation etc)	total amount of expenditure declared	• FLAT RATE





SCOs schemes submitted in Appendix 1 – overview per MS (for information) [3/3]

MS	Types of operation	Indicator triggering reimbursement	SCO
CZ	Reduction of primary energy from non RES	Energy savings generated	• SSUC
cz	Installation of forced ventilators with heat recovery	Capacity of the unit	• SSUC
CZ	Installation of heat electricity sources, combined heat and power generation and use of waste heat	Electrical/heat capacity or output of the source	• SSUC
RO	Technological investments in SMEs (industrial modernisation, advanced manufacturing techniques)	Trained SME employees with certified skills	• SSUC
RO	<ul> <li>Trade development/internationalisation/digitalisation of SMEs</li> <li>Incubation, supporting spin off and spin-out societies and start ups</li> <li>Skills development for smart specialisation etc</li> <li>Energy efficiency in SMEs, private housing and public buildings</li> </ul>	To be further clarified	• SSUC • FLAT RATE

### What is in it for Interreg programmes?



#### SCOs schemes submitted in Appendix 1

#### Article 53(3):

(d) in accordance with the rules for the application of corresponding unit costs, lump sums, and flat rates applied under schemes for grants funded entirely by the Member State for a similar type of operation;

#### **EC** interpretation:

- SCOs from MS national schemes to be used within the respective MS but NOT from MS to MS!
- For a similar type of operation similarity to be justified by the MA, no definition of what "similar" is;
- Method to be in place at the moment of copy-pasting;
- Totality of the method, not the result.



### **Article 94 SCOs and Interreg programmes**

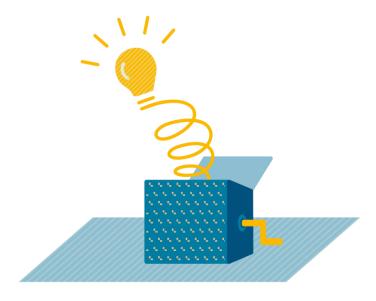
- Possibility to submit SCO schemes for the EC programme level (logical to use at the programme – beneficiary level) with the CP amendment – if not mature enough when submitting the programme;
- Fast-track adoption of the modification request;
- Submitting with the positive AA assessment (mandatory);
- Possibility to discuss SCOs schemes informally with the EC before official submission;
- Possibility to use amounts based on SCOs developed in 2014-2020 with the adaptation of amounts (SCOs – reliable proxy for the real costs);
- SFC 2021 Quick guide





#### You asked ...

#### **SCO**s questions from our mailboxes







1. Can two MSs in one Interreg programme develop two different methodologies for the same SCO (same cost category)?

- In some cases, it is possible BUT a thorough justification/ why's different approaches are used (non-availability of historical data in MSs, existing national schemes, etc.);
- Justification for the equal treatment of beneficiaries;
- Close cooperation with the AA!





2. Case: a programme uses 2 different methodologies for the same type of an SCO in one cost category for different types of beneficiaries. AA is questioning such an approach. Is it eligible?

- 15% off-the-shelf flat rate for travel and accommodation (for certain beneficiaries) + programmespecific flat rate for other beneficiaries;
- No rules in CPR/ Interreg Regulation that would exclude such combination;
- Such approach to be approved by the MC and to be applied for the whole programme;
- Justifications based on objective criteria for such combination equal treatment and no favoring certain beneficiaries over others;
- Differentiated rates should be based on solid underlying data.





3. Within the same call for proposals, can the MA leave it up for the beneficiaries to decide whether or not to use SCOs (e.g., 20% flat rate for staff costs)?

- Yes, MA's decision;
- Project partner level possible that one partner uses a 20% flat rate,
   while the other real costs;
- Selected method should not be changed for the whole project duration;
- Is it simplification? Considerations for the monitoring system, potential errors, etc.





4. If a project partner participates in different projects (potentially different programmes), can it use different methods for reimbursement of the same cost category? (e.g., 20% flat rate for staff in one project, unit costs – different project, real costs – other project).

- Regulations do not prevent this;
- Decision per project, although not a "Chinese wall" avoid double financing, proper arrangements for the checks (both for real costs and SCOs);
- Ideal world Interreg programmes using the same reimbursement method for the same cost category per MS simplification!





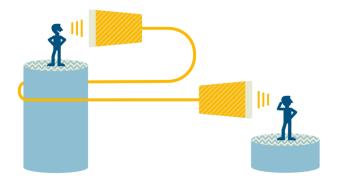
5. Case: A project with a 40% flat rate makes a trip which was not part of the AF. It is included in the partner report, a controller concludes that it has nothing to do with the project's objectives. How to deal with this situation since it is an SCO and underlying expenditure of other than staff costs should not be checked?

- SCOs do not "lift" programme's eligibility rules there are no checks if rules are complied with;
- Checks focus on the staff costs basis costs;
- Correction of costs with the effect on basis costs is only possible with the 40% flat rate –
  otherwise, costs could be ineligible, but there is no mechanism to control it for programmes
  (though could be checked through other checks);
- Remedy: cut staff-related costs to that trip -> reduction in the basis costs -> automatic correction
  of the flat rate amount for other than staff costs.



# Communicating SCOs to beneficiaries in the first calls for proposals

**Sharing experience** 





### HIT eligibility fact sheets

- For 2021-2027
- 6 fact sheets (incl. infrastructure and works)
- Common structure (covering real costs/ SCOs)
- Audit trail for both options

#### **Future plans:**

- Tool Matrix of costs 2021-2027
- Kick-off autumn



Factsheet | Technical assistance in 2021-2027 10/05/2022



HIT | Factsheet Travel and accommodation 05/05/2022



HIT | Factsheet Equipment 05/05/2022



HIT | Factsheet Office and administrative costs

05/05/2022



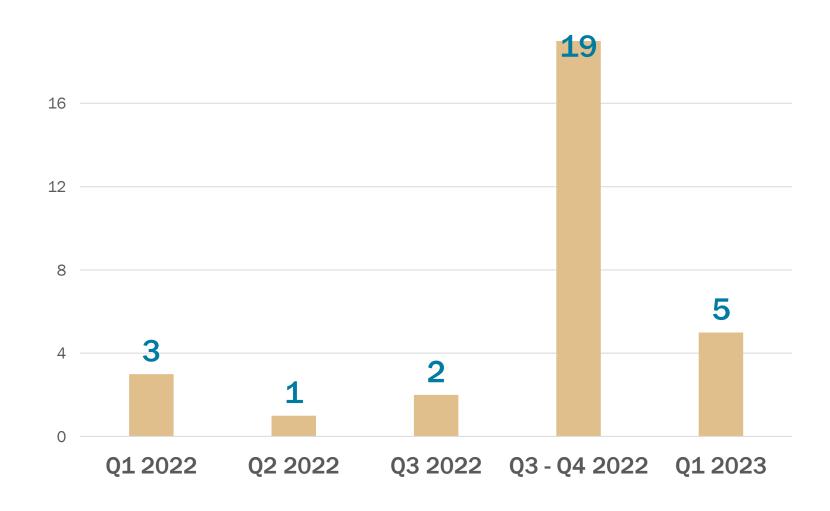
HIT | Factsheet Staff costs 05/05/2022

**Download here!** 



# 1<sup>st</sup> calls for proposals - plans

33 unique Interreg programmes

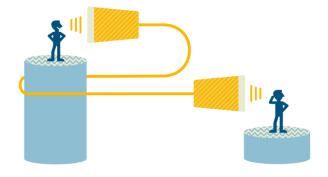




# Sharing experiences with communicating SCOs in the 1<sup>st</sup> calls for proposals

Massimo Caltavuturo, Interreg Euro-MED

Vaclav Kaplan, Interreg BSR





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# Peer-review of programmespecific methodologies for SCOs - Article 53(3)(a) CPR

Let's learn from each other!





### Set-up

- 3 breakout rooms 3 programme-specific SCOs
- 45 minutes
- SCOs presentation followed by feedback, Q&A
- Join the breakout room of your interest
- You can move between rooms if you wish (not recommended)

Click **Breakout Rooms** in your meeting controls.

This will display the list of open breakout rooms created by the host.

Hover your pointer over the number to the right of breakout room you wish to join, click **Join**, then confirm by clicking **Join**.

Repeat as necessary to join other breakout rooms, or click **Leave Room** to return to the main session.

• If you cannot join the breakout room, write in chat to Iris Etter (indicate which room you want to join) – she will help you!

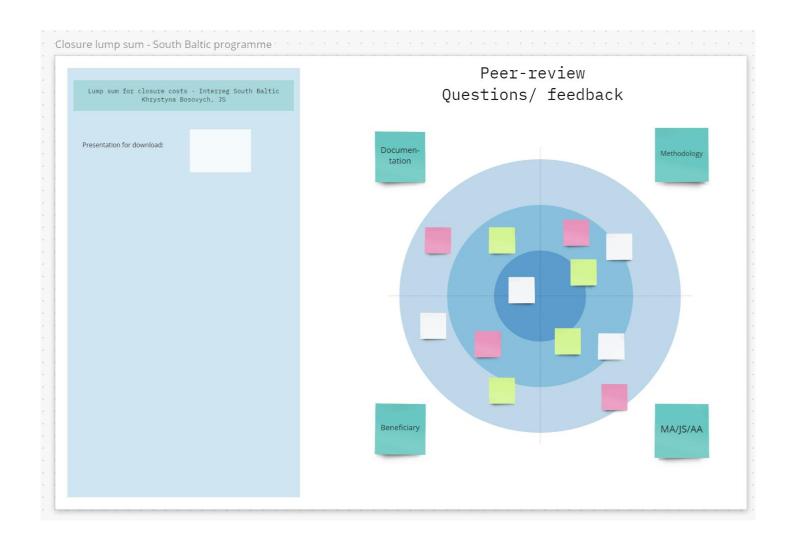


# Set-up

Room 1 – Closure lump sum (SB)

Room 2 – Unit cost for activities with exact number of participants (AT-CZ)

Room 3 – Functional groups unit costs (DE-DK)





# Re-using SCOs from other Interreg programmes

Is it possible? If yes, then how?





### 5 methods to calculate SCOs from CPR - Article 53(3)

- 1. Statistical data, other objective information, expert judgement
  - 2. Verified historical data of individual beneficiaries
- 3. Usual accounting practices of individual beneficiaries.

a. FEV method

b. Draft budget method

Case-by-case!

Total cost of the operation < EUR
200 000 (small-scale projects)

Total costs of project < EUR 100
000 (small projects, SPF)

Union policies – SCOs from Delegated Acts (Article 94(4) CPR + directly managed funds, Horizon Europe) c. SCOs from
Union policies for
similar type of
operations

d. SCOs from national schemes for similar type of operations

SCOs from national schemes – to be used within respective MS, not from one MS to MS!

e. Flat rates/ specific methods established by Regulations

Off-the-shelf SCOs (i.e., flat rates and unit costs, no off-the-shelf lump sums)



### Re-using SCOs from one Interreg programme to another

- It is not possible to use points (c) and/ or (d) Article 53(3) to "copy-paste" SCOs between Interreg programmes!
- Interact is working with the EC on finding potential workarounds to solve the matter asap.

#### Potential solution:

• Using *point* (a) expert judgement Article 53(3) to justify the "fit" of the methodology developed in the context of one Interreg programme to another.





### **Expert judgement method**

- No definitions are provided in Regulations
- The MA needs to specify the requirements for a judgment to qualify as an expert and to ensure that there is no conflict of interest.
- Expert judgement should be based upon:
  - a specific set of criteria and/ or expertise in a specific knowledge area, application or product area, a particular discipline, an industry...;
  - well documented;
  - specific to the particular circumstances of each case.





### **Expert judgement method**

External experts

At the level of the MA

#### Objective:

- to confirm that an SCO(s) used by one Interreg programme is suitable in the context of another Interreg programme:
  - by examining the data, methods used to develop the methodology;
  - to compare with relevant Interreg programme data
- to endorse/ verify data and officially conclude that it can also be applied under other Interreg programme.



# **Expert judgement method MA considered as an expert team**



#### Recommendation:

- to have a dedicated document with justifications of the fit;
- to have the method approved by the MC.



- competence and independence of experts;
- if the method is well documented, coherent and specific to the particular circumstances of each case;
- auditors will review the assumptions during the assessment of the methodology.



# Documentation of the expert judgement method [1/3]

Element	Practical examples
1. Rationale	Description of an SCO(s) to be re-used (e.g., how it was developed, data source, rates/%).
2. Reference to Article 53(3)(a)	FEV method using the expert judgment
3. Criteria for the experts' team	<ul> <li>E.g.:</li> <li>specific knowledge of the EU Cohesion Policy and European Territorial Cooperation (Interreg) context,</li> <li>experience in implementing an Interreg programme,</li> <li>experience in developing programme-specific SCOs (list own programme-specific SCOs),</li> <li>experience in developing SCOs, in particular, unit costs (e.g., the unit cost per participant per day to organise events, the unit cost for management equipment),</li> <li>experience with implementing SCOs (since the 2007-2013 programming period),</li> <li>experience in ongoing cooperation with relevant institutions, stakeholders, and instruments supporting regional development and cross-border/ international cooperation;</li> <li>knowledge of the programme area and its needs.</li> </ul> MA is considered as a team of experts that has the authority to conclude the suitability of the SCO(s) from X Interreg programme for Y Interreg programme.



# Documentation of the expert judgement method [2/3]

<ul><li>4. A conclusion is based on different types of fit:</li><li>a. geographical fit</li></ul>	e.g., TN and CBC – overlapping geography;
b. similarity of projects	<ul> <li>types of projects (e.g., regular projects);</li> <li>budget (ca EUR 1-2 mln);</li> <li>project duration (e.g., 2-3 years for regular projects);</li> <li>Application approach (e.g., 2-step approach);</li> <li>reporting requirements;</li> <li>partnership requirements (e.g., partners from at least 2 MS);</li> <li>cost categories eligible in the projects (5/6 cost categories);</li> <li>similarity of cost categories and their items covered by the SCO(s) (similar activities/descriptions covered by an SCO(s));</li> <li>key characteristics of a project (cooperation nature, joint development, implementation, staffing, financing)</li> </ul>
c. similarity of beneficiaries	Same types of eligible beneficiaries (e.g., national/ regional/ local public authorities, public authorities, bodies governed by public law, and bodies governed by private law)
d. Complementary nature to wider EU strategies/ policies	E.g., programme's objectives aligned with MRS/SBS.
e. methodological fit	Comparison of the SCO(s) rates/% with the Interreg programme's ("borrower") historical data.



### Documentation of the expert judgement method [3/3]

# 5. Justifications for no conflict of interest

The conflict of interests is avoided due to these factors:

- both programmes have their own managing bodies, Monitoring Committees (MC) to which programmes report and that guide programmes work;
- in both cases, the MC has approved the choice of SCOs and the overall methodological approach;
- programmes are scrutinized, monitored and led by a large and independent body (MC);
- separation of tasks of joint secretariats/ managing authorities;
- simplification of work at the level JS/ controllers/ beneficiary the MA gets results and is not involved in the day-to-day work with the projects along the project life cycle (training, assessment, monitoring of implementation, evaluation and closure) and is objective in the management process;
- MA is responsible for the development of the programme-specific SCOs, where it also acts as a team of experts to develop suitable for the programme SCO(s).

#### 6. Reality check

Whether the borrowed SCO fits programme's context

# 7. Conclusions on the fit

#### Based on:

- both are Interreg programmes;
- overlapping geography;
- proven similarity of beneficiaries, projects, types of actions;
- expert judgement of the MA of the Interreg programme (specific knowledge and expertise, **reality check**).

Conclusion on the suitability of SCO from X Interreg programme to be used in Y Interreg programme.





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## **AOB**

**Questions from registration and other topics** 



### Main takeaways from the 2<sup>nd</sup> EC Q&A document [1/2]



Blocks	Main takeaways
Article 94 CPR	<ul> <li>Mandatory use of approved SCOs in Appendix 1</li> <li>Approval of SCOs from Article 94 together with the programme's approval</li> <li>SCOs at the level programme – beneficiary are not approved by the EC (ex-ante assessment of AA is recommended!)</li> </ul>
Set-up/adjustment of methodologies	<ul> <li>Draft budget can be used to establish any SCOs, not only lump sums;</li> <li>Adjustment methods of SCOs methodologies are not considered as modifications of methodology (if documented and justified, e.g., due to inflation, etc.);</li> <li>Proper audit trail on the setting up of SCO methodologies to be ensured (no requirements for it to be digital though) + recording and storing information electronically on each operation (Article 72 CPR, Annex XVII CPR);</li> <li>It is possible to use different SCOs from one call to another (adapted SCOs due to inflation, economic changes, etc.);</li> <li>SCOs should be a reliable proxy for the real costs!</li> <li>Data from planned budgets cannot be used to establish SCOs – reliability cannot be ensured as data is not certified.</li> <li>Similarity of projects – for the MA to assess in a particular case.</li> <li>Programme historical data can be considered as statistical data (Article 53(3)(a) CPR).</li> <li>It is possible to use only part of the national scheme (but totality of the method, geographical fit, similar types of operations, reference to the method and justification).</li> </ul>

<sup>\*</sup>Public procurement and State aid in SCOs + management verifications and audit – a separate document to be prepared by the EC.



### Main takeaways from the 2<sup>nd</sup> EC Q&A document [2/2]

Blocks	Main takeaways		
	<ul> <li>It is possible to combine different data sources in FEV (e.g., expert judgement + other objective info) – a combination is not legally excluded.</li> <li>Adjustments of SCOs (Article 94) should be described when establishing the methodology. Any deviations from the approved SCOs will be considered irregular.</li> </ul>		
Ex-ante assessment of SCOs	<ul> <li>SCOs Article 94 - mandatory assessment by the AA (only positively assessed can be included).</li> <li>SCOs programme-beneficiary level - recommended ex-ante assessment by AA (no legal obligations).</li> <li>If SCOs from 2014-2020 are re-used and in case MA considers their relevance for 2021-2027, AA's assessment can be limited (ensure that methodology is in line with the new legal framework).</li> </ul>		
Audit of SCOs	<ul> <li>EC's checklist from 12/03/2021 + tailor-made for Interreg checklist + template for the AA assessment.</li> <li>Off-the-shelf SCOs – methodologies are not checked (also for TA flat rate).</li> </ul>		
Mandatory use of SCOs	<ul> <li>At the level of operation (small projects for SPF)!</li> <li>Where de minimis is used, SCOs are mandatory (de minimis is NOT State aid)! In cases with Stateaid relevance, SCOs are not mandatory, but optional!</li> <li>If operations below EUR 200 000 total costs are totally procured, the use of SCOs is still mandatory!</li> <li>The obligation of mandatory use of SCOs is at the moment of signature of the SC (if project's budget is reduced to below EUR 200 000/ EUR 100 000 for small projects during assessment, it has to be changed to SCOs).</li> </ul>		





Questions
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## **SCOs** in payment applications to the **EC**



**Annex XXIII – Template for payment applications – Article 91(3)** 

Priori- ty	Calcula -tion basis	Total amount of eligible expenditure incurred by beneficiaries and paid in implementing operations in accordance with point (a) of Article 91(3) and point (c) of Article 91(4)	Total amount of Union contribution pursuant to points (a) and (b) of Article 91(4)	Amount for TA in accordance with point (b) of Article 91(3)	Total amount of public contribution made or to be made in accordance with point (c) of Article 91(3)
	(A)	(B)	(C)	(D)	(E)
Priority 1	Total	Total amount of accepted expenditure at programme level (manual entry): Programme-beneficiary real costs and SCOs from Article 53 (Forms of grants)  Article 91(3)(a) – the total amount of eligible expenditure incurred by beneficiaries & Article 91(4)(c) – SCOs  Real costs + SCOs – programme – beneficiary level	Total amount of SCOs from Articles 94 & 95 (only EU – programme SCOs and FNLC), if relevant.  If same SCOs are used for the level programme – beneficiary, they will appear in column B!  SCOs + FNLC – EC – programme level	Calculated automatically!  (Basis - a sum of column B + C)	Enabling conditions are not applicable to Interreg (Article 1(5) CPR)



## **AOB**

Topics	Comments
Possibility of using off-the-shelf SCOs for management costs in SPF	Under clarification with EC NB: Possible to use for small projects within SPF!
Draft budget method-related questions	Will be tackled at a <u>dedicated event</u> , 17 June
How to communicate SCOs to beneficiaries?	A dedicated event on 8 September
Bi-annual SCOs event in autumn (beginning of November) + findings from audit of SCOs	Physical event





## Wrap up and Closure

What's coming?





#### **Useful resources**

- EC Q&A on SCOs (part 1, part 2)
- <u>EC guidance on SCOs</u> (references for the 2014-2020 period, but concepts are the same)
- Roadmap to a programme-specific SCO in 2021-2027 (incl. template for the description of an SCO)
- Legal references SCOs
- Appendix 1 mock-up example (with points of attention for each part)
- Application, control and audit
- SFC Support Portal Interreg
- HIT Eligibility fact sheets
- NEW: Online course coming during summer



## Stay in touch!



Please fill in our evaluation survey – link in chat!

Thank you in advance for taking the time!



Join our e-Interreg SCOs community

sco@interact-eu.net

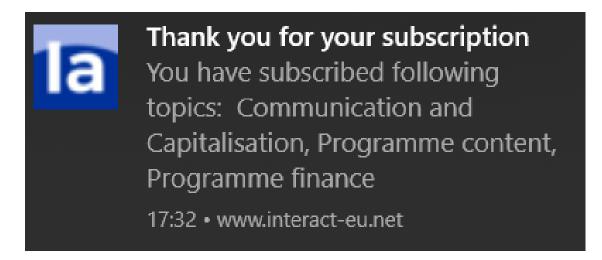


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Following feedback that it is not as easy as it could be to know when Interact has scheduled new events, we have implemented a new tool.

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## Have a nice summer break!

All materials will be available on:

www.interact-eu.net/library





# **Cooperation works**

All materials will be available on:

www.interact-eu.net