

## **Audit strategy**

Tallinn, 12 February 2020

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Research and Innovation

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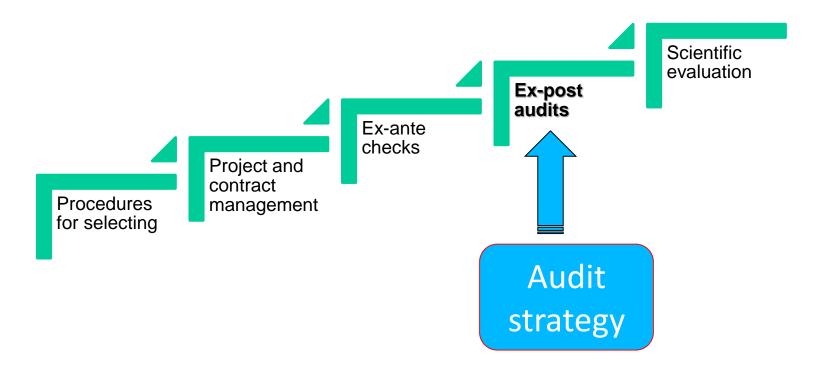
#### 1. H2020 Internal Control Framework

## 2. H2020 Audit Strategy 2016-2025:

objectives, scope, principles



## **Building blocks of the ICS for H2020**





#### Legal basis for ex-post audits

- **Article 29** of the H2020 Regulation of 11 December 2013
- **Article 22.1** of the H2020 Model Grant Agreements

ARTICLE 22 — CHECKS, REVIEWS, AUDITS AND INVESTIGATIONS — EXTENSION OF FINDINGS

22.1 Checks, reviews and audits by the [Agency and the] Commission

#### 22.1.1 Right to carry out checks

The [Agency or the] Commission will — during the implementation of the action or afterwards — check the proper implementation of the action and compliance with the obligations under the Agreement, including assessing deliverables and reports.

For this purpose the [Agency or the] Commission may be assisted by external persons or bodies.

The [Agency or the] Commission may also request additional information in accordance with Article 17. The [Agency or the] Commission may request beneficiaries to provide such information to it directly.

Information provided must be accurate, precise and complete and in the format requested, including electronic format.

- **Ex-post controls**
- in-house (CAS) +/-25%
- outsourced **(EAFs)** +/- 75%

#### External audits ARE NOT:

- Agreed Upon Procedures performed by CFS auditors
- Controls done by operational officers on deliverables
- Controls done by financial officers on Financial Statements (Forms C)

controls





## Framework for H2020 ex-post audits

One set of rules

One set of annotations AMGA

One governing body

Common
Implementation
Centre (CIC)\*

AND
One Common Audit
Service (CAS)

One Common Audit Service (CAS) performing the audits One Indicative Audit
Programme

AND

One set of
consequences of
findings

applied by CAS, KPMG,
PwC, and Moore
Stephens (now BDO)

Equality of treatment

Consistency of audit reports

Legal certainty



#### Research and Innovation Family - 20 entities

In:

DG RTD

**DG CNECT** 

**DG GROW** 

**DG HOME** 

DG ENER/MOVE\*

DG AGRI\*

DG EAC\*

\* Implement budget via EAs

**EAS** 

DGs

REA ERCEA EASME INEA CleanSky

**IMI** 

**ECSEL** 

BBI

**FCH** 

Sesar

Shift2Rail

GSA - Prague (Regulatory Agency)

Other

5

Out: EIT - Budapest

**ESA** 

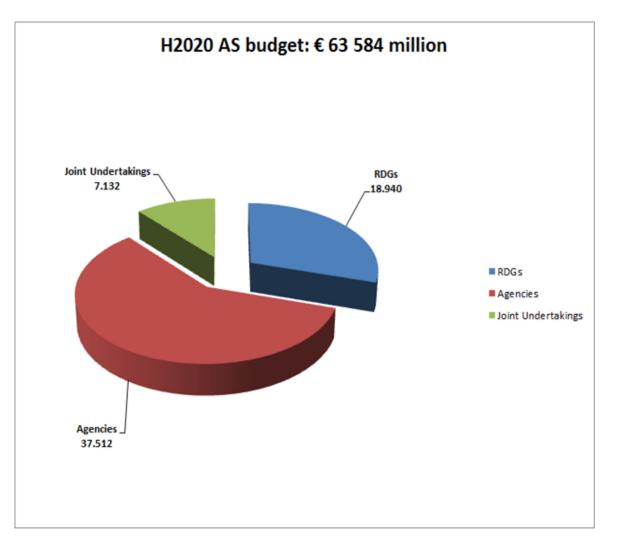
**P2Ps** (Article 185)

EIB



## **H2020 Budget Share**

Group	<b>▼</b> € million	%
■RDGs	18.940	30%
RTD	9.414	14,8%
CNECT	8.328	13,1%
GROW	651	1,0%
HOME	160	0,3%
ENER	261	0,4%
AGRI	85	0,1%
MOVE	39	0,1%
EAC	1	0,0%
■ Agencies	37.512	59%
REA	12.825	20,2%
ERCEA	12.629	19,9%
EASME	6.374	10,0%
INEA	5.603	8,8%
GSA*	80	0,1%
<b>■Joint Undertakings</b>	7.132	11%
Clean Sky2	1.704	2,68%
IMI2	1.638	2,6%
ECSEL	1.167	1,8%
BBI	975	1,5%
FCH2	665	1,0%
SESAR2	585	0,9%
SHIFT2RAIL	398	0,6%
Grand Total	63.584	100%



<sup>\*</sup> Budget is part of DG GROW budget



## Why an Audit Strategy?

#### **DECLARATION OF ASSURANCE**

*I, the undersigned,* 

Acting Director-General of Research and Innovation

In my capacity as authorising officer by delegation

Declare that the information contained in this report gives a true and fair view77.

State that I have reasonable assurance that the resources assigned to the activities described in this report have been used for their intended purpose and in accordance with the principles of sound financial management, and that the control procedures put in place give the necessary guarantees concerning the legality and regularity of the underlying transactions.

This reasonable assurance is based on my own judgement and on the information at my disposal, such as the results of the self-assessment, **ex-post controls**, the limited conclusion of the Internal Auditor on the state of control, the observations of the Internal Audit Service and the lessons learnt from the reports of the Court of Auditors for years prior to the year of this declaration.

Confirm that I am not aware of anything not reported here which could harm the interests of the institution.

However the following reservations should be noted:

- □ Payments in reimbursement of cost claims under the Seventh Framework Programme;
- ☐ Payments in reimbursement of cost claims under the Research Fund for Coal and Steel.

Brussels, the 28 March 2019 [Signed in ARES] Jean-Eric Paquet Director-General DG RTD



#### Assurance elements

- ➤ Assessing L&R of H2020 project payments
- Residual error rate acceptable level

General control objective: To get a residual error rate as close as possible to 2%, without necessarily expecting it to get below 2%.



#### Trust based approach

✓ The H2020 Audit Strategy takes into account the H2020 Regulation which considers that:

"a revised control strategy, shifting focus from minimisation of error rates towards risk-based control and fraud detection, should reduce the control burden for the participants".

- ✓ Audits may be started up to two years after the payment of the balance.
- ✓ Extension of audit findings cannot apply to grant agreements for which the payment of the balance occurred two years or more before the date of the letter of conclusion.
- ✓ As an indication: a <u>maximum of 7% of the number of beneficiaries</u> to be audited during H2020.

The creation of the CIC(previously CSC) - and the CAS in particular – should allow a better coordination of Horizon 2020 audits and avoid over-auditing the beneficiaries.



## Corporate approach (single programme)

- ➤ Common Audit Service (CAS)

  3/4 external, 1/4 internal
- Common Representative Audit Sample (CRS)
  Estimate the overall level of error



- > Common Representative Error Rate
- Common Anti-Fraud strategy



## Methodology - 3 sampling layers

1. Corporate sample

Complem. by Risk based sample

2. Additional sample

3. Article 10 sample



## Methodology - (1) Corporate sample

- Common Representative Audit Sample (CRS)
  Monetary Unit Sampling (MUS)
- Risk based audits / 'Corrective audits'
- Audits of biggest ('top') beneficiaries
- Cross-cutting specific risks: preceding audit findings, high amounts, large proportion of subcontracting, new beneficiaries, SMEs, entities with a high dependency on EU-funds, etc.
- Audits on request
- Fraud-risk audits



## Methodology - (2) Additional sample

- Depends on the requirements of specific implementing entities to obtain a certain level of direct audit coverage
- Coverage:
  - Specific grant agreements: MSCA and ERC grants
  - Separate discharge procedure: JUs and GSA
- ➤ The selection is done by CAS based on the specific requirements of the stakeholders
  - √ H2020 Working Arrangements



## Methodology - (3) Article 10 sample

Condition: if the audits under the 2 first layers are not sufficient for the JUs



Additional expost audits



#### Indicators on L&R for H2020

- Overall Detected Error Rate
- ➤ Representative Error Rate for the Framework Programme (RepER%)

All errors removed from the audited portion of the budget

Systematic errors removed from the non-audited portion of the budget received by audited beneficiaries

Residual Error Rate = Non-systematic error rate



# Thank you!

#### **Find out more:**

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

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