



Project Closure Manual

COOPERATION PROGRAMME INTERREG V-A

GREECE – BULGARIA 2014-2020

CCI: 2014TC16RFCB022

Version 4.0

September 2020

Table of Contents

1. PROJECT CLOSURE PROCEDURES	2
1.1. FINAL PROJECT REPORT	2
1.2. SUMMARY TABLE OF FINAL PROJECT REPORTING	2
2. MAIN CLOSURE PROCESS	3
3. SPECIFICATIONS REGARDING THE ELIGIBILITY OF EXPENDITURES ...	5
4. SUSTAINABILITY -DURABILITY	5
5. OWNERSHIP OF THE PROJECT OUTPUTS	6
6. STORAGE OF PROJECT DOCUMENTS AND ACCOUNTING RECORDS	7
7. RETENTION OF PROJECT DOCUMENTS	8

1. Project Closure Procedures

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

1.1. Final Project Report

After finalisation of the project's activities, the Lead Beneficiary must submit a Final Project Report (standard form provided¹) to the Managing Authority/ Joint Secretariat **not later than two (2) months from the date of the final verification**, giving a qualitative summary of the project implementation as a whole.

This report should provide an overview of the project's activities and achievements. It should also highlight how cross-border/transnational 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 certified expenditures.

As the Project Progress Report, the Final Project Report shall contain:

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

The Final Project Report must be filled in English, using pre-filled templates provided by the Joint Secretariat and it has to be submitted to the JS electronically, signed and stamped, via uploading on the MIS <https://logon.ops.gr/>.

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	FPR
Reporting period	Up to six (6) months from the end date of the project²		Up to two (2) month from the final verification(s)

¹ Template is available in the Programme website

² The LB/PBs may request an extension to this deadline under exceptional circumstances, if the payment procedure is delayed.

Timeline of final project reporting			
	Closure Period		
Reporting of eligible costs	Payment of all implementation-related costs incurred in the last reporting period as well as all costs related to the elaboration and submission of the Final Progress Report and to the project administrative closure activities (first level control and staff costs)	FLC - verification of expenditure of all implementation-related costs incurred in the last reporting period as well as all costs related to the elaboration and submission of the Final Progress Report and to the project administrative closure activities (first level control and staff costs)	Reporting of all implementation-related costs incurred, verified and paid out in the last reporting period as well as all costs related to the elaboration and submission of the Final Progress Report and to the project administrative closure activities (first level control and staff costs)
Reporting of activities			Giving a qualitative summary of the project as a whole and detailing all project activities as a whole, achievement of outputs and results, deliverables produced. This period is also including the final verification fee.

Please note that the respect of these timelines is mandatory for the beneficiaries and the FLCs. All the payments done after the 6th month from the end date of the project will be not eligible.³

2. Main Closure Process

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

- 1st Phase - Submission by the LB via MIS of:
 - a) the Final Application Form, (Electronically and in excel form)
 - b) the Final Project Report (attached to the AF, signed and stamped) and
 - c) the Final Progress Report (Electronically)

³ See previous note.

a) Final Application Form on MIS: It concerns the completion of the ordinary Application Form with all necessary information related to the final data of project implementation in both, physical and financial terms.

b) Final Project Report: The main objective of the Final Project Report is to provide the most representative information on the implementation of the project as related to both, physical activities performed and financial resources used.⁴

c) Final Progress Report: A Final Progress Report should be submitted, incorporating the final eligible costs of the project.

Along with the three (3) main documents described above, the LB submits, in electronic format, the project final deliverables which can be stored electronically and relevant attachments concerning communication and publicity documents.

- 2nd Phase:

Examination by the MA/JS of a) the Final Application Form, b) the Final Project Report and c) Final Progress Report

This stage can be considered as the most important in the project closure process. The documents submitted by the LB to the MA/JS are subject to thorough examination by the MA/JS in order to ensure that the final data, in both physical and financial terms, have been precisely described and clearly depicted. In addition, as far as the financial implementation of the project is concerned, it is pointed out that the budgets of the Final Application Form, the Final Project Report and the Final Progress Report should be aligned with the total expenses verified in the certificates of expenditure of the project beneficiaries. Special attention should, however, be focused on the following:

1. The final budget of the project should not incorporate any results from control/audit findings. 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 all documents should be equal to 150.300 €. It falls within the responsibility of the MA/JS, in case of noncompliance of all documents to the above principle, to ask from the LB the correction of the documents.

2. Following the examination of the documents and, especially, the acceptance of the total final budget, the MA/JS should, on the basis of the analytical list of projects of the last 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.

- 3rd Phase: Communication to the LB of the closure decision

Upon completion of the 2nd phase and the subsequent acceptance of the correctness of the data provided by the LB, the MA/JS drafts and forwards to the LB a "Letter of Acceptance"⁵, which signifies the administrative end of the project.

⁴ Template is available in the Programme website. Please make sure that you use the latest version.

⁵ Template will be available in the Programme website

The Letter of Acceptance is addressed to the LB and is, at the same time, copied to the Certifying Authority, the Audit Authority and the competent National Authorities.

- 4th Phase: Closure of the project in the MIS <https://logon.ops.gr/>

It concerns a purely technical aspect to be tackled with, via close collaboration between the MA/JS of the Programme on the one hand and the Certifying Authority and the Special MIS Service on the other hand.

3. Specifications regarding the eligibility of expenditures

- All invoices and relevant financial documents must be issued until the final date of the Subsidy Contract/Application Form;
- Expenditure has to be incurred (invoiced) before the end date of the project set in the Subsidy Contract, with the exception of costs incurred (invoiced) as described in the Table: Timeline of final project reporting (above). The payment of control costs and project closure administrative activities may be made up no later than 31/12/2023;
- When the FLCer's final payment is concluded, the beneficiary inputs the appropriate expenditure documentation on MIS within a period of 20 calendar days. Please note that this period is included in the two-month period for the submission of the FPR. The FLCer then verifies this last expenditure without any additional fee;
- The bank charges only 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 and must have the consent/ acknowledgement of the MA/JS;
- In all of the above cases, the Lead Beneficiary will have the obligation to incorporate the respective information into the Final Progress Report and Final Application Form, while no modification of the Partnership Agreement and the Subsidy Contract is required;
- Expenditures incurred by a Project Beneficiary after the submission of the Final Application Form by the Lead beneficiary to the MA/JS, are ineligible;
- Should, no later than the closure of the Programme, the project be identified as revenue-generating, the Managing Authority is entitled to ask for a refund to the Programme in proportion to the contribution from the funds. Should a cost benefit analysis is required this will be executed before the closure of the project and at the PB's expense unless otherwise indicated in their respective budget;
- Before submitting the closure documents, Greek Beneficiaries should have completed all necessary administrative steps in order to balance the payments of the Public Investment Fund with the certified amounts of their expenditure. They are obliged to return to the Public Investment Program any amounts not spent within the framework of their Project or any amounts that have been deemed ineligible following controls/ audits.

4. Sustainability -Durability

In the Final Project Report the Lead Beneficiary should describe how the deliverables of the proposed project would be used. For example, in the case of infrastructure projects, where maintenance and operation are required, the Lead

Beneficiary should indicate the existence of relevant bodies / structures / operating mechanisms or foresee the necessary actions within a specific timetable, in order to ensure maintenance and operation. In the case of projects which do not include operation, the way that the results will be used should be explained.

On a case-by case basis and depending on the type of actions, the MA/JS identifies in the Call the necessary evidence needed for the evaluation of this criterion. In the closure of the project, the partnership must ensure the viability of the project, by taking the necessary administrative decisions, if they have not yet been taken. At the same time the functionality of the project must be ensured.

Where appropriate and depending on the type of actions the MA/JS can identify the necessary evidence needed to ensure the functionality and viability of the sustainability of the project.

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).

5. Ownership of the project outputs

According to the Subsidy Contract, Project Beneficiaries are the owners of the intellectual and industrial property rights on the Project's results, reports and other documents related to it. The proofs of transfer of user rights shall be anyway annexed to the Final Project Report.

Following the provisions of the rules, the publication of information by Programme or National Authorities/Coordinator 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 Project beneficiaries' commercial secrets.

The produced outputs of the project cannot be transferred or be substantially modified within five years of the final payment to the beneficiary (Art.71, CPR). More in detail, the project must not undergo any substantial change:

- 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.

Should any of the above conditions not be met by any of the Project Beneficiaries, the Managing Authority must be informed without delay. This might imply a recovery of funds unduly paid.

The Lead Beneficiary 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.

All products and rights (material and intellectual) that derive from the project and its deliverables will be the property of the partnership in their entirety. The Managing Authority reserves the right to use any of them for information and communication actions 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.

6. Storage of project documents and accounting records

All accounting and supporting documents (e.g. Project Application Form, Subsidy Contract, reports, service contracts, public procurement documentation, rental contracts, important communication among project partners and between the project Beneficiaries and the Programme bodies as well as documents required to ensure an adequate audit trail, documents related to expenditures as e.g. original invoices and control and audit reports) must be available and accessible for a period of three years (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 No 1303/2013), unless stricter national rules state a later date. The Managing Authority shall inform beneficiaries of the start date of the period.

Official documents related directly to the communication with the Programme authorities shall be archived by the Lead Beneficiary, whilst the reporting and supporting documents related to the Project Beneficiaries must be kept at the Project Beneficiary'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 the versions held 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 Managing Authority, Joint Secretariat, National Authorities, First Level Control, Certifying Authority, Audit Authority, authorized officials of the Community 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:

Nr	Document	Lead Beneficiary	Project Beneficiary
1	Approved Application Form	Copy (original signed by LB)	Copy (original signed by LB)
2	Partnership Agreement (and its amendments)	Original	Original
3	Subsidy Contract (and its amendments)	Original	Copy
4	Project Progress Reports	Copy	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 invoices LB's	Only invoices PB's
9	All supporting documents related to project expenditure (e.g. payslips, bank statements, public procurement, 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

Nr	Document	Lead Beneficiary	Project Beneficiary
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 Progress Report	copy	copy
14	Final Project Report	copy	copy

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 **infrastructure** or **equipment** property is transferred after the project closes, 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);
- 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 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.