

# Mapping of methodologies for RBMV – mainstream programmes

Summary from the working group of the TN simplification network

Risk-based management verifications in Interreg/ 28 September 2023

**Interact**



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# Outputs

- Mapping of RBMV practices
- Detailed case reports (administrative and OTS checks)
- Step-by-step roadmap:
  - basic principles;
  - “selling points” for the RBMV approach.



# Working group on risk-based management verifications

- a) Work started on October 2022
- b) 2 meetings: October, February
- c) Task 1: mapping of practices of risk-based management verifications (Dec 2022 – Jan 2023):
- d) 17 MS + 1 (Interact) have developed/ are developing RBMV practices
- e) 5 MS have not started yet
- f) 31 unique practices in the draft map!

# How the risk-based models were developed

- Analysis of data from previous programming periods (AT, DE, EE, HR, LV, LU, PL, SK, INT, FR)
- Working group to determine risk factors based on previous experiences / expert judgment (AT, DE, DK, HU, LT, LV, PL, SK, INT, FR)
- ISA – International Standards of Auditing (SE)
- Data from audits and performance audits (FR)



# Risk factors

PROJECT level	BENEFICIARY level	COST / EXPENDITURE level
nature, complexity, partners / cooperation, duration, its assessment, aid intensity, state aid, who decides funding, changes, fulfilment of indicators, on-the-spot checks, risk of double funding (similar measures from national funds), negative medialisatation, ...	experiences with / of a beneficiary, previous controls / audits, ARACHNE, quality of submitted documents, staff turnover, ...	nature of costs (infrastructure, staff, etc.), amount of expenditures, numbers of items in payment claim, public procurement, ...

+ Focus on indicators of conflict of interests, risk of fraud, risk of leaking PP data/information, breach of anti-money laundering law, breach of regulations on sanctions, etc.

PL – divided SCO into two different groups of risk level – flat rate/lump sum = low risk; unit costs = medium risk

# Risk-based models

- Most of the practices indicate to use the risk-based model on the **level of payment claims**;
- the 2<sup>nd</sup> most common option is the level of **expenditures/ invoices**;

Other models:

- level of the project;
- progress report;
- programming / measure / call.

SCO – mostly included, in some cases, SCOs have been integrated into the model as a risk criterion

# Revision and update of the risk-based models

Based on the results of the management verifications, system audits, and audits of operations

Frequency:

- revision of the RB model will be done annually for the majority of practices;
- some admitted possibility of immediate action if needed;
- AT – every two years and if necessary;
- FR, EE – only if necessary;
- SK – every 3 months.



# Risk-based models – Good practices

- Setting up a working group of experienced control staff and structuring the group's ideas and views in a 'decision tree' (helpful tool to visualise the status of discussions);
- Opinions of all the relevant stakeholders were asked (IBs, ministries, AA);
- Risk factors are defined and calculated by using data available in the IT system / Using as a risk indicator only data available in the information system;
- Assess the effectiveness of the risk system and scope of checks / ensure effective program management in compliance with the principle of proportionality and an appropriate ratio of inputs to results;
- Performing pilot testing on a sample - it can validate the functionality of an RB model / Test the system on the 2014-2020 files;
- Extensive seminars/ training and proper communication of the new approach / Raise the awareness of instructors/ certifiers upstream of the assessment exercise;
- Automated scoring grid.





# Risk-based models – Not-so-good practices

- The size of sampling was questioned by the AA >> the IB carried out a full check;
- In the beginning, the sampling concept was so complicated that the auditors considered a full audit of all supporting documents to be more practicable;
- Increased risk of possible irregular procurement expenditure/payment claims that are not checked and represent a potential risk of increasing the annual error rate above 2%;
- We did not consider the need for training for project managers on RBMV and, therefore, we currently have a little delay in the introduction of the RB model;
- When the MA develops a single methodology for a program that covers several MS, it is important that these MS back up the methodology (for Interreg programmes).



# Risk-based models – Tools

- For the majority of practices: the RBMV system is implemented through MS excel sheets with no integration with the IT system;
- HU - A special function for risk assessment was designed in the IT system;
- DK - Data collected from projects via online reporting in a dedicated IT system (PRV), data from the company register, and data from tax authorities;
- DE - The risk assessment uses data from the AA and data of the administrative verifications carried out by the IB or MA available in the IT system (ERDF-DATA);
- LV – the risk system will be integrated into the management information system;
- SE - All handling takes place in the IT system;
- FR - Integration with the national European program management information (in progress);
- Interact – Further developing Jems.



# Risk-based models – Automization

- No automization (yet) - approx. 40% of the practices;
- Partial automatization - approx. 55% of the practices, e.g.:
  - A rating tool has been developed with automatic calculation functions and graphical representation in the form of radar to highlight the risks to be controlled or not;
  - mostly automatized, except the “final assessment”;
  - some risk factors are automated, others appear more difficult;
  - data entry is manual, but the risk index is calculated automatically
  - risk factors for the calls are chosen by the MA, otherwise, the system is fully automated

The process will be fully automated – approx. 5% of the practices



# Case report – RBMV in Slovakia

- No automatization (yet) - approx. 40% of the practices;
- 3 separate RB models for administrative controls (AC), for public procurement controls (PP), and for on-the-spot controls (OTSC):
  - 26 risk factors for AC; 10 risk factors for PP + 4 risk factors for amendments of the contract in PP
- 5 risk factors for OTSC

## State of play:

- ✓ After the testing on different projects implemented via various MAs on the data provided by the IT system for EU funds in Slovakia (ITMS2014+)
- ✓ Guidance Note of CCB on RB administrative control was issued in autumn 2022
- ✓ Unfortunately the trainings were delayed, but in the last month the first rounds of trainings have started – 6 trainings so far
- ✓ First MA/IB to use it in „training mode“
- ✓ Improving the verification part of the model



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# Case report – RBMV in Hungary

- A pool of 41 risk factors, risk factors are questions, if the answer is "yes", the factor is risky;
- 10-15 risk factors are used for each call (5 are "permanent")
- SUPER risk factor: #13 Was an irregularity related to the beneficiary in any programmes of the programming periods 2014-2020, 2021-2027 detected within 3 years with the consequence of the MA reducing the project budget?
- MAs can vary "changing parameters" in certain risk factors

State of play:

- ✓ the risk assessment function in the IT system was launched in January 2023
- ✓ there are calls in 2 programmes where the risk assessment function could be used
- ✓ the MA for Regional and Territorial Development Programme is testing the risk factors and the function "live" in a call for infrastructure developments of child-care institutions.



# Cooperation works

All materials will be available on:  
[Interact website/ Library](#)