

FAQs about Specific Actions under Thematic Facility Work Programmes AMIF and ISF 2021-2022, BMVI 2021-2024

17 March 2022

Horizontal questions raised on Specific Actions

Topic classification	Questions	Reply
Indirect costs for beneficiary	Please clarify if the beneficiary who will conduct the project is allowed to include some type of overhead costs (or indirect costs – usually a certain % of the project budget) in the budget form. It seems that there is nothing specific foreseen in the budget form as such, which is confusing... On the other hand, the budget form is quite basic, so it could be assumed that applicant could add it themselves...	<p>The Budget form should provide an indicative estimation of the budget, to be used by the Commission in the selection of the projects, to make sure that all the applicants are treated equally.</p> <p>As the specific actions are to be implemented under Shared Management, the national rules apply. Thus, it is up to the national authorities to define and establish the project costs, including overhead costs if needed, ensuring equality of treatment and avoiding any conflicts of interest, in accordance with the principles of sound financial management.</p>
Transfer of funding Third countries' participation National/CPR rules	<p>1) In case a project proposal is successful, will the lead country be responsible to receive the total amount and then transfer the corresponding share to the partners, or would it be possible for the European Commission to transfer directly the corresponding share to the lead and the partner countries?</p> <p>2) Regarding third countries participating as partners and since they cannot benefit directly from the EU funding, does it mean that there is no way to compensate for their participation/involvement in the project? In the framework of a project implementation phase, would it be possible to compensate for example the deployment of police officers from Serbia, Norway, Island, UK and US in the leading MS? How this compensation /payment would be possible?</p>	<p>1) The partnership may decide to use Option 1 or Option 2 as indicated in the note HOME-Funds/2022/07 (ref. No Ares(2022)1060102 of 14/02/2022) “Transnational specific actions under the Asylum, Migration and Integration Fund (AMIF), the Instrument for Financial Support for Border Management and Visa Policy (BMVI), and the Internal Security Fund (ISF) – Arrangements between partners“.</p> <p>2) Each Member State could decide to reimburse the costs of participants from third countries from its own additional specific action allocation following the rules of its ISF programme in terms of contractual obligations with the third country. The costs for the deployment of officers from third countries could be charged to the specific action, provided that these costs are eligible, documented and in line with the national eligibility rules. The Member State will also ensure the proper audit trail for these expenditure regarding third</p>

	<p>3) One more question now in relation to the enclosed document form the Committee for the Home Affairs Funds: Last paragraph in page 2 relates to the applicable rules on eligibility of expenditure for different categories of costs, indicating that “General eligibility rules could also be created specifically for the specific action, while being in line with the general rules stemming from the Common Provisions Regulation and the Fund-specific Regulations”.</p> <p>Does it mean that National rules can be overlooked as far as the applicable rules are in line with the general rules stemming from the Common Provisions Regulation and the Fund-specific Regulations? More specific: If according to the National rules it is not possible to execute an eligible cost, could this cost be executed if it is in line with the Common Provisions Regulation and the Fund-specific Regulations?</p>	<p>countries. For example, the Member State could pay directly for the plane ticket and accommodation of a Serbian officer. The involvement of third countries in the project should be clearly explained in the application form (sections: part 1 on project beneficiaries; part 2 project description and subsection B.5 Budget).</p> <p>3) No. National rules cannot be overlooked. However, the partnership may define some specific rules applicable to the specific action, provided that they are in line with the national rules of the Member States, the Fund-specific and the CPR Regulations, as well as validated by the relevant national audit authority. As the meaning of “execute a cost” is unclear, could you please provide the Commission with a specific example?</p>
<p>National partners</p>	<p>Our lead beneficiary has a question regarding how to present the involvement of a potential partner in their proposed action. More specifically, they are wondering where exactly they should mention the possible involvement of an internal national partner (a national University) in the project. This does not really fit with the partnership declaration annex as it stands now, and it’s also not intended for this I believe, since this is more aimed to external (international / EU) partner countries.</p> <p>Is it sufficient if they just mention the possible involvement of the national partner among the other beneficiaries of the project in the application form?</p>	<p>Yes. The involvement of national partners should be indicated in the application form (sections: part 1 on project beneficiaries; part 2 project description and subsection B.5 Budget).</p>
<p>Allocation of funding between partners</p>	<p>1) In the framework of specific actions we would like to have a clarification from the Commission on the arrangements between partners and more specifically on the allocation of funding.</p>	<p>1) It is possible that one of the partners will not receive funding in its Member State’s ISF programme yet fully participates in the action on a no-cost basis, whilst the other</p>

	<p>Assuming we choose option n°2 - allocation of funding to the national programmes of each partner - is it possible that some partners/co-applicants receive funding and others do not?</p> <p>In other words, is a "mixed arrangement" possible (options 1+2) within one project?</p> <p>→ E.g. Member State X is the lead applicant. Member States Y, W and Z are co-applicants. However, Member State Y wishes not to receive additional allocation of funding to its NP but the others wish.</p> <p>2) When it comes to transnational projects there is an opportunity to tick that "Funding to be allocated to the program of each partner member does this mean that you have a budget for each MS specifically, or can you report, for example, against specific items in the application directly to "your" funds, instead of everything being reported from one MS?</p>	<p>partners will participate and receive funding in their respective Member States' ISF programmes.</p> <p>It is important that these arrangements are clearly mentioned and detailed in the application form and reported on by the lead Member State as indicated in the note HOME-Funds/2022/07 ref. No Ares(2022)1060102 of 14/02/2022 on transnational specific actions (pages 2-3).</p> <p>2) Both options are possible. Please let us refer to the detailed guidance on the different options for allocating funds between partners in case of transnational Specific Actions under the HOME Funds including the corresponding reporting requirements as indicated in the note HOME-Funds/2022/07 ref. No Ares (2022)1060102 of 14/02/2022 on transnational specific actions (pages 2-3).</p>
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FAQ – Specific Actions ISF

❖ **ISF/2022/SA/2.2.1 - EMPACT**

Topic classification	Questions	Reply
EMPACT driver	Does the Driver has to participate in the ISF Specific Action call as main applicant or co-applicant to endorse the project ? How would DG HOME assess the driver being co-applicant if the driver has no activity and no corresponding budget within the submitted application ?	If the Driver is not involved in the project as co-applicant, the lead Member State should explain in the application form (section B.2 “ Involvement of EMPACT stakeholders Indicate the level of involvement and cooperation of relevant competent authorities from the group of EU Member States working in EMPACT”) why the Driver does not participate to any activity and does not receive any share of the EU funding, and how its involvement is ensured. This way the Commission is aware of the Driver’s position and can assess the sub-criterion “coordination with the Driver”.

FAQ – Specific Actions BMVI

❖ **BMVI/2021-2022/SA/1.2.1 - Innovation for sea/shore, and/or land border surveillance (operational testing in pilot projects)**

Topic classification	Questions	Reply
Eligibility of applicant	Are the national profit private bodies eligible as participating entities to the specific action?	Yes, they may be eligible, subject to the provisions of Article 192 Financial Regulation (EU, Euratom) 2018/1046 (“no-profit principle”), and if they meet the EU and national rules on financial management and audit. Please, make sure that the national eligibility rules provide that such bodies are beneficiaries of the BMVI, in the meaning of the definition included in Article 2(9) CPR [Regulation (EU) 2021/1060].