

Project Closure Manual

COOPERATION PROGRAMME INTERREG V A

GREECE – BULGARIA 2014-2020

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Table of Contents

1. PROJECT CLOSURE PROCEDURES	3
1.1. FINAL PROJECT REPORT	3
1.2. SUMMARY TABLE OF FINAL PROJECT REPORTING	3
2. MAIN PHASES IN THE PROJECT CLOSURE PROCESS	5
3. SPECIFICATIONS REGARDING THE ELIGIBILITY OF EXPENDITURE	6
4. SUSTAINABILITY/DURABILITY	7
5. OWNERSHIP OF THE PROJECT OUTPUTS	7
6. STORAGE OF PROJECT DOCUMENTS AND ACCOUNTING RECORDS	8
7. RETENTION OF PROJECT DOCUMENTS	9
8. ANNEX 1: BANK ACCOUNTS FOR RETURNING AMOUNTS (GREEK PBS)	11

1. Project Closure Procedures

At the end of the project implementation, several obligations arising from the Programme, the EU and the national legislation still apply.

1.1. Final Project Report

After finalisation of the project's activities, the Lead Beneficiary (LB) must submit a Final Project Report (standard form provided)¹ to the Managing Authority (MA)/ Joint Secretariat (JS) **not later than two (2) months from the date of the final verification**, giving a qualitative summary of the project implementation as a whole.

The Final Project Report is completed by the LB in collaboration with all PBs and its main objective is to provide the most representative information on the implementation of the project as related to both, physical activities performed and financial resources used. This report should provide an overview of the project's activities and achievements. It should also highlight how cross-border/territorial cooperation has contributed to attain the expected results and should include a detailed description of the measures foreseen in order to ensure their durability. In addition, it should contain financial information about all verified and/or certified expenditures.

The Final Project Report shall contain:

- report detailing all project activities, achievement of outputs and results, deliverables produced;
- financial reporting regarding all project certified expenditure, including those related to activities of the last reporting period;
- relevant attachments such as communication and publicity documents.

The Final Project Report must be filled in in English, using the template and it has to be submitted to the JS electronically, via uploading on the MIS (<https://logon.ops.gr/>) attached to the AF for Project Completion (see section 2 below).

1.2. Summary table of final project reporting

The table below shows the different steps during the project closure period:

Timeline of final project reporting			
	Closure Period		
Activity/ Deliverable	Final payments	Final verifications	Final Project Report
Reporting period	Preferably up to six (6) months <u>from the end date of the project²</u> and obligatorily by the 31/12/2023		Up to two (2) months from the date of the final verification(s)

¹ Template available at the Programme website

² Please note that this duration is highly recommended to be adhered by the PBs

Timeline of final project reporting			
	Closure Period		
Reporting of eligible costs	<p>Payment of costs (including costs related to the elaboration and submission of the Final Project Report and to the project administrative closure activities and the final verification fee).</p> <p>All core activities expenses should be invoiced before the end date of the project. Closure activities expenses, including the final verification fee can in any way be invoiced after the end date of the project.³</p>	<p>Verification of all expenditure. Strongly recommended by 31.12.2023</p>	<p>Reporting of all expenditure incurred paid out and verified.</p>
Reporting of activities			<p>Giving a qualitative summary of the project as a whole and detailing all project activities, achievement of outputs and results, deliverables produced. The financial data of the Final Project Report should also include the final verification fee.</p>

Please note that the respect of payment timelines is preferable for each Project Beneficiary (PB) and the FLCs. However, the Final Project Report should be submitted up to two months from the final verification(s).

³ All expenses, including the final verification fee, must be paid out by the 31st of December 2023 the latest in order to be eligible by the Programme. Accordingly, the FLC contract must be in force by that date, otherwise the cost of the verification will be covered by own means (by the PB).

2. Main Phases in the Project Closure Process

The Lead Beneficiaries should fulfil the following steps with the completion of all verifications:

- **1st Phase - Submission via MIS:**

During the closure of the project the LB submits the Last **Progress Report**⁴ (for the last reporting period) selecting on the MIS in Section A, field "Is the project completed" the option Yes".

The JS/MA examines and approves on MIS the last Progress Report of the project.

Then the LB submits the Application Form (AF) for Project Completion (Final AF) on MIS, which states all information related to the final data of the project implementation in both, physical and financial terms. The Final Project Report⁵ should be attached to the AF for Project Completion on the MIS.

Conditions for submission of AF for Project Completion by the LB:

- The Last Progress Report of the project is approved by the JS/MA,
- The total amount of the verified expenditures for all project beneficiaries is at least in the status "APPROVED",
- There are no pending reports by the FLC or 2nd LC, for the whole partnership,
- there are no 'open recommendations'

Along with the main documents described above, the LB submits at minimum a comprehensive list of all deliverables per beneficiary, which has to be acknowledged by the JS. Core deliverables have to be available at any time, therefore they must be stored electronically (drive folder with open access and/or otherwise i.e. on the project website) and attached (copy the drive link) in the relevant field of the AF, concerning communication and publicity.

- **2nd Phase:**

Examination by the MA/JS of the Final AF⁶ and the Final Project Report

The above documents submitted by the LB via the MIS are subject to thorough examination by the MA/JS to ensure that the final data, in both physical and financial terms, have been precisely described and clearly depicted. Special attention will be focused on the following:

1. The final budget of the project in the AF for Project Completion **should not incorporate any corrections from audit findings neither any ineligible**

⁴ Please refer to the MIS Closure Manual for PBs for more details on how to insert the Last Progress Report on MIS.

⁵ Template is available on the Programme website. Please make sure that you use the last version in force. Attachment category will be "Final Project Report"

⁶ Please refer to the MIS Closure Manual for PBs for more details on how to insert the final AF (AF for Project Completion) on MIS.

amounts from FLC verifications⁷. Assuming, for example, that in a project with total expenses, as defined above, of 150.300 € a correction has been imposed, as a result of an Audit Authority control, amounting to 50.000 €, then, total final budget in the AF for Project Completion should be equal to 150.300 €. The MA/JS, might request from the LB correction of the documents if needed.

2. Following the examination of the documents and, especially, for the acceptance of the total final budget, the MA/JS should, on the basis of the analytical list of projects of each payment claim, satisfy itself that no payment suspensions by the Certifying Authority, are in effect. In case a suspension is in effect, no further action can be taken without settling first that pending issue, through the collaboration of the MA/JS with the Certifying Authority.
3. According to the Management and Control System (MCS) of the programme, “on the spot verifications” are to be carried out throughout its implementation period and/or after completion. The MA/ JS must satisfy itself that the MCS clause has been fulfilled.
4. The national co-financing funds of all project beneficiaries should be balanced according to the project’s certified costs in the MCS.
5. The MA shall issue a decision for recovery of EU contribution at any point, even after the closure of the project.

- **3rd Phase: Communication to the LB of the Completion Decision**

Upon completion of the 2nd Phase and the subsequent acceptance of the correctness of the data provided by the LB, the MA/JS will issue a relative decision (Completion Decision) through the MIS to the LB, which signifies the administrative end of the project. The Completion Decision is addressed to the LB and is, at the same time, copied to the Certifying Authority, the Audit Authority, and the competent National Authorities.

3. Specifications regarding the eligibility of expenditure

- When the final payment to the First Level Controller is concluded, the PB inputs the appropriate expenditure documentation on MIS. The First Level Controller verifies this last expenditure without any additional fee;
- The bank charges for the transfer of the final EU contribution reimbursement will **not** be eligible;
- Non-conformity with the Call for Proposals thresholds at project closure may be accepted;
- In all of the above cases, the LB will have the obligation to incorporate the respective information into the Final Project Report, and Final AF, while no modification of the Partnership Agreement and the Subsidy Contract is required;
- Expenditure incurred by a PB after the submission of the Final AF by the LB to the MA/JS, is ineligible;
- If, no later than the closure of the Programme, the project is identified as revenue-generating, the MA is entitled to ask for a refund to the Programme in proportion to the public contribution granted. Should a cost benefit analysis is required, this will be made before the closure of the project and at the PB’s expense unless otherwise indicated in their respective budget;

⁷ The project final budget equals to the total eligible verified amount during the FLC.

- Before the issuance of the Completion Decision, Greek Beneficiaries should have completed all necessary administrative steps in order to balance the payments of the Public Investment Programme with the certified amounts of their expenditure. They are obliged to return to the Public Investment Programme any amounts not spent within the framework of the project or any amounts that have been deemed ineligible. (Please see Annex 1). Should this be the case, all project beneficiaries have to settle the national co-financing received according to the certified project's costs.
- Procedures which are defined in the Hellenic Joint Ministerial Decision (JMD) concerning the financial corrections will be followed (if it is applicable).
- For FLC purposes minor changes between the budget categories might take place at the end of the projects. The beneficiary should have the agreement of the Managing Authority for that changes which should be made before the finalization of the Final Project Report of the project.

4. Sustainability/Durability

In the Final Project Report the LB should describe how the deliverables of the proposed project will be used. For example, in the case of infrastructure projects, where maintenance and operation are required, the existence of relevant bodies/ structures/ operating mechanisms should be indicated or the necessary actions in a specific timetable should be foreseen, to ensure maintenance and durability of operation. In the case of projects which do not require subsequent operation, the way that the results will be further used should be explained.

Where appropriate and depending on the type of actions the MA/JS may request the necessary evidence needed to ensure the functionality and viability of the sustainability of the project. In the closure of the project, the partnership must ensure the viability of the project results by taking the necessary administrative decisions, if they have not yet been taken. At the same time the continuous functionality of the project results must be ensured.

An operation comprising investment in infrastructure or productive investment shall repay the contribution from the ESI Funds if within five years of the final payment to the beneficiary or within the period of time set out in State Aid rules, where applicable, it is subject to any of the following: (a) a cessation or relocation of a productive activity outside the programme area; (b) a change in ownership of an item of infrastructure which gives to a firm or a public body an undue advantage; (c) a substantial change affecting its nature, objectives or implementation conditions which would result in undermining its original objectives. Sums unduly paid in respect of the operation shall be recovered by the Member State in proportion to the period for which the requirements have not been fulfilled (Article 71 of the REGULATION (EU) No 1303/2013). The Partnership should commit to this in Paragraph 3 of the Final Project Report.

5. Ownership of the project outputs

According to the Subsidy Contract, the partnership is the owner of any intellectual and industrial property rights on the project's results, reports, deliverables and other documents in their entirety. The proofs of transfer of user rights, if applicable, shall be annexed to the Final Project Report.

The MA reserves the right to use any of the above for information and communication in respect of the Programme. In case there are pre-existing intellectual and industrial property rights, which are made available to the project, these are fully respected.

Following the provisions of the rules, the publication of information by the Programme Management Structures, or National Authorities, or the European Commission, in order to guarantee their widespread publicity and to make them available to the public, may not be

considered as a breach of industrial and intellectual property rights or a breach of confidentiality clause if the publication does not affect the PBs corporate secrets.

The produced outputs of the project cannot be transferred or be substantially modified within five years of the final payment to the PB (Art.71, CPR No 1303/2013).

The project must not undergo any substantial change, such as:

- cessation or relocation of a productive activity outside the programme area;
- a change in ownership of an item of infrastructure which gives to a firm or a public body an undue advantage;
- a substantial change affecting its nature, objectives or implementation conditions which would result in undermining its original objectives.

If any of the above conditions cannot be met by any of the PBs, the MA must be informed without delay. This might imply a recovery of funds unduly paid.

The LB shall ensure that all products developed within the framework of the project are, subject to the provisions of national laws regarding intellectual property, kept free of all rights. The project partnership explicitly commits to giving up all copyright on teaching material, methodologies and other products of any nature resulting from the project.

6. Storage of project documents and accounting records

All accounting and supporting documents (Project Application Form, Subsidy Contract, reports, service contracts, public procurement documentation, rental contracts, important communication among PBs and between the PBs and the Programme Authorities as well as documents required to ensure an adequate audit trail, documents related to expenditure as original invoices and control and audit reports, etc.) must be available and accessible for a period of three (3) years from 31 December following the submission of the accounts in which the expenditure of the operation is included (according to Art. 140 of the CPR No 1303/2013), unless stricter national rules state a later date. The MA shall inform PB of the start date of the period.

Official documents related directly to the communication with the Programme Authorities shall be archived by the LB, whilst the reporting and supporting documents related to the PBs must be kept at the PB's premises for an equal period of time. The documents can be kept either in the form of original copies or in a version in conformity with the original, as commonly accepted data carriers. The procedure for the certification of the conformity of these documents held on data carriers with the original documents must be in line with the provisions set by the national authorities and shall ensure that these versions comply with the national legal requirements and can be relied on for audit and control purposes.

In case of retaining the documents electronically, internationally accepted security standards must be met.

Representatives of the MA, JS, National Authorities, First Level Control, Certifying Authority, Audit Authority, authorized officials of the EU and their authorized representatives, European Commission and the European Court of Auditors are entitled to examine the project, all relevant documentation and accounts of the project also after its closure.

7. Retention of project documents

The following documents have to be retained as the project's audit trail:

S/N	Document	Lead Beneficiary	Project Beneficiary
1	Application Forms	Copy either original hardcopy or generated by MIS	Copy generated by MIS
2	Partnership Agreement (and its amendments)	Original	Original
3	Subsidy Contract (and its amendments)	Original or electronic version	Copy
4	Project Progress Reports	Copy either original hardcopy or generated by MIS	Not relevant
7	Certificate of Verified Expenditure	Print out version by the MIS	Print out version by the MIS
8	Each invoice and accounting document of probative value related to project expenditure (originals to be retained at the premises of the project Beneficiary concerned)	Only LB's invoices	Only PB's invoices
9	All supporting documents related to project expenditure (e.g. payslips, bank statements, public procurement documents, other documents etc.) to be retained at the premises of the project Beneficiary concerned	Only the supporting documents of the LB	Only the supporting documents of the PB
10	If relevant, documentation related to on-the-spot checks of the Controllers (to be retained at the premises of the project Beneficiary concerned)	Only LB's on the spot check documentation	Only PB's on the spot check documentation
11	If relevant, documentation of monitoring visits of the MA/JS	Original or Copy as in Programme practice	Original or Copy as in Programme practice
12	If relevant, audit reports	All audit reports, LB audit report in original, all other reports in copy	PBs audit report in original
13	Final Project Report	Copy of the attachment in the MIS	Copy of the attachment in the MIS

Control after project closure

The EU and Programme regulations indicate the open-to-control period after the project is closed. Key factors, related to being prepared for control after project closure, are indicated below:

- Project closure and the open-to-control period, of three (3) years from 31 December following the submission of the accounts in which the expenditure of the operation is included (according to Art. 140 of the CPR Regulation), or longer if foreseen at national level, require **preparation from the start** of project implementation;
- The **institutions and organisations** acting as Project Beneficiaries should **understand their obligations** during the open-to-control period, regardless of the continuity of the staff assigned to the project, especially in terms of the access to documents, information systems and infrastructure and equipment financed by the project;
- The **original documents** and the **computerised systems** need to be **easily accessible** during the open-to-control period. If the period for retention of documents and computerised records required by the national rules or the organisation's usual practice is less than the open-to-control period, ad-hoc adequate procedures have to be designed and implemented at the beginning of the project;
- **Web-sites** and any **internet-based** tools have to be **stored locally** to be able to show them in case of a control. A log of the evolution of web-sites and adequate local back-up systems have to be required from developers;
- In cases where the use of **infrastructure** or **equipment** property is transferred after the project closes⁸, the agreement with the recipient has to include the **right of access** during the open-to-control period. All technical documentation and photographs should be kept in the project archives (as needed, copies of the technical documents can be given to the owners of the equipment or infrastructure). Ownership remains with the PB. The MA/ JS must be notified accordingly;
- Any **equipment** at the end of its useful life for example, obsolete computers, needs to be **removed from** the organisation's **inventory** following adequate recorded procedures which have to be archived with the project documents, even after project closure;
- **Technical documentation** must include all supporting documents and photographs **proving all the activities** financed during project implementation, both tangible and intangible;
- **Financial documentation** must be accessible in its original form or equivalent according to national law and must include **proof of delivery of services and supplies**;
- The Lead Beneficiary and Project Beneficiaries must agree to nominate a **contact person during the open-to-control-period** with adequate knowledge of the project, its content, its archives and computer systems and records.

The actual duration of a project goes much longer than its implementation period.

Overall, before formally closing the project, Project Beneficiaries must ensure that:

- **Each Beneficiary's organisation is aware of the obligations** (not just those involved in project implementation) during the open-to-control period. A future control may need to be facilitated by someone even if without any knowledge of the project.
- **A communication line is kept among all project beneficiaries** during the open-to-control period. Even if it is written in the Partnership Agreement, any Beneficiary

⁸ The stipulations of Articles 61 and 71 of the Regulation(EU) No 1303/2013 should be kept

should check how this is going to work in practice in order to keep regular contact among them and with the Lead Beneficiary.

- **PBs should review the project documentation** (all of it) and verify that it is organised in a way that anyone with no knowledge of the project can ensure a smooth control by the relevant bodies.

8. Annex 1: Bank accounts for returning amounts (Greek PBs)

The bank account in the Bank of Greece that will be used for the cases mentioned below

1. Greek Project Beneficiaries that will return the non-eligible amounts from FLC
2. Greek Project Beneficiaries that will return the amounts received by PIP (PDE) and have them in commercial banks
3. Greek Project Beneficiaries that will return the amounts from interest in accounts in commercial banks

is the following:

23/3100100000231000

231- Αδιάθετα Υπόλοιπα Νομικών Προσώπων –IBAN GR 8501000233100100000231000

Non-Greek beneficiaries shall return non-eligible amounts to the Programme bank account indicated by the MA/ JS.