RBMV – first experiences in Austria

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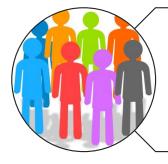
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1. RBMV Methodology Interact Programme



Our RBMV journey in Interact Programme

Timeline - certification Interact Office Vienna

→ First programme to apply RBMV Methodology for the FLC Vienna:

Interact Office Vienna

September:

Certification



- * <u>August</u>: Meeting between FLC and MA to clarify the contradictory passages.
- * Result: No completeness check necessary; no sampling!
- Only items to check: Risky items (staff costs, VAT, public procurement).

Submission of the first Report in June: Read all the documents related to RBMV (read HIT documents).

We found contradictory passages:
Therefore, we did a **completeness check**of all expenditure items **before starting**with control work.

Project partner did not accept that and requested a completeness check only of the sample.



August: Meeting with PP

Our RBMV journey in Interact Programme

Timeline - certification Interact Office Vienna

- \rightarrow IOV is responsible for the **completeness** of the documents.
- → Staff costs of the first two reporting periods are fully checked.
- → Travel costs are not checked anymore.



→ Interact follows the **HIT methodology**: https://interact.eu/about-interact/our-tools/hit



RBMV Methodology in Interact Programme

Methodological guideline // HIT Methodology



For example, page 13 of the *Guidance on the risk-based management verifications for 2021-2027 and HIT methodology:*

(...)

3.2. Approach and general principles

According to the HIT risk-based methodology, management verifications are done by controllers at the level of **each project partner** and **its partner progress report**.

Verification of each partner progress report is composed of a full verification of risky items ("key-item verification"), and items picked up for verification based on the professional judgement of the controller. Apart from the key-items verification and item picked up by the controller based on his professional judgement, a programme can decide to apply a random sampling of the remaining items to supplement verifications.

Full verification of the partner progress report could be justified if the analysis of the programme data suggests that some specific progress reports are riskier (e.g., first progress report, reports with investment items, etc.) than others. Full verification of a report could also result from the errors found by a controller in the verified items if the controller needs to obtain a necessary quality assurance level of the reported expenditure.



RBMV Methodology in Interact Programme

Methodological guideline // HIT Methodology

For example, pages 14-15:

3.3.2. Professional judgement

On top of the full verification of key items, the controller, based on his/her professional judgement (decision-making, analyses, or evaluation based on knowledge, skills,

training, or experience that the controller possesses) can select additional items from the list of expenditures to perform verifications on - provided this is needed to obtain the necessary quality assurance of the partner progress report.

and...

3.3.3. Random sampling

The composition (key-items verification and professional judgement) can be supplemented with random sampling of the remaining (non-risky) items, based on the following sampling principles:





2. Developing our own form to document the RBMV



Developing our own RBMV checklist

				BMV Interact IOV IV - Documentation							
Programme											
File number MA27											
Projectnr. JEMS											
Projectakronym											
Projektpartner											
Reporting period											
Report number											
Amount submitted in total											
Amount real costs											
				Minmu	m Scope of audit						
risky items				 Public procurement for contracting amounts above EUR 10.000 (excl. VAT - unless the threshold set by the applicable national rules is stricter). Staff costs of the first two progress reports where staff costs occur. Furthermore, staff costs of a new staff member included for the first time in the progress partner report, and if significant changes in the staff costs occur (e.g. > 20%) in the time allocation of staff members (if the fixed percentage method is used), or if there are changes in the staff costs methodology (e.g., a change from fixed percentage method to an hourly rate). VAT (for all beneficiaries with total costs of at least EUR 5.000.000, including VAT). 							
total expenditure items (Staff costs= 1 expenditure item)			136	0,00							
risky items			48								
risky items: public procurement 47											
risky items: staff costs			1								
risky items: VAT	risky items: VAT 0			0,00							



Developing our own RBMV checklist

Sample									
Pos.	invoice number	Invoice isuer	Cost category	Amount sumitted	not eligible	eligible	error category	Explanation for drawing the sample	Comments
1	1	хуz	4	€ 12.000,00	0,00	12.000,00	n.a.	mandatory to check - risky item	v
2									
3									

Error categories:

n.a. systematic unspecific

Explanation for drawing the sample:

mandatory to check - risky item

mandatory to check – systematic error

mandatory to check – parked item

Professional judgment

Extension of the sample due to error rate in the original sample



3. Other Programmes & Conclusion



Other Programmes



Interreg Slovakia-Austria Programme

Slovakia – Austria

Before drawing the sample, a **completeness check** must be carried out to ensure that the required documents were uploaded in the appropriate quality (not so in Interact!). Besides the risky items, the controller can choose min. 2 items per cost category.

A checklist for SK FLC and AT FLC for sampling based on the RBMV method is provided by the MA.

A document called "Random number generator" for drawing the sample will be provided as well.



Interreg Slovakia-Austria Programme

	_										
	l		L	L	-				-		
		Control questions			-						
1.	The submitt	ted LDE is the first or the final one.	yes	It is necessary to check all items							
			,	in the LDE.	no	please co	ntinue with	the selection	on of exper	iditures for	verification
	Verification	of the risky items									
\neg				please indicate the reference							
_ I	I DE contain	s expenditure from public procurement with the estimated contract value exceeding EUR	l	numbers of the expenditures to							
2.	10 000,	s experiation from public procurement with the estimated contract value exceeding cox	yes	be verified and please continue							
_ I	10 000,		1								
				in this checklist	no	please co	ntinue with	the selection	on of exper	iditures for	verification
_ I				please verify all expenditure in							
				the cost category "Staff costs" in							
_ I			l	the first two submitted LDEs in							
3.	LDE contain	s declared staff costs (real costs).	yes	which they are declared and in							
				those LDE(s) where there has							
			l	been a change in the cost							
			l	category "Staff costs"							
			l		please continue with the selection of expenditures for veri						
-		The state of the s			no	piease co	ntinue with	the selection	on or exper	iditures for	ventication
4.		partner is entitled to claim VAT from the tax office (for projects with a total project budget	ves	please verify the eligibility of VAT							
		n EUR 5 million).	,	claims	no	please co	ntinue with	the selection	on of exper	ditures for	verification
	Professiona	l judgement									
			l								
			l	indicate the reference numbers							
_ I			l	of expenditures to be verified -							
			l	min. 2 expenditures from each							
5.	Ineligible exp	penditure has been identified in previous LDE(s).	yes	cost category in which ineligible							
			l	expenditures have been							
			l	identified							
			l		no						verification
-				1		prease co	itinge with	the selection	On or exper	dituies for	vermeation
			l								
6.		ed for verification by the FLC control manager based on experience with the Lead		ference numbers of expenditures							
~	partner/Part	tner, problems in project implementation, insufficient quality of the submitted LDE(s) etc.	wit								
			l								
	Error rate de	etected on the verified sample									
		neligible expenditure identified:		- €							
		xpenditure verified:		- •							
		•		#DIV/0!							
tne	error rate to	und in the sample:		#DIV/U:							
		l									
	Extension o	f the sample where ineligible expenditure has been identified									
			I	please indicate the reference	l						
			I	numbers of expenditures to be	l						
7.	The identific	ed ineligible expenditure has common characteristics.	yes	verified - all remaining	I						
				expenditures with the same							
				characteristics							
				Characteristics							
I			T								
I	If the identif	fied ineligible expenditures do not share common characteristics, the extension of the	I	I	I						
	sample shall be determined as follows:			indicate the reference numbers	I						
I	sample shall	and the second s	I	of the expenditure to be verified	I						
l			1	I							
[Sample	Extension of the minimum scope for verifying the submitted expenditures on a real-cost	I	I	l						
8.	error rate	basis	yes	(in case of an error rate of 5-25	I						
	< 5 %	No sample extension required	1	%, please also provide a							
H			1	calculation demonstrating that at							
I		At least 50 % of the value of the expenditures actually declared in the LDE on the real-cost	I	least 50 % of the value of the	I						
∣ !	5 - 25 %	basis must be verified to the full extent	4	expenditure has been verified)							
I		1	I	expenditure has been ventied)	I						
I	> 25 %	100 % of the expenditure in the LDE must be verified to the full extent	I	I	I						
-	> 20 %	200 % or the expenditure in the LDC must be verified to the full extent									
			-		-	-	-		-		



Other Programmes



Interreg Austria-Czechia/ Austria-Hungary

Austria-Czechia:

At least 10 expenditure items and a minimum of **25%** of real costs have to be checked (where the risky items are included!!! The other expenditure items are chosen by the FLC).

If the report consists of less than 10 expenditure items, the controller will do a 100% audit.

Austria-Hungary:

No documents yet.



Conclusion

What's new?

Generally, for all programmes (ATHU, ATCZ, SKAT), the FLC Vienna will do a **content related check** with regard to the achievement of the specified outputs and results, to make sure the incurred costs are justified.

We developed another Excel checklist for this reason.



Questions & discussion

- → Why do not all Programmes use HIT by Interact?
- → Will the risk really be mitigated with RBMV?
- → How is the RBMV method handled in your Programmes?



Thank you!

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Sources

https://interreg.eu/programme/interreg-austria-czech-republic/

https://www.sk-at.eu/de/

https://interreg.eu/programme/interreg-slovenia-austria/

https://interreg.net/

https://interact.eu/about-interact/our-tools/hit

