



HORIZON 2020

Avoiding Common Errors

Brussels, 11 April 2019

The Framework Programmes timeline

2007

2014

2021

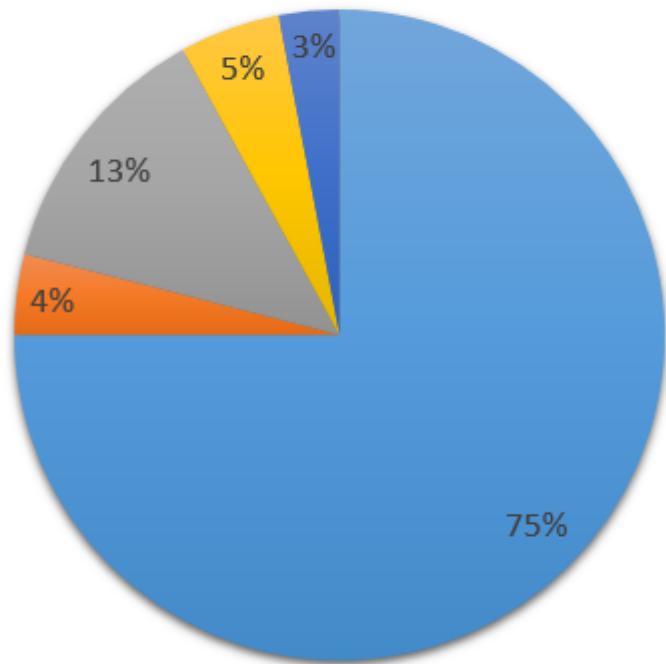


Horizon Europe

Each Framework Programme has its own rules !

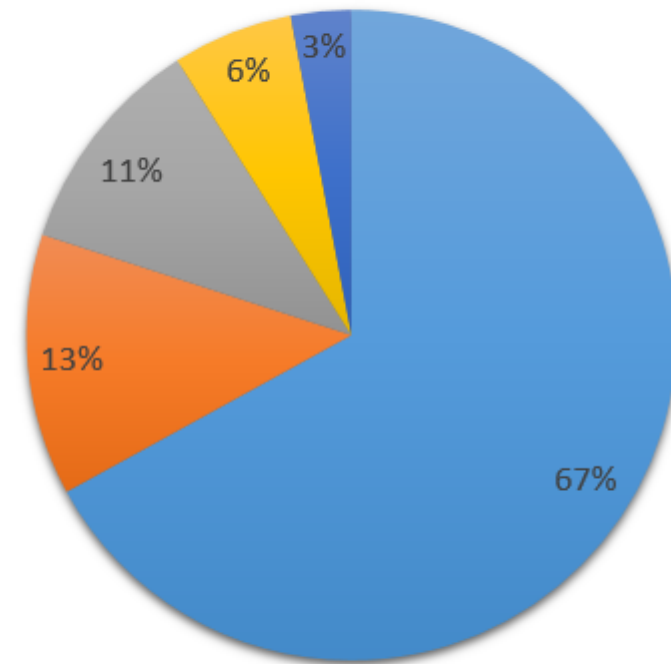
Declared costs vs Errors

Declared costs



- Personnel costs
- Other Goods and Services
- Travel
- Subcontracting
- Equipment

Errors



- Personnel costs
- Other Goods and Services
- Travel
- Subcontracting
- Equipment

First results of H2020 audits (1/3)

Personnel costs – actual costs (50% of all adjustments) due to:

- Incorrect productive hours calculation (15%)
- Incorrect remuneration costs - e.g. estimated (15%)
- Incorrect time working on action claimed (6%)
- Other - e.g. unreliable/missing timesheets, incorrect additional remuneration (14%)

Personnel costs – unit costs (17% of all adjustments) due to:

- Incorrect productive hours calculation (9%)
- Incorrect time working on action claimed (5%)
- Incorrect remuneration costs - e.g. budgeted, estimated (3%)
- Other – e.g. indirect costs claimed as direct costs, unreliable/missing timesheets (<1%)

First results of H2020 audits (2/3)

Subcontracting (13% of all adjustments) due to:

- Lack of adequate supporting documents (5%)
- Not foreseen in Annex I nor agreed by EU services (4%)
- Other errors – including e.g. no value for money, (4%)

Other goods and services (11% of all adjustments) due to:

- Lack of adequate supporting documents (5%)
- Cost not related to the action (2%)
- No direct measurement of the cost (2%)
- Other errors – e.g. indirect costs claimed as direct costs , no value for money (2%)

First results of H2020 audits (3/3)

Equipment (6% of all adjustments) due to:

- No direct measurement of the cost (4%)
- Other errors – e.g. no value for money, cost not related to the action (2%)

Travel (3% of all adjustments) due to:

- Cost not related to the action (1%)
- Other errors – e.g. lack of adequate supporting documents (2%)

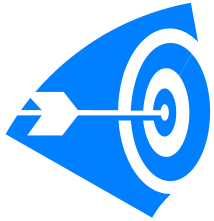
What contract under what budget category

A. Direct personnel costs		B. Direct costs of subcontracting	C. Direct costs of fin. support]	D. Other direct costs	E. Indirect costs ²
A.1 Employees (or equivalent)	A.4 SME owners without salary			D.1 Travel	
A.2 Natural persons under direct contract	A.5 Beneficiaries that are natural persons without salary			D.2 Equipment	
A.3 Seconded persons				D.3 Other goods and services	
[A.6 Personnel for providing access to research infrastructure]				[D.4 Costs of large research infrastructure]	
Actual	Unit ⁷	Unit ⁸	Actual	Actual	Flat-rate ⁹

Workforce costs

What contract under what budget category

What can you declare under personnel costs?



Persons hired by the beneficiary via an *employment contract*

(qualified as such under national law; and for whom the beneficiary pays social security contributions)

Other cases:

→ Natural persons hired **directly** via a contract other than an employment contract **if**:

- the person works under conditions similar to those of an employee (e.g. organisation or work, premises, etc.)
- The result of the work belongs to the beneficiary (exceptions may apply)
- The costs are not significantly different from those of an employee of the beneficiary doing similar tasks

NEW !
(2017)

→ Employees of a third party seconded to the beneficiary (must be set in Annex 1!)

What contract under what budget category

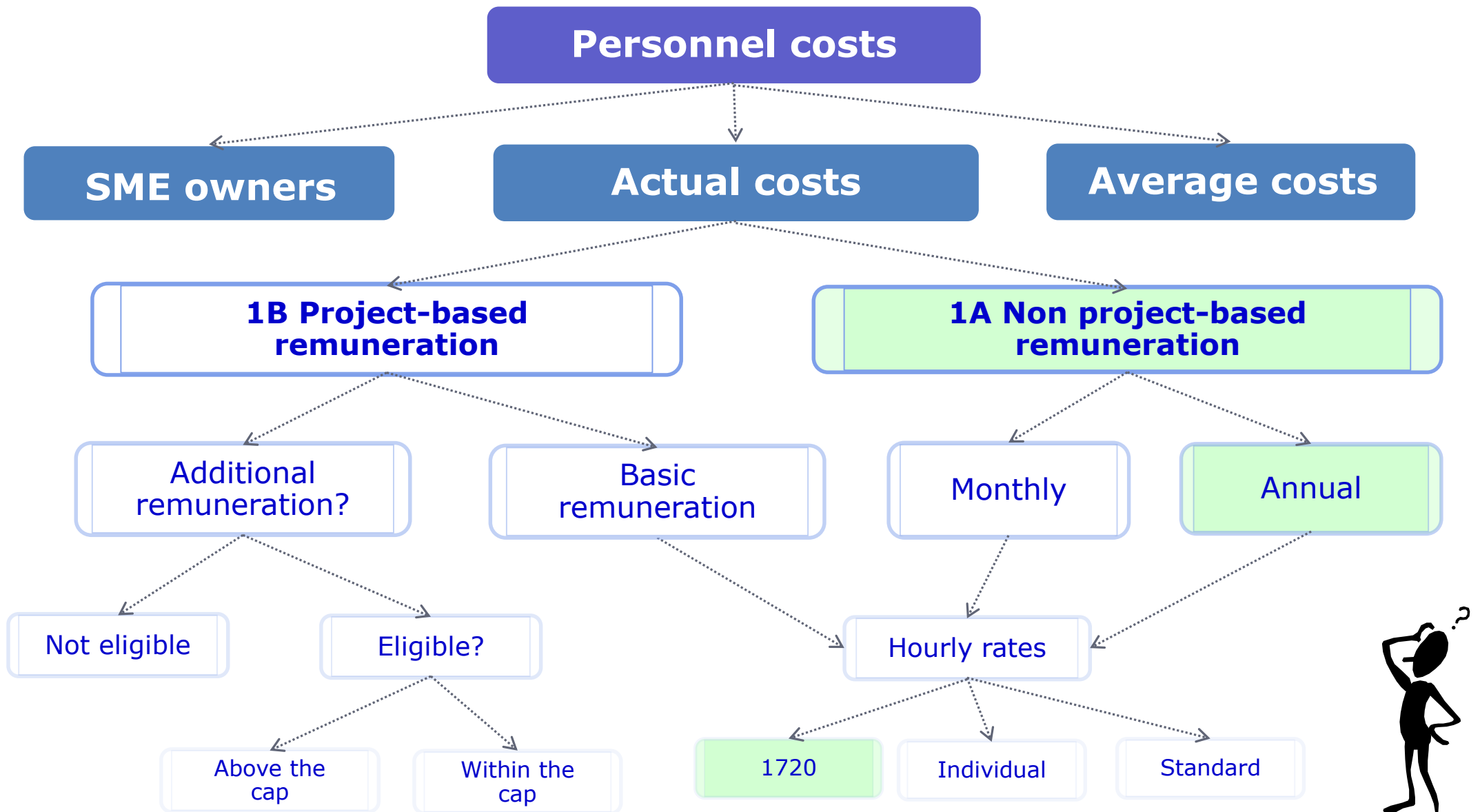
What can you **NOT** declare under personnel costs?

- ❌ Contracts with companies to provide staff (e.g. temporary work agencies)
- ❌ Natural persons (e.g. consultants) not fulfilling all the conditions mentioned in the previous slide.
 - e.g. working systematically off-site while employees have to work in the premises of the beneficiary
- ❌ Natural persons (e.g. consultants) paid *for deliverables* rather than for *working time*



In the cases above the costs may be eligible under 'Other goods and services' or under 'Subcontracting' but not as personnel costs

Personnel costs: finding your way



Personnel costs: Calculation



Hours worked



Hourly rate

EUR/hour



Additional remuneration



Time records



**Formula actual costs
&
specific unit costs**

**Applies only to
beneficiaries with project-
based remuneration schemes**

Only the hours actually worked on the action can be charged.

➤ Think of how you follow different projects

You cannot declare:

- Budgeted time (what you indicated for the budget)
- Estimated time (e.g. person 'guessing' at the end of the year)
- Time allocation (e.g. x % of the contractual time of the person)



Hours declared to the action must be supported by reliable records and documentation !



Time records: supporting documents

⇒ **Depend if the person works exclusively on a H2020 action or not**

↳ For this purpose, "*working exclusively*" refers to an uninterrupted period of at least one full calendar month during which all the hours worked by the employee for the beneficiary were dedicated to the H2020 action.

Working exclusively	Records	Conditions (full details available in the AGA; page 160)
YES	Declaration on exclusive work for the action	<ul style="list-style-type: none">→ only one per reporting period (per person)→ covering one uninterrupted period of exclusive dedication of at least one calendar month
NO	Time records (i.e. timesheets)	<ul style="list-style-type: none">→ dated and signed at least monthly by the person and his/her supervisor→ minimum conditions and information needed are detailed in the AGA

Auditor's advice: Time sheets

***I work 100% on the action
so I do not have to fill in TS, correct?***

Correct, but pay attention:

- Did I spend a significant part of my time building up a network with other entities or other laboratories of my company, for future projects?
- Did I spend time in writing proposals for the next calls?
- Did I give lectures for the University?
- Did I travel for other unforeseen activities?

Do keep time records

Time records should include, as a minimum:

- ✓ title and number of the action
- ✓ beneficiary's full name
- ✓ full name, date and signature of the person working for the action
- ✓ number of hours worked for the action
- ✓ supervisor's full name and signature
- ✓ reference to the action tasks or work packages of Annex 1



Information included in time-sheets must match records of annual leave, sick leave, other leaves and work-related travel.

SME owner without a salary

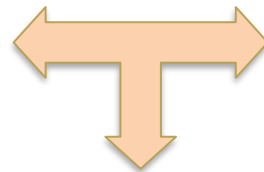
- Hourly rate (unit cost) fixed in the grant by the Commission

Average personnel costs

- Average hourly rate (unit cost) calculated in accordance with the beneficiary's usual cost accounting practices

Actual costs

1.A Salary is **NOT** project-based



1.B Salary is project-based

Per **full-financial year** or per **month**

Actual costs

1A - General case: the salary does not depend on specific projects

$$\text{Hourly rate} = \frac{\text{Total personnel costs}}{\text{Total productive hours}}$$

1B - Specific case: project-based remuneration

$$\text{Hourly rate} = \frac{\text{Personnel costs for the H2020 action}}{\text{Hours worked for the H2020 action}}$$



Subject to the provisions on **additional remuneration**

ACTUAL personnel costs: hourly rate



How do I know if I am in the general case 1A or in the specific case 1B?

If your remuneration for time worked in some projects is different from your remuneration for your other duties: you are in the **specific case (1B)**

For example:

- ↳ You get a supplementary employment contract to work in a project
- ↳ You get a bonus or premium for the time worked in a project
- ↳ Your contract fixes a specific hourly rate for work in specific projects

Otherwise, you are in the **general case (1A)**

Hourly rate: CASE 1A (remuneration is not project-based)

$$\text{Hourly rate} = \frac{\text{Personnel costs}}{\text{Productive hours}}$$

NEW !
(2016)

Annual hourly rate

Hourly rates calculated per full financial year

$$\frac{\text{Annual personnel costs}}{\text{Annual productive hours}}$$

Two options

Monthly hourly rate

Hourly rates calculated per month

$$\frac{\text{Monthly personnel costs}}{\text{Monthly productive hours}}$$

Hourly rate: CASE 1A (remuneration is not project-based)

$$\text{Hourly rate} = \frac{\text{Personnel costs}}{\text{Productive hours}}$$

Eligible personnel costs

➤ **Include:**

- ✓ Salaries
- ✓ Social security contributions (employers' and employees')
- ✓ Taxes and other costs included in the remuneration if they arise from national law or the employment contract

➤ **Do not include:**

- ✗ Any ineligible item (article 6.5)
- ✗ Any costs included in other budget categories (e.g. indirect costs)

Hourly rate: CASE 1A (remuneration is not project-based)

$$\text{Hourly rate} = \frac{\text{Personnel costs}}{\text{Productive hours}}$$

Annual productive hours

Advice

1720 hours

! you must use this option if the employment contract does not specify the working time conditions or if the "annual workable hours" cannot be determined

Individual annual productive hours

• Formula: annual workable hours + overtime - absences

Standard annual productive hours

• According to the beneficiary's usual accounting practices. Minimum threshold: annual productive hours \geq 90 % of the standard annual workable hours

Annual productive hours options: principles

- ❖ *Same option applied to all personnel working in H2020 actions; although... different options for different types of personnel are possible, if:*
 - ✓ the same option is applied at least **per group of personnel** employed under similar conditions (e.g. same staff category, same type of contract, cost center, etc.); and
 - ✓ the options are applied **consistently** (e.g. the choice of the option is not changed ad-hoc for specific employees)
- ❖ *keep the same option(s) for the full financial year*
 - ✓ Options **may be changed for the next financial year**

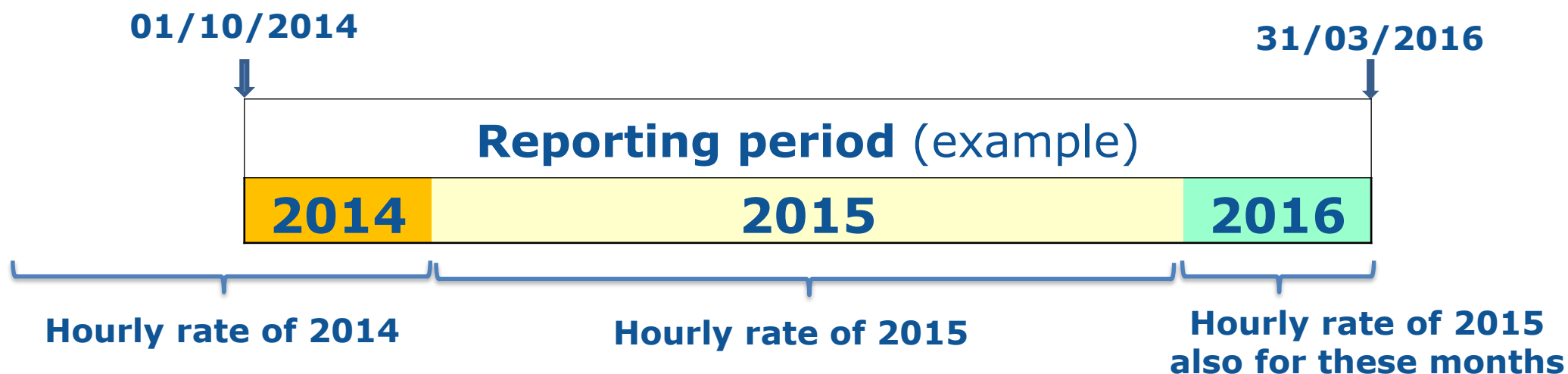
Hourly rate: CASE 1A (remuneration is NOT project-based)

Annual hourly rate specificities

$$\frac{\text{Annual personnel costs}}{\text{Annual productive hours}}$$

 The annual hourly rate must be calculated **per full financial year**

If the financial year is not closed at the end of the reporting period, the beneficiary must use the hourly rate of the *last closed financial year available*.



Hourly rate: CASE 1A (remuneration is NOT project-based)

Monthly hourly rate specificities

$$\frac{\text{Monthly personnel costs}}{\text{Monthly productive hours}}$$

One hourly rate **per each month the person works in the action**

↪ **Monthly productive hours** = 1/12 of the annual productive hours

⚠ Only options 1 (1720) and 3 (standard) are allowed. Option 2 (individual) is NOT allowed for monthly hourly rates.

↪ **Thirteen salary** (and similar) included in each month "pro-rata"; not in full in the month when they are paid.

↪ **Time spent in parental leave** cannot be deducted from the monthly productive hours. However, personnel costs incurred during parental leave may be charged in proportion to the time the person worked for the action.

Personnel costs: double ceiling

Beneficiaries must ensure that:

- the **total number of hours declared** in EU and Euratom grants for a person for a year is **NOT higher** than the number of **annual productive hours** used for the calculation of the hourly rate



Σ hours declared \leq total annual productive hours

- the **total** amount of **personnel costs declared** (for reimbursement as actual costs) in EU and Euratom grants for a person for a year is NOT higher than the total personnel costs recorded in the **beneficiary's accounts** (for that person for that year).

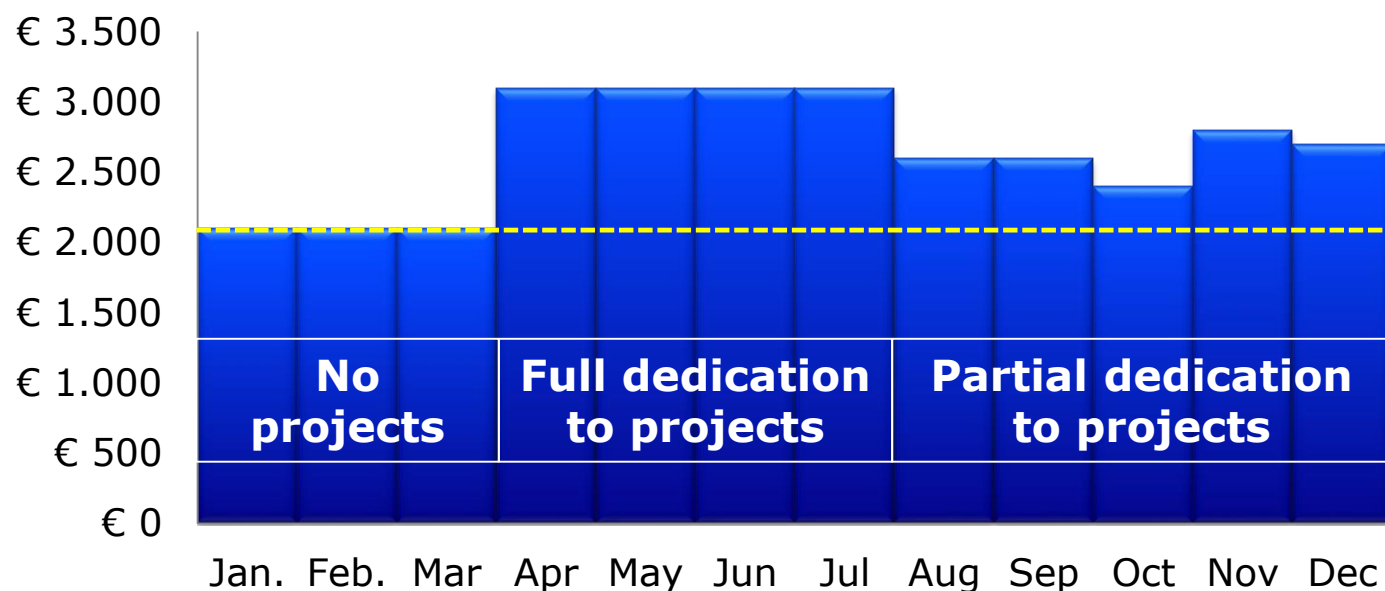


Σ cost declared \leq total personnel costs for the person

The remuneration of Ms R. is composed of:

Gross annual salary fixed by contract: 24 000 EUR + family allowance fixed in the collective labour agreement: 100 EUR/month

Besides, when she works in externally funded projects she gets an extra remuneration of 1 000 EUR per month of full dedication



Ms R. would be in the specific case 1B! (her remuneration is project-based)

1 Additional remuneration?

Identify what part of the remuneration of the employee is 'basic' and what part is 'additional'

2 Hourly rate

Calculate the hourly rate of the employee using only the 'basic remuneration'

3 Personnel costs: 'basic'

Multiply that hourly rate by the number of hours worked in the action

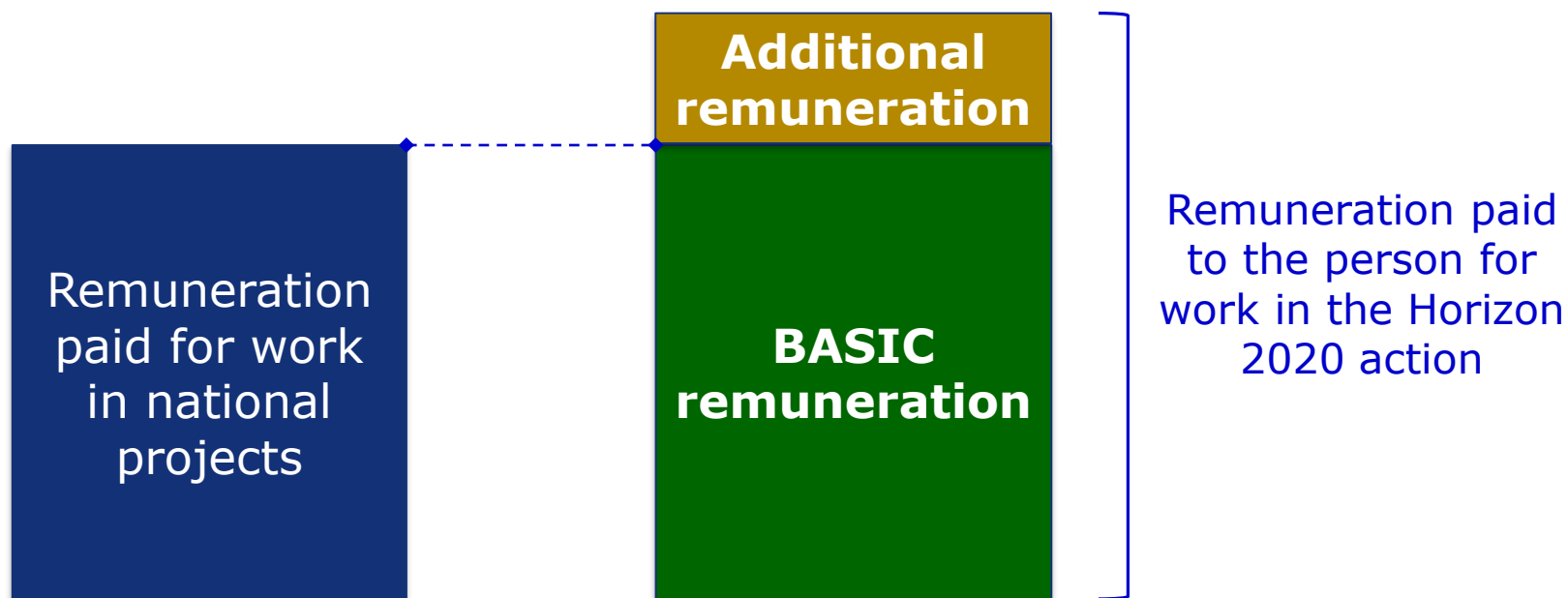
4 + Additional remuneration

Calculate what part of the additional remuneration identified in Step 1 is eligible & add it to the result of Step 3

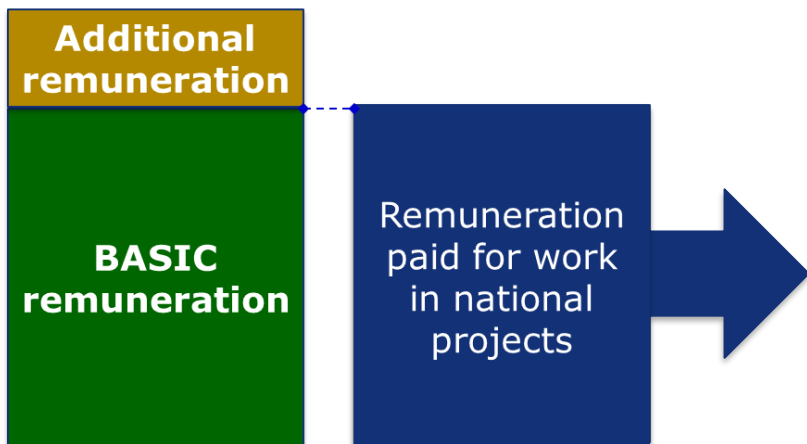
CASE 1B: FOUR STEPS TO CALCULATE THE PERSONNEL COSTS

What is additional remuneration?

Article 6.2.A.1: 'Additional remuneration' means any part of the remuneration which exceeds what the person would be paid for time worked in projects funded by national schemes.



Additional remuneration may only be eligible for non-profit legal entities



What is considered as remuneration paid for work in national projects?

- ➡ Remuneration set out in national law or internal rules for work in national projects (it must have been paid at least once before the submission of the proposal to any employee of the entity)

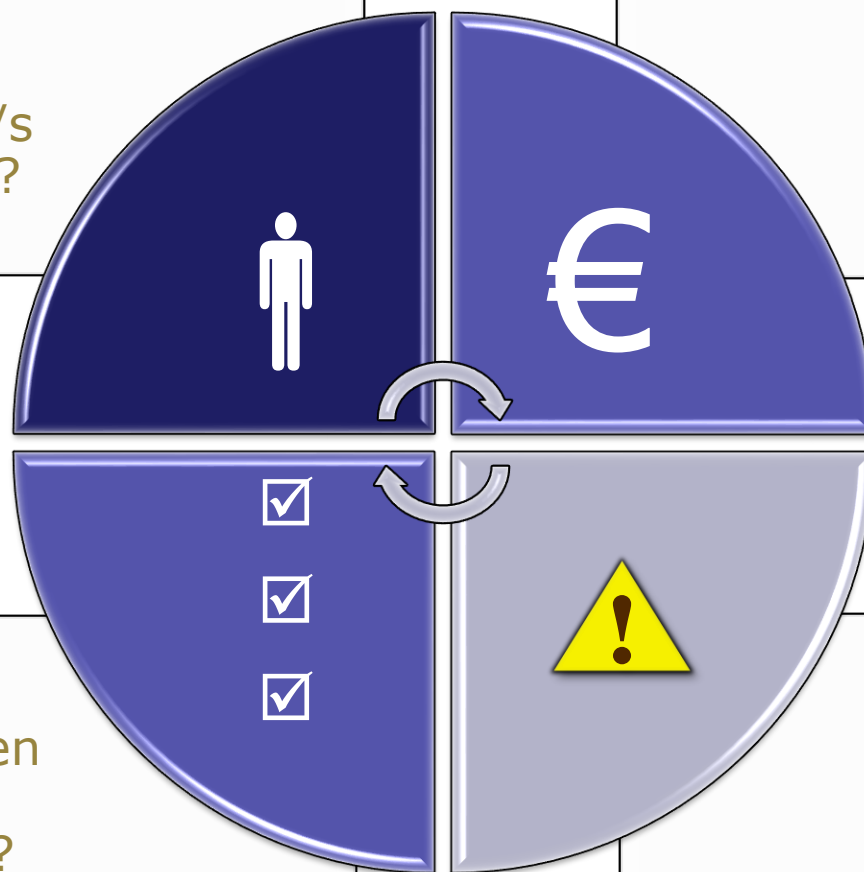
Only if there is no applicable national law or internal rules:

- ➡ Average of the salary of the person the previous year (excluding remuneration and time for work in H2020 actions)

What do the internal rules have to say?

- **Who** can get the extra remuneration (e.g. which person/s or staff categories)?

- **How much** extra money will they get?

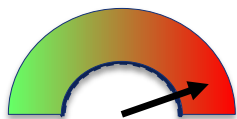


- **What** has to happen for them to get the extra remuneration?

- It can **NOT** apply only to EU actions !

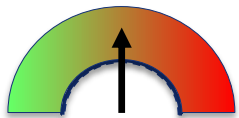
What if the internal rules say...

- The director may decide an extra payment for any member of staff participating in projects*



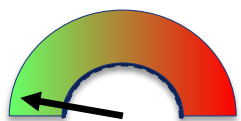
There would not be any objective condition and the extra remuneration would not be eligible at all

- Any researcher participating in projects receiving external funds will get an extra remuneration of 20 % of its salary*



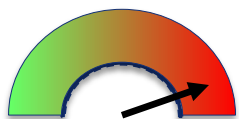
If the extra remuneration is the same regardless of the number of hours worked in the project, it would have to be divided by all the hours worked by the person (project and non-project) to calculate the eligible part.

- Any professor participating in a research project receiving external funds will get 10 € extra per hour worked in the project



✓ We know who will get how much when

- We do not have internal rules for the bonuses but we always pay the same bonuses in the same circumstances.



If you actually do so, write it down in your internal rules !

Example (I): Identification of additional remuneration

The remuneration of Ms T. is composed of:

- Annual basic salary: 18 000 €
- ✦ Fix annual complement for seniority: 3 500 €
- ✦ Variable complements depending on her participation in research projects. Those variable complements are paid based on the internal rules of the entity.

In 2016 she worked 860 hours in the Horizon 2020 action and she got 12 900 € extra for that work.

The beneficiary uses 1720 as annual productive hours and calculate annual hourly rates.

Is any part of her salary 'additional remuneration'?

If so, how much?

Example (I): Identification of additional remuneration

.... It depends on:

- What the internal rules say
- What the entity has paid in past for work in national projects

Example (follow up):

- The internal rules say that employees working in externally-funded research projects **may get up to 2 500 € extra** per month of full dedication
- Due to budgetary restrictions, **the maximum paid** by the entity as extra to any person **is 1 433 €** per month of full dedication

Example (I): Identification of additional remuneration

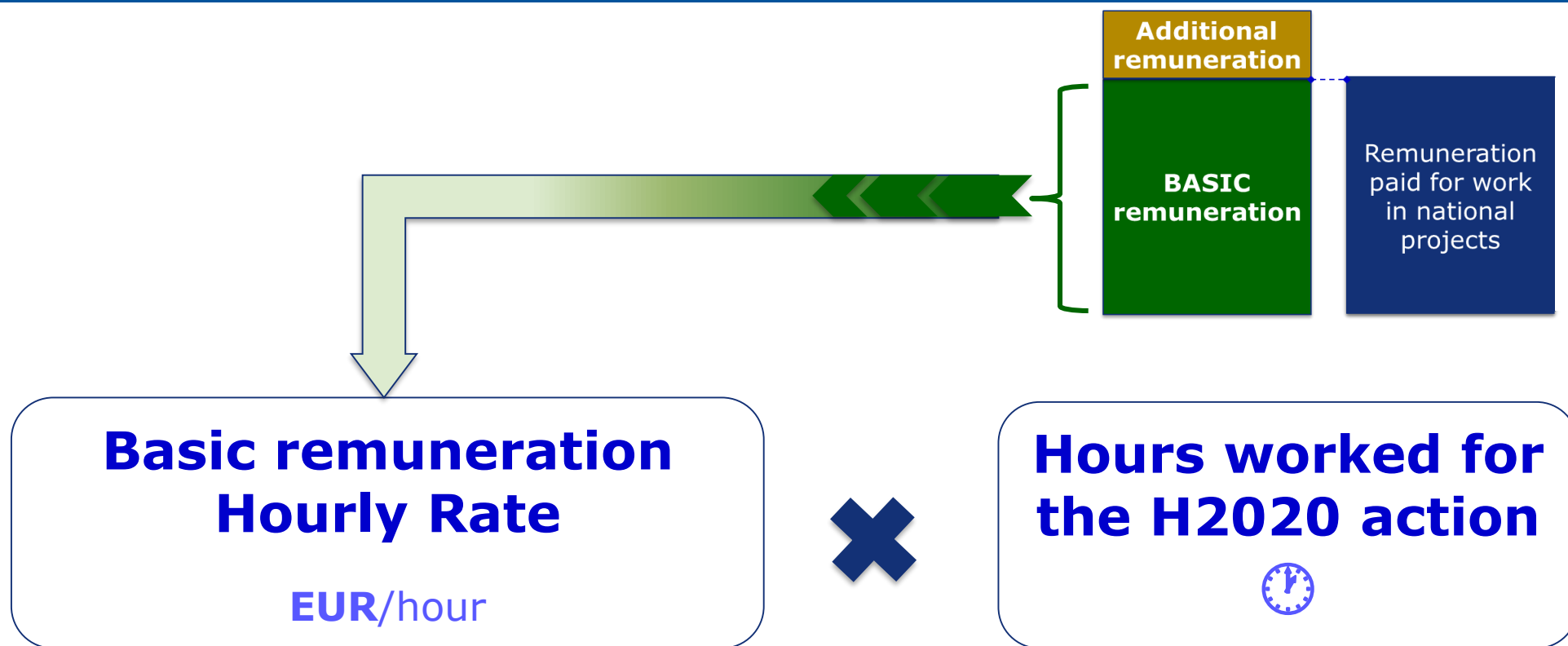
Additional remuneration =

Hourly rate of the person for work in the H2020 action (*action reference*)

minus Hourly rate paid for national projects (*national reference*)

	Fix salary		Project bonus		
<i>Action reference</i>	$\frac{(18\ 000 + 3\ 500)}{1720}$	+	$\frac{12\ 900}{860}$	=	27,5 €
<i>National reference</i>	$\frac{(18\ 000 + 3\ 500)}{1720}$	+	$\frac{1\ 433}{(1720/12)}$	=	22,5 €

Additional remuneration = 27,5 – 22,5 = 5 €/hour x 860 hours = **4 300 €**



Example (II): Calculate the 'basic' personnel costs

'Basic' personnel costs = 22,5 €/hour x 860 hours = 19 350 €

Additional remuneration ceiling



Additional remuneration

Eligible additional remuneration is subject to a eligibility ceiling fixed at EUR 8 000 for a full-time employee working exclusively for the action during the entire year.

Occupation	Contract	
	hired full time during the entire year	NOT hired full time during the entire year
working exclusively for the EU action during the entire year	EUR 8 000	pro-rata amount of EUR 8 000
NOT working exclusively for the EU action during the entire year	{8 000 / annual productive hours FTE} * hours worked for the action over the year	



The ceiling covers the additional salary + all additional taxes, costs and social security contributions triggered by the additional salary.

Example (III): Add eligible additional remuneration (Step 4)

'Basic' personnel costs = 22,5 €/hour x 860 hours = 19 350 €

Additional remuneration = 27,5 - 22,5 = 5 €/hour x 860 hours = 4 300 €

LEGAL
ENTITY

If **for-profit**: eligible additional remuneration = \emptyset

Personnel costs = 19 350 + 0 = **19 350 €**

If **non-profit**: additional remuneration eligible up to the pro-rata of the ceiling

Pro-rata = $(8\ 000 / 1720) \times 860 = 4\ 000\ €$

Paid (4 300) > Pro-rata (4 000) → 300 € ineligible

Personnel costs 2016 = 19 350 + 4 000 = **23 350 €**


Personnel costs: bonuses

BONUSES

Ineligible

- Arbitrary bonuses
- Bonus based on commercial targets (e.g. sales target), fund raising targets or representing profit distribution (dividends)
- Bonus applied only to EU actions

Additional Remuneration

- Triggered by specific projects and resulting in a level of remuneration higher than under national projects
- Paid for additional work or expertise
- Part of the usual remuneration practices of the entity
- Based on objective criteria established in the internal rules
-  **Eligible only for non-profit legal entities**

(also) Basic Remuneration

- If not triggered by specific projects OR if triggered by projects, up to the level of remuneration paid in national projects
- Scheme authorised by law, collective agreement or contract
- Determined using objective criteria established in the internal rules

STILL PUZZLED?

Why don't you try the Personnel Cost Wizard?

Grant Management | Project Periodic Report | nmariudi (EXTER)

666037 (666037) ERC-ADG | Financial Statement

THE FRAMEWORK PROGRAMME FOR RESEARCH AND INNOVATION
HORIZON 2020

Period No: 1 | Duration (months): 18
Reporting Period : [20 Apr 2015 - 19 Oct 2016]

Financial Statement

Financial information from contract

No contribution requested? Yes No

Financial Statements

Period	Adjustment	Requested Contribution
20 Apr 2015 - 19 Oct 2016 (Period No. 1)	No	66,855.18 €

Financial Statement for period '1' - (20 Apr 2015 - 19 Oct 2016)

Eligible costs:

Cost Category	Total	Actions
a) Direct personnel costs declared as actual costs	0.00 €	
b) Direct personnel costs declared as unit costs (average costs)	0.00 €	
d) Direct costs of subcontracting	0.00 €	
e) Other direct costs	0.00 €	
g) Costs of internally invoiced goods and services	0.00 €	
h) Indirect costs (= 0.25 * (a + b + e + g - n))	0.00 €	
i) Total costs (= a + b + d + e + g + h)	0.00 €	
l) Maximum EU contribution (= 100% * i)	0.00 €	
m) Requested EU contribution	0.00 €	

Wizard entry point



Additional Information for indirect costs:

Use of 'costs of in-kind contributions not used on premises?' (n) Yes No 0.00 €

Direct costs for the action

Direct costs are costs that are directly linked to the action's implementation and can be attributed to it directly. They must not include any indirect costs

Direct costs are:

- costs that have been caused in full by the action
- or costs that have been caused in full by several actions and the attribution to a single action can, and has been, directly measured (e.g. not allocated via cost drivers)

Direct costs for the action

- Must be justified by sufficient **persuasive evidence** showing the **direct link to the action**
- Must be **properly recorded** in order to allow direct measurement of the use for the action and to ensure auditability
- The measurement system used by the beneficiary must accurately **quantify** the cost
- Direct measurement of costs **does not mean** fair apportionment of costs through proxies, cost drivers or allocation keys. Once you use them, it's indirect cost!
- In principle, what was considered direct/indirect in FP7 remains the same in H2020 **But** → Now, it is even more important because Indirect Cost is calculated at 25% flat rate

Examples (1)

A beneficiary uses a x-ray machine **for the action** for few hours and for the rest of the time the x-ray machine is used **for other activities**. The beneficiary charges the **full** depreciation costs for the period in the cost statement of the action.

NOT ALLOWED!

The allocation of the part of the annual depreciation to the H2020 action must be calculated based on the number of hours/days/months of actual use of equipment for the action. The **actual** use should be **directly measured** (logbook, etc.).

Examples (2)

The **total consumables costs** are charged as **direct costs** on the H2020 action as **proportion** of the action hours to total worked hours in the laboratory.

NOT ALLOWED!

Even if the usual accounting practice of a beneficiary is to consider laboratory consumables as direct costs.

The costs of other goods and services should be declared as **actual** costs e.g. direct consumption for the action should be **measured**.

Auditor's advice: direct measurement

*In FP7, energy and power supply was an indirect cost:
can I charge it as direct in H2020?*

Yes, if I can measure it...

*Administrative staff members doing accounting for the action:
can I charge them to the action?*

Yes, with time sheets and provided it is your usual practice...

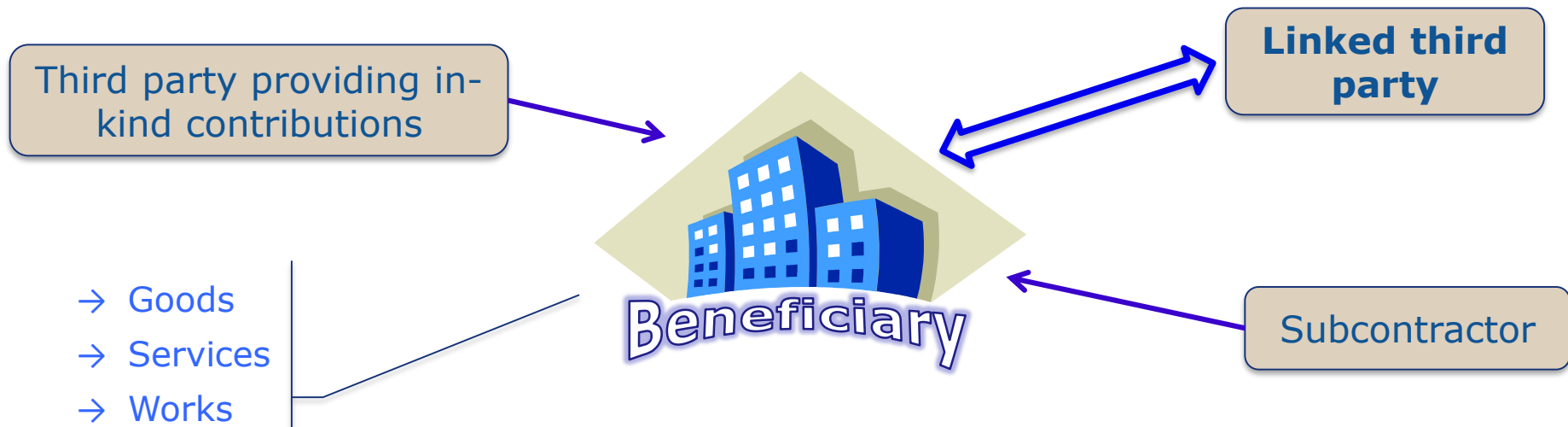
*Multi-purpose equipment used for several activities/actions:
can I charge its depreciation to an EU action as a % of
total capacity based on my experience?*

No. I have to measure its use.

Third parties: summary

Types of third parties	CHARACTERISTICS						
	Does work of the action	Provides resources or services	What is eligible?	Must be indicated in Annex 1	Indirect costs	Selecting the third party	Articles
Linked third party	YES	NO	Costs	YES	YES	Must be affiliated or have a legal link	Article 14
Subcontractors	YES	NO	Price	YES	NO	Best value for money, avoid conflict of interest	Article 13
International partners	YES	NO	No EU funding	YES	No EU funding	Partner to one beneficiary	Article 14a
In-kind contributions by third parties	NO	YES	Costs	YES	YES	Not used to circumvent the rules	Articles 11 and 12
Contractors	NO	YES	Price	NO	YES	Best value for money, avoid conflict of interest	Article 10
Financial support to third parties	Only if allowed in the call The beneficiaries' activity consists in providing financial support to the target population			YES	NO	According to the conditions in Annex 1	Article 15

Third parties: Warnings !



The beneficiary retains the sole responsibility for the work and the costs declared !

If something goes wrong with the third party, the beneficiary will be responsible



The beneficiary must ensure that Commission, OLAF and European Court of Auditors can audit its third parties including subcontractors and providers



In case of an audit to a 3rd party, the beneficiary is also in copy of all relevant communications (announcement of the audit, audit report, etc.)

- Do not wait for an audit!
- At grant signature:
Foresee and justify all subcontracts in Annexes 1 & 2
- During the grant execution:
 - Ask for amendment to include subcontracts
 - Justify subcontracts in the technical reports
 - Communicate clearly and in writing with the project officers



Best Practice

You must demonstrate '**best value for money**' both, in sub-contracting and in purchases of goods

- Some level of tendering to demonstrate 'best value' – e.g. tender, three offers, market survey, etc.
- Naming the supplier in the grant does not mean that you do not have to demonstrate best value
- We will normally accept your standard practices, when properly used

BUT



Your accounting practices are not panacea!

(e.g. cash basis depreciation is not automatically accepted even if it is in line with your accounting practices)

Conflict of interests

Avoid **conflict of interests** (Art.35 of the MGA)

*'The beneficiaries must take all measures to prevent any situation where the impartial and objective implementation of the action is compromised for reasons involving economic interest, political or national affinity, family or emotional ties or any other shared interest ('**conflict of interests**').'*

Conflict of interests

Avoid conflict of interests

(Art.35 of the MGA)

The beneficiaries must formally notify the EC/Agency without delay any situation constituting or likely to lead to a conflict of interests and immediately take all the necessary steps to rectify this situation.

Non-compliance may have consequences (reduction of grant, termination).

Funding & tender opportunities Portal

<https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/home>

-  Horizon 2020 Annotated Grant Agreement
http://ec.europa.eu/research/participants/data/ref/h2020/grants_manual/amga/h2020-amga_en.pdf
-  Horizon 2020 On-line Manual
http://ec.europa.eu/research/participants/docs/h2020-funding-guide/index_en.htm
-  H2020 Indicative Audit Programme
http://ec.europa.eu/research/participants/data/ref/h2020/other/gm/audit/h2020-iap_en.pdf
-  **Questions?** *Research Enquiry Service*
<http://ec.europa.eu/research/enquiries>



HORIZON 2020

**Thank you
for your attention!**

Find out more:

<http://ec.europa.eu/programmes/horizon2020/>

*Research and
Innovation*