CALL FOR PROPOSALS 2022CE160AT013

Empowering youth in the EU Outermost Regions – YOUTH 4 OUTERMOST REGIONS (#YOUTH4ORS)
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1. **INTRODUCTION – BACKGROUND**

The EU outermost regions face a number of permanent constraints linked to their remoteness, small size, vulnerability to climate change and insularity. Prospects for young people are limited in these regions, which are characterised by high levels of unemployment and early school leaving, with many young people not in education employment or training.

The President of the European Commission highlighted the role of young people in shaping the future and established 2022 as the European Year of the Youth. Announcing the initiative, the President remarked how “Europe needs all of its youth” and “everything the European Commission does, from the European Green Deal to NextGenerationEU, is about protecting young people’s future”.

The European Union needs the engagement and the participation of young people to build a better future. 2022 is a year dedicated to listen, to involve and to support youth to become active citizens, and foster a sense of belonging. The success of the Year will depend on the mobilisation and active contribution of young people and youth stakeholders at European, national, regional and local levels.

This initiative targeted to the youth in the outermost regions will actively contribute to the spirit of the European Year of the Youth.

2. **OBJECTIVE – PRIORITIES**

2.1. **Objective**

In the context of the Year, the objective of the grant is to empower and mobilise youth in the outermost regions. Young people can become agents of change, entrepreneurs and innovators in their local communities. This grant is part of a group of grants targeted at young people in specific EU regions, following from the call for proposals “Promoting youth participation in just transition – EUTEENS4GREEN” (2021CE160AT032).

The scope of the Year is broad since many EU policies are relevant to support the personal, social and professional development of youth. For instance, the green and digital transitions offer a renewed perspective for the future and opportunities for young people and society at large. Moreover, the whole range of EU policies should go hand in hand with the implementation of NextGenerationEU.

The proposal selected under this call will develop a scheme to provide financial support to youth, as defined in point 2.2 of the present call. The beneficiary will be responsible for promoting, organising and evaluating the results of several calls for actions dedicated to young people.

The calls for actions should result in the selection of a minimum of 70 actions. They should be of small size and limited duration up to 12 months. Action activities, properly justified, will be eligible to receive funding between EUR 5 000 and EUR 10 000.

The total budget earmarked for co-financing is EUR 1 000 000 with a total duration of the grant of 24 months. At the end of the grant, the beneficiary will provide the European Commission with recommendations and lessons learned.

2.2. **Priorities**

The present initiative aims to empower young people and to make them actors in the definition and implementation of solutions in their local communities, by creating a grant scheme – managed by the beneficiary entity - financing small projects by young people.
The present call for proposals will select **one beneficiary**¹ to manage and act as secretariat of this grant scheme. The organisations/entities that apply to this call for proposals must be **legally based and located in one of the EU outermost regions.**

The beneficiary will provide **small grants to (groups of) young people**², aged between **15 and 24 years old or youth organisations representing young people of this age group** that: a. are legal residents in one of the nine EU outermost regions; b. have submitted applications in one of the call for actions; c. were selected for funding.

The beneficiary will launch the **calls for actions** - in French, Portuguese and Spanish)- in a dedicated website, after having disseminated them in the appropriate **social media** tools and multipliers. In order to promote extensive participation of youth across all the outermost regions, the beneficiary will launch a minimum of **two calls for actions**, starting as early as month 2 and a second one at the latest in either month 9 or 10 of the project implementation.

During the implementation phase of the project, the individual actions by young people/youth organisations should not run for a period longer than 12 months. The beneficiary should also ensure adequate solutions for the granting of funds to young applicants below the age of majority. The beneficiary should strive towards a geographic balance in the representation of the 9 outermost regions of the European Union.

The **actions proposed** should empower and encourage youth to become active in their local communities in the definition and implementation of solutions to improve citizens’ quality of life and foster local / regional development. They should be adapted to the specific situation of each region and bring about concrete improvements. While the actions should generate added value and improvements in each respective region, actions can include intra-regional cooperation (for example within the same archipelago), or cooperation with other outermost regions, with neighbouring countries or territories and with the continental European Union.

While there is **no particular area** or subject on which the proposed actions should focus, actions linked to EU priorities are welcome, such as the twin - green and digital-transition, socio-economic recovery and the European Pillar of Social Rights.

For instance, actions **could contribute** to: **climate neutrality**; environmental protection; biodiversity preservation and nature based solutions, green energy transition and energy efficiency; oceans and blue economy; sustainable food production; green tourism; helping local communities and economic sectors adjust to cleaner practices, circular economy and waste management; low-cost innovative solutions; awareness raising and education activities; capacity building for skills needed for the green transition. The digitalisation of these proposed green solutions is particularly encouraged.

The proposed actions **could also focus on digital solutions** to local challenges; development of digital skills; uptake of digital technologies; low cost enabling digital solutions. In any case, applicants can submit actions in any domain and/or sector relevant to improve the local situation.

The actions should be fair and inclusive and **could contribute** to implementing the key principles set by the European Pillar of Social Rights³ in particular equal opportunities and access to the labour market; gender equality and gender balance; fair working conditions; and social protection and inclusion.

Young people will be invited to submit their applications for action in **French**,

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¹ See definition in points 6.1 & 7.4
² This definition includes a single or several natural persons or a legal personhood (e.g. youth associations, organisations, clubs, etc) that are resident in any outermost region.
**Portuguese or Spanish,** or in English if the action entails co-operation with other regions or Member States; and will be encouraged to communicate about their actions in these languages - or in English - when promoting their work through the information portal (see description of the portal, point 3 of paragraph 2.4) or through their own social media channels. The beneficiary should facilitate automatic translation tools in the portal for exchanges between young people.

The beneficiary should implement a **communication strategy** to maximise participation and outreach (e.g. languages of the regions, appropriate communication channels). The beneficiary will also develop and provide **online training and advisory service** to the grantees on how to prepare and run the project. It will also provide a **virtual space** for networking between the grantees (e.g. event, collaborative space). The beneficiary should give special emphasis to the **dissemination activities** related to the achievements of the different actions (e.g. kick-off awareness campaign targeted to youth, regular newsletters with success stories, video testimonials, strong social media presence and a final dissemination event).

**2.3. Eligible area and geographical balance**

The map below identifies the outermost regions, which are Guadeloupe, French Guiana, Martinique, Mayotte, Réunion, Saint-Martin, the Azores, Madeira and the Canary Islands. The (groups of) young applicants or youth organisations must be resident in one of those regions in order to be eligible for participation in the calls for actions that the beneficiary will publish.

There is no budget reserved per specific outermost region for the calls for actions, which are competitive and based on excellence.

![Map of the outermost regions](https://ec.europa.eu/regional_policy/en/policy/themes/outermost-regions/)

**Source:** EU & outermost regions


**2.4. Expected tasks to be performed**

The beneficiary is expected to perform the following tasks:

1. Prepare, organise and promote the calls for actions;
2. Manage the calls for actions (launch calls; receive applications; evaluate applications; select the applications on the basis of the established criteria and award the grants; monitor the implementation of the actions; make payments);
3. Set-up and maintain a project information portal in English, French, Portuguese and Spanish;
4. Communicate about the actions through the project information portal as well as identifying other appropriate media channels including, but not limited to, social media, press, tv, radio, advertising, publications;

5. Evaluate and conclude on the granted actions and report to the Commission;

6. Provide recommendations for future actions.

The implementation of the project includes two clear distinct phases:

- The 1st phase, object of the present call, is related to the selection of one organization only (the beneficiary) that will function as the secretariat.

- The 2nd phase is related to the administration of the awarded grant. During this phase the selected organisation (the beneficiary) will launch the calls for actions and select and monitor the actions (third parties).

2.5. Expected results

At the end of the project, the beneficiary should have achieved the following results:

1) Increased participation and involvement of young people from the outermost regions into their local communities.

2) A set of low-cost innovative actions implemented by young people/youth organisations which have supported local communities or which have contributed in a visible way to sustainability/digital transition/improving local living conditions, etc.

3) A number of concrete actions with tangible results on the ground, which reinforce the sense of belonging of youth with their region, and to promote entrepreneurship that can bring economic opportunities.

2.6. Minimum elements to be included in the proposal

Applicants shall indicate in their proposals the organizational framework to deliver all necessary arrangements to manage projects in compliance with the objectives of the call and the applicable legal framework, including the following:

1) Work plan of the project, with time and sequence of implementation of the various tasks;

2) The methodology to implement the full cycle of the call for actions, including the following elements:
   a) promotion of the calls for actions in the appropriate channels and languages among eligible youth and groups of youth resident in the outermost regions;
   b) process to manage the incoming applications and ways to cope with (potentially) high numbers of applications;
   c) evaluation and selection process, including how to manage applications in different languages and taking into account the geographical balance between the outermost regions;
   d) measures to support youth, e.g. online training, advisory services, virtual space for networking, virtual engagement activities;
   e) implementation, monitoring and support to actions;
   f) dissemination activities about successful actions and communication products in English, French, Portuguese and Spanish;
   g) financial management; and
   h) evaluation and reporting.
3) Description of the main features of the projects information portal and multi-language translation tools;
4) Financial allocation by task, taking into consideration that the beneficiary should allocate **at least 65%** of the total grant to the minimum of 70 actions;
5) The grant will be defined by applying a maximum co-financing rate of 95 % to the eligible costs actually incurred and declared by the beneficiary and its affiliated entities.
6) Personnel costs **cannot go beyond 25% of the total budget**.
7) Measures to ensure quality control and management of risks, for the whole project implementation and for the call for actions in particular.

**2.7. Elements requiring formal validation by the European Commission during project implementation**

The beneficiary is expected to work in close contact with the European Commission throughout the implementation process of the grant. Working language for the interactions with the Commission will be one of the three procedural languages of the European Commission. In particular, the following elements will have to be validated by the Commission prior to their implementation:

- The text of the call for actions in French, Portuguese or Spanish, as defined in point 2.2, in particular description of the selection process and material prepared to assist youth in submitting their applications.
- The nomination of the call for actions’ evaluation committee(s). A representative of the Commission can take part in these committee(s) as an observer.
- The call for actions evaluation report, including the final list of youth selected to benefit from financial support and statistics per language and region.
- Communication strategy and design of the projects information portal.

**3. TIMETABLE**

<table>
<thead>
<tr>
<th>Steps</th>
<th>Date and time or indicative period</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Publication of the call</td>
<td>4 May 2022</td>
</tr>
<tr>
<td>(b) <strong>Deadline for submitting applications</strong></td>
<td><strong>04/07/2022 – 17:00 Central European Time (CET)</strong></td>
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<tr>
<td>(c) Evaluation period</td>
<td>July/August 2022</td>
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<td>(d) Information to applicants</td>
<td>August 2022</td>
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<tr>
<td>(e) Signature of grant agreement</td>
<td>September 2022</td>
</tr>
<tr>
<td><strong>Implementation phase</strong></td>
<td></td>
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<tr>
<td>(g) Entity to launch first “call for actions”</td>
<td>As early as month 2 of start of grant implementation</td>
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</tbody>
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4 English, French and German
4. BUDGET AVAILABLE

The total budget earmarked for the co-financing of actions under this call for proposals is estimated at **EUR 1 000 000**.

The Commission expects to fund one proposal only.

The Commission reserves the right not to distribute all the funds available.

5. ADMISSION REQUIREMENTS

In order to be admissible, applications must be:

- sent no later than the deadline for submitting applications referred to in point 3;
- drafted in one of the EU official languages.

Failure to comply with those requirements will lead to rejection of the application.

6. ELIGIBILITY CRITERIA

6.1. Eligible applicants

Proposals may be submitted by any of the following applicants:

- non-profit organisation (private or public);
- public authorities (regional and/or local);
- universities;
- educational institutions;
- research centres;

**Country of establishment**

The organisations/entities that apply to this call for proposals must be **legally based and located in one of the EU outermost regions**.

The outermost regions are defined as:

- One of the EU outermost regions as listed in Article 349 of the Treaty on the Functioning of the EU: Guadeloupe, French Guiana, Martinique, Mayotte, Réunion, Saint-Martin (France), the Azores, Madeira (Portugal) and the Canary Islands (Spain).
The same eligibility criteria apply to affiliated entities.

**Supporting documents**

In order to assess the applicants’ eligibility, the following supporting documents are requested:

- **private entity**: extract from the official journal, copy of articles of association, extract of trade or association register, certificate of liability to VAT (if, as in certain countries, the trade register number and VAT number are identical, only one of these documents is required);
- **public entity**: copy of the resolution, decision or other official document establishing the public-law entity;
- **entities without legal personality**: documents providing evidence that their representative(s) have the capacity to undertake legal obligations on their behalf.

**6.2. Eligible activities**

The following types of activities are eligible under this call for proposals:

- The activities necessary to achieve expected output under article 2.4 of this call;
- Financial support to third parties (see point 11.7.d);
- analyses,
- Awareness and dissemination actions.

The beneficiary will provide support to actions by eligible youth selected through a competition within the scope set in points 2.2 and 2.3. The support per action cannot exceed the value of EUR 10 000, with a minimum of EUR 5 000 support per action selected for funding.

**Implementation period**

The maximum duration of the project to be implemented by the beneficiary is 24 months. Applications for projects scheduled to run for a longer period than that specified in this call for proposals will not be accepted. The beneficiary should take into account these aspects when publishing the “call for actions”.

**7. EXCLUSION CRITERIA**

**7.1. Exclusion**

The authorising officer shall exclude an applicant from participating in call for proposals procedures where:

(a) the applicant is bankrupt, subject to insolvency or winding-up procedures, its assets are being administered by a liquidator or by a court, it is in an arrangement with creditors, its business activities are suspended, or it is in any analogous situation arising from a similar procedure provided for under EU or national laws or regulations;

(b) it has been established by a final judgment or a final administrative decision that the applicant is in breach of its obligations relating to the payment of taxes or social security contributions in accordance with the applicable law;

(c) it has been established by a final judgment or a final administrative decision that the applicant is guilty of grave professional misconduct by having violated applicable laws or regulations or ethical standards of the profession to which the applicant
belongs, or by having engaged in any wrongful intent or gross negligence, including, in particular, any of the following:

(i) fraudulently or negligently misrepresenting information required for the verification of the absence of grounds for exclusion or the fulfilment of eligibility or selection criteria or in the performance of a contract, a grant agreement or a grant decision;

(ii) entering into agreement with other applicants with the aim of distorting competition;

(iii) violating intellectual property rights;

(iv) attempting to influence the decision-making process of the Commission during the award procedure;

(v) attempting to obtain confidential information that may confer upon it undue advantages in the award procedure;

(d) it has been established by a final judgment that the applicant is guilty of any of the following:


(ii) corruption, as defined in Article 4(2) of Directive (EU) 2017/1371 or Article 3 of the Convention on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union, drawn up by the Council Act of 26 May 1997, or conduct referred to in Article 2(1) of Council Framework Decision 2003/568/JHA, or corruption as defined in the applicable law;

(iii) conduct related to a criminal organisation, as referred to in Article 2 of Council Framework Decision 2008/841/JHA;

(iv) money laundering or terrorist financing within the meaning of Article 1(3), (4) and (5) of Directive (EU) 2015/849 of the European Parliament and of the Council;

(v) terrorist offences or offences linked to terrorist activities, as defined in Articles 1 and 3 of Council Framework Decision 2002/475/JHA, respectively, or inciting, aiding, abetting or attempting to commit such offences, as referred to in Article 4 of that Decision;

(vi) child labour or other offences concerning trafficking in human beings as referred to in Article 2 of Directive 2011/36/EU of the European Parliament and of the Council;

(e) the applicant has shown significant deficiencies in complying with main obligations in the performance of a contract, a grant agreement or a grant decision financed by the Union's budget, which has led to its early termination or to the application of liquidated damages or other contractual penalties, or which has been discovered following checks, audits or investigations by an authorising officer, OLAF or the Court of Auditors;

(f) it has been established by a final judgment or final administrative decision that the applicant has committed an irregularity within the meaning of Article 1(2) of Council Regulation (EC, Euratom) No 2988/95;

(g) It has been established by a final judgement or final administrative decision that the
applicant has created an entity in a different jurisdiction with the intent to circumvent fiscal, social or any other legal obligations of mandatory application in the jurisdiction of its registered office, central administration or principal place of business;

(h) it has been established by a final judgement or final administrative decision that an entity has been created with the intent referred to in point (g);

(i) for the situations referred to in points (c) to (h) above, the applicant is subject to:

(i) facts established in the context of audits or investigations carried out by European Public Prosecutor's Office after its establishment, the Court of Auditors, the European Anti-Fraud Office or the internal auditor, or any other check, audit or control performed under the responsibility of an authorising officer of an EU institution, of a European office or of an EU agency or body;

(ii) non-final judgments or non-final administrative decisions which may include disciplinary measures taken by the competent supervisory body responsible for the verification of the application of standards of professional ethics;

(iii) facts referred to in decisions of persons or entities being entrusted with EU budget implementation tasks;

(iv) information transmitted by Member States implementing Union funds;

(v) decisions of the Commission relating to the infringement of Union competition law or of a national competent authority relating to the infringement of Union or national competition law; or

(vi) decisions of exclusion by an authorising officer of an EU institution, of a European office or of an EU agency or body.

7.2. Remedial measures

If an applicant declares one of the situations of exclusion listed above (see point 7.4), it must indicate the measures it has taken to remedy the exclusion situation, thus demonstrating its reliability. This may include e.g. technical, organisational and personnel measures to correct the conduct and prevent further occurrence, compensation of damage or payment of fines or of any taxes or social security contributions. The relevant documentary evidence which illustrates the remedial measures taken must be provided in annex to the declaration. This does not apply for situations referred to in point (d) of point 7.1.

7.3. Rejection from the call for proposals

The authorising officer shall not award a grant to an applicant who:

(a) is in an exclusion situation established in accordance with point 7.1; or

(b) has misrepresented the information required as a condition for participating in the procedure or has failed to supply that information; or

(c) was previously involved in the preparation of documents used in the award procedure where this entails a breach of the principle of equal treatment, including distortion of competition, that cannot be remedied otherwise.

The same exclusion criteria apply to affiliated entities. Administrative sanctions (exclusion) may be imposed on applicants, or affiliated entities where applicable, if any of the declarations or information provided as a condition for participating in this procedure prove to be false.
7.4. Supporting documents

Applicants and affiliated entities must provide a declaration on their honour certifying that they are not in one of the situations referred to in Articles 136(1) and 141 FR, by filling in the relevant form attached to the application form accompanying the call for proposals and available at https://ec.europa.eu/regional_policy/en/newsroom/funding-opportunities/calls-for-proposal/.

This obligation may be fulfilled in one of the following ways:

For mono-beneficiary grants:

(i) the applicant signs a declaration in its name and on behalf of its affiliated entities; OR
(ii) the applicant and its affiliated entities each sign a separate declaration in their own name.

For multi-beneficiary grants:

(i) the coordinator of a consortium signs a declaration on behalf of all applicants and their affiliated entities; OR
(ii) each applicant in the consortium signs a declaration in its name and on behalf of its affiliated entities; OR
(iii) each applicant in the consortium and the affiliated entities each sign a separate declaration in their own name.

8. SELECTION CRITERIA

8.1. Financial capacity

Applicants must have stable and sufficient sources of funding to maintain their activity throughout the duration of the grant and to participate in its funding. The applicants’ financial capacity will be assessed on the basis of the following supporting documents to be submitted with the application:

a) Low value grants (≤ EUR 60 000):
   – a declaration on their honour.

b) Grants > EUR 60 000:
   – a declaration on their honour, and

   EITHER
   ➢ the profit and loss account as well as the balance sheet for the last two financial years for which the accounts were closed;
   ➢ for newly created entities: the business plan might replace the above documents;

   OR
   ➢ the table provided for in the application form, filled in with the relevant statutory accounting figures, in order to calculate the ratios as detailed in the form.

c) Grants for an action > EUR 750 000:
   (i) the information and supporting documents mentioned in point b) above,
and

(ii) **an audit report** produced by an approved external auditor certifying the accounts for the last 2 financial years available, where such an audit report is available or whenever a statutory report is required by law.

If the audit report is not available AND a statutory report is not required by law, a self-declaration signed by the applicant’s authorised representative certifying the validity of its accounts for the last 2 financial years available must be provided.

In the event of an application grouping several applicants (consortium), the above thresholds apply to each applicant.

On the basis of the documents submitted, if the Commission considers that financial capacity is weak, it may:

- request further information;
- decide not to give pre-financing;
- decide to give pre-financing paid in instalments;
- decide to give pre-financing covered by a bank guarantee (see point 11.4 below);
- where applicable, require the joint and several financial liability of all the co-beneficiaries.

If the Responsible Authorising Officer considers that the financial capacity is insufficient s/he will reject the application.

### 8.2. Operational capacity

Applicants must have the professional competencies as well as appropriate qualifications necessary to complete the proposed action. In this respect, applicants have to submit a declaration on their honour, and the following supporting documents:

- curriculum vitae or description of the profile of the people primarily responsible for managing and implementing activities;
- the organisation's activity reports;
- an exhaustive lists of previous projects and activities performed and connected to the actions to be carried out in this call; this list must also include the geographic area where the projects are/have been carried out; an inventory of natural or economic resources involved in the project.

Applicants must prove the capacity to evaluate and process submissions in **English, French, Portuguese and Spanish**.

**Evidence**: CVs of the people responsible for managing and implementing the project.

Applicants must also prove experience of project management **in at least one outermost region**.

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5 In the case of multi-beneficiary grants ie consortia (see points 6.1 & 7.4), the coordinator can be supported by another experienced partner to handle the administrative procedures.

6 In the case of multi-beneficiary grants ie consortia (see points 6.1 & 7.4), the consortium must prove their experience and operational capacity as a whole.
Evidence: Proven past experience in projects of relevant magnitude (above EUR 200 000) and in at least one outermost region.

At least one of the team members should demonstrate experience in managing grants.

If, during the lifetime of the project, the proposed team should be adapted, the **CVs of new team members** shall be submitted to the Commission and validated by the Commission before they start working for the project (CV to follow standard model available here: [http://europass.cedefop.europa.eu/en/documents/curriculum-vitae](http://europass.cedefop.europa.eu/en/documents/curriculum-vitae)).

**9. AWARD CRITERIA**

Eligible applications will be assessed on the basis of the following criteria:

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Maximum points</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Relevance and added-value of the proposal <em>(threshold 15 points)</em></td>
<td>30</td>
</tr>
<tr>
<td>2. Overall quality of the proposals <em>(threshold 20 points)</em></td>
<td>40</td>
</tr>
<tr>
<td>3. Outreach and dissemination of project <em>(threshold 10 points)</em></td>
<td>20</td>
</tr>
<tr>
<td>4. Organisation of the project team <em>(threshold 5 points)</em></td>
<td>10</td>
</tr>
</tbody>
</table>

1. **Relevance and added-value of the project for the outermost regions (30 points – minimum threshold 15)**

This criterion will evaluate:

- Relevance of the proposed action to respond to the objectives and expected results of the project; i.e. to which extent the proposal corresponds to the objectives and results envisaged; including the suitability of the methodology proposed to select relevant applications;

- The added value in terms of effectiveness, complementarity, and improved coordination, i.e. to which extent the proposal improves access to financial support, resulting in greater knowledge, shared experiences and enhanced capacities to make better use of limited resources.

- The proposal should also demonstrate the upholding of European Union values such as nourishing mutual understanding and fostering diverse and inclusive youth/societies, as foreseen in article 3 and 176 of the Treaty on European Union (TEU).

- The proposal should also demonstrate how it intends to provide tailored support to young people in these regions to help overcome the challenges linked to the outermost regions’ remoteness and their particular conditions.

- A particular attention will be given to project proposals that contribute to addressing poverty, social exclusion, discrimination and gender inequality tailored to the situation in the outermost regions. For instance, actions can target young people - especially girls and young women - from disadvantaged socio economic backgrounds and/or households living below poverty line. Actions could support their skills and knowledge development to create positive social change in their local communities.
2. Overall quality of the proposals (40 points – minimum threshold 20)

This criterion will evaluate:

- Rationale of the proposed methodology and organisation, including the quality of the proposed work plan and its monitoring;

- Cost effectiveness of the proposed activities and in particular the relevance and quality of the means of implementation and the resources deployed in relation to the objectives envisaged;

- Sustainability of the project and in particular to which extent the proposed activities are realistic and sustainable, reaching medium- or long-term results and there is potential for continuation of the project beyond the end of the requested support.

3. Outreach and dissemination of the project (20 points – minimum threshold 10)

This criterion will evaluate:

- Adequacy of the approach proposed for the outreach activities to the youth target groups in the outermost regions to ensure maximum dissemination and communication;

- Relevance of the dissemination activities and the selected social media and multipliers, taking into account the specific context of the outermost regions;

- Impact of the expected results.

4. Organisation of the project team (10 points – minimum threshold 5)

This criterion will evaluate:

- organisation of work; proposed system to efficiently manage potential high numbers of youth project applications;

- organisation of roles and assignments within the project team to prepare, implement and monitor the various aspects of the whole project.

A maximum of 100 points will be awarded for the quality of the overall proposal. The required minimum overall score is 60 points out of 100. Furthermore, each award criteria has a minimum threshold indicated. Only the proposals meeting the above-mentioned quality thresholds will be put onto the ranking list. Reaching the threshold does not automatically imply award of the grant.

10. LEGAL COMMITMENTS

In the event of a grant awarded by the Commission, a grant agreement, drawn up in euro and detailing the conditions and level of funding, will be sent to the applicant, as well as the information on the procedure to formalise the agreement of the parties.

Two copies of the original agreement must be signed first by the beneficiary or the coordinator on behalf of the consortium and returned to the Commission immediately. The Commission will sign it last.

The applicants understand that submission of a grant application implies acceptance of the general conditions attached to this call for proposals. These general conditions
bind the beneficiary to whom the grant is awarded and shall constitute an annex to the grant decision.

11. FINANCIAL PROVISIONS

11.1. Forms of the grant

11.1.1 Reimbursement of costs actually incurred

The grant will be defined by applying a maximum co-financing rate of 95% to the eligible costs actually incurred and declared by the beneficiary and its affiliated entities.

For details on eligibility of costs, please refer to point 11.2.

11.1.2 Reimbursement of eligible costs declared on the basis of a flat-rate

The grant will be defined by applying a maximum co-financing rate of 95% to the eligible costs declared by the beneficiary and its affiliated entities on the basis of:

(a) a flat rate of 7% of the eligible direct costs (‘reimbursement of flat-rate costs’) for the following categories of costs: indirect costs.

The flat rate will be paid following acceptance of the costs to which the flat rate is to be applied.

11.2. Eligible costs

Eligible costs shall meet all the following criteria:

- they are incurred by the beneficiary.
- they are incurred during the duration of the action, with the exception of costs relating to final reports and audit certificates;
  - The period of eligibility of costs will start as specified in the grant agreement.
  - If a beneficiary can demonstrate the need to start the action before the agreement is signed, the costs eligibility period may start before that signature. Under no circumstances can the eligibility period start before the date of submission of the grant application.
- they are indicated in the estimated budget of the action;
- they are necessary for the implementation of the action which is the subject of the grant;
- they are identifiable and verifiable, in particular being recorded in the accounting records of the beneficiary and determined according to the applicable accounting standards of the country where the beneficiary is established and according to the usual cost accounting practices of the beneficiary;
- they comply with the requirements of applicable tax and social legislation;
- they are reasonable, justified, and comply with the principle of sound financial management, in particular regarding economy and efficiency.

The beneficiary's internal accounting and auditing procedures must permit direct reconciliation of the costs and revenue declared in respect of the action/project with the corresponding accounting statements and supporting documents.
The same criteria apply to costs incurred by the affiliated entities. Eligible costs may be direct or indirect.

11.2.1 Eligible direct costs

The eligible direct costs for the action are those costs which:

with due regard to the conditions of eligibility set out above, are identifiable as specific costs directly linked to the performance of the action and which can therefore be booked to it directly, such as:

(a) the costs of personnel working under an employment contract with the beneficiary or an equivalent appointing act and assigned to the action, provided that these costs are in line with the beneficiary’s usual policy on remuneration.

Those costs include actual salaries plus social security contributions and other statutory costs included in the remuneration. They may also comprise additional remunerations, including payments on the basis of supplementary contracts regardless of the nature of those contracts, provided that they are paid in a consistent manner whenever the same kind of work or expertise is required, independently from the source of funding used;

The costs of natural persons working under a contract with the beneficiary other than an employment contract or who are seconded to the beneficiary by a third party against payment may also be included under such personnel costs, provided that the following conditions are fulfilled:

(i) the person works under conditions similar to those of an employee (in particular regarding the way the work is organised, the tasks that are performed and the premises where they are performed);

(ii) the result of the work belongs to the beneficiary (unless exceptionally agreed otherwise); and

(iii) the costs are not significantly different from the costs of staff performing similar tasks under an employment contract with the beneficiary;

(b) The recommended methods for the calculation of direct personnel costs are provided in Appendix.

(c) costs of travel and related subsistence allowances, provided that these costs are in line with the beneficiary’s usual practices on travel;

(d) the depreciation costs of equipment or other assets (new or second-hand) as recorded in the beneficiary’s accounting statements, provided that the asset:

(i) is written off in accordance with the international accounting standards and the beneficiary’s usual accounting practices; and

(ii) has been purchased in accordance with the rules on implementation contracts laid down in the grant agreement, if the purchase occurred within the implementation period;

The costs of renting or leasing equipment or other assets are also eligible, provided that these costs do not exceed the depreciation costs of similar equipment or assets
and are exclusive of any finance fee;

Only the portion of the equipment’s depreciation, rental or lease costs corresponding to the implementation period and the rate of actual use for the purposes of the action may be taken into account when determining the eligible costs. By way of exception, the full cost of purchase of equipment may be eligible under the Special Conditions, if this is justified by the nature of the action and the context of the use of the equipment or assets;

(e) costs of consumables and supplies, provided that they:
   (i) are purchased in accordance with the rules on implementation contracts laid down in the grant agreement; and
   (ii) are directly assigned to the action;

(f) costs arising directly from requirements imposed by the Agreement (dissemination of information, specific evaluation of the action, audits, translations, reproduction), including the costs of requested financial guarantees, provided that the corresponding services are purchased in accordance with the rules on implementation contracts laid down in the grant agreement;

(g) costs derived from subcontracts, provided that specific conditions on subcontracting as laid down in the grant agreement are met;

(h) costs of financial support to third parties, provided that the conditions laid down in the grant agreement are met;

(i) duties, taxes and charges paid by the beneficiary, notably value added tax (VAT), provided that they are included in eligible direct costs, and unless specified otherwise in the grant agreement.

11.2.2 Eligible indirect costs (overheads)

Indirect costs are costs that are not directly linked to the action implementation and therefore cannot be attributed directly to it.

A flat-rate amount of 7% of the total eligible direct costs of the action, is eligible as indirect costs, representing the beneficiary's general administrative costs which can be regarded as chargeable to the action/project.

Indirect costs may not include costs entered under another budget heading.

**Applicants’ attention is drawn to the fact that if they are receiving an operating grant financed by the EU or Euratom budget, they may not declare indirect costs for the period(s) covered by the operating grant, unless they can demonstrate that the operating grant does not cover any costs of the action.**

In order to demonstrate this, in principle, the beneficiary should:

a. **use analytical cost accounting that allows to separate all costs (including overheads) attributable to the operating grant and the action grant.** For that purpose the beneficiary should use **reliable accounting codes and allocation keys ensuring that the allocation of the costs is done in a fair, objective and realistic way.**
b. *record separately:*

- all costs incurred for the operating grants (i.e. personnel, general running costs and other operating costs linked to the part of its usual annual activities), and

- all costs incurred for the action grants (including the actual indirect costs linked to the action)

If the operating grant covers the entire usual annual activity and budget of the beneficiary, the latter is not entitled to receive any indirect costs under the action grant.

### 11.3. Ineligible costs

The following items are not considered as eligible costs:

a) return on capital and dividends paid by a beneficiary;
b) debt and debt service charges;
c) provisions for losses or debts;
d) interest owed;
e) doubtful debts;
f) exchange losses;
g) costs of transfers from the Commission charged by the bank of a beneficiary;
h) costs declared by the beneficiary under another action receiving a grant financed from the Union budget. Such grants include grants awarded by a Member State and financed from the Union budget and grants awarded by bodies other than the Commission for the purpose of implementing the Union budget. In particular, beneficiaries receiving an operating grant financed by the EU or Euratom budget cannot declare indirect costs for the period(s) covered by the operating grant, unless they can demonstrate that the operating grant does not cover any costs of the action.
i) contributions in kind from third parties;
j) excessive or reckless expenditure;
k) deductible VAT.

VAT\(^7\) will be ineligible when the activities to be supported through the grant are taxed activities/exempt activities with right of deduction or activities engaged in by bodies governed by public law acting as a public authority of a Member State (i.e. activities resulting from the exercise of sovereign powers or prerogatives exercised by Member States under the special legal regime applicable to them in line with Article 13(1) of Council Directive 2006/112/EC: e.g. police, justice, definition and enforcement of public policies, etc.).

### 11.4. Balanced budget

The estimated budget of the action must be attached to the application form. It must have revenue and expenditure in balance.

The budget must be drawn up in euros.

Applicants for whom costs will not be incurred in euros should use the exchange rate published in the Official Journal of the European Union on the Infor-euro website available at:


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\(^7\) Article 186 (4) (c) of the Financial Regulation
The applicant must ensure that the resources which are necessary to carry out the action are not entirely provided by the EU grant.

Co-financing of the action may take the form of:

- the beneficiary's own resources,
- income generated by the action or work programme,
- financial contributions from third parties.

Overall co-financing may also include in-kind contributions from third parties, i.e. non-financial resources made available free of charge by third parties to the beneficiary or to the consortium. The corresponding costs of third parties are not eligible under the grant, e.g. providing a meeting room or equipment for free, etc.

In-kind contributions shall be presented separately in the estimated budget to reflect the total resources allocated to the action. Their approximate value shall be indicated in the estimated budget and shall not be subject to subsequent changes.

11.5. Calculation of the final grant amount

The final amount of the grant is calculated by the Commission at the time of the payment of the balance. The calculation involves the following steps:

Step 1 — Application of the reimbursement rate to the eligible costs and addition of the flat-rate

The amount under step 1 is obtained by applying the reimbursement rate specified in point 11.1.1 to the eligible costs actually incurred and accepted by the Commission, including costs declared in the form of flat rates to which the co-financing rate applies in accordance with point 11.1.2.

Step 2 — Limit to the maximum amount of the grant

The total amount paid to the beneficiaries by the Commission may in no circumstances exceed the maximum amount of the grant as indicated in the grant agreement. If the amount obtained following Step 1 is higher than this maximum amount, the final amount of the grant is limited to the latter.

If volunteers' work is declared as part of direct eligible costs, the final amount of the grant is limited to the amount of total eligible costs approved by the Commission minus the amount of volunteers' work approved by the Commission.

Step 3 — Reduction due to the no-profit rule

‘Profit’ means the surplus of receipts over the total eligible costs of the action, where receipts are the amount obtained following Steps 1 and 2 plus the revenue generated by the action for beneficiaries and affiliated entities other than non-profit organisations.

In-kind and financial contributions by third parties are not considered receipts.

The total eligible costs of the action are the consolidated total eligible costs approved by the Commission. The revenue generated by the action is the consolidated revenue established, generated or confirmed for beneficiaries and affiliated entities other than non-profit organisations.
non-profit organisations on the date on which the request for payment of the balance is
drawn up.

If there is a profit, it will be deducted in proportion to the final rate of reimbursement of
the actual eligible costs of the action approved by the Commission.

**Step 4 — Reduction due to improper implementation or breach of other obligations**

The Commission may reduce the maximum amount of the grant if the action has not been
implemented properly (i.e. if it has not been implemented or has been implemented
poorly, partially or late), or if another obligation under the Agreement has been breached.

The amount of the reduction will be proportionate to the degree to which the action has
been implemented improperly or to the seriousness of the breach.

11.6. Reporting and payment arrangements

**11.6.1 Payment arrangements**

The beneficiary may request the following payments provided that the conditions of the
grant agreement are fulfilled (e.g. payment deadlines, ceilings, etc.). The payment
requests shall be accompanied by the documents provided below and detailed in the grant
agreement:

<table>
<thead>
<tr>
<th>Payment request</th>
<th>Accompanying documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>A pre-financing payment corresponding to 45 % of the maximum grant amount</td>
<td>financial guarantee (see point 11.6.2)</td>
</tr>
<tr>
<td><strong>One interim payment:</strong></td>
<td></td>
</tr>
</tbody>
</table>
| For the purpose of determining the amount due as interim payment, the reimbursement rate to be applied to the eligible costs approved by the Commission shall be 95 %. | (a) 1st interim technical report
(b) interim financial statement
(c) a certificate on the financial statements and underlying accounts |

The interim payment shall not exceed 35% of the amount of the maximum grant amount.
The total amount of pre-financing and interim payments shall not exceed 80% of the maximum grant amount.

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8 2nd interim technical report will not lead to any further payment
Payment of the balance

The Commission will establish the amount of this payment on the basis of the calculation of the final grant amount (see point 11.5 above). If the total of earlier payments is higher than the final grant amount, the beneficiary will be required to reimburse the amount paid in excess by the Commission through a recovery order.

(a) final technical report
(b) final financial statement
(c) summary financial statement aggregating the financial statements already submitted previously and indicating the receipts
(d) a certificate on the financial statements and underlying accounts

In case of a weak financial capacity, point 8.1 above applies.

11.6.2 Pre-financing guarantee

A pre-financing guarantee for up to the same amount as the pre-financing may be requested in order to limit the financial risks linked to the pre-financing payment.

The financial guarantee, in euro, shall be provided by an approved bank or financial institution established in one of the EU Member States. When the beneficiary is established in a third country, the Commission may agree that a bank or financial institution established in that third country may provide the guarantee if it considers that the bank or financial institution offers equivalent security and characteristics as those offered by a bank or financial institution established in a Member State. Amounts blocked in bank accounts shall not be accepted as financial guarantees.

The guarantee may be replaced by:

- a joint and several guarantee by a third party or,
- a joint guarantee of the beneficiaries of an action who are parties to the same grant agreement.

The guarantee shall be released as the pre-financing is gradually cleared against interim payments or the payment of the balance, in accordance with the conditions laid down in the grant agreement.

As an alternative to requesting a guarantee on pre-financing, the Commission may decide to split the payment of pre-financing into several instalments.

11.7. Other financial conditions

a) Non-cumulative award

An action may only receive one grant from the EU budget.

b) Non-retroactivity

No grant may be awarded retrospectively for actions already completed.

A grant may be awarded for an action which has already begun only where the applicant can demonstrate in the grant application the need to start the action before the grant agreement is signed.

In such cases, costs eligible for financing may not have been incurred prior to the date of submission of the grant application.
c) **Implementation contracts/subcontracting**

Where the implementation of the action requires the award of procurement contracts (implementation contracts), the beneficiary may award the contract in accordance with its usual purchasing practices provided that the contract is awarded to the tender offering best value for money or the lowest price (as appropriate), avoiding conflicts of interest.

The beneficiary is expected to clearly document the tendering procedure and retain the documentation in the event of an audit.

Entities acting in their capacity as contracting authorities within the meaning of Directive 2014/24/EU or contracting entities within the meaning of Directive 2014/25/EU must comply with the applicable national public procurement rules.

Beneficiaries may subcontract tasks forming part of the action. If they do so, they must ensure that, in addition to the above-mentioned conditions of best value for money and absence of conflicts of interests, the following conditions are also complied with:

a) subcontracting does not cover core tasks of the action;
b) recourse to subcontracting is justified because of the nature of the action and what is necessary for its implementation;
c) the estimated costs of the subcontracting are clearly identifiable in the estimated budget;
d) any recourse to subcontracting, if not provided for in description of the action, is communicated by the beneficiary and approved by the Commission.

The Commission may grant approval:

(i) before any recourse to subcontracting, if the beneficiaries requests an amendment

(ii) after recourse to subcontracting if the subcontracting:

- is specifically justified in the interim or final technical report and
- does not entail changes to the grant agreement which would call into question the decision awarding the grant or be contrary to the equal treatment of applicants;

e) the beneficiaries ensure that certain conditions applicable to beneficiaries, enumerated in the grant agreement (e.g. visibility, confidentiality, etc.), are also applicable to the subcontractors.

d) **Financial support to third parties**

The applications may envisage provision of financial support to third parties. In such case the applications must include:

- an exhaustive list of the types of activities for which a third party may receive financial support out of the following fixed list:

- participatory processes,

- *Engagement activities,*

- *Communication activities*

- *Demonstration projects*;
the definition of the persons or categories of persons which may receive financial support out of the following categories:

- young people, between 15 and 24 years old resident in outermost regions territories as described at point 2.2 and 2.3

- the criteria for awarding financial support as follows:

  projects from young people selected through a call for actions whose elements have been validated by the Commission as described at point 2.7

- the maximum amount to be granted to each third party and the criteria for determining it as follows:

  - In case the beneficiary provides support to one of the action only by providing youth with funds to be used for purchase of good and services, for voluntary’s work, the maximum financial support per action is limited to 10 000EUR.

12. PUBLICITY

12.1. By the beneficiaries

Beneficiaries must clearly acknowledge the European Union’s contribution in all publications or in conjunction with activities for which the grant is used.

In this respect, beneficiaries are required to give prominence to the name and emblem of the European Commission on all their publications, posters, programmes and other products realised under the co-financed project. Communications best practice examples and resources can be found here:


To do this they must use:

- the text: “With financial support from the European Union”
- the emblem available at https://europa.eu/european-union/about-eu/symbols/flag_en
- the rules on use of the EU’s visual identity: https://ec.europa.eu/info/resources-partners/european-commission-visual-identity_en
- the following disclaimers:

For publications in print or electronic format:

'This publication was produced with the financial support of the European Union. Its contents are the sole responsibility of <name of the author/partner> and do not necessarily reflect the views of the European Union'

For websites and social media accounts:

'This <website/account> was created and maintained with the financial support of the European Union. Its contents are the sole responsibility of <name of the author/partner> and do not necessarily reflect the views of the European Union'

For videos and other audio-visual material:

'This <video/film/programme/recording> was produced with the financial support of the European Union. Its contents are the sole responsibility of <name of the author/partner> and do not necessarily reflect the views of the European Union'.
If this requirement is not fully complied with, the beneficiary’s grant may be reduced in accordance with the provisions of the grant agreement.

12. By the Commission

With the exception of scholarships paid to natural persons and other direct support paid to natural persons in most need, all information relating to grants awarded in the course of a financial year shall be published on an internet site of the European Union institutions no later than the 30 June of the year following the financial year in which the grants were awarded.

The Commission will publish the following information:

- name of the beneficiary;
- address of the beneficiary when the latter is a legal person, region when the beneficiary is a natural person, as defined on NUTS 2 level if he/she is domiciled within the EU or equivalent if domiciled outside the EU;
- subject of the grant;
- amount awarded.

Upon a reasoned and duly substantiated request by the beneficiary, the publication shall be waived if such disclosure risks threatening the rights and freedoms of individuals concerned as protected by the Charter of Fundamental Rights of the European Union or harm the commercial interests of the beneficiaries.

13. PROCESSING OF PERSONAL DATA

The reply to any call for proposals involves the recording and processing of personal data (such as name, address and CV). Such data will be processed pursuant to Regulation (EU) No 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC. Unless indicated otherwise, the questions and any personal data requested that are required to evaluate the application in accordance with the call for proposal will be processed solely for that purpose by DG REGIO – Budget and Financial Management. Personal data may be registered in the Early Detection and Exclusion System by the Commission, should the beneficiary be in one of the situations mentioned in Articles 136 and 141 of Regulation (EU, Euratom) 2018/1046.

For more information, see the Privacy Statement on: https://ec.europa.eu/info/data-protection-public-procurement-procedures_en

14. PROCEDURE FOR THE SUBMISSION OF PROPOSALS

Proposals must be submitted by the deadline set out under point 3.

No modification to the application is allowed once the deadline for submission has elapsed. However, if there is a need to clarify certain aspects or to correct clerical mistakes, the Commission may contact the applicant during the evaluation process.

Applicants will be informed in written about the results of the selection process.

Application forms are available at: https://ec.europa.eu/regiona_l_policy/en/newsroom/funding-opportunities/calls-for-proposal/
Applications must be submitted using the correct form, duly completed and dated. They must be signed by the person authorised to enter into legally binding commitments on behalf of the applicant organisation.

Where applicable, all additional information considered necessary by the applicant can be included on separate sheets.

Applicants are requested to submit their applications by email in **pdf format** to the following email address: **EU-Youth4ORs@ec.europa.eu**

All documents must be provided in **pdf format (not in pdf.p7m format, no link to Drive or WeTransfer or any other platform)**. The estimated budget must also be provided in **Excel format**.

Please note that you will receive an automatic reply confirming receipt notification which will be followed by an official receipt notification after opening of proposals.

Please also note that the maximum size of an email accepted to this email address is **25 MB**. If one email is not sufficient to send all the required documents, applicants may send more than one email which should then be numbered.

Please note that in the case that you have sent several emails, you will receive only one automatic receipt notification. Applications sent by post or by fax will not be accepted.

**Contacts**

Any questions related to this call may be addressed to **REGIO-CONTRACTS@ec.europa.eu**. In order to ensure an efficient handling of any enquiry, please indicate clearly the reference of this call for proposals in the subject or in the text of the email.

The answers to the questions submitted will be published in the Q&A list at [https://ec.europa.eu/regiona_policy/en/newsroom/funding-opportunities/calls-for-proposal/](https://ec.europa.eu/regiona_policy/en/newsroom/funding-opportunities/calls-for-proposal/) to ensure equal treatment of all potential applicants. Questions may be sent by applicants to the above address no later than 10 days before the deadline for the submission of proposals.

**Annexes:**

- Application form
- Checklist of documents to be provided
- Model grant agreement
Appendix

Specific conditions for direct personnel costs

1. Calculation

The ways of calculating eligible direct personnel costs laid down in points (a) and (b) below are recommended and accepted as offering assurance as to the costs declared being actual.

The Commission may accept a different method of calculating personnel costs used by the beneficiary, if it considers that it offers an adequate level of assurance of the costs declared being actual.

a) for persons working exclusively on the action:

\[
\text{monthly rate for the person} \times \text{number of actual months worked on the action}
\]

The months declared for these persons may not be declared for any other EU or Euratom grant.

The monthly rate is calculated as follows:

\[
\text{annual personnel costs for the person} \div 12
\]

using the personnel costs for each full financial year covered by the reporting period concerned.

If a financial year is not closed at the end of the reporting period, the beneficiaries must use the monthly rate of the last closed financial year available;

b) for persons working part time on the action

(i) If the person is assigned to the action at a fixed pro-rata of their working time:

\[
\text{monthly rate for the person} \times \text{pro-rata assigned to the action} \times \text{number of actual months worked on the action}
\]

The working time pro-rata declared for these persons may not be declared for any other EU or Euratom grant.

The monthly rate is calculated as above.
(ii) In other cases:

{hourly rate for the person multiplied by number of actual hours worked on the action} or

{daily rate for the person multiplied by number of actual days worked on the action}

(rounded up or down to the nearest half-day)

The number of actual hours/days declared for a person must be identifiable and verifiable.

The total number of hours/days declared in EU or Euratom grants, for a person for a year, cannot be higher than the annual productive hours/days used for the calculations of the hourly/daily rate. Therefore, the maximum number of hours/days that can be declared for the grant are:

{number of annual productive hours/days for the year (see below) minus

total number of hours and days declared by the beneficiary, for that person for that year, for other EU or Euratom grants}.

The ‘hourly/daily rate’ is calculated as follows:

{annual personnel costs for the person divided by

number of individual annual productive hours/days} using the personnel costs and the number of annual productive hours/days for each full financial year covered by the reporting period concerned.

If a financial year is not closed at the end of the reporting period, the beneficiaries must use the hourly/daily rate of the last closed financial year available.

The ‘number of individual annual productive hours/days’ is the total actual hours/days worked by the person in the year. It may not include holidays and other absences (such as sick leave, maternity leave, special leave, etc). However, it may include overtime and time spent in meetings, trainings and other similar activities.

2. **Documentation to support personnel costs declared as actual costs**

For persons working exclusively on the action, where the direct personnel costs are calculated following point (a), there is no need to keep time records, if the beneficiary signs a declaration confirming that the persons concerned have worked exclusively on the action.
For persons assigned to the action at a fixed pro-rata of their working time, where the direct personnel costs are calculated following point (b)(i), there is no need to keep time records, if the beneficiary signs a declaration that the persons concerned have effectively worked at the fixed pro-rata on the action.

For persons working part time on the action, where direct personnel costs are calculated following point (b)(ii), the beneficiaries must keep time records for the number of hours/days declared. The time records must be in writing and approved by the persons working on the action and their supervisors, at least monthly.

In the absence of reliable time records of the hours worked on the action, the Commission may accept alternative evidence supporting the number of hours/days declared, if it considers that it offers an adequate level of assurance.