

Checklist for project control

(the list can be extended by the auditor)

Project number	Grant Contract number, e.g. PLBU.01.01.00-20-0123/17-00; Addendum number (if applicable), e.g. PLBU.01.01.00-20-0123/17-01	
Project title		
Name and address of the beneficiary		
Role in the project	<input type="checkbox"/> Lead Beneficiary	<input type="checkbox"/> Project Beneficiary
First and last name of the auditor		
Name and address of the auditing entity		
Phone number/e-mail address of the auditor		
Report number	Report number complies with the number of Request for payment 1st financial report, e.g. PLBU.01.01.00-20-0123/17-<u>002-01</u> Final report, e.g. PLBU.01.01.00-20-0123/17-<u>003-01</u>	
Reporting period	The reporting period is stipulated in the §16 of the Grant Contract. In duly justified cases on the request of the LB, prolongation of the reporting period could be agreed by the JTS. The reporting period is indicated in the pre-filled form of a financial report (part “list of expenditures”), which is sent by the JTS to the LB.	
Amount of reported expenditure	Total amount of reported costs	
Amount of certified expenditure	Total amount of costs considered as eligible by the auditor/ amount certified by the Auditor – inserted in Annex No. 2 Auditor's Certificate	
Type of control	On-desk control <input type="checkbox"/>	On-the-spot control <input type="checkbox"/>



	Verification of the report on the basis of certified copies provided by the beneficiary	Verification at the beneficiary's office on the basis of original documents	
Date of the on-the-spot control	<i>Place</i> To be filled in in case of the on-the-spot control. Otherwise – N/A.	<i>Date</i> To be filled in in case of the on-the-spot control. Otherwise – N/A.	
Final project control	YES <input type="checkbox"/>	NO <input type="checkbox"/>	
Control of fixed assets with a value equal to or greater than 5 000 EUR gross	YES <input type="checkbox"/> The administrative verification on-the-spot/at the beneficiary's office is obligatory in case of purchase of fixed assets by the beneficiary for the value equal to or higher than 5000 EUR gross. This type of verification should be carried out till the end of the project implementation, before the final report submission. During the on-the-spot control auditor verifies ALL expenditure incurred in the reporting period (+sample from the previously approved report) and not only costs related to a fixed asset with a value equal to or greater than 5 000 EUR gross.	NO <input type="checkbox"/>	
Description of the identified shortcomings, stipulations, irregularities	<i>Describe problems, shortcomings, non-eligible costs, which were found during control</i>		
Description of conclusions and recommendations	Please, indicate steps taken to resolve detected errors, shortcomings or irregularities. Point out recommendations to avoid similar errors in the future.		
Thematic modules of the checklist used during control, concerning the specifics of the given project and the scope of control	Controlled area	Yes	Not applicable
	1. Control of the activities planned in the project	<input type="checkbox"/>	<input type="checkbox"/>
	2. Control of achievement of indicators	<input type="checkbox"/>	<input type="checkbox"/>
	3. Control of accounting records	<input type="checkbox"/>	<input type="checkbox"/>

Expenditure verification:			
4.	Expenditure relating to the category – STAFF COSTS	<input type="checkbox"/>	<input type="checkbox"/>
5.	Expenditure relating to the category – TRAVEL AND SUBSISTENCE COSTS	<input type="checkbox"/>	<input type="checkbox"/>
6.	Expenditure relating to the category – EQUIPMENT AND SUPPLIES	<input type="checkbox"/>	<input type="checkbox"/>
7.	Expenditure relating to the category – SERVICES	<input type="checkbox"/>	<input type="checkbox"/>
8.	Expenditure relating to the category – INFRASTRUCTURE COMPONENT	<input type="checkbox"/>	<input type="checkbox"/>
9.	Expenditure relating to the category – ADMINISTRATIVE COSTS	<input type="checkbox"/>	<input type="checkbox"/>
10.	Control of compliance with the information and visibility requirements	<input type="checkbox"/>	<input type="checkbox"/>
11.	Control of public procurement procedures	<input type="checkbox"/> <i>If YES, please attach to this checklist, a Checklist of public procurement</i>	<input type="checkbox"/>

Thematic modules of the checklist:

1. General:

No.	Question	Yes/No Not applicable	Remarks/Comments
1	Was the report prepared on the proper form and signed by persons authorized to represent the beneficiary?		GENERAL NOTE: Answers to each question in the checklist should be YES, NO, N / A.

			In case the answer is N / A, there should always be a comment provided (explanation, justification).
2	Is the paper version of the report compatible with the electronic version of the report?		
3	Was the reporting period properly indicated? (Was continuity ensured, while not overlapping the period for which the previous request for payment had been made?)		<p>If the Lead Beneficiary is not able to deliver the required reports in set deadlines, the Lead Beneficiary is obliged to submit a formal request (an official letter) to the JTS together with the explanation of reasons of delay and information on the possible date of reports submission. This letter shall be submitted before the deadlines set for sending particular reports.</p> <p>The JTS informs the Lead Beneficiary in writing on whether the deadline is extended or not.</p> <p>In case of not submitting reports within the deadline/extended deadline approved by the JTS - <u>lump sums for staff costs are ineligible.</u></p>
4	Was all necessary project documentation (Grant Contract with relevant Addenda including all annexes, Partnership Agreement, etc.) made available to the auditor?		In order to correctly certify declared costs auditor needs to be acquainted with the rules and provisions applicable in the institution. Therefore, within the first report, certified copies of the internal regulations (e.g. concerning remunerations, public procurement, etc.), approved accountancy Policy as well as accountancy plan need to be provided as the auditor has to make conclusions regarding clear identification of the costs allocated to the project.
5	Is the report correct in terms of arithmetic rules?		
6	<p><i>(In cases where the expenditure is not settled exclusively within the project)</i></p> <p>Was the eligibility level of the project's expenditure properly calculated according to a reasonable, transparent, verifiable and objective methodology for allocating costs to the project?</p>		<p>N/A - if all confirmed costs are paid exclusively within the project</p> <p>or</p> <p>Yes – in case of shared costs providing comments on methodology for allocating costs to the project.</p>
7	Was the value of expenditure converted to euro using the correct rates in accordance with the Programme rules?		<p><i>Please specify the currency used.</i></p> <p>Please enter the currencies used in the report. No need to enter all ex-change rates.</p>
8	Was the expenditure reported in the relevant budget lines?		Each budget cost (e.g. 3.1.1.2) should be examined.

9	Was not the project budget exceeded, including the particular categories of expenditure?		The answer confirming that the budget has not been exceeded is "YES". Each budget cost (e.g. 3.1.1.2) should be examined.
10	If the beneficiary exceeds the project budget or a budget line, was the change appropriately agreed with the lead beneficiary and the JTS, or the addendum to the grant contract was signed?		In case of correct situation, the answer will be N/A as each change agreed with the JTS results in a change of a budget. If there are overruns on budget items, it means that the change has not been agreed / correctly implemented. The auditor should provide comments and deduct exceeded costs as ineligible expenditure.
11	Did the beneficiary of the project receive the payment from the lead beneficiary, as agreed in the Partnership Agreement and in the Grant Contract?		<i>Please indicate the date of receipt of payment and the amount (in line with information in the Certificate).</i> N/A – in case of a Lead Beneficiary.
12	Were all expenditures foreseen in the Grant Contract and its annexes and are necessary for the implementation of the project?		
13	Was there any evidence that the adequacy of expenditure is not ensured, i.e. expenditure incurred are reasonable, justified, and comply with the requirements of sound financial management, in particular regarding economy and efficiency.		<i>/in case of expenditures of Polish beneficiaries equal or lower than 50 000 PLN the auditor shall describe on what base he or she has declared that the expenditure had been incurred reasonably, in justified way, and comply with the requirements of sound financial management, in particular regarding economy and efficiency. e.g. based on analysis on the market prices, etc./</i> NO – in case the adequacy of expenditure is ensured. YES – in case the evidence that the adequacy of expenditure is not ensured has been detected. Situation should be described in detail.
14	Were any public contracts of the project significantly diverging from the market prices?		The question applies to all contracts concluded under the project. Regardless of the amount, it should be examined whether the contract has been concluded by applying the appropriate rules for the selection of the contractor.
15	Were expenditure incurred during the Project implementation period? (It does not apply to the costs of preparation and closing of the Project, if – in accordance to the Programme rules – they may be incurred outside the project implementation period)		

16	<p>Were expenditures incurred during the same period which the request for payment is covering?</p> <p>/if NOT/</p> <p>Is it justified to refund expenditure incurred before or after the period indicated in the request for payment?</p>		<p>In case the answer is NO, auditor should provide comment what kind of expenditure incurred and why it is eligible.</p>
17	<p>/if applicable/</p> <p>Were the preparatory costs for the infrastructure component incurred by the beneficiary during the eligibility period and in line with the Programme rules?</p>		<p>N/A – no preparatory costs for the infrastructure component in the report;</p> <p>YES – costs incurred and paid after the date of Concept Note submission and were directly related to the infrastructure component as described in the project. Date when costs have been incurred and paid should be provided in the comment.</p> <p>NO – comment should be provided which of the above eligibility requirements have not been fulfilled. Amount deducted as ineligible should be indicated in the comment.</p>
18	<p>/if applicable/</p> <p>Is the lumps sum (for strong partnership and personnel costs) claimed in the right amount as stated in the Grant Contract?</p>		<p>Applicable for all partners in case planned in the project budget. Costs can be divided among partners.</p>
19	<p>Is there any evidence of income in the project and if income had occurred, was it taken into account in accordance with the Programme rules and reported?</p>		<p>N/A – no income in the project identified during the report verification;</p> <p>YES – income has been identified and it complies with the Programme rules (interest/ revenues/ cash inflows do not exceed the threshold of the Lead beneficiary's and beneficiary's co-financing);</p> <p>NO - income has been identified and exceeds the threshold of the Lead beneficiary's and beneficiary's co-financing. Amount above the threshold of the co-financing should be indicated in the comment as ineligible.</p>
20	<p>/Applicable only to the final request for payment/</p> <p>In relation to an identified risk, has it an impact on the eligibility of costs presented in the request for payment being verified?</p>		<p>If the auditor described possible threats in project implementation in previous checklist (point 3.3 of the checklist), reference should be made to those threats in the final report.</p>
21	<p>Were the rules of origin and nationality, stipulated in art. 8 and art.9 of the regulation 236/2014, followed in case of contracted works/services/supplies?</p>		<p><i>/in the case of actions jointly co-financed or implemented through a Member State in shared management, countries which are eligible under the rules of that Member State shall also be eligible/</i></p>

			YES - the field does not require additional comments - all contracts implemented in the program meet the provisions of art. 8 and art. 9 of Regulation 236/2014.
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2. Check out of the activities planned in the project

No.	Question	Yes/No Not applicable	Remarks/Comments
1	Was the physical progress of particular project activities in the given reporting period described?		The auditor should examine the actual progress with the described progress in the narrative report prepared by the given beneficiary. In addition to consolidated one, the JTS requires separate narrative reports to be prepared by ALL partners. Signature of the auditor is required on the narrative report to confirm it has been checked by the auditor (Grant Contract § 16 point 2).
2	Is the progress status of particular activities within the project compatible with the Grant Contract and its annexes?		<i>If NOT, please describe derogations from the planned scope of project implementation</i> The auditor should describe any deviations from the implementation schedule as in the Grant Contract and its annexes.
3	Did the implemented activities comply with the assumptions included in the Grant Contract and its annexes?		The auditor should describe any deviations from the activities as contracted in the Grant Contract.
4	Is the progress status of the project, presented in the project implementation progress reports, consistent with the actual activities implemented?		<i>/Verification on-site/ Applicable to the on-the-spot controls</i> N/A – in case of the on-desk control. In case of the on-the-spot it should be described how the actual (physical) progress has been verified.
5	Are the documents submitted in the project implementation progress reports consistent with the original project documentation?		<i>Answer on the basis of the sample verification/ Applicable to the on-the-spot controls</i> N/A – in case of the on-desk control. In case of the on-the-spot it should be checked on a sample basis that the copies submitted during the on-desk control comply with the originals.

3. Control of achievement of indicators

No.	Name of the indicator presented in the Grant Contract and its annexes	Measurement unit	Target value of the indicator	Verification sources / Measurement method	State of achievement of the indicator	Remarks
I	All project indicators - according to part 3.4 of the project description (Annex III to the Grant Contract).					
...						
1	Were the values of the output indicators achieved in the reporting period consistent with the description of project implementation progress?		<i>yes/no/not applicable</i>	<p><i>Describe any possible derogations</i></p> <p>Auditor is requested to verify if reported values of the output indicators comply with the described progress. Maybe the beneficiary declares achievement of an output indicator, while from the description of the project progress it is clear that activity is under preparation or is still in the process and is not finalised.</p>		
2	Were the indicators achieved?					
3	Does the reached cumulative achievement of the output indicators show that there is a threat to the correct project implementation?			<p>Auditor should estimate, if reported cumulative achievement of the output indicators does not show the threat to the correct project implementation.</p> <p>If the auditor described possible threats in previous checklist, reference should be made to those threats in the final report.</p> <p>In case output indicators have not been achieved/achieved partly, it should lead to the financial correction. Detailed explanation should be provided by the auditor.</p>		

4. Control of accounting records

No.	Question	Yes/No Not Applicable	Remarks/Comments
1	Are the separate accounting records or a separate accounting code kept for all project implementation activities? (Not applicable to settling expenditure by lump sums and flat rates)		
2	Were the expenditures presented by the beneficiary in the progress reports actually incurred, paid and recorded in the accounting records at the appropriate amounts? <i>Does not apply to flat rates and lump sums</i>		<i>[pay attention to: "Include buffer", "B" indicating temporary introduction of the provisions]</i> Print outs from the financial system of the beneficiary should be verified.
3	Is there the accounting document (e.g. invoice, payroll) existent for each expenditure presented ? <i>Does not apply to flat rates and lump sums</i>		
4	Is there a document confirming the payment for each expenditure? <i>Does not apply to flat rates and lump sums</i>		
5	Are accounting records described in a manner that indicates that they had not been financed from different sources, in line with the Programme rules? /To exclude double financing /		In case of financing from sources other than the program / own resources, it should be described how the possible double financing was excluded.
6	Were the expenditures paid during the eligibility period of the expenditure specified in the grant contract?		
7	Can VAT be considered as eligible in connection with the Beneficiary's Statement and the eligibility rules?		N/A - VAT is not eligible in case of Belarusian and Ukrainian beneficiaries and in case of Polish beneficiaries, if it is recoverable. The auditor should provide comment that VAT has not been reported; YES - in case of Polish beneficiaries VAT is eligible if it is not recoverable. It is checked by the auditor on the basis of Statement

			<p>provided by the beneficiary. Comment should be provided by the auditor on which base VAT is eligible.</p> <p>NO:</p> <p>- if VAT is reported in case of BY or UA beneficiaries or</p> <p>- if recoverable VAT is reported in case of PL beneficiaries.</p> <p>Reported VAT deducted as ineligible should be indicated by the auditor in the comment.</p>
8	<p>/for Polish beneficiaries only/</p> <p>a) During the project implementation is the beneficiary registered in the tax office as an active VAT payer?</p> <p>b) Does the project generate taxable activities?</p> <p>c) Is there any evidence of the direct and unquestionable relation between the goods / services / fixed assets acquired under the project and the VAT taxable activities being carried out and/or activities exempted from VAT under Article 90 p. 2 of the Act on VAT?</p> <p>d) Are the contractors (if any) of the beneficiary an active VAT payers?</p>		<p>N/A – for BY and UA beneficiaries.</p> <p>For PL beneficiaries 4 answers should be provided.</p>
9	<p>Were the expenditures covered by the request for payment previously settled within the advance payment or refunded or repeatedly included in the current request for payment?</p> <p>Note: special attention should be paid to the expenditure incurred (issued / paid) in the period prior to the verified request for payment.</p>		<p>NO – if no repeatedly included costs.</p> <p>YES - Comment is requested in case expenditure incurred (issued / paid) has been included repeatedly.</p>

5. Expenditure Verification - Category of expenditure - STAFF COSTS

No.	Question	Yes/No Not Applicable	Remarks
5.1			
1	Does each employee have the activities regarding project within responsibilities specified in a job description?		Employee's job description is to be verified. N/A - if staff costs are settled as a lump sum up to 50.000 EUR.
2	If the employee also performs activities other than activities regarding project, is there the method of calculating the cost of employee's salary available?		In case of the answer "YES" the methodology for calculating the remuneration settled in the project should be described.
3	For people working part-time in the project and without fixed number of hours, are there the records of working time available?		Applicable in case type of staff assignment is "part-time with a flexible number of hours worked on the project per month".
4	In case of the salaries settled on the basis of hourly cost based rate: <ul style="list-style-type: none"> a) is there hourly rate for part-time workers with a flexible number of hours worked on the project per month calculated, b) was the hourly rate multiplied by the number of hours actually worked in the project, c) was the working time documented with the time sheet showing the total working time. 		In case an answer to at least one of the listed points is NO, the general answer should be "NO" and comments provided.
5	Are the salaries expenditure limited to gross salaries including social security charges and other remuneration-related costs that:		In case an answer to at least one of the listed points is NO, the general answer should be "NO" and comments provided.

	<p>a) have been defined in a contract, service contract or other documents of equivalent probative value,</p> <p>b) comply with the national legislation,</p> <p>c) comply with the internal remuneration regulations or remuneration practices applying to all employees in the organization,</p> <p>d) cannot be recovered by the employer.</p>		
6	<p>Are the following documents available:</p> <ul style="list-style-type: none"> • Labour contract, contract other than a labour contract • Responsibilities specified in the job description • Payrolls or other documents of equivalent probative value • Proofs of payment • Attendance lists • Timesheets (in case of hourly rate) signed by staff member and employer 		
7	<p>Were contracts other than labour contract (e.g. service contract) preceded by the appropriate procurement procedure depending on the value of the contract?</p>		<p>Contracts other than a labour contract:</p> <p>Civil law contracts with a physical person/UA private entrepreneurs concluded as a result of successfully implemented public procurement procedure.</p> <p>Service contracts with the legal entities cannot be concluded under BL1.</p> <p>In case the answer is "YES", type of concluded contract should be indicated. Auditor also should indicate public procurement procedure applied and if it is correct depending on the value of the contract.</p>
8	<p>If the cost of civil law contracts with the employee of the beneficiary is reported, does the scope of the contract exceed the employee's responsibilities specified in the job description within labour contract?</p>		<p>Employee's job description for the main position in the institution is to be requested and verified.</p>

9	Were the salary-related charges fully paid?		
10	If awards/bonus payments/ allowances were submitted for reimbursement - were the eligibility criteria indicated in the Programme documents satisfied?		<p>Holidays and sick leaves – eligible</p> <p>Overtime – eligible in duly justified cases</p> <p>Bonus payments – ineligible (except cases when they are an obligatory component of salary in accordance with the employment policy of the beneficiary organisation or legislation in the employer’s country)</p> <p>Unpaid voluntary work – ineligible</p> <p>N/A – no awards/bonus payments/ allowances were submitted for reimbursement;</p> <p>YES – comments to be provided what kind of awards/bonus payments/ allowances have been reported and how eligibility requirements have been satisfied;</p> <p>NO – comments should be provided why reported awards/bonus payments/ allowances are not eligible and amount deducted as ineligible.</p>
5.2	Verification of the lump sum		
11	/if applicable/ If the beneficiary received a lump sum for the staff costs weren’t these expenditure presented as real costs in other budget line of the statement?		<p>N/A – no lump sum for the staff costs;</p> <p>YES – if received lump sum have not been presented as real costs in other budget line;</p> <p>NO - if received lump sum have been presented as real costs in other budget line. Comment to be provided under which budget lines such costs have been reported and amount deducted as ineligible.</p>
12	Is the physical progress shown in the narrative report and covered by lump sum adequate to the progress of the project?		<p>The answer, in general, is "YES" as the lump sum is settled in accordance with the provisions of the Grant Contract, i.e. 50% + 50%.</p> <p>In case of not submitting reports within the deadline - <u>lump sums for staff costs ineligible.</u></p>

13	Is the value of the lump sum in line with the amount set in the Grant Contract?		
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6. Expenditure Verification - Category of expenditure - TRAVEL AND SUBSISTENCE COSTS

No.	Question	Yes/No Not Applicable	Remarks
1	Are the travels related to the tasks planned in the project?		Expenditure on travel and accommodation costs of the management staff of the Beneficiary's organisation related to the project implementation.
2	Was the travel documented (agenda, invitation, tickets, bills, invoices)?		
3	Was the travel expenditure incurred and settled in accordance with the national legislation or internal regulations of the beneficiary (amount of per diems / lump sums, etc.)?		
4	In case of providing food by the organizer of the meeting, was the amount of the per diems reduced accordingly?		
5	Were the private means of transport (TAXI, company car, private car) selected in accordance with the Programme rules?		In case of a private means of transport, documents confirming the correct use of the private car (decision of the head of unit, etc.) have to be submitted.
6	Is the travel time consistent with the date of the event? <i>(arrival and departure time is not longer than 1 day from the start and the end of the event. In case of a longer stay, were the cost savings proved?)</i>		
7	/if applicable/ Are the expenditures of the travel outside the Programme area eligible according to the Programme rules?		N/A – no expenditure of the travel outside the Programme area reported. YES - expenditure of the travel outside the Programme area reported. The auditor should describe in the comment what kind of costs and where incurred and how eligibility has been ensured.

			NO - expenditure of the travel outside the Programme area have been reported but it has not been foreseen in the AF/approved by the JTS in advance. Comment to be provided and amount deducted as ineligible indicated.
8	/applicable only for micro-projects/ If the beneficiary received a lump sum for the travel costs weren't these expenditure presented as real costs in other budget lines of the statement?		applicable only for micro-projects N/A – no lump sum for the travel costs; YES – if received lump sum have not been presented as real costs in other budget line; NO - if received lump sum have been presented as real costs in other budget line. Comment to be provided under which budget lines such costs have been reported and amount deducted as ineligible.
9	/applicable only for micro-projects/ Is the value of the lump sum in line with the amount set in the Grant Contract?		applicable only for micro-projects Up to 2 000 EUR In order to approve it, the beneficiary needs to reach an assigned indicator as stipulated in grant contact.

7. Expenditure Verification - Category of expenditure - EQUIPMENT AND SUPPLIES

No.	Question	Yes/No Not Applicable	Remarks
1	Did the beneficiary submit the contract with the contractor?		
2	Did the beneficiary submit the delivery acceptance note or is there the relevant information attached to the invoice?		
3	Was the purchase/supply delivered necessary for the project and foreseen in the Grant Contract and its annexes?		
4	Is the scope of performed deliveries consistent with the contract with the contractor?		

5	Was the content scope implemented within the deadline indicated in the contract with the contractor?		
6	Was the scope of performed work performed/equipment delivered at the price agreed in the contract with the contractor?		
7	Were the expenditures being verified incurred in accordance with the public procurement law (national, EU or programme rules)? Should they? /if YES, in Remarks should be entered if and when the appropriate checklist for control of public procurement was filled in/		<p>All purchases, regardless their value, should be verified and their compliance with the relevant requirements (depending on the value) should be confirmed.</p> <p>All purchases should be listed in the comment indicating the purchase procedure applied (direct award, market research, open procedure, etc.) as well as if applied procedure has been based on the internal regulations, the principle of competitiveness, Public Procurement Law, etc.</p> <p>Annex 6 - Checklist for Public Procurement Control for the Ukrainian beneficiaries must be filled in by Auditor in case of open procedure when the procurement is done by public entities according to the Ukrainian law on public procurement with the use of electronic system ProZorro.</p>
8	In case the beneficiary resigned from carrying out the proceedings in accordance with the public procurement law, was he/she entitled to do this?		Comment should be provided in case of an answer “YES”.
9	Were the expenditures being verified incurred in accordance with the principle of competitiveness? Should they? / if YES, the list should include a checklist to examine the Programme principle of the offer policy and information on the outcome of this verification /		Applicable only for PL beneficiaries.
10	In case the beneficiary resigned from carrying out the proceedings in accordance with the principle of competitiveness, was he/she entitled to do this?		<p>Applicable only for PL beneficiaries.</p> <p>N/A – in case principle of competitiveness has been applied;</p> <p>YES – in case no purchases above 50.000 PLN + comment “Threshold for the procedure has not been reached” or stricter procedure has been applied;</p>

			NO – in case beneficiary resigned from carrying out the procedure without justification. Comment including financial correction to be provided.
11	<p>/for UA and BY entities only/ Were the expenditures being verified incurred in accordance with the principles stipulated in Annex 10 to the Programme Manual - TESIM Guide on procurement procedures in Ukraine and Belarus (applicable for procurements launched by 30.06.2019) or General Rules of Procurement by Beneficiaries within the PBU projects (applicable for procurements launched from 01.07.2019).</p> <p>Should they?</p> <p>a) Has the adequate procedure been applied?</p> <p>b) Has the information about the procedure been adequately announced (if applicable)?</p> <p>c) Have the selection and award criteria been correctly indicated (if applicable)?</p> <p>d) Has the procedure been properly documented (if applicable)?</p>		<p>1. Beneficiaries based in Belarus have to comply with the requirements of p. 6.4.3 of the Programme Manual – part 1 and General Rules of Procurement by Beneficiaries within the Projects (hereinafter - General Rules);</p> <p>2. Beneficiaries based in Ukraine:</p> <p>- public entities have to comply with Ukrainian law on public procurement and with the requirements of p. 6.4.3 of the Programme Manual – part 1. When procuring services, supplies and works below the threshold stipulated in the Ukrainian law on public procurement for the use of Prozorro, the contracting authorities have to comply with the order adopted by the ProZorro on 19 of March # 10 “On approval of Instructions on the use of the electronic system of procurement in the case if procurement cost is less than the threshold stipulated in the second and third paragraphs of part one of article 2 of the Law of Ukraine “On public procurement” and with these General Rules;</p> <p>- private entities have to comply with the requirements of p. 6.4.3 of the Programme Manual – part 1 and General Rules.</p>
12	In case the beneficiary made changes to the concluded contracts / signed the annexes, was it in accordance with the provisions and contract concluded with the contractor?		
13	<p>/if applicable/ If there is a cost of the workplace equipment - is the workplace equipment related to the employee performing the tasks within the project?</p>		
14	<p>/if applicable/ If the beneficiary purchased used fixed assets, is it in accordance with the Programme rules?</p>		Purchase cost of used equipment is eligible, provided the equipment complies with applicable norms and standards.

15	Were the purchased fixed assets included in the fixed assets record?		
16	Is the serial number on fixed asset equal to the number entered in the fixed assets record?		<i>Refers to the on-the-spot control</i> N/A – in case on-desk control.

8. Expenditure Verification - Category of expenditure –SERVICES

No.	Question	Yes/No Not Applicable	Remarks
1	Did the beneficiary submit the contract with the contractor?		
2	Did the beneficiary submit the service acceptance note or is there the relevant information attached to the invoice?		
3	Is the scope of performed services consistent with the contract with the contractor and the Grant Contract and its annexes?		
4	Was the content scope implemented within the deadline indicated in the contract with the contractor?		
5	Were the expenditures being verified incurred in accordance with the public procurement law? Should they? /if YES, in the Remarks should be entered if and when the appropriate checklist for control of public procurement was filled in/		All purchases, regardless their value, should be verified and their compliance with the relevant requirements (depending on the value) should be confirmed. All purchases should be listed in the comment indicating the purchase procedure applied (direct award, market research, open procedure, etc.) as well as if applied procedure has been based on the internal

			<p>regulations, the principle of competitiveness, Public Procurement Law, etc.</p> <p>Annex 6 - Checklist for Public Procurement Control for the Ukrainian beneficiaries must be filled in by Auditor in case of open procedure when the procurement is done by public entities according to the Ukrainian law on public procurement with the use of electronic system ProZorro.</p>
6	In case the beneficiary resigned from carrying out the proceedings in accordance with the public procurement law, was he/she entitled to do this?		Comment should be provided in case of an answer “YES”.
7	<p>Were the expenditures being verified incurred in accordance with the principle of competitiveness? Should they?</p> <p>/if YES, to the list should be attached a checklist to examine if principle of competitiveness and information on the outcome of this verification /</p>		Applicable only for PL beneficiaries.
8	In case the beneficiary resigned from carrying out the proceedings in accordance with the principle of competitiveness, was he/she entitled to do this?		<p>Applicable only for PL beneficiaries.</p> <p>N/A – in case principle of competitiveness has been applied;</p> <p>Yes – in case no purchases above 50.000 PLN + comment “Threshold for the procedure has not been reached” or stricter procedure has been applied</p> <p>No – in case beneficiary resigned from carrying out the procedure without justification. Comment including financial correction to be provided.</p>
9	<p>/for UA and BY entities only/</p> <p>Were the expenditures being verified incurred in accordance with the principles stipulated in Annex 10 to the Programme Manual - TESIM Guide on procurement procedures in Ukraine and Belarus (applicable for procurements launched by 30.06.2019) or General Rules of Procurement by Beneficiaries within the PBU projects (applicable for procurements launched from 01.07.2019).</p> <p>Should they?</p>		<p>1. Beneficiaries based in Belarus have to comply with the requirements of p. 6.4.3 of the Programme Manual – part 1 and General Rules of Procurement by Beneficiaries within the Projects (hereinafter - General Rules);</p> <p>2. Beneficiaries based in Ukraine:</p> <p>- public entities have to comply with Ukrainian law on public procurement and with the requirements of p. 6.4.3 of the Programme Manual – part 1. When procuring services, supplies and works below the threshold stipulated in the Ukrainian law on public procurement</p>

	<p>a) Has the adequate procedure been applied?</p> <p>b) Has the information about the procedure been adequately announced (if applicable)?</p> <p>c) Have the selection and award criteria been correctly indicated (if applicable)?</p> <p>d) Has the procedure been properly documented (if applicable)?</p>		<p>for the use of ProZorro, the contracting authorities have to comply with the order adopted by the ProZorro on 19 of March # 10 “On approval of Instructions on the use of the electronic system of procurement in the case if procurement cost is less than the threshold stipulated in the second and third paragraphs of part one of article 2 of the Law of Ukraine “On public procurement” and with these General Rules;</p> <p>- private entities have to comply with the requirements of p. 6.4.3 of the Programme Manual – part 1 and General Rules.</p>
10	Does the contract with the contractor clearly state the duties, contract duration and due remuneration?		
11	Was the scope of work performed made at the price agreed in the contract with the contractor?		
12	Is there evidence of task performance by the contractor?		
13	In case the beneficiary made changes to the concluded contracts / signed the annexes, was it in accordance with the provisions and contract concluded with the contractor?		
14	Did the beneficiary provide evidence of training / events?		
15	Does the provided documentation confirm that the training / event was held for the target group specified in the Grant Contract and its annexes?		
16	Were not external services outsourced to another beneficiary participating in the project?		YES – in case no services outsourced to another beneficiary.

9. Expenditure Verification - Category of expenditure - INFRASTRUCTURE COMPONENT

No.	Question	Yes/No / Not applicable	Remarks
1	Did the beneficiary submit the contract with the contractor?		

2	Did the beneficiary provide the acceptance note or put the relevant remark on the invoice?		
3	Was the purchase foreseen in the Grant Contract and its annexes?		
4	Is the scope of performed works consistent with the contract with the contractor?		Auditor can involve a special expert who can evaluate the quality of the performed work (for example when we are talking about the infrastructure element like a construction of buildings, roads). In such case the auditor carries the costs of such expert services. In any case, checklist shall be completed and signed by the project Auditor solely.
5	Are the purchased fixed assets used for the purpose specified in the Grant Contract and its annexes?		
6	Was the scope of works done at the price agreed in the contract with the contractor?		
7	Was the content scope implemented within the deadline indicated in the contract with the contractor?		
8	In the case of acquisition of real estate, were not the limits laid down in the Programme documents exceeded?		Purchase of land or buildings cannot exceed 10 % of the total eligible expenditure of the project.
9	Was the acquisition cost of the property shown in the project in the correct amount / proportion?		
10	Were the expenditures being verified incurred in accordance with the public procurement law? Should they?		<p><i>If YES, in the remarks / comments please enter if and when the appropriate checklist for control of public procurement was filled in.</i></p> <p>All purchases, regardless their value, should be verified and their compliance with the relevant requirements (depending on the value) should be confirmed.</p> <p>All purchases should be listed in the comment indicating the purchase procedure applied (direct award, market research, open procedure, etc.) as well as if applied procedure has been based on the internal</p>

			<p>regulations, the principle of competitiveness, Public Procurement Law, etc.</p> <p>Annex 6 - Checklist for Public Procurement Control for the Ukrainian beneficiaries must be filled in by Auditor in case of open procedure when the procurement is done by public entities according to the Ukrainian law on public procurement with the use of electronic system ProZorro.</p>
11	In case the beneficiary has resigned from carrying out the proceedings in accordance with the public procurement law, was he/she entitled to do this?		Comment should be provided in case of an answer “YES”.
12	<p>Have the expenditures being verified incurred in accordance with the principle of competitiveness? Should they?</p> <p>/if YES, to the list should be attached a checklist to examine if principle of competitiveness and information on the outcome of this verification /</p>		Applicable only for PL beneficiaries.
13	In case the beneficiary resigned from carrying out the proceedings in accordance with the principle of competitiveness, was he/she entitled to do this?		<p>Applicable only for PL beneficiaries.</p> <p>N/A – in case principle of competitiveness has been applied;</p> <p>YES – in case no purchases above 50.000 PLN + comment “Threshold for the procedure has not been reached” or stricter procedure has been applied</p> <p>NO – in case beneficiary resigned from carrying out the procedure without justification. Comment including financial correction to be provided.</p>
14	<p>/for UA and BY entities only/</p> <p>Were the expenditures being verified incurred in accordance with the principles stipulated in Annex 10 to the Programme Manual - TESIM Guide on procurement procedures in Ukraine and Belarus (applicable for procurements launched by 30.06.2019) or General Rules of Procurement by Beneficiaries within the PBU projects (applicable for procurements launched from 01.07.2019).</p> <p>Should they?</p>		<p><i>/private entities from Ukraine and Belarus shall apply competitive negotiated procedures for any contract above 20.000€, even though articles 53 to 55 of ENI CBC IR request this procedure only over 60.000€/</i></p> <p>1. Beneficiaries based in Belarus have to comply with the requirements of p. 6.4.3 of the Programme Manual – part 1 and General Rules of Procurement by Beneficiaries within the Projects (hereinafter - General Rules);</p> <p>2. Beneficiaries based in Ukraine:</p>

	<p>a) Has the adequate procedure been applied?</p> <p>b) Has the information about the procedure been adequately announced (if applicable)?</p> <p>c) Have the selection and award criteria been correctly indicated (if applicable)?</p> <p>d) Has the procedure been properly documented (if applicable)?</p>		<p>- public entities have to comply with Ukrainian law on public procurement and with the requirements of p. 6.4.3 of the Programme Manual – part 1. When procuring services, supplies and works below the threshold stipulated in the Ukrainian law on public procurement for the use of Prozorro, the contracting authorities have to comply with the order adopted by the ProZorro on 19 of March # 10 “On approval of Instructions on the use of the electronic system of procurement in the case if procurement cost is less than the threshold stipulated in the second and third paragraphs of part one of article 2 of the Law of Ukraine “On public procurement” and with these General Rules;</p> <p>- private entities have to comply with the requirements of p. 6.4.3 of the Programme Manual – part 1 and General Rules.</p>
15	In case the beneficiary made changes to the concluded contracts / signed the annexes, was it in accordance with the provisions and contract concluded with the contractor?		
16	Were legally required permits and documents (e.g. building permit, the application works, environmental decision, the assessment of impacts on the environment) delivered?		All compulsory requirements set by the EU and national legislation related to the respective investment of infrastructure (e.g. feasibility study, building permission, etc.) should be fulfilled.
17	Is there a document confirming the right to dispose of the property / place of investment / construction works?		

10. Expenditure Verification – Investment and infrastructure component

1	<p>/ applicable for micro-projects/</p> <p>Did the part of the project budget, spent on infrastructure (budget line 6) and investments (budget sublines 3.1, 3.2, 3.3) not exceed 20% of the EU grant?</p>		<p>applicable for micro-projects</p> <p>N/A – no costs for infrastructure and investments;</p> <p>YES - costs for infrastructure and investments do not exceed 20% of the EU grant;</p> <p>NO - costs for infrastructure and investments exceed 20% of the EU grant. Comment and amount deducted as ineligible should be provided by the auditor.</p>
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11. Expenditure Verification - Category of expenditure - ADMINISTRATIVE COSTS

No.	Question	Yes / No / Not applicable	Remarks
1	<p>Did the flat rate not exceed the rate approved in the Grant Contract and its annexes, i.e. do not exceed 7% of the total direct eligible costs excluding costs incurred in relation to the provision of infrastructure?</p> <p>/Please check if the beneficiary has correctly calculated the amount of the eligible expenditure according to the rate of the flat rate indicated in the Grant Contract and its annexes /</p>		<p>Administrative costs do not need to be supported by accounting documents.</p> <p>N/A – no administrative costs reported;</p> <p>YES – reported costs <u>do not exceed</u> rate approved in the Grant Contract of the total direct eligible costs;</p> <p>NO - reported costs <u>exceed</u> rate approved in the Grant Contract of the total direct eligible costs. Comment and amount deducted as ineligible should be provided by the auditor.</p> <p>NOTE! Flat rate approved in the Grant Contract concerns the entire project, while each beneficiary can have different %. Auditor should verify flat rate in accordance with the methodology for the administrative costs of each beneficiary.</p>
2	<p>If the beneficiary received flat rate for indirect costs (postal, courier and similar services, archive, office supplies and other consumables, office maintenance, office rental, insurance, telephone, electricity, heating, cleaning of bank charges) weren't these expenditures presented as real costs in the statement?</p>		<p>Expenditure covered by the flat-rate cannot be reported under any other budget line.</p> <p>N/A – no administrative costs;</p> <p>YES – if indirect costs <u>have not been presented</u> as real costs in other budget line;</p> <p>NO - if indirect costs <u>have been presented</u> as real costs in other budget line. Comment to be provided under which budget lines such costs have been reported and amount deducted as ineligible.</p>

12. Control of compliance with the information and visibility requirements

No.	Question	Yes / No /	Remarks
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		Not applicable	
1	Did the information and visibility activities and materials contain the necessary information according to the Programme requirements, including whether they were marked with the logo of the Programme, the EU symbol, containing information about the Programme co-financing?		Programme obligations related to visibility measures are mentioned in the §20 of the Grant Contract and are described in more details in Visibility Guidelines.
2	Were fixed assets, e.g. the room where the event took place (e.g. conference, training, office supplies / publications) marked in accordance with the Programme rules?		
3	Did the Beneficiary inform the public of the received support by the Programme by posting on its website [if there is any] a brief description of the operation, proportional to the level of support, including its objectives and results, and highlighting the EU financial support / if the obligation arises from the Programme rules/?		
4	Did the Beneficiary respect the Programme rules on information and promotion?		
5	Are costs incurred for the information and visibility activities necessary to achieve the objectives of the project?		Visibility activities have to be planned in the Grant Contract and its annexes as well as included in the project budget.

13. Control of the filling the task in the Project by lead beneficiary

No.	Question	Yes / No / Not applicable	Remarks
1	Does the Lead Beneficiary provide the other beneficiaries with a part of the advance payment or the final balance payment in accordance with the partnership agreement and the grant contract as soon as possible and in total?		(Please enter the date of receipt of payment) N/A – in case auditor verifies report of the Beneficiary not being a LB.
2	Does the Lead Beneficiary do not deduct or suspend any amounts or impose any specific fees or other charges with equivalent effect which would cause a decrease in the amount of advances to the other beneficiaries?		N/A – in case auditor verifies report of the Beneficiary not being a LB. YES – in case no deductions/ suspending.



			NO – comment of the situation should be provided.
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14. Control of compliance with other EU rules

No.	Question	Yes / No / Not applicable	Remarks
1	Was there any evidence that the project activities do not comply with the EU horizontal objectives of environmental protection?		<p>Answer N/A is not possible under this question.</p> <p>NO – everything is OK;</p> <p>YES – evidence that the project activities do not comply with the EU horizontal objectives have been detected. Comments should be provided.</p> <p>E.g. In the project related to waste water treatment plants it appeared that equipment installed does not meet waste water emission standards of the EU.</p>
2	Was there any evidence that the project activities do not comply with the EU horizontal objectives of equal opportunities and non-discrimination as well as equality between men and women?		<p>Answer N/A is not possible under this question.</p> <p>NO – everything is OK;</p> <p>YES – evidence that the project activities do not comply with the EU horizontal objectives have been detected. Comments should be provided.</p> <p>E.g. remuneration for a man and woman in a project under the same position differs.</p>
3	Was there any evidence that the project activities do not respect the provisions regarding the accessibility of disabled persons?		<p>Answer N/A is not possible under this question.</p> <p>NO – everything is OK;</p> <p>YES – evidence that the project activities do not comply with the EU horizontal objectives have been detected. Comments should be provided.</p>
4	Was there any evidence that the project exclude other target groups based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation?		<p>Answer N/A is not possible under this question.</p> <p>NO – everything is OK;</p>

			YES – evidence that the project activities do not comply with the EU horizontal objectives have been detected. Comments should be provided.
5	<p>Was there any evidence of violation of EU rules on state aid, i.e. it can be confirmed that</p> <p>a) project activities are in line with the Grant Contract and its annexes and do not raise any new issues</p> <p>b) project activities do not create an economic advantage for a partner or a third party and are without potential impact on competition, but serve a general common interest.</p> <p><i>(Does not concern BY beneficiaries)</i></p>		If no problems, breaches, the answer should be “NO”.
6	<p>In case there are activities of the project partner that are not defined as state aid in the Grant Contract and its annexes are these activities of noneconomic nature?</p> <p><i>In this context, non-economic means:</i></p> <p><i>The beneficiary does not undertake any activities for which a market exists; or</i></p> <p><i>The beneficiary does not offer goods/ services for which a market exists; or</i></p> <p><i>The beneficiary does not implement activities in the context of the project that could be carried out by a private operator which intends to make profit (even if it is not the intention within the project); or</i></p> <p><i>The beneficiary does not provide goods/services in the context of the project that could be provided by a private operator which intends to make profit (even if it is not the intention within the project); or</i></p> <p><i>The beneficiary does not construct infrastructure (e.g. port</i></p>		



<p><i>infrastructure) that shall be exploited economically and is not and is not available for public use free of charge.</i></p> <p><i>(Does not concern BY beneficiaries)</i></p>		
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15. Other elements of expenditure eligibility verification

No.	Question	Yes No Not applicable	Remarks
1	<p>Did, during the control of the estimation of the value of public contracts, the controller obtain assurance that the beneficiary did not split the contract for parts by, for example,</p> <ul style="list-style-type: none"> • analysis of the procurement plan, • analysis of concluding contracts in terms of scope / type, • analysis of planned expenditure during project implementation in terms of convergence of scope / type. 		<p>If no problems, breaches, the answer should be “YES”.</p>
2	<p>Was it ensured during the audit that the following expenditures were not reported as eligible:</p> <ul style="list-style-type: none"> a) debt and debt service charges (interest); b) provisions for losses or liabilities, c) costs declared by the beneficiary and already financed from the Union budget, d) purchase of land or buildings for an amount exceeding 10% of the eligible expenditure of the project, e) foreign exchange losses, f) duties, taxes and charges, including VAT, except where no recovery is possible under applicable national tax laws, unless otherwise specified in the relevant provisions agreed with partner countries involved in cross-border cooperation, g) loans to third parties, h) fines, financial penalties and expenditure related to litigation, i) contributions in kind, including volunteering. 		<p>If no problems, breaches, the answer should be “YES”.</p>



3	During the check of expenditure, including the public procurement procedures, has the auditor come across any evidence of fraud?		In case of “YES” the JTS shall be informed immediately
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SUMMARY
(Obligatory Part)

No.	Question	Yes No Not applicable	Remarks
1	Are the expenditures reported so far consistent with the eligibility rules in force in the Programme, as specified in the Programme Manual?		YES – if no problems, breaches of rules; NO – in case of problems, deductions + comment.
2	Is the project documentation kept in a way that ensures availability, confidentiality and security, and the correct audit trail?		YES – in case documents are available and audit trail ensured; NO – in case of problems, missing documents + comments.
3	Were there found any ineligible expenditure during the audit?		NO – if all costs considered eligible; YES – in case of ineligible costs in the report + comments.
4	Was a conflict of interest identified or are there any indications that such a conflict may exist?		NO – in case no conflict of interest; YES – in case conflict of interest has been identified + comments.
5	Does the auditor identify risks for proper project implementation?		NO – in case no risks identified; YES – in case of problems and threats identified + comments. Answer should comply with the answer under point 3.3 of a checklist.
6	Is there a need for the beneficiary to correct the project interim reports submitted so far?		N/A – in case of the first report.

7	Is there any need to notify the JTS that ineligible expenditure were found and the need to initiate the procedure for recovery of incorrectly made payments?		Applicable for the final report only.
8	Were recommendations from previous audits of the project implemented? /if applicable/		N/A – in case no audits conducted till the moment of the report verification.
9	If some irregularities have been found during previous controls, has the related expenditure been properly presented for further settlement in the amount/proportion accepted.?		<i>Please consider the results of previous controls (i.e. public procurement controls, control of the rule of competitiveness, on the spot control, etc)</i>
NOTES			
ANNEXES	- e.g. list for ex-post controls of public procurement procedures, etc.		

Auditor's data	
Name	
Signature	
Date	