

## **FREQUENTLY ASKED QUESTION**

Version February 2013

<b>Composition of a Comenius Regio Partnership</b>	
Which types of institutions are eligible to participate in Comenius Regio?	<p>Comenius Regio partnerships are bilateral partnerships between two local or regional authorities with a role in school education in different countries. Only those authorities may apply for funding. A list of all eligible institutions can be found on <a href="http://ec.europa.eu/education/comenius/doc854_en.htm">http://ec.europa.eu/education/comenius/doc854_en.htm</a>.</p> <p>Each of the two local or regional authorities is obliged to involve at least one school and one other organisation from its region or municipality in the project. The school should be one of those eligible for the Comenius School Partnerships scheme; the other organisation could be any organisation or institution in the region which contributes to the project. It could be a museum, youth club, NGO, association, training institute, library or local company, for example.</p>
If the regional authority involves a school and a kindergarten in the project in our region, can it apply for a grant?	No. Kindergartens and other pre-school institutions are regarded as schools under the Comenius Programme. In addition to the local or regional authority and at least one school, a Comenius Regio Partnership has to involve at least one non-school organisation or institution, which is not the case in this example.
If the regional authority involves a school and a teacher training institute, can it apply for a grant?	Yes, as there is one school and one other organisation — the teacher training institute — involved.
Can two local or regional authorities from one country participate in a Comenius Regio partnership?	Yes, but only if one of the authorities acts as another local partner institution. In this case the additional authority is <u>not</u> regarded as a non-school organisation or institution and it would be necessary to add another partner to fulfil this role within the consortium.

<p>Can a business enterprise take part in a Comenius Regio Partnership?</p>	<p>Yes. As can, for example, other types of public or voluntary bodies such as the local fire brigade, the adult education centre, a museum or an association. It is important that all partners have a relevant contribution to make to the project.</p>
<p>How can we find out which institutions and authorities in other participating countries can apply for funding?</p>	<p>A list of all types of institutions eligible for a Comenius Regio grant is published on this website. If in doubt, your partner institution should contact its National Agency to check that it is eligible.</p>
<p>How does Comenius Regio define a “region”?</p>	<p>There is no strict definition. Comenius Regio Partnerships can involve cities, municipalities or larger regions. It very much depends on the way school education is organised in each partner country, the topics and the activities planned.</p>
<p>What happens if one of the regional or local partners resigns from the partnership and the minimum requirements are no longer met (e.g. there is no longer any non-school organisation in the partnership)?</p>	<p>In the worst-case scenario, the whole partnership would no longer be eligible for funding. Therefore it is advisable to contact the National Agency as soon as possible and clarify whether the partner that is leaving can be replaced by another organisation. Of course, the aims and activities of the project should not change.</p>
<p>In an approved project, in the case that the contact person responsible for the coordinating regional partnership leaves the post or is unable to coordinate the project, could the school principal of one of the regional partners coordinate the project?</p>	<p>It is not possible for a school principal (or a school teacher for that matter) to take over the coordinating tasks of the regional authority. The whole idea of Comenius Regio is that regional authorities should coordinate the projects, to get and keep them involved in the subjects at stake and to make sure that dissemination of the project will also reach the local/regional authority.</p> <p>As it says in the Fiche on Comenius Regio: Only local or regional authorities with a role in school education are eligible to apply for funding and must coordinate the project within their region.</p> <p>So the contact person for the coordination authority should find someone in his/her own organization as a successor.</p>

Is it possible to base the Comenius Regio Partnership on an existing town-twinning scheme?	Yes. It is possible to use Comenius Regio with an existing or newly created town twinning arrangement. Of course, you must ensure there is no double financing and that the activities supported by the Comenius Regio grant are clearly identifiable.
Why is Comenius Regio only bilateral?	Experience with the new scheme and with bilateral partnerships will help to develop the necessary administrative support for partnerships and to allow multilateral partnership, eventually, in the future.
<b>Preparation and application procedure</b>	
How do we find partners for a Comenius Regio Partnership?	You could start with existing cooperation with another region or municipality in Europe, a school partnership or contacts through other European Networks and initiatives. There is no partner search facility yet, but National Agencies will help disseminate requests via their networks. Please contact your National Agency if you need support in finding a partner.
Can we apply for Preparatory Visit grants to prepare a Comenius Regio application?	Yes. Please contact your National Agency for detailed information on the application procedure.
Where can we get the application form for Comenius Regio Partnerships?	The application form is available on the website of your National Agency. Each partner sends the application to its National Agency. Please consult the website of your National Agency for details of the application procedure.
Who has to sign the application form? All partners in the region?	The local or regional authority signs the application form on behalf of all partners in the region. The partners are asked to submit letters of intent confirming that they want to take part in the project.

<b>Mobility in Comenius Regio</b>	
What is "a mobility"?	"mobility" is a trip abroad as part of a Comenius Regio Partnership either to the partner institution or to an event which relates to the objectives of the Comenius Regio project. One "mobility" refers to one trip by one person to another country participation in the Lifelong Learning Programme.
Is it possible to conduct more mobilities than necessary with regard to the lump sum amount?	Certainly! There is no upper limit. If you can organise trips in a cost-effective way and do not use all your lump sum, you can spend the remaining budget on more trips for more people.
We want to hold a conference, but even the highest lump sum amount (for 24 mobilities) is not sufficient to finance the travel of all potential participants. Can we ask for additional funding under "other project costs"?	No. The grant for other project costs cannot be used to fund additional mobilities. In this case, you must look to other sources to co-finance the travel of participants to the conference.
Can we choose 4 short distance mobilities and 12 long distance mobilities in one project?	No. It is not possible to have multiple mobility requests in one project.
Does participation in meetings which take place in the home region count as part of the minimum number of mobilities?	No. Only a trip abroad (either to the partner institution or to an event organised by a European project or network) counts as an eligible mobility in Comenius Regio.
We are hosting a seminar / small conference with our partner region. They will use their mobility lump sum to finance their participation. But can we use our mobility lump sum to fund also the attendance of participants from our country?	No. Mobility inside the country is not an eligible mobility to justify the lump sum amount. If a region has already conducted the minimum number of mobilities and has not used the whole lump sum amount yet, it is of course possible to use remaining funds for other project purposes.

Can we officially involve other organisations or institutions from the region in the Comenius Regio partnership?	Yes. Once the grant agreement with the National Agency has been signed it can be amended by adding other partners from your region. Please note that it is not possible to raise the grant amount.
Is pupil mobility allowed in the Comenius Regio?	The LLP Guide states that: <i>"Any participation of pupils in mobilities has to be justified with regard to the aims of the partnership."</i>  Pupils' mobility should be foreseen from the beginning and it should have a clear function in reaching the objective of promoting school development and structured cooperation among the partner regions.
Can we apply for a Comenius In-Service Training grant in order to participate in a teacher training seminar or conference organised by the Comenius Regio Partnership?	Yes, on condition that the seminar or conference meets the minimum requirements for Comenius In-Service Training. That means, for example, that the event has to be widely publicised (e.g. via the Comenius-Grundtvig course database) and be open to participants from all countries participating in the Comenius / Lifelong Learning Programme.
<b>Financial aspects</b>	
What does Comenius Regio finance?	Comenius Regio provides funding for mobility on the basis of lump sums (related to the minimum number of mobilities conducted by each partner), and other non-mobility costs on the basis of a contribution (maximum 75%) towards real costs.  Granting lump sums for mobilities eases the burden on applicants, who do not have to calculate the cost of each trip in detail. For other costs, the approach is flexible enough to allow financing of a wide range of activities.
What is the maximum amount of the EU grant per project?	The maximum EU grant per project fixed at national level is EUR 45.000 depending on the maximum lump-sum level in each country. The EU grant consists of a lump sum (maximum

	EUR 20.000) to support the mobility costs and a separate grant amount of up to 75% of the eligible non-mobility costs (staff, equipment, subcontracting and other direct costs) up to a maximum of EUR 25.000.
Is co-financing required under Comenius Regio?	Beneficiaries are expected to contribute with at least 25% of co-financing to the non-mobility project costs.
To what extent will costs for subcontracting and costs for equipment be funded in the project?	Costs for subcontracting may be funded up to a maximum of 30 % of the total eligible project costs including the lump sum amount for mobilities.  Costs for equipment may be funded up to a maximum of 10% of the total eligible project costs including the lump sum amount for mobilities.
Is the depreciation for equipment necessary?	Costs indicated for equipment should be depreciated in accordance with the tax and accounting rules applicable to the beneficiary and in accordance with the rules set out in Article 14.2 of the General conditions of the Grant Agreement and it has to be depreciated according to the relevant tax and accounting rules of the beneficiary follow national regulations.
Is the transfer between budget headings possible?	No transfer of grant amounts is allowed between the lump sum mentioned under the category of mobilities costs and non-mobilities costs.  However, when carrying out the action, the beneficiary can adjust the distribution of non-mobility costs (i.e. staff costs, equipment, subcontracting and other costs) within the approved budget. The transfer between the headings should not exceed 10% of the amount of each heading of eligible costs from or to which the transfer is applied.  If at final report stage, the NA discovers that the changes (for instance concerning a purchase of equipment not foreseen in the approved proposal) were not needed for the project, it can always declare the related cost as ineligible.

	<p>In cases where the transfer exceeds the 10%, the beneficiary has to submit a request for an amendment to the grant agreement in writing to the NA, as indicated in the general conditions of the Grant agreement (article 13). Any amendment to the grant conditions must be the subject of a written supplementary agreement. No oral agreement may bind the parties to this effect. In those cases, the NA shall check if the adjustments proposed by the beneficiary do not affect the implementation of the action, that the cost proposed are eligible and follow the criteria specified in article 14 of the Grant Agreement. If the NA considers the adjustments acceptable, the NA shall inform the beneficiary thereof by formal letter.</p>
Are indirect costs eligible for funding?	<p>Indirect costs are not eligible for funding. Indirect costs are defined in the grant agreement as those related to expenses for the administration of the project (e.g. overhead costs, telecommunication and office supplies).</p>
Should be the purchase of consumables directly linked to a conference/event/meeting which was organized within the project treated indirect or direct costs?	<p>If there is a direct link between purchased consumables (e.g. postage, printer ink) and the conference/event/meeting which was organized within the project, the costs of purchase can be treated as direct costs and placed in the other costs budget heading.</p>
The purchase of a laptop is a direct or an indirect cost? If it is a direct cost, can it be financed within the equipment costs heading?	<p>The purchase of laptop is a direct cost. The beneficiaries may purchase laptops only if they can show that their purchase is needed for the implementation of the project. For example, if the online cooperation is planned or the project will focus on multimedia aspects. In such case, the purchase would be eligible. The purchase can be financed within the equipment costs heading. The depreciation rules must apply.</p>
Is linguistic and cultural preparation for mobility an eligible subcontracting cost?	<p>Yes, but only if it is directly linked to the theme or language of the project.</p>
Can institutions which are already involved in other Comenius or Lifelong Learning Programme projects	<p>Yes, as long as there is no double financing of activities and the activities supported by the Comenius Regio grant are clearly identifiable.</p>

participate in Comenius Regio?	
What costs are eligible for funding under Comenius Regio?	<p>To be considered as eligible, costs must satisfy the following general criteria:</p> <ul style="list-style-type: none"> <li>▪ They must relate to activities involving countries that are eligible to participate in the programme;</li> <li>▪ They must be incurred by the project partners;</li> <li>▪ They must be connected with the project (i.e. relevant and be directly linked to the execution of the project in accordance with the work plan);</li> <li>▪ They must be necessary for performance of the project;</li> <li>▪ They must be reasonable and justified and they must accord with the principles of sound financial management, in particular in terms of value for money and cost effectiveness;</li> <li>▪ They must be generated during the lifetime of the project;</li> <li>▪ They must be actually incurred by the beneficiary and be recorded in their accounts in accordance with the applicable accounting principles, and be declared in accordance with the requirements of the applicable tax and social legislation;</li> <li>▪ They must be identifiable and verifiable.</li> </ul> <p>The LLP Guide also lists expenses which are definitely <u>not</u> eligible (see Chapter 4F).</p> <p>Please note that indirect costs are not funded under Comenius Regio Partnerships; costs relating to mobility are covered by the lump sum.</p>
Is it possible to subcontract a specific and limited task (e.g. translation or web design) to someone employed	No. Subcontracts can be awarded to an individual only if this person is not employed by any of the partner organisations (see LLP Guide, chapter 4F).



<p>by the beneficiary or one of the local partners, but doing this work in addition to his usual job?</p>	
<p>Can we cover the costs of conferences and meetings from Comenius Regio funds?</p>	<p>The cost of holding a meeting or conference, e.g. rental fees, interpretation, or fees for speakers can be financed from the grant for other (non-mobility) project activities. Travel and subsistence costs for participants from the partner region have to be financed from their mobility lump sum.</p> <p>Costs related to the participation of persons from other parts of the host country can be funded in exceptional and justified cases, e.g. in order to disseminate results of the partnership to other regions. But it should be kept in mind that the funding shall support first of all the cooperation of the two partner regions.</p>
<p>Who manages the EU grant and distributes it to the other partner institutions in the region?</p>	<p>In general, the grant is managed by the regional or local authority which submitted the application for the region. The local or regional authority will sign the grant agreement and is responsible for the overall management of the project in its region (including financial management).</p>
<p>Does the local or regional authority have to sign a contract with the other local partners?</p>	<p>Not necessarily. All partners are linked to the contract with the National Agency, which should clarify the contractual obligations of all partners sufficiently. But the partners will have to decide among themselves how they want to work together.</p> <p>Agreements between the partner organisations should not contradict the grant agreement with the National Agency.</p>
<p>Do the different partners in each region have to sign the application form?</p>	<p>No, but they are asked to submit a letter of intent confirming that they want to take part in the project. Later they will be asked to sign the contract.</p>
<p>What happens if one of the regional or local partners</p>	<p>In the worst-case scenario, the whole partnership would no longer be eligible for funding.</p>

<p>resigns from the partnership and the minimum requirements are no longer met (e.g. there is no longer any non-school organisation in the partnership)?</p>	<p>Therefore it is advisable to contact the National Agency as soon as possible and clarify whether the partner that is leaving can be replaced by another organisation. Of course, the aims and activities of the project should not change.</p>
<p>Costs for equipment have to be depreciated. Are there any fixed durations or percentages for depreciation in Comenius Regio?</p>	<p>No. The depreciation has to be in accordance with the tax and accounting rules of the beneficiary. The beneficiary must explain the rules applied.</p>
<p>Can the contribution of 25% of non mobility costs for Comenius Regio projects for 2009 and 2010 be entirely made up of staff costs?</p>	<p>Yes in both cases.  The rules for 2010 changed in comparison to those of 2009. From 2010, staff costs can also be supported by the grant for non-mobility costs.</p>
<p>When one of the subcategories under B. Non-mobility costs exceeds the threshold, e.g. equipment (10%) or Sub contracting (30%) and the NA reduces the amounts for the subcategory to comply, should the project be asked to send to the NA a revised breakdown of the costs for the subcategory?</p>	<p>In this case there is no need to ask the project to send a revised breakdown; the NA can always revise and change the budget if necessary.</p>
<p>When the total non-mobility costs surplus the maximum EUR 25,000 and therefore is reduced by the NA, who decides how much from each of the subcategories will be reduced? Is the applicant asked to submit a breakdown, so they can decide whether (and by how much) they will reduce staff, subcontracting, equipment or other costs?</p>	<p>The NA is entitled to revise the budget, and it can discuss with the beneficiary if necessary.</p>

<b>Relation to Comenius School Partnerships</b>	
If a school takes part in a Comenius School Partnership and a Comenius Regio Partnership, do both partnerships have to involve the same partner countries?	No. Different countries might be involved in the two partnerships. This could also enrich the work in both partnerships. Most Comenius School Partnerships are multilateral and this will bring in additional partner countries.
Can a Comenius Regio Partnership be used to promote more School Partnerships in and between the two regions?	Yes, this is also desirable. But bear in mind that Comenius School Partnerships can be multilateral and involve more countries than, or different countries from, those in the Comenius Regio Partnership.
<b>Assessment and approval of applications</b>	
Who decides whether an application in Comenius Regio can be funded or not?	Each application will be assessed by external experts in the country of the partnership coordinator. The assessment is based on the European common quality criteria. However, each National Agency of the partnership countries decides whether an application can be funded taking into account the assessment results and the available budget. Only if both countries decide to fund their partner region can the Regio Partnership receive a grant.
What happens if, in one of the partner countries, the budget is not sufficient?	In that case the partnership cannot be funded, regardless of quality.
Can it happen that a smaller grant is awarded (than that requested)?	At the contracting stage the lump sum amount will be granted in full, given that it corresponds to the minimum number of mobilities planned. But the grant amounts for non-mobility costs may be cut if not all costs meet the eligibility criteria set out in the LLP Guide. In that case your National Agency will contact you in order to agree on a revised budget.
Can it happen that the final amount of the grant is	Yes, at the final report stage, the lump sum amount for mobilities can be reduced if the

<p>smaller than that originally awarded?</p>	<p>number of mobilities has been reduced. The grant amounts for non-mobility costs may be cut if not all costs meet the eligibility criteria set out in the LLP Guide.</p>
<p><b>Final report checks</b></p>	
<p>In the case of checks of staff costs, do national agencies have to check the time sheets only, or do they need to require additional proof i.e. pay roles?</p>	<p>NAs must check all final reports, and check the supporting documentation for a sample.</p> <p>The beneficiary must in all cases retain for 5 years a verifiable audit trail of the staff time spent on the projects. Where this consists of timesheets, these should also be reconcilable with pay rolls and other proof of expenditure. This proof may be requested by the NA, the Commission or the Court of Auditors.</p>